

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

Our ref: HA/2014/116370/01-L01
Your ref: APP/14/01107
Date: 20 November 2014

Dear Sir/Madam

CONSTRUCTION OF A THREE STOREY DWELLING TO PROVIDE 10NO. 2 BED APARTMENTS WITH ASSOCIATED CYCLE/ BIN STORAGE, PARKING AND FRONT BOUNDARY GATES AND RAILINGS

LAND ADJACENT TO BEN HALL, HAMBLEDON ROAD, WATERLOOVILLE, PO7 6XB

Thank you for consulting the Environment Agency on the above application, which was received on 3 November 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 set out in National Planning Policy Framework and the accompanying Planning Practice Guidance. 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:

- 1. Clearly assess the residual risk of fluvial flooding to the proposed development***
- 2. Demonstrate any measures that will mitigate against the risk of fluvial flooding, for example, finished floor levels, flood proofing measures.***

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 reconsultation. Our objection will be maintained until an adequate FRA has been submitted.

Advice to the Local Planning Authority / Applicant

The proposed development is located within Flood Zone 2 on the Environment Agency's Flood Map for Planning. It is considered to be at risk of flooding during an extreme fluvial flood event.

Whilst the FRA sets out mitigation measures with respect to surface water flooding, there is no detail as to how fluvial flooding will be mitigated against. The residual risk to the site from fluvial flooding is not adequately assessed. For example, it is not clear what the finished floor levels of habitable accommodation are in relation predicted flood levels. No flood proofing or flood resilience measures appear to be applied to the development.

Guidance on the requirements for undertaking a FRA can be found online at the links below:

<https://www.gov.uk/planning-applications-assessing-flood-risk>

<http://planningguidance.planningportal.gov.uk/blog/guidance/flood-risk-and-coastal-change/>

Section 7 of the FRA suggests that Environment Agency's Flood Map for the site is incorrect, but no suitable evidence has been provided to support this. There only is a brief reference to a site visit and the local topography.

If the applicant does not wish to incorporate mitigation measures against fluvial flooding then they will need to provide adequate evidence to demonstrate why these mitigation measures are not 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

Direct dial 01794834590

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