

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

Our ref: HA/2022/124420/01-L01
Your ref: APP/22/00669
Date: 15 September 2022

Dear Sir/Madam

OUTLINE PLANNING APPLICATION WITH ALL MATTERS RESERVED (EXCEPT FOR ACCESS) FOR THE DEVELOPMENT OF UP TO 140 RESIDENTIAL DWELLINGS (C3 USE), WITH ACCESS FROM MEYRICK ROAD, THE PROVISION OF OPEN SPACE, LANDSCAPING AND OTHER ASSOCIATED WORKS INCLUDING DEMOLITION OF EXISTING BUILDINGS ON SITE

LAND AT KINGSCROFT FARM ADJACENT TO RIDGWAY AND, MARPLES WAY, HAVANT

Thank you for consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position below.

Environment Agency Position

We **object to this application as submitted** as it involves building an access and egress road over the Bellmouth Culvert which is a strategic main river flood relief channel. It is unlikely that we would grant a flood risk activity permit for this application as submitted.

Reason

We recognise that this is an outline application with all matters reserved apart from access. Whilst we have no objection to the principle of residential development on this site we have significant concerns with regard to the proposed access.

Section 1.3 - Site Description in the Flood Risk Assessment (FLOOD_RISK_ASSESSMENT__FRA__AND_DRAINAGE_STRATEGY-1691576) states: *"The main access was provided by Meyrick Road to the northeast"* and the

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

Cont/d..

indicative plan (ILLUSTRATIVE_SITE_PLAN-1685782) shows the proposal to build an undetermined length of access road on top of the culvert within the site and to utilise the existing unmade road on top of the Bellmouth culvert at the Southern end of Meyrick Road. It is unclear from the information provided whether there are any proposed upgrades required to Meyrick Road in order to serve the proposed development.

This proposal may further restrict essential maintenance and emergency access to the culvert. It is not clear whether the additional load arising from the development is likely to adversely affect the construction and stability of the Bellmouth Culvert and compromise its function. Should the culvert collapse due to increased usage (traffic load), it would restrict the watercourse's flow and therefore increase flood risk to the Havant community upstream.

While the layout of the site is yet to be confirmed. We would wish to make you aware that the illustrative plan as submitted with this application would be unacceptable as proposed due to the alignment of the proposed road at the entrance to the site in relation to the existing culvert.

Overcoming our Objection

We would prefer that there would be no further road construction on top of the strategic flood relief culvert to ensure that the Environment Agency have full access in the event of a blockage or collapse

A previous FRA (FLOOD_RISK_ASSESSMENT__FRA__AND_DRAINAGE_STRATEGY-1691603) showed the main access and egress connection to be via Abrams Way which does not impact the culvert. This would be preferential and would overcome the concerns expressed above. If this is not achievable the applicant should provide justification as to why the Meyrick Road option is being proposed given that it has the potential to increase flood risk elsewhere.

At a previous pre-application meeting in May we expressed our concerns over the alignment of the road within the site being over the culvert. Following this meeting, the applicant has amended the road layout within the site to avoid the culvert. However, where the site's main access road joins Meyrick Road the proposed alignment still appears to run over the top of the culvert for an undetermined length. We require further information in order to determine whether a Flood Risk Activity Permit could be issued for this work and therefore overcome our objection.

The Bellmouth culvert is large at 1500mm diameter, and if maintenance or replacement was required in the future it is likely that significant portion of the road would need to be closed for the work to be undertaken in the current layout. This would likely leave the site cut off.

We strongly suggest either a re-alignment or change of the access road to ensure minimal impacts the culvert. We would expect the exact alignment of the culvert and its manholes to be surveyed and annotated accurately on all drawings.

We understand the need for the culvert crossings required within the site road network, which may be acceptable in principle with further evidence and justification. This will need to include, but is not limited to, detailed calculations and drawings that demonstrate there will be no additional loading placed on the culvert as a result of the

proposed works. It is of utmost importance that the structural integrity of the culvert is preserved during and after the development, and that maintenance and replacement is possible.

We would also like to see a commitment to CCTV surveys from within the culvert directly before and after construction to show no damage is caused during construction. Plus, additional CCTV surveys for a period of time afterwards to take account of any settlement of the ground and a contribution towards increased CCTV survey costs due to increased frequency as a result of the change in land use.

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

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.

Advice to the Applicant

Following this objection, we would welcome a site visit with the Environment Agency's Asset Performance team and potentially Highways (who we presume will adopt the road post development) to discuss the proposal further and to try to identify a way forward that minimises the impact on the culvert.

Advice to the Local Planning Authority

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

We will always support and substantiate our objections to major development proposals at appeal wherever a refusal is lodged in line with our advice. If you are minded to grant permission against our advice, please contact the Sustainable Places Advisor named below before making a formal decision to discuss the conditions and advice that we would wish to apply to this proposal.

In accordance with the Planning Practice Guidance (Ref. ID: 20150415), 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.

Environmental Permit

Planning permission does not remove the requirement for an Environmental Permit. The Environmental Permitting (England and Wales) Regulations 2016 require a permit 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 culvert (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 a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have 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 03702 422 549. 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.

The proposed works are located within 8 metres of a main river designated by the Environment Agency. Under the terms of the Environmental Permitting (England and Wales) Regulations 2016, the proposed works will require the prior written permission of the Environment Agency in the form of a Flood Risk Activity Permit (FRAP).

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor

Direct dial 0203 0257 250

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