

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

Our ref: HA/2014/115599/02-L01
Your ref: APP/14/00360
Date: 30 May 2014

Dear Sir/Madam

FURTHER INFORMATION – 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 information, which was received on the 28 May 2014.

We objected to the outline application within our response dated 1 May 2014 (our reference: HA/2014/115599/01) due to an unacceptable Flood Risk Assessment (FRA) being submitted with the application. Following the submission of the additional information dated 21 May 2014 (your reference: VLC/SD/25525) we are unable to remove our objection for the below reasons.

The additional information provided in support of the previously submitted FRA does not comply with the requirements set out in the Planning Practice Guidance Section 10. 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 2 units to the North East of the site will be compensated for; and how will the excavated material from the attenuation pond be managed to ensure no further displacement of water from the flood plain.
3. The required betterment for managing flood risk in Emsworth, as per Havant Borough Council's planning policy.
4. How the existing drains on the development site will be safely managed

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

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5. How the discharges both from the development site surface water drainage system and the proposed alleviation pond will be 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 welcome the additional information which has been provided in the letter dated 21 May 2014. However, it is not sufficient to alleviate the concerns stated above. It is not clear how the sequential approach has been applied to the layout of this site. The proposed development is largely within Flood Zone 1, and yet it is proposed to place properties in Flood Zone 3 and raise land. Given the potential space available within the site, we would like to understand why an alternative layout has not been proposed whereby these properties would not be located in the flood zone and the proposed land raising would not be necessary.

The proposed land raising will cause the displacement of flood water. Although landscaping will occur, it is not clear how this will account for the displaced flood water, or what will happen to the spoil it creates. If the spoil is left on site it may cause further displacement of flood water.

The Environment Agency supports any betterment provided by the proposed basin storage, as this is in accordance with the Havant Borough Council's Emsworth Flood Risk Strategy. The Local Planning Authority will need to be able to quantify the proposed betterment to determine if it is in accordance with the local planning policy. The Environment Agency is supportive of the Emsworth Flood Risk Strategy and the scheme at Emsworth will contribute to the implementation of this strategy.

The site layout shows that culverting will occur. We would recommend that this is avoided where possible. No building should occur above or adjacent to culverts and any culverting will require permission from Hampshire County Council. Please be aware that in any surface water drainage strategy we would expect to see at least 2 stages of water treatment, in accordance with the CIREA SuDS Manual C697.

We would expect the controlled peak flow from the landscaped basin at a minimum to

match the existing rates, ideally reduce them. This should be agreed with the Local Planning Authority through the FRA and Surface Water Drainage Strategy submitted as part of the planning application for the proposed development. The Local Planning Authority will consult with the Environment Agency as a statutory consultee for advice on the suitability of these proposals.

If site access is to be across a ford, an assessment of the associated water hazard during extreme flood events is required. If it is not safe to cross the ford during extreme flood events the Local Planning Authority's Emergency Planners may wish to consider if appropriate emergency and evacuation plans are in place.

We have previously raised the concerns above in pre-application advice to the developer by letter in October 2013 (our reference: 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.

Mr Ian Miller of the Environment Agency is aware of, and fully supportive of the points raised in this response.

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