

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

Our ref: HA/2014/115791/02-L01
Your ref: APP/14/00547
Date: 28 August 2014

Dear Sir/Madam

**RESPONSE TO EA COMMENTS - OUTLINE PLANNING PERMISSION FOR 125
RESIDENTIAL UNITS AND A WATER RETENTION AREA ALL MATTERS
RESERVED EXCEPT ACCESS AND LEVEL**

LAND WEST OF HORNDEAN ROAD AND SOUTH OF SOUTHLEIGH ROAD

Thank you for consulting the Environment Agency on Bidwells comments to our response to the Outline application (our reference: HA/2014/115791/01).

We have reviewed the letter from Charles and Associates Consulting Engineers Ltd produced in reply to the Environment Agency's response to Outline application reference APP/14/0054. We can confirm that do not wish to change our position from that stated in the letter abovementioned.

Our reasons for this are outlined below:

1. **Condition 1** - We do not agree with the proposed change to the wording of this condition as it does not seem necessary.
2. **Condition 2** - The Emsworth Flood Risk Strategy is a document produced by the Local Planning Authority (LPA) requiring developments to demonstrate a reduction in post development run-off. The Environment Agency requires compensatory storage for loss of fluvial flood plain on the West Brook.

Section 3 of the Flood Risk Assessment (FRA) states that land levels at the western edge of the wetland area will be lowered in order to compensate for loss of flood plain.

Section 9 discussed the proposed wetland area and its capacity of 18,000 – 20,000 cubic meters but gives no explanation of how this links up with the flood plain compensation area on the western edge, or if they are one and the same thing. The

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plans in Appendix E show that the flood plain compensation area and the wetland to be two separate areas.

However, despite the cross sections, no calculations could be found in the referenced Appendix F to support the estimated capacity of the wetland area. We require a simple summary to clarify that together the flood compensation area and wetland will provide in the region of 30,000 - 32,000 cubic meters of storage.

We also require basic calculations showing that given the length, width and depth of the proposed wetland, the stated capacity of 18,000 – 20,000 cubic meters is appropriate. Likewise, we require basic calculations to demonstrate that capacity of the flood compensation area is appropriate given its length, width and depth. As we do not have this information we believe that the wording of condition 2 is appropriate.

3. **Condition 3** - We acknowledge that a great deal of information has already been submitted with respect to the proposed surface water drainage scheme but do not believe it is necessary to change the wording of the condition.

4. **Condition 4** - The 8m buffer should be applied from the top of the river bank and not the river centreline.

5. **Advice Section** - As discussed above in Point 2, whilst Appendix E shows that the flood compensation area and wetland area are adjacent, this is not clear in the main body of the FRA. Minor amendments to the FRA could provide the required clarification.

Our position with respect to update the Environment Agency's flood map remains the same. We cannot update the flood map until modelling work has been carried out to confirm the changes on site. It may be possible for the applicant to submit their own model to the Environment Agency, demonstrating that the site is no longer in Flood Zone 1. However, it will need to pass the Environment Agency's review process if it is to be used to update the flood map.

6. **Advice Section** - The volume and earthwork calculations referred to by the applicant do not appear to be in the FRA. These are required to confirm the design of the wetland and flood compensation areas.

Whilst no new culverts have been proposed on site, it is intended to divert an existing culvert. The Environment Agency's culverting policy and technical guidance are applicable to this work.

We acknowledge that extensive work has been undertaken in producing the FRA and as a result, we do not believe that it will be relatively straightforward for the applicant to provide the additional detail required.

If you have any queries regarding the information set out above, please contact me on the details below.

Yours faithfully

Miss Verity Giles
Planning Advisor, Environment Agency

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