

Havant Borough Council - Development
Control

Reference: PA-0001348/01
Customer reference: APP/24/00890
15 April 2026

Flood defence works. Construct earth embankment along the Eastern edge of land as the Coastal Partners scheme for frontage 1B, from Chainage 0 to Chainage 145.

Land and mudflats, Langstone Road, Havant PO9 1RX

Dear Ms Owusu-Ansah,

Thank you for consulting us on the above application, on 30 March 2026.

We have reviewed the submitted information that is relevant to our remit and set out our position and comments below.

The majority of the application site lies within Flood Zone 2 and 3, which is land defined by the Planning Practice Guidance to the National Planning Policy Framework (NPPF) as having a medium and high probability of flooding respectively.

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:

- Consider how a range of flooding events (including extreme events) will affect people and property (residual risk to surrounding properties)
- Take the impacts of climate change into account. Specifically, flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because it has not been demonstrated that they will make the development resilient to the flood levels when climate

change allowances are applied. Consequently, the development proposes inadequate:

- Demonstration of sufficient flood defence height including how climate change allowances have been calculated/applied
- Consideration of residual risk
- Freeboard/overtopping allowances

The application is therefore contrary to paragraph 181 of the National Planning Policy Framework and Policy CS15 - Flood and Coastal Erosion Risk of the Havant Borough Core Strategy, adopted March 2011.

The applicant has not demonstrated the inclusion of the most up to date climate change allowances, or how the proposed crest level for the defences has been calculated. It is for to the applicant to assess and determine which climate change allowance to use, and this should be justified within the assessment. Planning practice guidance provides advice on what is considered to be the lifetime of the development in the context of flood risk and coastal change ([see ref ID: 7-006-20220825](#)). The Environment Agency guidance '[Flood risk assessments: climate change allowances](#)' provides allowances for future sea level rise, wave height and wind speed to help planners, developers and their advisors to understand the likely impact of climate change on coastal flood risk. It also provides peak river flow and peak rainfall intensity allowances to help planners understand the likely impact of climate change on river and surface water flood risk.

There are no details to demonstrate whether freeboard has been considered or included within the proposal. The applicant needs to provide an appropriate site-specific freeboard allowance to the present day 1 in 200-year level plus climate change. It is up to the applicant to demonstrate and provide evidence to justify their freeboard allowance. For more information on freeboard allowances, please see the following: [Accounting for residual uncertainty: an update to the fluvial freeboard guide - GOV.UK](#)

The submitted CEMP should also be amended to demonstrate that the existing standard of protection is not reduced whilst the works take place.

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 the Applicant/LPA

Residual risk and mitigation measures

The proposed flood risk management infrastructure is intended to reduce the risk of tidal flooding to the properties at risk. However, flood defences cannot eliminate risk completely and a residual risk of flooding from breach, overtopping and/or events of a greater magnitude than designed for will remain. Without any details showing consideration for overtopping and residual risk, we will be objecting to the proposal at this time.

Environmental Permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the riverbank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission

Please see the details below regarding requirements for Flood Risk Activity Permits (FRAPs) for any terrestrial construction works planned at main river watercourse crossing points. In addition, there will also be a requirement for Flood Defence Consents (FDC) for any ordinary watercourse crossing points and the potential requirement for a Marine Licence for any works proposed below the Mean High Water Spring (MHWS) mark.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Final Comments

Please note that this response is based on the information provided at this time and if this changes in the future, we would need to consider our position again.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me through the email address below.

Please re-consult us if further relevant information is submitted. We will aim to provide comments within 21 days of re-consultation.

Yours sincerely,

Jo Purvis, [Click or tap here to enter text.](#)

PlanningSSD@environment-agency.gov.uk

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