

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/17/01874	Your Ref:	APP/16/00583
EH Case Officer Extn:	44 6677	Date:	06 October 2017
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/16/00583		
Site Address:	Plot 1 - The Retreat, Croft Lane, Hayling Island		
Proposed Development:	Demolition of existing stable block and erection of 1No. dwelling incorporating swimming pool and detached double garage. (Approved 17.11.16). Discharge of condition No/s 2, 5, 7, 8, 9, 10 and 11 (26.06.17). A request has been made to discharge the following condition(s) on the above application: Condition 2: Condition 5: Condition 7: [Drainage Layout]. Condition 8: Condition 9: Condition 10: [...Contamination Watching Brief] Condition 11: [...Noise]		

Observations / Comments:

I have reviewed the submitted information, and would like to make comment in respect of information pursuant to the discharge of Condition 7, and condition 10. I understand that Laurent has already made representation under separate cover with respect to condition 11.

Condition 10, Contamination

It would appear that the information provided consists solely a statement under section 8 of the cover letter that the requirements of this condition *will be* met. By definition, as c.7 has not been discharged, development should not have commenced on site, and it cannot therefore be known whether any source of contamination will be encountered as works progress.

Condition 10 has a 'prior to occupation' restriction, not a 'prior to commencement'. In this way, c.10 does not prevent the applicant proceeding with works, and discharge of the condition is neither required nor appropriate at this time. The applicant should apply for discharge of c.10 at some point (as convenient) between the completion of groundworks and completion of the development.

I would object to the discharge of c.10 on this basis, as to do so would nullify the reason for imposing it.

Condition 7; Drainage

I note that Steve Mountain has already responded to this consultation - and I do not wish to over-step my bounds. I did however have some observations not picked up in Steve's response that I believe would be useful to put forward.

The foul connections to extant system are noted - I have no objections to the layout or destination. I have this part of the public system as foul, and not as "combined", and so it follows that rainwater (roofwater) should not be over-flowing to the foul system.

I note the comment regarding coastal shallow groundwater, and the position of the property <300m from the harbour, on permeable river terrace sands. Depth to groundwater is unknown, similarly it's seasonal range is not known.

As best as I am able to ascertain, the proposals for surface water (roof water) drainage are a closed system, discharging to a nominal 5000L storage tank without apparent overflow facility. I note that the rainwater harvesting system is proposed to be for garden watering only. I have several concerns relating to this system, namely:

- No calculations have apparently been undertaken to appropriately size the tank to accommodate the required volume rainwater for a closed system to function with adequate protection from surcharging to surface & causing localised flooding at the property.
- The greatest demand for rainwater storage capacity will by definition be during seasons where water demand in the garden is at it's least.
- No alternative use for stored rainwater is proposed to ensure a winter demand, and thus maintenance of capacity, during wet seasons.

For these reasons, the proposals would not appear to be adequate. I would suggest that the applicant consider utilising rainwater in the home - for example, in the washing machine and for toilet flushing, to ensure winter demand, and reduce overall storage requirement (a 5000L tank is likely to fall well short of requirements for a closed system with garden watering use, as proposed). If considering this option, the applicant should be aware that siltation / floatation trap on the feeder run, and post-pump filtration may be beneficial (both low cost additions).

Alternatively, an over-flow provision should be made. It is possible that the local sandy soils would support a shallow infiltration drainage solution, though suitability of soil would need to be physically confirmed on site.

The applicant should also be aware that where used in raw/natural, uncoated form zinc is a phytotoxic material, which is liberated from roofing materials in small but potentially significant quantities by slightly acidic precipitation. Use in garden watering could adversely impact plant growth. The same is true of alternative roofing materials such as copper.

It is also worth noting that over time, leaching from roofing materials to an infiltration drainage feature could lead to local contamination of receiving soils at concentrations that could be considered significant. This should be borne in mind when considering overflow options, and it may be worth the applicant considering overflow options and roofing material selection concurrently, to ensure compatibility.

At this stage it would appear to me that the drainage plans as they relate to surface waters are insufficiently developed (or insufficient illustration has been given) as to support a favourable decision as regards formal discharge.

With reference to the engineers comments as regards anchoring of the pool to combat the risk of floatation, it is worth noting that the same logic applies to the harvesting tank.

From a sustainability perspective, the adoption of rainwater harvesting is encouraged - and I would not wish these comments to be interpreted as advocating a less sustainable solution. Any system implemented does however need to be fit for purpose, and of appropriate capacity for it's intended duty.

Other than as it relates to pollution, this matter falls outside the formal remit of Environmental Health, and it is for this reason I am not making a formal recommendation. I flag these issues for the benefit of the applicant, and for the Development Management team to follow up as appropriate.

Mr. Jonathan Driver
Environmental Control Officer