

Havant Borough Council - Development
Control
Civic Centre Road, Havant, PO9 2AX

Reference: PA-0014266/01
Customer reference: APP/26/00379
23 October 2026

Application for Prior Approval to convert Barn C into a 2 bedroom dwelling. All other buildings and structures on site are to be demolished except for building D (the stable Block) which is to be retained and kept as is.

Land at Gutner Farm, Gutner Lane, Hayling Island.

Dear Planning Officer,

Thank you for contacting us.

This is our response to your consultation APP/26/00379.

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.

Reason(s)

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 people will be kept safe from the identified flood hazards

- Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the 1 in 200 year design flood level, plus climate change allowances. Consequently the development proposes inadequate:
 - Raised finished floor levels
 - Resistance and resilience measures

- Safe access and escape routes

Finished floor levels

The Finished Floor Levels of the proposed development fall under what is acceptable from a flood risk perspective and provide no betterment to what is already present. Due to all sleeping accommodation being located on the ground floor, we would strongly recommend in this case that the developments finished floor levels are raised above the design flood level plus climate change and include sufficient freeboard allowances.

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 [Flood resilient construction of new buildings - GOV.UK](#)
- CIRIA Code of Practice for property flood resilience [Code of practice for property flood resilience C790](#)
- British Standard 85500 – Flood resistant and resilient construction [BS 85500:2015 | 30 Nov 2015 | BSI Knowledge](#)

Advice to Local Planning Authority

Advice on flood risk issues that are not in our direct 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
- 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
- Details and calculations relating to the structural stability of buildings during a flood
- Whether insurance can be gained or not

Flood warning and emergency response

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

[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 LPAs 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 F4(1-3) of the NPPF and the guiding principles of the PPG.

We have considered the findings of the flood risk assessment in relation to the likely duration, depths, velocities and flood hazard rating against the design flood for the proposal. This indicates that there will be a danger to some people (e.g. the elderly and infirm).

This does not mean we consider that the access is safe, or the proposal is acceptable in this regard. We remind you to consult with your emergency planners and the emergency services to confirm the adequacy of the evacuations.

Signing up for flood warnings

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning, or visit [Sign up for flood warnings - GOV.UK](#). It is a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email or text message. Anyone can sign up.

Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities.

For practical advice on preparing for a flood, visit [Prepare for flooding: Protect yourself from future flooding - GOV.UK](#).

To get help during a flood, visit [What to do before or during a flood - GOV.UK](#).

For advice on what to do after a flood, visit [What to do after a flood - GOV.UK](#).

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 planningssd@environment-agency.gov.uk.

Yours sincerely,

Victoria Hindmarsh,
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