

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

Our ref: HA/2014/115599/01-L01
Your ref: APP/14/00360
Date: 01 May 2014

Dear Sir/Madam

**OUTLINE APPLICATION FOR THE CONSTRUCTION OF 53 DWELLINGS WITH
NEW VEHICULAR ACCESS FROM COLDHARBOUR FARM WAY WITH ALL
OTHER MATTERS RESERVED**

LAND WEST OF COLDHARBOUR FARM, EMSWORTH

Thank you for consulting the Environment Agency on the above application, which was received on 14 April 2014.

Environment Agency Position

In the absence of an acceptable Flood Risk Assessment (FRA) we **OBJECT** to the grant of planning permission and recommend refusal on this basis for the following reasons:

The FRA submitted with this application does not comply with the requirements as set out in Paragraph 9 the Technical Guide to the National Planning Policy Framework. The submitted FRA does not therefore provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In particular, the submitted FRA fails to demonstrate:

- 1. That a sequential approach has been applied to the development as 2 residential properties are located within Flood Zone 3.**
- 2. How water from the floodplain that has been displaced by the proposed alleviation pond will be safely managed/compensated.**
- 3. How much storage and what standard of protection the proposed alleviation pond will provide.**
- 4. How the existing drains on the development site will be safely managed.**
- 5. How the discharges both from the development site surface water drainage system and the proposed alleviation pond will be**

Environment Agency
Romsey Depot Canal Walk, Romsey, Hampshire, SO51 8DU.
Customer services line: 03708 506 506
www.environment-agency.gov.uk

Cont/d..

controlled. The surface water drainage system needs to be designed to control a range of runoff events, not just the 1 in 100 year plus climate change.

- 6. That safe access and egress can be provided to the site. The main access appears to cross the river and the floodplain and could potentially be cut off in flood conditions.**

Overcoming our Objection

You can overcome our objection by submitting an FRA which covers the deficiencies highlighted above and demonstrates that the development will not increase risk elsewhere and where possible reduces flood risk overall. If this cannot be achieved we are likely to maintain our objection to the application. Production of an FRA will not in itself result in the removal of an objection.

We ask to be re-consulted with the results of the FRA. We will provide you with bespoke comments within 21 days of receiving formal re-consultation. Our objection will be maintained until an adequate FRA has been submitted.

Advice to the Local Planning Authority / Applicant

Whilst the Environment Agency has no objection to the principle of the proposed development we believe that the concerns raised must be resolved prior to any Outline planning permission being granted.

We have previously raised the concerns above in pre-application advice to the developer by letter in October 2013 (our ref: HA/2013/114781/01-L01) but from the information provided, they do not yet appear to have been addressed. Our concerns need to be resolved at the Outline planning application stage, as they could impact on several Reserved Matters for the site.

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

Direct dial 01794834590

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