

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/17/02059	Your Ref:	APP/17/01069
EH Case Officer Extn:	44 6677	Date:	27 October 2017
DC Case Officer:	Rachael McMurray		
DC Case Officer Extn:	44 6546		
Application Number:	APP/17/01069		
Site Address:	33 Lovedean Lane, Waterlooville, PO8 8HJ		
Proposed Development:	Demolition of existing dwelling and erection of 4No. dwellinghouses, 2No.3 bed and 2No. 4 bed with associated parking and widening of access to Lovedean Lane.		

Observations / Comments:

I have reviewed the context of this site, and note no contamination or air quality concerns. I have also reviewed the application documents, and would like to make comment as regards the OPUS drainage strategy submitted.

The OPUS strategy identifies the existing connections at the property as being combined. This would be unusual for a build of this date, but may be the case. The existing connections are not relevant to a wholesale redevelopment of the site, and would not appear justifiable to propose a surface water connection to a foul system on a new-build property, especially where the sewer maps indicate the presence of a public surface water system within 8m of the curtilage of the development site.

I appreciate that it may be inconvenient for the developer to make a connection which is compliant with the Building Regulations, however it is entirely feasible to do so, and so would be entirely reasonable to require it.

The Design & Access Statement makes reference to sustainability, but the drainage strategy gives very little thought to the breadth of possible options within the 'sustainable urban drainage' toolkit, drawing a very rapid conclusion that the least sustainable option is the only feasible one.

I note that Building Control has not picked up on this issue, and that neither HBC's own engineers, nor the LLFA has been consulted on this application. It is not currently clear that the proposals are compliant with local policy relating to sustainability, or high quality design, and it is unclear whether the implicit proposal (attenuation chambers and hydrobrake chamber with unspecified capacity or discharge rate) would be compliant with pollution policy, with reference to the development's unnecessary contribution to the occurrence of emergency discharges from the local WWTW's to internationally protected habitats.

Similarly, no consideration has been given to the increase in runoff rate that will result from the increase in the proportion of hard-surfacing at the site.

I would suggest that it is appropriate for the applicant to consider improvements to the submission as regards the management &/or use of surface water. For example, filter strips, rain gardens, permeable paving collection systems, and rainwater harvesting are all options that would not require favourable infiltration conditions. At a minimum, surface water should be disposed of at the appropriate adjacent public segregated system.

If you are minded to grant consent, it is considered reasonable to address these matters by way of a suitable condition. The suggested wording below is equivalent to that typically used by the Environment Agency for small-to-medium residential development.

Condition 1 - Sustainable Urban Drainage

No development shall take place until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The drainage strategy should demonstrate the surface water run-off generated up to and including the 1 in 100 year (with an allowance for climate change) will not exceed the run-off from the existing site following the corresponding rainfall events.

The drainage scheme should:

- 1. Provide an assessment of how the site is currently drained, its existing runoff rates and the proposed runoff rates. It should demonstrate that the combined flow from the proposed development does not exceed existing rates.*
- 2. Demonstrate the surface water run-off generated up to and including the 1 in 100 year an allowance for climate change will not exceed the runoff from the existing site following the corresponding rainfall event.*
- 3. Demonstrate the measures employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving waters.*
- 4. Include details of how the scheme shall be maintained and managed after completion. This shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to*
secure the operation of the sustainable urban drainage scheme throughout its lifetime.
- 5. A timetable for its implementation.*
- 6. A written summary of the scheme, including supporting calculations The scheme shall subsequently be implemented in accordance with the approved details before the development is completed.*

Reason: Having due regard to policies DM10, CS15 & CS16 of the Havant Borough Local Plan (Core Strategy) 2011; and the National Planning Policy Framework 2012; To ensure appropriate & sustainable management of surface water runoff from the development site, and to prevent the increased risk of flooding off site .

No objections in principle.

Mr. Jonathan Driver
Environmental Control Officer