

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

Our ref: HA/2017/119972/02-L01
Your ref: APP/17/01036
Date: 13 June 2018

Dear Sir/Madam

(ADDITIONAL DOCUMENTS) ERECTION OF 1NO. 2 BED BUNGALOW TO LAND REAR OF 60 FIR COPSE ROAD (INCLUDING RELOCATION OF ELECTRICITY SUBSTATION) 60 FIR COPSE ROAD, WATERLOOVILLE, HAMPSHIRE, PO7 5HZ.

Thank you for consulting the Environment Agency on the above planning application. We have reviewed the submitted plans and documents relevant to our remit, and have the following comments to make.

Environment Agency Position

In the absence of a Flood Risk Assessment (FRA), we **object** to this application and recommend refusal of planning permission until a satisfactory FRA has been submitted.

Reasons

The Environment Agency Flood Map was updated on the 30th April 2018. The application site now lies within Flood Zone 3, defined by the Environment Agency Flood Map as having a high probability of flooding. Paragraph 103, footnote 20 of the National Planning Policy Framework (NPPF) requires applicants for planning permission to submit an FRA when development is proposed in such locations.

An FRA is vital if the local planning authority is to make informed planning decisions. In the absence of an FRA, the flood risk resulting from the proposed development are unknown. The absence of an FRA is therefore sufficient reason in itself for a refusal of planning permission.

Overcoming our objection

You can overcome our objection by undertaking an FRA which demonstrates that the development is safe without increasing risk elsewhere and where possible reduces

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

Advice to LPA/Applicant

We previously raised an objection to the proposals to reposition the electricity substation as per our letter dated 12th December 2017. We raised an objection due to concerns regarding the proximity of the repositioned electricity substation to the culvert and unacceptable risk posed to the structural integrity of the culvert. A CCTV survey of the culvert was undertaken by contractors working on behalf of the Environment Agency. The CCTV culvert survey shows that the culvert actually follows a route that is more than 8 metres from the proposed location of the substation and therefore the repositioned substation is unlikely to impact on the culvert and its structural integrity. In light of this information, we will be lifting our objection to the proposed repositioned electricity substation.

In response to our letter dated 12th December 2017, the applicant submitted a drainage statement and Proposed Water Open Course Plan (drawing reference 17060/002P A, dated December 2017). These documents outline plans to replace their culverted section of the North Purbrook Heath Stream with an open channel and potentially alter the route of the watercourse to create a continuous unobstructed area between the substation and the culvert. In light of the findings of the CCTV culvert survey, the removal of the culvert and creation of an open channel would not be necessary. Whilst the Environment Agency generally supports culverted watercourses being returned to open channels for both flood defence and environmental purposes; this costly proposal would not be necessary at this site.

The alteration of an existing culvert requires an Environmental Permit for Flood Risk Activities. A new charging scheme for Environmental Permits was implemented on 1st April 2018 and the permit charge for this work would likely be around £900.00 - £1,500.00. As part of the application process for this permit, the applicant would be required to carry out detailed modelling including estimating changes to flow hydraulics and would be required to demonstrate that culvert removal wouldn't cause an increased flood risk both on the site and off-site. In addition, a detailed method statement, construction phase plan and risk assessment would be required. The applicant should be aware of the permitting requirements for this work and should consider this prior to making a decision on whether to proceed with the proposals to remove the culvert and create an open channel. Further details and guidance on environmental permits are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.

The Environment Agency will always support and substantiate its objections to major development proposals at appeal wherever a refusal is lodged in line with its advice. If you are minded to grant permission against the Environment Agency's advice, please contact the Planning Liaison Officer named below before making a formal decision to discuss the conditions and informatives that the Environment Agency would wish to apply to this proposal.

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify the Environment Agency 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.

If the Applicant would like any further detailed advice we would be happy to provide this subject to a charge.

As part of this service you would have a dedicated project manager to coordinate the advice from different teams within the Environment Agency. It would also include bespoke technical and planning advice if you request this. This will allow you to have greater clarity about the assessments you need to accompany your planning application and certainty about whether the development is acceptable to us before you resubmit.

Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor

Direct dial 02030 257250

Direct e-mail planningSSD@environment-agency.gov.uk