

From: Natalie Fellows
Sent: 26 April 2022 00:18
To: Eaves, David
Subject: FW: APP/21/00200 32 New Lane, Havant - Drainage Conditions & others outstanding

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Hi David,

I hope you had a nice Easter.

Are you in a position to discharge Conditions 11 in relation to Contamination and Condition 17 in relation to pilling now? I am keen to receive approval of any remaining pre-commencement conditions as we approach the commencement stage.

The other critical conditions relate to drainage.

Our drainage engineers have produced the below response to the EHO questions in blue. I understand all other consultees are happy with the information provided.

With regards to the long-term maintenance agreement, I can confirm that the maintenance will be in accordance with our drainage strategy to cover the point in C.15.

Any further questions please let me know.

I am keen to serve the Commencement Notice in line with the S106 requirements as soon as possible to enable invoices to be raised for highway works etc. We anticipate commencement starting in May (ground works) but I am awaiting the exact date.

Kind regards, Natalie.



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From: "Eaves, David"
Date: Tuesday, 5 April 2022 at 17:43
To: Natalie Fellows
Subject: APP/21/00200 32 New Lane Conditions

Good afternoon Natalie

I refer to the discharge of conditions at the above site and note that you have been in contact with Portsmouth Water directly and would comment as follows:

Condition 11 Contamination:

Environmental Health, Environment Agency and Local Lead Flood Authority raise no objection to discharge.

Portsmouth Water required further information and were re-consulted in relation to your additional details by email 16th March 2022. I have received the following response:

*Dear Havant Borough Council Planning Services,
Thankyou for you correspondence dated 17th March 2022 in regard to the reconsultation request for APP/21/00200 concerning 32 New Lane, Havant.*

Thankyou for the clarification in regard to the timeline of contamination investigations for which we have provided comment under Condition 11. Following the review of this information we would request to be consulted on Condition 12 concerning the Verification Reports and the updated position regarding Barrier Pipe use.

I have now emailed Portsmouth Water to ask them to confirm whether they are content for condition 11 to be discharged as this is not clear to me. I note that condition 12 has yet to be submitted and we will consult Portsmouth Water once this has been received.

Condition 14 Foul and Surface Water Drainage

Southern Water, Portsmouth Water and the LLFA raise no objection to discharge. I have emailed Jonathan Driver to confirm whether there are any remaining issues from the Environmental Health perspective.

Condition 15 Long Term Maintenance arrangements for Surface Water Drainage System

Southern Water, Portsmouth Water and EA no comments. LLFA no objection to discharge.
Comments from Environmental Health provided below:

Re: c.15;

- I note that 3.9.3 includes a maintenance table directly reproduced from SuDS Manual - by definition in line with guidance

- 3.9.4 & 3.9.5 similarly reproduce SuDS manual recommendations, but refer to 'guidance' and 'typical maintenance schedule' – it is unclear that listing the v.11 drainage strategy as an approved document would actually secure maintenance in line with the tables presented (in principle, might not be enforceable, and so might not be adequate to demonstrate that c.15 has been met)
- 3.9.5 refers to proprietary systems. I am unclear as to which elements of drainage infrastructure this section refers to, given that 3.9.2 refers specifically to oil separators / petrol interceptors, and no other proprietary treatment is proposed.
3.9.5 Was for Quadraceptors and should have been removed from the latest issue.

Please provide a response to the above points for consideration.

Condition 16 Drainage System

Environmental Health have raised the following issues:

I might interpret c.14 as concerning the disposal destination for surface water & foul wastewater, given it's use of the language 'means of... disposal', and 'in consultation with Southern Water. c.16 probably concerns the adequacy of the site internal network.

On that assumption, I'd highlight just a couple of point Re: c.16;

- Section 3.4 describes the interceptor units specifically as petrol interceptors, to prevent potential contaminants 'in the form of hydrocarbons from oil spillages' – in principle excluding the attenuation of suspended solids &/or DNAPL. In practice, most petrol interceptors are combined / multi-pollutant attenuators, but the strategy does not provide details of the interceptors, e.g. manufacturer, model, or specification / capacity of the units. Flow according to nominal size (NSB) is labeled for each petrol interceptor within C200810-PIN-XX-XX-DR-C-00205 P13. Interceptors can be selected amongst complete manufacturers using the respective NSB size. Any flow in excess of the nominal size is allowed to bypass the separation chamber, thereby keeping the separated and trapped oil safe.
- Section 3.9.3 refers to a catchpit manhole upstream of each cellular attenuation tank, which will capture suspended solids (TSS), but C200810-PIN-XX-XX-DR-C-00205 P13 doesn't identify any catchpit chambers, and the South/West Catchment bypasses both of the specified tanks. Catchpit manholes are identified in the manhole schedule C200910-PIN-XX-XX-DR-C-00207 attached.
- It would appear that inputs from rainwater downpipes associated with the MSVP structure (south / west catchment), and warehouse roof/van loading canopy (north catchment) are not segregated from the flows being directed to the petrol interceptors. Best practice is to separate flows, to ensure maximum capture efficiency – it is not unacceptable for an interceptor unit to manage a combined flow, but the unit capacity / specification will need to account for the additional flow volume. In line with the first point above, it is not clear from the strategy that appropriate units have been / will be specified.
The Warehouse roof drainage will be conveyed via the central network which is not treated by petrol interceptor. Rainwater from the MSVP will be treated by petrol interceptor due to risk of contamination from vehicles using MSVP, this volume has been allowed for with the sizing of the petrol interceptors.
- The removal of the Quadraceptor tertiary treatment units might justify seeking assurance that the petrol interceptor units (as a primary pollutant attenuation measure) will be adequate.
The updated treatment train includes petrol interceptors, catchpits, and slotted-lined attenuation tanks and is sufficient for the contamination risks for this site.

- 3.9.3 also includes reference to a perforated / slotted 'distribution' pipe, providing filtration / treatment – It is assumed from C200810-PIN-XX-XX-DR-C-00205 P13 that the permeable surface collection system is to be a tanked/sealed system, and 3.9.3 meaning 'collection' and not 'distribution' – but development management may wish to confirm this. The attenuation crate specified (SDS Geolight) will have a slotted distribution pipe that will act as a level of treatment to stored water.

Please provide a response to the above comments and revised details as appropriate.

Condition 17 Piling

Please confirm that the two documents:

Havant – Pile Proposal(2) and Havant – Ground Improvement Proposal (1) are formally submitted for consideration.

I note that Portsmouth Water responded to you with the following comments:

Thank you for the further documentation regarding the piling proposals for the development in relation to Condition 17.

Previous site investigations on site have identified London Clay to a depth of 20 mbgl (max depth of boreholes). From our interpretation the maximum depth of the piles will be 17mbgl and therefore providing a minimum of a 3 metre gap as a buffer between the foot of the piles and the underlying chalk aquifer. I can confirm on receipt of these documents and confirmation of the maximum depth of piles will be 17m we have no objections to the discharge of Condition 17. If the piles are greater than 17 mbgl we wish to be further consulted before we are satisfied with the discharge of condition 17.

I have asked Portsmouth Water to provide me with formal comments based on the additional details but they may request a formal consultation following the formal submission of the additional details.

Condition 27 Hardsurfacing

Landscape Team confirmed revised details acceptable – Condition discharged today.

Condition 28 Employment and Skills Plan

This is a compliance condition – however, I would request an update in relation to progress on the Employment and Skills Plan requirements.

I trust that this is a helpful update and await further details/clarifications as set out above.

Regards

David Eaves

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