

Eastleigh Borough Council
(Development Management)
Eastleigh House Upper Market Street
Eastleigh
Hampshire
SO50 9YN

Our ref: HA/2024/125670/01-L01
Your ref: F/23/96527
Date: 13 February 2024

Dear Sir/Madam

DEVELOPMENT OF SOLAR FARM AND BATTERY STORAGE WITH COMBINED MAXIMUM GRID EXPORT CAPACITY OF 27 MW, INCLUDING SOLAR PANELS, CONTAINERISED BATTERY STORAGE, SECURITY FENCING, CCTV CAMERAS, INTERNAL ACCESS TRACKS, UNDERGROUND CABLING, INVERTERS, SUBSTATIONS, GRID CONNECTION, ENVIRONMENTAL ENHANCEMENT MEASURES AND OTHER ANCILLARY DEVELOPMENT.

LAND BETWEEN ALLINGTON MANOR FARM, RODDINGTON FORGE & CHALCROFT FARM, ALLINGTON LANE, WEST END, SO30 2HU

Thank you for the consultation on the above application, please quote our reference on all correspondence.

Environment Agency position

In the absence of an acceptable flood risk assessment (FRA) we **object** to this application and recommend that planning permission is refused.

Reason(s)

The submitted FRA (*DAS Appendix D – Flood Risk Assessment compressed*) dated the 8th December 2023) 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.

In this instance the FRA does not adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- **demonstrate that the development is ‘safe’**
- **consider whether flood risk will be increased in the surrounding area**
- **take the impacts of climate change into account**

Environment Agency
Canal Walk, ROMSEY, Hampshire, SO51 7LP.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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- There is no assessment of the current flood levels or impact of climate change using appropriate climate change allowances
- Flood risk mitigation measures to address flood risk for the lifetime of the development have not been included within the design. Consequently, the development proposes inadequate:
 - Freeboard allowances (for solar panels, buildings and associated equipment)
 - Flood storage compensation assessment

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 on any revised FRA submitted and we'll respond within 21 days of receiving it.

Advice to Applicant

This FRA requires Product 4 information to indicate future flood levels for flood zones 2 and 3 for this site. Please contact SSDEnquiries@environment-agency.gov.uk (including a site map and grid reference) to obtain a Product 4 for your development. The applicant should indicate points on a detailed map where you require flood data.

Flood risk data requests will be based on existing EA hydraulic river model data with an allowance for climate change. Data should be taken from the Product 4 to inform the future flood depths for the lifetime of the development of where solar panels, buildings and associated equipment are proposed.

Climate change allowances

In Section 4.58 of the FRA, the 1 in 100-year fluvial flood levels (1% AEP) plus climate change for the lifetime of the development (75 years) has not been calculated using the updated climate change allowances found here: [Flood risk assessments: climate change allowances](https://www.gov.uk/government/publications/flood-risk-assessments-climate-change-allowances) - GOV.UK (www.gov.uk).

Climate change allowances should be applied based on the flood depths and added as percentage on top of this. This is a very rudimentary and precautionary method as it overestimates the levels of flooding, but is a basic method for applying climate change allowances when modelling is not a viable option.

It is for the applicant to assess and determine which climate change allowances to use, and this should be justified.

We note a topographical map is mentioned in the FRA, however it could not be found. It is advised that a detailed topographical map is produced for each field, that shows the following:

- Detailed layout of the solar panels
- Flood Zones 2 and 3
- All buildings and associated equipment

Freeboard allowance

It is inadequate to assume that setting solar panels 0.8m above ground levels across the whole site would be appropriate. For the buildings and associated equipment an appropriate freeboard should also be determined.

An appropriate freeboard should be set compared to the 1 in 100-year design event plus updated climate change allowances, as seen above. The freeboard allowance should then be determined according to the residual risks of the site. It is up to the applicant to demonstrate and provide evidence to justify their freeboard allowance. Further information can be found here - [Accounting for residual uncertainty: an update to the fluvial freeboard guide - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/accounting-for-residual-uncertainty-an-update-to-the-fluvial-freeboard-guide)

Floodplain storage compensation

We require the applicant to complete a flood storage compensation assessment. To enable us to assess the impact to the flood plain, the applicant should demonstrate that any increase in built footprint within FZ3 (including climate change) can be directly compensated for.

The FRA should consider the depth of flooding on the site in addition to the footprint of the solar panels, building and associated equipment to determine the volume of floodwater displaced. Floodplain compensation should be provided on a 'level for level' basis, calculating the replacement of volumes lost from the floodplain through development, by reducing nearby ground levels connected to the floodplain. The compensatory volume must be at the same level, or provide a betterment, as the lost storage.

Detailed building plans

The applicant must provide detailed plans and drawings of the battery storage facility and any other buildings on site. They should also indicate any risks associated with the buildings and outline measures to mitigate the risk.

Advice to the Applicant/LPA

Section 4.45 of the FRA indicates that the development site is in an area near Ordinary Water Courses (Local River Networks), which are the remit of the Local Planning Authority (LPA). We advise the applicant makes early contact with the LPA to discuss development impacts on these watercourses.

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning or visit <https://www.gov.uk/sign-up-for-flood-warnings>. It's 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 <https://www.gov.uk/prepare-for-flooding>.

To get help during a flood, visit <https://www.gov.uk/help-during-flood>.
For advice on what to do after a flood, visit <https://www.gov.uk/after-flood>.

Yours faithfully

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Planning Advisor, Environment Agency

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