

Havant Borough Council
Development Control
Civic Offices Civic Centre Road
Havant
Hampshire
PO9 2AX

Our ref: HA/2013/114492/04-L01
Your ref: APP/14/00026
Date: 11 August 2014

Dear Sir/Madam

REVISED RESPONSE TO DISCHARGE OF CONDITION NOS 8 AND 26 OF FULL PLANNING PERMISSION APP/12/01222 AND CONDITION 28 OF OUTLINE PLANNING PERMISSION APP/12/01222

MANOR FARM AND COPSEYS NURSERY, HALLETT ROAD, HAVANT

Thank you for consulting the Environment Agency on the above Discharge of Conditions.

We are still not in a position to recommend the Discharge of Conditions 6 and 28 for the same reasons stated in our letter of 18 March 2014 (our reference HA/2013/114492/02):

- The plan showing the overflow from the permeable sub-base into the balancing ponds does not demonstrate how it will safely transfer surface water from across the site when groundwater levels are high.
- There are no details showing how exceedance flows will be managed safely within the site.
- There are no calculations supporting the proposed method of preventing the lining of the attenuation ponds from floating when groundwater levels are high.
- The design of the private soakaways does not use the precautionary principle, may increase risk to the existing properties to the west, and as shown will make some properties responsible for the drainage of others.

MJA have submitted a letter (dated 30 April 2014, their reference: CP/13:0262/4527) in response to these points, however none of the points have been satisfactorily addressed. Please find below further comments regarding these points, which should be read in conjunction with our previous letters:

Transfer of Surface Water runoff into Ponds

The letter states that overflows with the capacity of 88l/s will be installed to transfer

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runoff from the subbase into the ponds. Given that the developed runoff rates within the original Flood Risk Assessment (FRA) are 322l/s for the 1 in 1 year and 1046l/s for the 1 in 100 plus climate change, how will the overflows cope with these higher rates?

Exceedance Flows

The additional information consists a plan showing a single overland flow route and a statement that runoff will be contained within the highway. Further detail is needed to demonstrate this for the whole site, and design details should be produced to show where raised pavements and/or dropped kerbs are required. The details should also demonstrate that the overland flow can be safely contained, in line with CIRIA publication C635 Designing for Exceedance in Urban Drainage - Good Practice.

Pond Lining Calculations

The letter states that the highest groundwater depth recorded was 0.45m BGL, with a level of 12.75mAOD. The records in the original FRA show depth the closest borehole to the ponds, borehole 5, was actually 0.31m BGL.

The ground level at this borehole is 13.60mAOD, making the groundwater level there 13.29mAOD - this is above the base of the ponds.

The letter includes a simple buoyancy calculation for the pond liner. However, this has been calculated for the base of the pond, rather than the liner itself, which from the details provided would be a further 0.5m deeper below ground. This makes the uplift force in the calculation greater than the forces acting against it. These calculations need to be rerun.

Soakaway Design

The letter states that the infiltration rate used in the soakaway calculations was not the best available. This is not the case in the calculations provided to us, where the best available infiltration rate has been used.

The letter also states that some soakaways do not have an overflow connection. The number of these and the total volume, along with the proposed mitigation, should be identified.

Further design work is also needed to demonstrate that connecting the overflows from soakaways on the western and northern edges of the development to the proposed land drain will not adversely affect properties.

Condition Status

Until the drainage scheme is revised to address the above concerns then the Environment Agency cannot recommend that the conditions be discharged.

All of the above points need to be addressed in a single, comprehensive drainage strategy, rather than a piecemeal series of letter and notes.

If you have any queries regarding the information set out above, please contact me on the details below.

Yours faithfully

Miss Verity Giles
Planning Advisor, Environment Agency

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