

From: Driver, Jonathan
Sent: 05 Oct 2018 02:05:04
To: Rachel.Ballam@havant.gov.uk, Steve.Mountain@havant.gov.uk,
Subject: RE: APP/17/00530 - land to the rear of 78-80 Silvester Road, Waterlooville
Attachments:

Rachel,

The revised strategy is essentially what I was suggesting, and certainly represents a simplification that will serve to ensure reliable long term operation and clear ownership / liabilities. Whether you require evidence of SWS's approval of the scheme prior to making a positive determination is a planning question – I don't envisage any problems with obtaining connection consent.

As regards the last paragraph Re: greenfield run-off rates & flow control – it is not correct to say that drainage to allocated surface water main should not need this. It is true that the NPPF allies provisions to developments within flood risk areas, and to 'major' developments. Local policy (CS15) however states that *"All development will be required to ensure that there is no net increase in surface water run off"*. The LLFA would generally require this to be considered for any development for which it's consultation threshold is met, and it is beneficial to control run-off rate to public sewers as these ultimately discharge to local watercourses where inputs may contribute to flash flooding issues. Whether it should be regarded that CS15 apply strictly to a small development is a planning question, and my intention here is simply to flag to consideration.

I am otherwise entirely satisfied with the proposed scheme, and have no further comments to make.

Best Regards,

Jon

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Environmental Control Officer

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From: Ballam, Rachel
Sent: 05 October 2018 10:25
To: Driver, Jonathan <Jonathan.Driver@havant.gov.uk>; Mountain, Steve <Steve.Mountain@havant.gov.uk>
Subject: FW: APP/17/00530 - land to the rear of 78-80 Silvester Road, Waterlooville

Good afternoon Jonathon and Steve,

A consultation response in respect of the above application was gratefully received on 02/05/2018.

The applicant has submitted the below points and attached revised plan:

"See below comments summarizing the same in response to each point raised."

The surface water drainage proposal is not supported by favourable soakage tests, construction details, or required storage volume (soakaway sizing) calculations. The foul sewerage submission is not supported by information from Southern Water confirming that both the principal and means of connection is suitable

These tests and sizing calculations are not relevant as we are discharging to the foul and surface water mains.

Drawing no. A114 V7.3 shows surface water disposal by means of a shared soakaway, located adjacent to the driveway of the 'type B' property. It is not clear whether the soakaway shown serving the garage to the 'type A' property is located on the land associated with the type A or B plot. If on land associated with the 'type A' plot, it is unclear why the drainage for the main house has not been directed to the soakaway present on the plot - presumably to avoid the public sewer 'exclusion zone'. I have been unable to determine from Southern Water whether shallow conveyance of surface water within the exclusion zone is prohibited, but note that a) the existing properties lie within the exclusion zone, and b) that ground level / invert information from Southern Water suggest that the public sewer is in excess of 10m below existing ground level. If b) is accurate, it seems plausible to me that installation of services within the exclusion zone might be permissible. The absence of any evidence of engagement with Southern Water makes it very difficult to gauge whether the somewhat awkward drainage layout is necessary, or whether an objection to it would be reasonable in planning terms.

Also awaiting approval from Southern Water for the revised drainage plan.

Shared soakaway drainage is not recommended, as owner of one plot necessarily adopts responsibility for the drainage of the other. This could unnecessarily result in the Council needing to invoke drainage enforcement powers, or could place the occupants at greater risk of civil dispute over the efficacy of drainage systems, or the impact of disposal (e.g. waterlogging of ground).

No longer relevant.

If the proposed scheme is accepted (as being necessary to accommodate site constraints), the applicant would need to ensure that rights and responsibilities in respect of maintenance of-, and access to- private drainage are properly addressed within the titles to the properties. However, this seems a somewhat odd approach where it appears that the existing properties are already served by public surface water system (chamber in road opposite #78, with communication in a northerly direction), providing an alternative means of disposal.

No longer relevant.

In line with CS15, use of SuDS is supported where appropriate. However, it is not clear from the submission that the proposal demonstrates that function is likely to be satisfactory, or that arrangements are adequate to ensure "whole life management and maintenance". In this sense, it could be argued that the submission fails to meet CS15. It is not considered appropriate to rely upon building control to address a material planning matter.

I would ordinarily expect the LLFA to address these concerns, but I am aware that the scale of this development is insufficient to trigger a consultation with the LLFA.

Should discharge of c.3 be refused, and the applicant consider alternative disposal via the public surface water system, drainage design should consider attenuation and controlled release to maintain greenfield runoff rates in order to comply with CS15."

Drainage to the allocated surface water main should not need this."

Southern Water have also since sent in a consultation response approving the foul drainage scheme. In light of this and the above comments would either of you wish to submit revised comments in respect of Condition 3?

Kind regards,

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