

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

Our ref: HA/2020/121974/04-L01
Your ref: APP/19/01226
Date: 21 April 2022

Dear Sir/Madam

ADDITIONAL INFORMATION - CONSTRUCTION OF 44 DWELLINGS WITH ACCESS, OPEN SPACE, LANDSCAPING AND ASSOCIATED WORKS. LAND WEST OF COLDHARBOUR FARM ROAD, EMSWORTH

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

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

Reason(s)

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- consider how people will be kept safe from the identified flood hazards

Overcoming our objection

The information provided in the FRA does not provide adequate details of the access route which is proposed to cross the West Brook (statutory main river) from Coldharbour Farm Road. There is no detail provided as to what is proposed to go over the watercourse, the potential impact of this on the watercourse or information on the design of the proposed access route. There is only brief mention of this in the original FRA submitted in 2019, as evident in point 2.11 *'Access and egress for the site during a flood event would be to the west (via the service station on the western boundary)* and in the more recent FRA submitted in January 2022, point 2.6 implies that this will be a road surface *'Construction of the site access will ensure the road*

surface...'. However, the drawings and plans submitted do not clarify as to what type of access route is being proposed.

This watercourse crossing will be the main access route into the site, and therefore it is key to ensure that safe access / egress is provided to ensure safety from identified flood hazards. The modelling submitted considered the 1% AEP flood event, but in addition, also modelled the 0.1% AEP present day event. As evidenced in figure D.3 flood depths of up to 1m are modelled for the 0.1% AEP present day event, with these levels in close proximity to the crossing. As such, further information on the crossing is required to ensure safe access is provided for the lifetime of the development.

The modelling previously submitted does not indicate the type of watercourse crossing that will be used or is in situ on Coldharbour Farm Road. Any updated FRA should include details of this watercourse, and construction techniques that will be used for this. In the first instance we would require a clear span crossing, allowing maintenance and access to the main river and ensuring that any crossing will not impact on flood risk and zones. If this is not possible, the adequate justification should be provided as to why this cannot be achieved and any mitigation measures that will be implemented to ensure the crossing does not have a determinantal impact.

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 LPA / Applicant – 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 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 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.

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 02030 257250

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