

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

Our ref: HA/2025/127177/01-L01
Your ref: APP/25/00697

Date: 28 October 2025

Dear Planning Team,

COU FROM MOTOR-TRADE PURPOSES (SUIS GENERIS) TO USE AS A SHOWROOM FOR VIEWING WINDOW AND DOOR UNITS MANUFACTURED BY OTHERS FOR BOTH DOMESTIC AND COMMERCIAL USE TO INCLUDE THE STORAGE AND DISPLAY OF PRODUCTS FOR USE IN THE BUILDING/CONSTRUCTION TRADES INCLUDING BUT NOT LIMITED TO WINDOW AND DOOR UNITS AND ASSOCIATED OFFICE USE.

24 PALMERS ROAD, EMSWORTH, PO10 7DL

Thank you for consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position and comments below.

Environment Agency position

In the absence of a Flood Risk Assessment (FRA), we **object** to this application and recommend that planning permission is refused.

The application site lies within Flood Zones 2 and 3, which is land defined by the Planning Practice Guidance for the National Planning Policy Framework (NPPF) for Flood Risk and Coastal Change as having a high probability of flooding. The NPPF (paragraph 181, footnote 63) states that an FRA must be submitted when development is proposed in such locations.

An FRA is vital to making informed planning decisions. In its absence, the flood risks posed by the development are unknown. This is sufficient reason for refusing planning permission.

Overcoming our objection

To overcome our objection, the applicant should submit an FRA which demonstrates that the development is safe without increasing risk elsewhere. Where possible, it should reduce flood risk overall.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us on any revised FRA submitted and we'll respond within 21 days of receiving it.

Guidance on how to prepare a flood risk assessment can be found at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>.

Advice to the Local Planning Authority

We are aware that your LPA may currently be subject to the 'presumption in favour of sustainable development'. Given our outstanding objection on flood risk grounds we would like to highlight that in this case, as set out in NPPF footnote 7, the 'presumption in favour of sustainable development' should not apply as our objection provides a clear reason for refusal.

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify us to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

In accordance with the Planning Practice Guidance (Ref. ID: 20150415), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Advice to Applicant

If the Applicant would like any further detailed advice we would be happy to provide this subject to a charge.

As part of this service you would have a dedicated project manager to coordinate the advice from different teams within the Environment Agency. It would also include bespoke technical and planning advice if you request this. This will allow you to have greater clarity about the assessments you need to accompany your planning application and certainty about whether the development is acceptable to us before you resubmit.

Sources of information for an FRA

We do not prepare or provide FRAs. However, our Customers and Engagement teams can provide any relevant flood risk information that we have available. Please email SSDEnquiries@environment-agency.gov.uk and request a 'Product 4' or flood data for your site location. When sending a request, please also send a plan identifying the site boundary. Requests are usually dealt with within 20 working days.

Your Local Planning Authority should have undertaken a Strategic Flood Risk Assessment (SFRA) which will also include local flood risk information to inform your FRA. Please contact your Local Planning Authority to determine what information is available.

Guidance on how to prepare a flood risk assessment can be found on the gov.uk website here - <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications>.

A checklist on what should be included in a flood risk assessment can also be found on the gov.uk website here – <https://www.gov.uk/guidance/flood-risk-and-coastal-change#Site-Specific-Flood-Risk-Assessment-checklist-section>.

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information

Yours faithfully

Victoria Hindmarsh
Planning Advisor

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Direct dial: 07484974072