

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

Our ref: HA/2024/126299/01-L01
Your ref: APP/24/00777
Date: 20 November 2024

Dear Sir/Madam

OUTLINE PLANNING APPLICATION WITH ALL MATTERS RESERVED APART FROM ACCESS FOR DEVELOPMENT WITHIN CLASS E (LIGHT INDUSTRIAL, RETAIL, CAFÉ AND RESTAURANT, LEISURE / GYM), B2, B8 AND B8 TRADE COUNTERS.

FORMER BAE SYSTEMS, WATERLOO PARK, ELETTRA AVENUE, WATERLOOVILLE

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

Environment Agency position

The proposed outline planning permission will only be acceptable if the following planning conditions are included in any permission granted.

No development approved by this planning permission shall commence until such time as the following schemes have been submitted to, and approved in writing by, the local planning authority:

- **Finished Floor Levels are set no lower than 34.77m Above Ordnance Datum.**
- **Overland flooding in the southwest corner of the site shall be managed through the design and implementation of a swale feature, directing flood water to the previously constructed flood alleviation works.**
- **Ensure that the development will not result in any loss of floodplain storage over the lifetime of the development.**

The scheme shall be fully implemented and subsequently maintained, in accordance with the scheme's timing/phasing arrangements, or within any other

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

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period as may subsequently be agreed, in writing, by the local planning authority.

Reason(s)

- To reduce the risk of flooding to the proposed development and its future users.
- To prevent any loss of floodplain storage and ensure that the risk to off-site areas is not increased.

Although we are satisfied at this stage that the proposed development could be allowed in principle, the applicant will need to provide further information to ensure that the proposed development can go ahead without posing an unacceptable flood risk to the site and off-site areas.

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reasons

National Planning Policy Framework (NPPF) paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution. Government policy also states that planning policies and decisions should ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

Advice to LPA/Applicant

The site area for the proposed development is located largely within flood zone 1, with a section of the southwest area located within flood zone 2. As the proposed development vulnerability classification is categorised as less vulnerable, we are satisfied that an adequate site-specific flood risk assessment has been provided.

In Section 9.2.1 (i) of the FRA, the applicant has proposed a finished floor level of 34.77mAOD, whereby a freeboard allowance of 300mm has been applied above the 1 in 1000-year fluvial flood level for the site (34.47mAOD). We are satisfied with the identified freeboard allowance of 300mm used as a flood mitigation measure in this instance, provided from reliable flood models for this site.

Under Section 8.1.1 of the FRA, the table details potential surface water drainage techniques for this site, whereby swale features are identified within the table as 'suitable' and 'no initial constraints identified'. We highly recommend that the applicant considers the inclusion of a swale feature to direct overland flood water to the constructed flood alleviation works. This is supported within a previously approved outline application for the site (within the FRA and FRA addendum – ref: HA/2018/120854/01, APP/18/01072), where there was consideration to construct a swale feature to manage flood water if the capacity of the twin culverts on the site was exceeded. We consider the implementation of a swale to be an important flood alleviation feature for the development.

We request that the applicant demonstrate, in the detailed layout of the development at

the reserved matters application stage, that there will be no loss of floodplain storage over the lifetime of the development. Also providing evidence that any loss of floodplain storage does not increase flood risk elsewhere to off-site areas.

The following issues are not within our direct remit or expertise, but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought.

- Details and adequacy of flood proofing and other building level resistance and resilience measures.

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
<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

CIRIA Code of Practice for property flood resilience
https://www.ciria.org/Research/Projects_underway2/Code_of_Practice_and_guidance_for_property_flood_resilience.aspx

British Standard 85500 – Flood resistant and resilient construction
<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

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.

The site is in a inner source protection zone (confined). This refers to a source protection zone in the confined chalk, which occurs at significant depth beneath the site and is protected by a significant thickness of low permeability London clay which underly the site. From a controlled waters perspective this is not a particularly sensitive site in relation to shallow contamination. There is some head deposits noted, but these are not likely to support significant groundwater resources. Some connection to surface water also may exist. Though some potential source are described, no major sources of contamination have been directly identified.

Due to the limited sensitivity and the fact that no major sources have been identified, we would not require any additional investigations. A careful watching brief for potential contamination should be observed during site development.

We could not see any assessment of potential PFAS contamination. Depended on exact natures of activities on site, PFAS sources may exist, though we would not in the first instance believe this to be a major sources. Though we would advise some assessment of potential PFAS to be undertaken, to confirm if any watching briefs etc may be warranted.

As no soakaway are proposed, we have no comments singicant concerns with the surface water drainage proposals.

Environmental permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit <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.

Yours faithfully

Miss Suz Greenwood
Planning Advisor, Environment Agency

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