

GBC Water Front and Town Centre SPD.docx

---

**From:** Lax, Laura [REDACTED]  
**Sent:** 13 September 2017 09:25  
**To:** Planning Policy Internet  
**Cc:** [REDACTED]  
**Subject:** EA response to Waterfront and Town Centre SPD

Dear sir/Madam

Please find attached the Environment Agency's response to your current consultation on the Waterfront and Town Centre SPD.

We hope that you find the comments useful. If you have any queries please give me a call.

Kind regards  
Laura

Laura Lax  
Sustainable Places  
Solent and South Downs

Tel: [REDACTED]  
Email: [REDACTED]

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else.

We have checked this email and its attachments for viruses. But you should still check any attachment before opening it.  
We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.  
Click [here](#) to report this email as spam

---

Please consider the environment before printing this email.

Deputy Head of Planning Services  
(Policy)  
Gosport Borough Council  
Town Hall High Street  
Gosport  
Hampshire  
PO12 1EB

**Our ref:** HA/2006/000117/SD-  
06/IS1-L01  
**Your ref:**  
**Date:** 13 September 2017

Dear Sir/Madam

**Gosport Waterfront and Town Centre Supplementary Planning Document –  
Consultation Draft June 2017**

Thank you for consulting the Environment Agency on your consultation draft of the above document.

Having read and reviewed the document we are pleased to see that issues within our remit have been well recognised and taken account of when considering development in these areas. In conjunction with your adopted local plan we think this should give a good steer for development in the area and a firm basis for making decisions on planning applications. We are especially pleased to see the significant recognition and evidence that is given to the issue of flood risk and how this will be dealt with without prohibiting development. We think you have taken a practical approach that ensures that the worst areas of flood risk are avoided and mitigation and resilience measures are implemented to ensure flood risk is managed.

We hope we can continue to work with you to help ensure that development occurs in a sustainable manner.

If you have any queries regarding the above please do not hesitate to contact me

Yours faithfully

**Mrs Laura Lax**  
**Senior Planning Advisor**



Environment Agency  
Canal Walk, ROMSEY, Hampshire, SO51 7LP.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
End

---

**From:** Lax, Laura [REDACTED]  
**Sent:** 24 October 2017 09:47  
**To:** Grygiel, Jayson; Catt, Kim  
**Subject:** Waterfront and Town Centre SPD

Hi Jayson/Kim

Sorry to contact you out of the blue but following your recent consultation on the Waterfront and Town Centre SPD it has come to light that there is a small amendment that we feel needs to be made. I am really sorry that we didn't pick this up in our previous response and I understand that it may be too late to make any alteration but I felt that it was however important to highlight it.

The SPD says that the Council's more detailed strategy on flood management is set out in the River Hamble to Portchester Coastal Flood and Erosion Risk Management Strategy, which recommends sustaining a minimum 1:100 year Standard of Protection. It should be noted that the Coastal Strategy sets out what is the most appropriate standard of protection for existing property, taking into account economic, environmental and technical considerations. It may not be affordable or appropriate to provide the same standard of protection for existing development as we would expect for new development. We would generally expect new development to remain safe during the design event, which is the 1:200 year event, taking into account climate change. We would therefore recommend consideration is given to the text on p.45 which could currently lead to flood risk mitigation measures which would not meet our collective expectations of safety when assessing planning applications.

## GOSPORT WATERFRONT AND TOWN CENTRE SPD

JUNE 2017

4.29 Within the Gosport Waterfront and Town Centre area a number of flood risk management measures have already been taken. Further works will be required as part of proposed new development. Specific flood risks associated with individual development sites are contained in the Site Profiles Companion document, with salient points identified in Section 5. Policy LP45 of the GBLP provides further guidance on this issue.

Key elements of the flood risk element of the development strategy are outlined below.

➤ **To locate wherever possible new development in the lowest flood risk areas i.e. flood zone 1.**

➤ **To ensure that flood risk management measures, either associated with new development or protecting existing development, contributes to the overall strategy for reducing flood risk to the existing community over the next 100 years. Many flood management measures can be built into the design of new development. Potential measures include a mix of the following:**

- The siting of lower risk land uses on parts of an individual site with high flood risk (such as

marine uses, open spaces, car parking or commercial) rather than residential uses on the ground floor;

- In certain cases it will be necessary to construct new flood defences or improve existing ones on a site. This may include the provision of a flood wall along the development site's frontage with the waterfront to a suitable (1 in 100) standard of protection; or it could be a contribution towards a vulnerable section off-site which if not improved would result in the flooding of the proposed new development.

- Buildings and associated structure in the flood zone should be designed to incorporate flood resilience and flood resistance measures. A design-led approach can ensure flood management measures can be incorporated in an interesting and attractive way.

- Similarly sewerage infrastructure associated with the new development should consider flood risk.

- Development proposals in floodzones 2 and 3 must demonstrate safe access and egress to and from the site in the event of flood.

➤ **To ensure that development located on 'exception sites' mitigates any outstanding flood risk.**

- In most cases the Borough Council would expect development to be located in areas of lower flood risk. However in accordance with Government guidance set out in the NPPF where a site has been shown to have overriding sustainability benefits and the flood risk can be mitigated it can be possible to build in such areas. These are known as 'exception sites'.

- It will be necessary for any proposal in sites covered by Flood Zones 2 and 3 to be accompanied with a site specific Flood Risk Assessment (FRA). This will need to demonstrate that the development is safe from flooding without increasing flood risk elsewhere and where possible reduces flood risk overall. Proposals must clearly demonstrate that any residual risks can be safely managed.

I hope that this makes sense and I apologise again for us not picking this up sooner. I do understand if it is too late to make amendments.

Any queries please give me a call.

Thanks

Laura

Laura Lax  
Sustainable Places  
Solent and South Downs

Tel: [REDACTED]  
[REDACTED]

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else.

We have checked this email and its attachments for viruses. But you should still check any attachment before opening it.

We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Click [here](#) to report this email as spam

---

Please consider the environment before printing this email.