

Hampshire County Council  
The Castle  
Winchester  
Hampshire  
SO23 8UE

**Our ref:** HA/2011/112212/01-L01

**Your ref:** APP/11/01470

**Date:** 27 October 2011

Dear Sir/Madam

**PROVISION OF A NEW HAVANT HOUSEHOLD WASTE RECYCLING CENTRE (HWRC)**

**FORMER HAVANT INCINERATOR LAND, HARTS FARM WAY, HAVANT AND AN ACCESS ROAD TO THE LAND TO THE NORTHWEST OF THE FORMER INCINERATOR LAND**

Thank you for consulting the Environment Agency on the above application which we received on 6 October 2011.

**Environment Agency Position**

In the absence of a flood risk assessment (FRA), we **OBJECT** to this application and recommend refusal of planning permission on this basis for the following reasons:

**Reason**

The application lies within Flood Zone 1 defined by Planning Policy Statement 25 (PPS25): Development and Flood Risk as having a low probability of flooding. However the proposed scale of development may present risks of flooding on-site and/or off-site if surface water run-off is not effectively managed. Paragraph E9 of PPS25 requires applicants for planning permission to submit a FRA when development on this scale is proposed in such locations.

In the absence of a FRA, the flood risks resulting from the proposed development are unknown. The absence of a FRA is therefore sufficient reason in itself for a refusal of planning permission. This reflects the precautionary approach to development in flood risk areas set out in paragraphs 10 and E9 of PPS25

We ask to be re-consulted with the results of the FRA. Our objection will be maintained until an adequate FRA has been submitted.

Environment Agency  
Colvedene Court (Wessex Business Park) Wessex Way, Colden Common, Winchester, SO21 1WP.  
Customer services line: 03708 506 506  
[www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

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Advice to Planning Authority / Applicant:

The applicant has submitted a number of enquiries in relation to the management of surface water runoff at this site and the adjacent site to be used for salt storage barns. The Environment Agency has, in principle, agreed to the proposed method of storage and attenuation of surface water runoff to the Harts Farm Way Stream.

The applicant has previously stated that storage for the 1 in 100 year 20% storm event will be provided by a pond and ditch system, with flows attenuated to the 1 in 1 year storm event before being discharged to the Harts Fram Way Stream. However, no drainage calculations have been provided to demonstrate that this system will be feasible in practice.

Furthermore, as the application site is greater than 1 hectare in size a Flood Risk Assessment should be submitted in accordance with Planning Policy Statement 25, Annex E. The FRA should in particular detail how surface water at the site will be managed, but should also consider other sources of flood risk such as tidal inundation, overland flow and groundwater. The PUSH, Strategic Flood Risk Assessment map shows that parts of the site fall within tidal flood zone 3 by 2055 and most of the site falls within this zone by 2085. Therefore, the implications of possible tidal inundation over the full lifetime of the development should be assessed. This is in line with Hampshire County Councils Draft Minerals & Waste Plan, policies 1 (Climate change - mitigation & adaption) and 10 (Flood risk & prevention).

The Harts Farm Way Stream is fed by springs in the area and it is possible that ground water levels could be quite high on the site. The FRA should assess whether the possibility of high groundwater levels will have any implications for the proposed method of surface water storage in the ditch and pond. If these features are filled with groundwater for periods of time then their effectiveness for surface water drainage purposes will be compromised.

If the above issues can be satisfactorily addressed within a FRA, then the Environment Agency is likely to be in a position to remove it's objection.

If any further information is required on flood risk issues please contact Rob Waite, at the Environment Agency, on telephone number 01962 764897.

Yours faithfully

**Mr Jon Maskell**  
**Planning Liaison Officer**

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Direct e-mail [PlanningSSD@environment-agency.gov.uk](mailto:PlanningSSD@environment-agency.gov.uk)

cc Hampshire County Council

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