

Mrs Sally Smith
Havant Borough Council
Hampshire
PO9 2AX

Our ref: HA/2013/114866/01-L01
Your ref: APP/13/00911
Date: 30 October 2013

Dear Mrs Smith

RESERVED MATTERS APPLICATION RELATING TO PLANNING PERMISSION APP/10/00737 FOR PLOT 1 OF NEW BUSINESS AND INDUSTRIAL DEVELOPMENT AND ASSOCIATED DISCHARGE OF CONDITIONS [3(I) THE RESERVED MATTERS: A, B, C AND (II) OTHER MATTERS: D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, W] TOGETHER WITH DISCHARGE OF CONDITIONS 4, 7, 8, 9, 10 AND 12 RELATING TO THE WHOLE DEVELOPMENT SITE.

HAVANT BOROUGH COUNCIL DEPOT, SITE 4, HARTS FARM WAY, HAVANT

Thank you for consulting the Environment Agency on the above application, which was received on 3 October 2013.

Environment Agency Position

The Environment Agency is unable to recommend the Discharge of Conditions 3, 7, 9 and 10 of Planning Permission 02/52646/016.

Reasons:

The drainage strategy (redacted) document provide a layout for the surface and foul drainage. However details for any pollution prevention measures have not been included; therefore, we do not recommend the discharge of this condition (3).

Inadequate information has been provided regarding the proposed relocation route and the buffer to the river to discharge the condition with respect to conveyance of water through the site (7).

Inadequate information has been provided to show that flood risk to the development site and surrounding area will be adequately managed by the proposed surface water drainage scheme; therefore we cannot recommend the discharge of condition 9 at this stage.

With regards to condition 10, no information has been submitted to detail any pollution prevention measures. Therefore we do not recommend the discharge of this condition.

We support comments made by Jonathan Driver of Havant Borough Council regarding land quality issues around Condition 7. Further information is required to address the issues associated with land quality and potential pollution of the water environment.

Condition 7

Although cross sections through the proposed river corridor have been provided, partially due to the lack of scale on the plan, it is not clear that an adequate buffer has been provided along the river. A written summary and more detail are required before the condition can be discharged.

In addition, we require full details of the watercourse realignment, to include;

- Scale drawings of the proposed streams works.
- Construction methodology.
- Details to demonstrate how the biodiversity value of the stream will be enhanced and protected.
- Plans showing the extent and layout of the buffer zone.
- Details of the proposed planting scheme (this should include planting native species).
- Details demonstrating how the buffer zone will be protected during development and managed/maintained over the longer term including adequate financial provision and named body responsible for management plus production of detailed management plan.
- Details of any proposed fencing, lighting etc.

Condition 9

We have reviewed the drainage strategy submitted as part of the planning application, and whilst we welcome the intention to attenuate runoff rates to as close as possible to Greenfield runoff rates, there are number of issues with the proposed drainage strategy that need to be resolved before we can recommend the discharge of condition 9.

We outlined these issues in our letter to the applicant dated 15 August 2013 (ref HA/2013/114572/01-L01).

In particular, we are concerned about the discharge of highways drainage directly into the stream without attenuation. The volume and rate of discharge from the access road should be calculated and included within the total proposed discharge from the site, for clear comparison with the existing discharge.

Section 3.1.11 states that shallow cellular storage is proposed beneath the car park area. Though the drainage calculations in appendix E show that approximately 630 m² of storage has been included in the proposed cellular storage area, there are no calculations within the report as to how much storage is required based on the site runoff. Further clarity within the main body of the report should be provided as whether the amount of cellular storage provided is adequate for the amount of storage required.

Given the low invert levels of both outfalls, the impact of tide locking needs to be considered within the drainage strategy. Additional storage may be required to account for backing up water if tide locking were to occur.

It is stated that flooding may occur during a 1 in 100 year event and that any ponding of surface water should not present a risk. Whilst the appendices calculate the flooded volume during a 1 in 100 year event and show the pipe runs affected, there is no indication as to the depth and extent of flooding. In line with CIRIA C635 "Designing for Exceedence in Urban Drainage", short-term surface flooding in events in exceedance of the 1 in 30 year return period is acceptable, so long as this can be safely stored without risk to people.

The discharge rates from the site are stated for the 1 in 2 and the 1 in 100 events in appendix D. The proposed discharge in the 1 in 1 and 1 in 30 should also be included for comparison with the greenfield runoff rates. The hydrobrake arrangements also need to be confirmed - the drawing of the hydrobrake chamber for network 2 (Eastern) in appendix D shows a twin hydrobrake arrangement yet the calculations in appendix E only show a single hydrobrake.

Please note that a timetable for the implementation of the proposed surface water drainage scheme needs to also be provided.

There is no indication within the submitted details as to who will own and maintain the drainage scheme. It is vital that arrangements are in place to ensure the long-term functioning of the drainage system as designed.

Until the drainage scheme is revised to address the above concerns then the Environment Agency cannot recommend that condition 9 be discharged.

Flood Defence Consent

Please be aware that the proposed development involves relocating designated main river.

Under the terms of the Water Resources Act 1991, and the southern region land drainage and sea defence byelaws, prior written consent of the Environment Agency is required for any proposed works or structures, in, under, over or within 8m of designated main river.

Consent will only be issued if the works do not pose a flood risk to people and property, and do not conflict with the Environment Agency's other duties.

Please note that this is a separate requirement to planning permission and that consent cannot be issued retrospectively.

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

Yours sincerely

Miss Verity Giles
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