

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

Our ref: HA/2025/127309/01-L01
Your ref: APP/25/00902
Date: 24 December 2025

Dear Planning Officer,

UPGRADE OF FOOTPATH 508 WITH NEW LINK AND BRIDGE OVER THE HERMITAGE STREAM TO CREATE A 3M WIDE SHARED PEDESTRIAN, CYCLE AND MOBILITY VEHICLES ROUTE FROM PARK HOUSE FARM WAY TO FITZWYGRAM WAY; ASSOCIATED REMOVAL OF CONCRETE PLAY AREA AND REINSTATEMENT AS GRASSED/LANDSCAPED AREA.

SHARED ROUTE FROM PARKHOUSE FARM WAY TO FITZWYGRAM WAY.

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 an adequate flood risk assessment (FRA) **we object** to this application and recommend that planning permission is refused.

Reason(s)

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere. In particular, the FRA fails to adequately assess the potential impact of the proposed work on the flood plain of the Hermitage Stream. It does not therefore demonstrate that the footpath upgrade, new bridge and track will not obstruct flood flow routes and/or reduce floodplain storage capacity.

Overcoming our objection

Environment Agency
Teville Gate House 25 (Cafe) Railway Approach, Worthing Central, Worthing, BN11 1UR.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us if a revised FRA is submitted and we will respond within 21 days of re-consultation.

Advice to Local Planning Authority and applicant

The FRA correctly identifies that the Footpath 508 lies adjacent to the Hermitage Stream and sections of it are located within Flood Zones 2 and 3. Section 5 of the Design and Access Statement refers to the importation of material and the creation of new landforms either side of the new footway as shown in Drawing 'General Arrangement Northern Section'. This implies that there may be raising of levels within Flood Zones 2 and 3, which has the potential to displace floodwater and increase flood risk elsewhere. This would be noncompliant with the National Planning Policy Framework (NPPF) and with the FRA which concludes that the work will not have a detrimental effect on flood risk and would positively enhance flood risk. Please provide further information to clarify the proposals with regard to land levels pre- and post-development. It would also be useful to confirm how close the proposed works are to the Hermitage Stream (in metres).

The proposed bridge crosses the Hermitage Stream but the FRA fails to demonstrate how the bridge design has taken flood risk into account to ensure that it will not obstruct flood flows, displace flood water or increase flood risk upstream or downstream. Please refer to the Standard Rules for Environmental Permitting on gov.uk (SR2015 No 28).

Advice to applicant

Environmental permit

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river
- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main

river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks or manure clamps in these places) For further guidance please visit [Flood risk activities: environmental permits - GOV.UK](#) or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Advice to the Local Planning Authority

Should our objection be addressed in due course, we are likely to request some conditions for inclusion in any planning permission and provide further. Further conditions relating to flood risk may also be needed subject to our assessment of any additional information submitted.

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.

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

Direct dial 07484 974072

Direct e-mail Victoria.Hindmarsh@environment-agency.gov.uk