

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

Our ref: HA/2018/120172/01-L01
Your ref: APP/18/00071
Date: 06 March 2018

Dear Sir/Madam

Proposed new factory and wood chip store and associated works for B1, B2 and B8 use

Plot 2, Hermitage Park, Harts Farm Way, Havant, PO9 1FA

Thank you for consulting the Environment Agency on the above planning application which we received on 15 February 2018.

Environment Agency Position

In the absence of an acceptable Flood Risk Assessment (FRA) we **object** to the grant of planning permission and recommend refusal on this basis for the following reasons:

Reason

The FRA submitted with this application does not comply with the requirements set out in paragraph Section 9 & 10 of the Planning Practice Guidance to the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change or Policy CS15 Flood and Coastal Erosion Risk of the Havant Borough Council Core Strategy 2011.

The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development as a part of the site proposed to be built on is located in tidal Flood Zone 3.

In particular, the submitted FRA fails to provide:

- Site specific flood and levels for the proposed development (1 in 100 year flood level)
- Take the impacts of climate change into account
- Consider the requirement for flood emergency planning including flood warning and evacuation of people for a range of flooding events up to and including the extreme event.
- Adequate compensatory flood storage for the proposed development (in m³)

Overcoming our objection

You can overcome our objection by submitting an FRA which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we

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

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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 Local Planning Authority (LPA) / Applicant:

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.

In accordance with the Planning Practice Guidance (Reference ID: 7-043-20140306), 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 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.

Advice to Applicant

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.

We do not prepare or provide FRAs. However, our customers and engagement team can provide any relevant flooding information that we have available. Please contact SSD Enquiries under SSDEnquiries@environment-agency.gov.uk. We suggest requesting Product 4 which includes flood zones, defences and storage areas, areas benefiting from defences, statutory main river designations, historic flood event outlines and more detailed information from our computer river models. Please find attached the link for more precise information:

<https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#get-information-to-complete-an-assessment>

Your local planning authority should have undertaken a strategic flood risk assessment (SFRA), where information on flood risk locally, which may inform your FRA, has been collated. Please contact your local planning authority to determine what information may be available.

Flood Risk Activity Permit

Please note that this development may require an Environmental Permit or an exemption from an Environmental Permit from the Environment Agency. Any works located in, over, under or within 8 metres of a main river or 16m or a tidal defence, is likely to require a Flood Risk Activity Permit from the Environment Agency.

The applicant is advised to contact the National Customer Contact Centre (NCCC) on 03708 506 506

The need for an environmental permit is separate to the need for planning permission. The granting of planning permission does not necessarily lead to the granting of an environmental permit.

Further details and guidance are available on the GOV.UK website:
www.gov.uk/guidance/flood-risk-activities-environmental-permits

Yours faithfully

Mr David Griggs
Planning Advisor

Direct dial 02030 259625

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