

Havant Borough Council - Development
Control

Reference: PA-0001314/01
Customer reference: APP/26/00089
01 April 2026

Erection of a detached, three-bedroom, self-build dwelling with associated access, parking, hard and soft landscaping, and associated works, with an ancillary one-bedroom carers annexe following subdivision of the plot and demolition of the existing buildings.

26 WITTERING ROAD, HAYLING ISLAND, HAVANT, BOROUGH, PO11 9SP.

Dear Planning Officer,

Thank you for contacting us.

This is our response to your consultation APP/26/00089.

This response supersedes our previous response (our ref: HA/2026/127544/01-L01).

Environment Agency position

In the absence of an adequate Flood Risk Assessment (FRA) **we object** to this application and recommend that planning permission is refused.

Reasons

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere. In particular, the FRA fails to:

- Assess and include flood risk mitigation measures to address flood risk for the lifetime of the development. The development proposes inadequate:
 - Raised finished floor levels
 - Resistance and resilience measures
- Assess the impact of climate change using appropriate climate change allowances

Advice to Local Planning Authority (LPA)

The Flood Risk Assessment for the proposed development shows that the property is currently located in Flood Zone 1 (land defined by the National Planning Policy Framework (NPPF) as having a low probability of flooding) but is located in the future tidal flood zone as shown in the Partnership for South Hampshire (PfSH) Strategic Flood Risk Assessment (SFRA).

The FRA has used the Environment Agency's 2018 flood model for the East Solent, and has applied the latest UKCP18 climate change allowances to this to determine a design flood level for the site of 4.2 metres Above Ordnance Datum (mAOD) in 2125 (1 in 200 year event, assuming a 100 year lifespan for the development).

The FRA proposes to set the finished floor levels at 4.5mAOD, a freeboard 300mm above the design flood level. However, this freeboard allowance is unlikely to be sufficient. Freeboard should be determined in line with our guidance on freeboard allowances, available at [Accounting for residual uncertainty: an update to the fluvial freeboard guide - GOV.UK](#).

In addition, the Environment Agency has released an update to the 2018 East Solent model using the UKCP18 allowances. The FRA should be updated to use the latest available information.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us if a revised FRA is submitted and we will respond within 21 days of re-consultation.

Advice to Local Planning Authority and applicant

Flood resistance and resilience

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings and special construction materials are just some of the ways you can help reduce flood damage. To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal

Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction
<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

CIRIA Code of Practice for property flood resilience
https://www.ciria.org/Research/Projects_underway2/Code_of_Practice_and_guidance_for_property_flood_resilience.aspx

British Standard 85500 – Flood resistant and resilient construction
<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

Advice to the Local Planning Authority

Flood warning and emergency response

Please note that we do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

The NPPF [Planning Practice Guidance](#) (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a [design flood](#) and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to '[Flood risk emergency plans for new development](#)' and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 167 of the NPPF and the guiding principles of the PPG.

Matters outside of our remit

The following issues are not within our direct remit or expertise, but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Adequacy of rescue or evacuation arrangements
- Safe access and escape routes
- Details and adequacy of an emergency plan
- Provision of and adequacy of a temporary refuge
- Details and adequacy of flood proofing and other building level resistance and resilience measures

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. In accordance with the planning practice guidance, our role is to ensure that built development proposals incorporate adequate flood risk mitigation up to the design flood level.

We are aware that your LPA may currently be subject to the 'presumption in favour of sustainable development'. Given our outstanding objection on flood risk grounds we would like to highlight that in this case, as set out in NPPF footnote 7, the 'presumption in favour of sustainable development' should not apply as our objection provides a clear reason for refusal. If your LPA is not subject to the 'presumption in favour of sustainable development' you can disregard this paragraph. If our objection on flood risk is subsequently withdrawn, you can also disregard this paragraph.

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify us to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

In accordance with Paragraph 019 of the 'Determining a planning application' Guidance (Ref. ID: 21b-019-20190315), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

If you have any questions regarding our response, please contact
Victoria.Hindmarsh@environment-agency.gov.uk.

Yours sincerely,

creating a better place
for people and wildlife



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