

Your ref:

Our ref: APP/14/00547

dd:

df: 01245505080

e:

Date andrew.blackwell@bidwells.co.uk

7 August 2014

Email and post

Heather Lealan
Planning Officer
Development Control
Havant Borough Council
Public Service Plaza
Civic Centre
Havant
Hants PO9 2 AX



Saxon House
27 Duke Street
Chelmsford
Essex CM1 1HT
t: 01245 250998
f: 01245 251214
bidwells.co.uk

Dear Mrs Lealan

Land West of Horndean Road, Emsworth

In response to the Environment Agency (EA) letter, their ref: HA/2014/115791/01-L01, and dated 4 July 2014, my client, Philip White wishes the following observations from our consultant engineers, C and A Associates, to be made known to the EA and who are asked to respond to the points below.

"1. Condition 1. Appears to be a reasonable condition as detailed design is still to be carried out however C and A suggest a change that says designs to be in accordance with the approved preliminary designs within the submitted FRA;

2. Condition 2. The EA are confusing the Wetland Area with the Development Flood Compensation requirements. The Wetland has been specifically created to provide the EA required storage and is not related to any development drainage whatsoever, save the need to drain the site to the relocated West Brook. Located in the centre of the Wetland at greenfield runoff rates. Additionally a preliminary design has already been provided as such the comment at the end of 1 above applies here as well;

3. Condition 3. The condition ignores the fact that a full detailed design has already been submitted for the Developments SuDs scheme. C and A suggest that it should say any future alterations should be restricted to the design principles already set out within the FRA;

4. Condition 4. Refers to an 8 metre buffer strip to the relocated water course. As the water course sits central to the wetland, and the wetland is not considered a water course, this should not be an issue;

5. Condition 5. Relates to landscape management as such C and A have no comment;

6. Condition 6. Confirms that the EA require the Wetland and watercourse relocation to be in place before development on site proceeds for ecological reasons. As the site is currently an arable field this is an overly onerous condition and should be removed;

7. The Advice to the Planning Authority.

This is factually incorrect it is important that the FRA is read fully and questions asked to avoid misinterpretation of it. As such the Planning Authority is being misinformed and this needs correction.

Verity Giles is correct regarding the EA required figure of 18,000 to 20,000 cubic metres of storage being provided within the Wetland area and has done so for some time now. As stated above this is totally independent of the development and has been offered to assist with the Emsworth Flood Alleviation scheme after long and complicated discussions.



It is incorrect and misleading to say that 12,000 cubic meters of the Wetland is needed to compensate loss of flood plain on the development land itself, with only 6000 to 8000 cubic metres being left for the Emsworth Flood Alleviation scheme. It is very clear within the FRA that the Development flood compensation is being provided adjacent to but NOT part of the Wetland scheme. As such the full 18,000 to 20,000 cubic metres and the Wetland itself is provided for the Emsworth Flood Alleviation Scheme in its entirety. With the 12,000 cubic metres of flood compensation being provided as a separate standalone scheme. It is incorrect to say that until the model has been rerun the Development site will remain in Flood Zone 3.

It is clear within the FRA that like for like level flood compensation is being provided. As such when the development land is filled and flood compensation provided elsewhere, the development site will be out of flood zone 3 and the EA maps should be altered accordingly, regardless as to whether the model is rerun or not. It is extremely important that the EA acknowledges this.

8. Advice to the Applicant / Local Planning Authority (LPA)

As stated C and A believe EA have misinterpreted the FRA. It is clear that no culvert of existing water courses is being considered. Information has been provided in the form of volume and earthworks calculations within the FRA which clearly show the storage volumes for the wetland and separately the Flood Compensation. Finally there are extensive calculations and drawings that clearly show the development follows Standard SuDs procedures and is controlled to green field runoff discharge rates.

In closing C and A suggest that the EA should be in a position to acknowledge the extensive amount of work that has already been undertaken within the FRA, particularly with respect to items 7 and 8 above.

Yours sincerely



Andrew Blackwell

Partner

Planning Division

CC Verity Giles