

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/18/01480	Your Ref:	APP/18/00672
EH Case Officer Extn:	44 6677	Date:	09 August 2018
DC Case Officer:	Mrs Emma Chisnall		
DC Case Officer Extn:	6523		
Application Number:	APP/18/00672		
Site Address:	Land off Westwood Close, Emsworth		
Proposed Development:	Erection of 46no. dwellings with associated parking, access from Westwood Close, diversion of Havant Footpath 73, landscaping and surface water drainage. Felling and works to trees within Area A1, subject to TPO 2071.		

Observations / Comments:

I have reviewed the supporting documents to this application, and would like to make some general comments regarding it's environmental credentials, and with respect to the SuDS drainage scheme proposed.

Geotechnical, groundwater monitoring, and SuDS;

I note that the groundwater monitoring report provides no technical interpretation, it simply presents monitoring data.

Data presented show consistently 'climbing' groundwater levels over the period Nov '17 - April '18, recording GW levels in BH4 which are coincident with ground levels (April '18). It is unclear whether standing levels recorded are representative of 'strike' levels (i.e. the actual / natural level within the productive unit, were the well absent).

A basic conceptual model for the site might be characterised as a shallow permeable strata (comprising gravelly / sandy clay) overlying a stiff, low-permeability clay with topographic sloping generally to the SW &/or SE. It is likely that there is a hydraulic connection between the productive strata and surface water channel, though there is potential for the natural flow 'system' to be overwhelmed by pluvial inputs where infiltration rates exceed the hydraulic conductivity of gravelly/sandy clays (and therefore the groundwater flow capacity - resulting in waterlogging).

I note that poor soakage results correspond to locations where monitoring indicates shallowest groundwater. The hard-surface drainage system should improve local capacity within the productive strata by diverting volume of local inputs from the permeable unit - either by direct conveyance to the surface water, or to the proposed attenuation tanks. In this way, I am not overly concerned about the shallow groundwater, and view this as a 'construction process constraint' - though there remains potential for occasional post-completion occurring during extreme weather events. Exceedance flow information presented shows that any local groundwater flows are likely to follow pluvial flows, directed away from dwellings.

I note that the SuDS strategy utilises trapped gulleys for impermeable areas, lined / tanked permeable paving off the spine road, and flow-controlled discharge via a bioretention swale, where the flow control ensures that the relatively short / small surface area of the swale has reasonable retention time as to serve a treatment function. These measures are considered to be sufficient to address the pollution risk posed by a development of this type.

In terms of the attenuation tanks proposed, I note that these are exclusively offline, and located at elevated positions - in some cases some distance from the flow control structure. The system is heavily reliant upon a significant 'backing up' in order to utilise capacity. This may mean that the system is prone to siltation blockages, and that surcharge problems may arise (storage levels relative to chamber cover levels is not explicit). I am not sure that the applicant has done enough to demonstrate that this strategy is feasible - if the storage volume proposed is not available in practice, the SuDS 'mitigated scenario' calculations will be invalid.

Whilst I have no significant pollution concerns, I would recommend that specialist advice from HBC's drainage engineers or the LLFA (whichever is appropriate) is sought with regards to the acceptability of the level of detail provided in support of this scheme - particularly in respect of levels relative to AOD for the sewer inverts / cellular storage tank tops, and chamber covers / cover types.

Air Quality;

No significant issues arise from the Transport Assessment - trip generation rates (AADT) for the development of ~213 (PCU), and ~79 pedestrian will be significant in terms of proportional impact at Westwood close (will change it's character), but do not represent material trip rates relative to transport emissions or pedestrian facilities. A shared surface cycleway available on the nearby Westbourne Avenue, and the closest Bus stops are within recommended distances.

In this way, there is no concern about the direct impact of the development on local ambient concentrations at any specific location. However, Para 181 of the 2018 NPPF requires (local policies) to aim to *sustain compliance with and contribute towards EU limit values or national objectives for pollutants taking into account (...) the cumulative impacts from individual sites in local areas*". Whilst this provision is a direction to local planning authorities to guide local policy, it is reasonable to take this direction as a steer to the interpretation of existing local policy - i.e. that the cumulative impact of development should be taken into account, and that all development should be designed to sustain compliance with national objectives, and exploit opportunities to improve air quality.

Against these criteria, this development does not have made a robust offering. The Design and Access statement refers (at 6.3) to *'potential for incorporation of energy efficiency measures'*, but does not go on to outline any specific plans or proposals, and I note that the SuDS strategy does not include any harvesting to which the above statement could be taken to refer. In this way, it is unclear whether the development should be deemed to be compliant with- or contrary to- policies CS14 & CS16.

The tone of the Design & Access statement is one which appears defensive of the housing density, which represents a +30% quantum relative to the draft allocation for the site in the emerging local plan (UE27A), and which I would imagine is pushing the boundaries of acceptability given the character of the local area. I would regard the proposed density - and moreover, the increased density over that which the Council considers the site is capable of in line with it's policy aspirations - as being reasonable justification for seeking a stronger sustainability offering, or at the very least, seeking clarification on sustainability proposals.

Sustainability elements relevant to air quality local to the site would include supporting infrastructure for electric vehicle / plug-in-hybrid vehicles; any space/water-heating or household appliances which are 'zero-emission at point of use' (i.e. electrical, where these replace a combustion appliance), the provision of on site renewables (direct solar, PV, or heat

pump) or any technology which reduces the need for combustion or reduces combustion emissions - e.g. ultra-low NOx boilers, ventilation with heat recovery, or high quality design which makes efficient provision for solar gain for both heating and the avoidance of over-heating (minimising the need to cool). Many of these measures could also indirectly reduce offsite emissions, and thus contribute to incremental improvements in air quality.

Mr. Jonathan Driver
Environmental Control Officer