

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

Our ref: HA/2021/123441/01
Your ref: APP/21/00601
Date: 17 August 2021

Dear Sir or Madam,

PORTSMOUTH WATER HEADQUARTERS BUILDING (USE CLASS E(G)(I) USE) AND NEW EMPLOYMENT PREMISES (USE CLASS B2.B8/E(G)(III) USE); WIDENED ACCESS ONTO SOLENT ROAD; AND ASSOCIATED ACCESS, CAR PARKING, LANDSCAPING AND WORKS; INCLUDING THE FELLING OF 7NO. TREES THE SUBJECT OF TPO NO.1801 IN ORDER TO IMPROVE THE ACCESS AND ALLOW FOR THE DEVELOPMENT.

LAND NORTH OF SOLENT ROAD (ADJACENT TO BOSMERE MEDICAL CENTRE), HAVANT.

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 acceptable Flood Risk Assessment (FRA) we **object** to this application and recommend that planning permission is refused.

Reasons

The submitted FRA is based upon the assumption of modelling outputs that have not been reviewed by us for planning purposes. The modelling undertaken by the Applicant places the site within Flood Zone 1, which is contrary to our Flood Map for Planning which places the site largely within Flood Zone 3 (i.e. an area at high risk of flooding). The FRA does not therefore adequately assess the flood risks posed by the development. This is because its contents are based upon the outputs of modelling that we have not had the opportunity to scrutinise and ultimately verify for practical use in the allocation of Flood Zones.

Overcoming our objection

In order for us to find the submitted FRA acceptable, the Applicant should submit to us the model files and all associated reports in order for a model review to be undertaken. From this review we will ascertain whether the outputs of the provided modelling are fit for purpose and of adequate standard to inform the FRA. Upon completion of the model review, we will be in a position to comment on the adequacy of the submitted FRA.

Please re-consult us on any additional information submitted and we will respond within 21 days of receiving it.

If the Applicant requires clarification on the files and associated information required in order for us to undertake a formal model review, please contact psohiow@environment-agency.gov.uk. Please note that model reviews can take between 6 – 10 weeks to be completed depending on our workloads and incident response work at the time.

Advice to the Local Planning Authority

Our objection

We will always support and substantiate our objections to major development proposals at appeal wherever a refusal is lodged in line with our advice. If you are minded to grant permission against our advice, please contact us before making a formal decision to discuss the conditions and advice that we would wish to apply to this proposal.

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.

Sequential test

Our response to this application is on the understanding that the Local Planning Authority is satisfied that the Sequential Test has been adequately demonstrated in accordance with the requirements set out in the National Planning Policy Framework (NPPF) paragraph 162, and paragraph 019 of the Planning Practice Guidance to the NPPF for Flood Risk and Coastal Change.

This means that before proceeding to determination, the Local Planning Authority must apply the Sequential Test and therefore, must consider whether the Applicant has demonstrated and sufficiently justified that no alternative sites are available in lower flood risk zones.

Please note that it is the role of the Local Planning Authority to determine and assess the acceptability of the Sequential Test. We do not comment upon the comparative assessment of land, its availability or suitability for development.

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information relating to this application APP/21/00601.

Yours faithfully,

Mrs Sophie Brown
Sustainable Places Planning Advisor

Direct dial: 02030 257250

Direct e-mail: planningSSD@environment-agency.gov.uk