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

Our ref: HA/2013/114492/02-L01
Your ref: APP/14/00026

Date: 18 March 2014

Dear Sir/Madam

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 application, which was received on the 13 February 2014.

Environment Agency Position
We are unable to recommend the Discharge of Condition 26 of Full Planning Permission APP/12/01222 and Condition 28 of Outline Planning Permission APP/12/01222 at present. This is for the following reasons:

- 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.

<u>Advice to Local Planning Authority</u>

Condition 26 of Full Planning Permission APP/12/01222 and Condition 28 of Outline Planning Permission APP/12/01222 requires that:

"No development hereby permitted shall commence on each phase until such time as a

surface water drainage scheme for that phase, 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 scheme shall be fully implemented for that phase before the dwellings are occupied and thereafter managed and maintained in accordance with the approved details. These details shall include:

1. Information about the design storm period and intensity, the method employed to delay and control the surface water discharge from the site and the measures taken, including petrol/oil interceptors, to prevent pollution of the receiving surface waters;
2. Calculations to demonstrate that the capacity of the attenuation pond is adequate and may exceed the needs of sustainable drainage; and
3. a timetable for its implementation of i. above; and
4. a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangement to secure the operation of the sustainable urban drainage scheme throughout its lifetime."

The conditions require details to be submitted prior to the commencement of development. However we note that construction on the site started last year.

MJA, who are the drainage consultants acting on behalf of the developer, have submitted a short report responding to comments we made after the granting of planning permission last year. Their comments address some of the outstanding concerns we had regarding the drainage, however there are still issues that need resolving.

If groundwater levels are high, then the private soakaways are designed to overflow into an infiltration trench contained within the permeable sub-base of the estate roads. This overflow is then transferred into the attenuation ponds along the east of the development. However, the details do not show what the capacity of the sub-base is, and in particular, whether or not the overflow from the soakaways can be safely transferred across the development if the permeable sub-base already contains water. Supporting calculations should be provided to demonstrate this.

There are no details showing that the overflow structures connecting to the ponds can transfer the volume of water generated by the development safely if groundwater levels are high.

It is proposed to stop the lining of the pond floating by means of a thick layer of aggregate reinforced with a geogrid. This is fine in principle, however no calculations have been provided to show that this is sufficient to prevent uplift when groundwater levels are high. These should include water pressures and design loadings.

The drainage plans show overflows from the private soakaways entering the land drain running across the western and northern edge of the development. The land drain was intended to allow the existing properties to the west to drain through the site, given that the development is to be raised. No assessment of the impact of allowing overflow from the private soakaways into this drain has been made.

The soakaway design included within the report is based upon the best soakage rate obtained from the ground investigations carried out as part of the Flood Risk Assessment (FRA). Given the variable soakage results obtained in the preliminary investigations, the soakaway designs should use the infiltration rate from

the closest test. Further tests may be required across the site to achieve this. At the least, the worst soakage rate should be used in the design in line with the precautionary principle.

The drainage plans also show some properties share a single soakaway, and that the overflow pipes in places cross neighbouring properties. This creates a situation where some properties may be responsible for the drainage of other properties, and conversely, that some properties will be reliant upon others for their drainage. The drainage details should be amended to avoid this situation - if unavoidable then consideration should be given to handing ownership/responsibility for these elements to the management company.

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

Diversion of Ordinary Watercourse

The development includes the diversion of a section of ditch that runs through the northern section of the site. This ditch is classified as an ordinary watercourse, and as such the prior consent of the Hampshire County Council, who are the relevant Lead Local Flood Authority under the Flood and Water Management Act 2010, is required for the diversion. Contact details for their consenting department can be found at http://www3.hants.gov.uk/flooding/watercourses.htm.

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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