

Havant Borough Council
Development Control
Civic Offices Civic Centre Road
Havant
Hampshire
PO9 2AX

Our ref: HA/2017/119366/01-L01
Your ref: APP/14/00547
Date: 18 May 2017

Dear Sir/Madam

REQUEST TO DISCHARGE CONDITION NO. 11 (21.3.16). REQUEST TO DISCHARGE CONDITIONS 5, 7 - 22 AND PARTIAL DISCHARGE OF CONDITION 23 (18/04/2017) OF OUTLINE PLANNING PERMISSION APP/14/00547 - OUTLINE PLANNING PERMISSION FOR 125 RESIDENTIAL UNITS AND A WATER RETENTION AREA ALL MATTERS RESERVED EXCEPT ACCESS AND LEVEL

LAND WEST OF HORNDEAN ROAD AND SOUTH OF SOUTHLEIGH ROAD

Thank you for consulting the Environment Agency on the above planning application which we received on 28 April 2017.

Environment Agency Position

Conditions 14 - Detailed design of relocated route of watercourse, 15 - Detailed design for proposed wetland area & 22 - Water compensation area

Whilst we welcome the intention of the development to include a flood storage area and compensation for the loss of floodplain storage, we cannot currently recommend the discharge of conditions 14, 15 or 22 at this stage due to a lack of detail regarding the design of the wetland area.

Advice to Local Planning Authority / Applicant:

Conditions 14, 15 and 22 of the outline planning permission require further details of the watercourse diversion, wetland flood storage area and floodplain compensation to be provided.

The details submitted comprise a series of plans that, whilst they show the layout of the proposed wetland area clearly, do not provide sufficient information to meet these conditions. Therefore the details cannot demonstrate that the proposed wetland area will adequately reduce flood risk to people and property.

In particular, there is no information regarding:

- The capacity of the wetland area/flood storage area and to what return period it

- will store floodwater.
- The outflow rates from the wetland area compared to the existing situation.
- How the outflow structure will operate to control flows.
- Who will be responsible for the operation and maintenance of the wetland area and the outflow structure.
- That the volume of floodplain compensation provided matches the volume lost level-for-level

Wetland area design

We note that the design work within the original Flood Risk Assessment submitted as part of the outline application is based upon JFLOW data, which is not suitable for use in site specific Flood Risk Assessments.

The applicant therefore needs to assess the flood levels and flows through the site in detail themselves.

Drawings 13-016-WA-001 and 13-016-WA-003 (Wetlands Area General Arrangement and Drainage Design) make reference to the outflow for the wetland area to be in line with MHE Associates Technical Note - FSA Hydraulic Modelling dated 12/1/2016, but this does not appear to have been submitted with this application.

Floodplain Compensation

Developers must ensure that there is no loss of flood flow or flood storage capacity for floods up to the 1% annual probability fluvial flood as a result of their development. Developers must also include an appropriate allowance for climate change when designing their development, including any storage proposals, and should seek to create a net flood risk benefit wherever possible.

Floodplain compensation should be provided on a 'level for level' basis. Level for level compensation is the replacement of volumes lost from the floodplain through development with new floodplain volume, by reducing nearby ground levels. The compensatory volume must, as a minimum, be at the same level (within reasonable working limits) as the lost storage.

Overcoming our objection

Full details of how the wetland area will control and store floodwater, along with detailed designs for the watercourse diversion and floodplain compensation must be provided in an updated Flood Risk Assessment. This should include calculations and the reasoning behind the choice of design.

Until details are submitted to address the above concerns then the Environment Agency cannot recommend that conditions 14, 15 or 22 be discharged.

Condition 17 - Provision and Management of 8m Buffer Zone and 18 Landscape Management Plan

Currently we are unable to discharge conditions 17 and 18 as the documents supplied do not contain details of native species (local provenance) planting for the newly created watercourse, its banks and buffer zones. Details of native species planting have been supplied for the wetland area.

Condition 19 – Scheme & Method Statement for realigned watercourse and compensation area

We are satisfied to discharge this condition.

Condition 16 – Surface Water Drainage Scheme

Amendments to the Development Management Procedure Order (DMPO) came into effect on 15th April 2015. As a result we are no longer a statutory consultee on surface water drainage, in terms of flood risk, and will therefore not be commenting on the surface water aspects of this proposal. Hampshire County Council as the Lead Local Flood Authority are now statutory consultee for 'Major development with Surface Water Drainage', we therefore recommend that you consult them on this application.

Other Conditions

Please note that the Environment Agency did not request conditions 5, 7, 8, 9, 10, 11, 12, 13, 14, 20, and 21 of Outline planning permission APP/14/00547 and therefore we do not have any comments to make.

Yours faithfully

Mr Jon Maskell
Planning Advisor, Environment Agency

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