

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

**Our ref:** HA/2025/126438/01-L01  
**Your ref:** APP/24/01004  
**Date:** 23 January 2025

Dear Sir/Madam

**VARIATION OF CONDITION 2 OF APP/18/00109 FOR ERECTION OF FOUR DWELLINGS WITH THE ASSOCIATED VEHICULAR AND PEDESTRIAN ACCESS AND LANDSCAPING AND REPLACEMENT CULVERT (APPROVED 26/03/2021) TO REPLACE APPROVED DRAWINGS FOR PLOT 1(16A\_071 015 REV H) WITH PROPOSED DRAWING SD-2236-01 F.**

**LAND ADJ 15 BILLETT AVENUE, WATERLOOVILLE, PO7 7SZ**

#### **Environment Agency position**

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

#### **Reason(s)**

The application for a variation to condition 2 is not acceptable without an updated flood risk assessment and supporting information. The previous application included conditions that allowed the original design of Plot 1 to be granted. Therefore, with the changes suggested in the proposed design plan (ref: *PROPOSED\_FLOOR\_PLANS\_AND\_ELEVATIONS\_PLOT\_1-2053603*) we cannot determine whether it will be acceptable from a flood risk perspective and meet the conditions as outlined in our previous consultation response.

Hence, without such information we consider that the site lies within Flood Zones 2 and 3, which is land defined by the planning practice guidance as having a high probability of flooding. The National Planning Policy Framework (paragraph 167, footnote 55) states that an FRA must be submitted when development is proposed in such locations.

An FRA is vital to making informed planning decisions. In its absence, the flood risks posed by the development are unknown. This is sufficient reason for refusing planning permission.

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

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## Overcoming our objection

To overcome our objection, the applicant should submit an FRA which demonstrates that the development is safe without increasing risk elsewhere. Where possible, it should reduce flood risk overall.

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. Guidance on how to prepare a flood risk assessment can be found at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>.

## Advice to the Applicant

### Design Plan

In the submitted design plan (ref: *PROPOSED FLOOR PLANS AND ELEVATIONS PLOT 1-2053603*) the applicant failed to include the design future flood level and FFLs for Plot 1. In the previous response, the FFL had been conditioned and we request that the applicant includes this information in a revised design plan.

### Flood Risk Assessment

We request that the applicant produces a flood risk assessment to demonstrate that the proposed changes to Plot 1, will be safe from a flood risk perspective. The conditions outlined in our previous response, listed below, should be adhered to and supported with detailed information within the revised FRA.

### Condition/s:

- Finished floor levels shall be set no lower than 40.87 metres above Ordnance Datum (AOD), as demonstrated in drawing 16A-071-012E
- Access to the culvert shall be maintained, demonstrated in drawing 16- 2654-2102 – Section A-A
- All proposed development shall occur in FZ1. No development shall take place in FZ 2 & 3 (including infrastructure that may impede or divert overland flood flows)

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Yours faithfully

**Miss Suz Greenwood**  
**Planning Advisor, Environment Agency**

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