

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

Reference: PA-0014317/01
Customer reference: APP/26/00762
26 October 2026

Application to determine if Prior Approval is required for a proposed: Change of use of the existing commercial premises to form 2 no. self-contained residential flats (Class MA, Part 3, Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015), communal rear garden, cycle storage and refuse storage

42 North Street Havant Borough PO9 1PT

Dear Planning Officer,

Thank you for contacting us.

This is our response to your consultation APP/26/00762.

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:

- Take the impacts of climate change into account

Different climate change allowances have been used to assess future flood risk than those advised in ['Flood risk assessments: climate change allowances'](#), without adequate justification. The FRA has not taken into account the most up to date climate

change allowances for tidal flooding. The future flood levels provided in the Product 4 were calculated before the latest climate change allowances were available. When considering the impacts of climate change please view the above guidance. Applying these allowances will result in future flood levels higher than current flood levels shown in the FRA. It is for to the applicant to assess and determine which climate change allowance to use, and this should be justified within the assessment.

- 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 flood levels for a 1 in 200 year design flood event, plus climate change allowances and sufficient freeboard. Consequently the development proposes inadequate:
 - Raised finished floor levels (not demonstrated within the FRA)
 - Resistance and resilience measures
 - Safe access and escape routes

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](#)

Environmental permit – Flood risk activities

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river
- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks or manure clamps in these places)

For further guidance please visit [Flood risk activities: environmental permits - GOV.UK](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.

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

Advice to the Local Planning Authority

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,
National Contact Centre: 03708 506 506
planningssd@environment-agency.gov.uk