

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

Our ref: HA/2012/113728/02-L01
Your ref: APP/12/00772
Date: 12 March 2013

Dear Sir/Madam

RE-CONSULTATION ON THE ERECTION OF 81 DWELLINGS CONSISTING OF 10NO. 1 BED FLATS, 12NO. 2 BED FLATS, 6NO. 2 BED HOUSES AND 53NO. 3 BED HOUSES, CONSTRUCTION OF ACCESS FROM RANELAGH ROAD, PROVISION OF LANDSCAPING, OPEN SPACE AND ASSOCIATED WORKS.

LAND SOUTH OF RANELAGH ROAD, HAVANT

Thank you for re-consulting the Environment Agency on the above application, which was received on 18 February 2013.

Environment Agency Position

We can confirm that the Environment Agency has no objection in principle to the proposed development as submitted; however, we request that the following planning conditions be attached to any planning permission granted in order to make the development acceptable.

Planning Conditions:

The Environment Agency requests that the following conditions be attached to any planning permission granted, and that details in relation to these conditions (and on which the Environment Agency would wish to comment) be submitted to and approved by the Local Planning Authority:

No development shall take place until a surface water drainage scheme for the site, 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 drainage strategy should demonstrate the surface water run-off generated up to and including the 1 in 100 years 30% critical storm will not exceed the run-off from the undeveloped site following the corresponding rainfall events. The scheme shall subsequently be implemented in accordance with the approved

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details before the development is completed.

The scheme shall also include:

1. Information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;
2. A timetable for its implementation; and
3. 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 arrangements to secure the effective operation of the sustainable urban drainage scheme throughout its lifetime.

Reason: To prevent the increased risk of flooding, both on and off site.

No development approved by this planning permission shall take place until a remediation strategy that includes the following components to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

1. A preliminary risk assessment which has identified:
 - all previous uses
 - potential contaminants associated with those uses
 - a conceptual model of the site indicated sources, pathways and receptors potentially unacceptable risks arising from contamination at the site.
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the express written consent of the local planning authority. The scheme shall be implemented as approved.

Reasons: The site lies above the Lewes nodular chalk formation, a principal aquifer and within the groundwater Source Protection Zone 1 for the Bedhampton and Havant Springs water supply. Contamination may be present at the site as a result of its historical use(s). Any contamination present may pose a risk groundwater underlying the site and potable supplies.

No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall

include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a “long-term monitoring and maintenance plan”) for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Reasons: The site lies above the Lewes nodular chalk formation, a principal aquifer and within the groundwater Source Protection Zone 1 for the Bedhampton and Havant Springs water supply. Contamination may be present at the site as a result of its historical use(s). Any contamination present may pose a risk groundwater underlying the site and potable supplies.

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unsuspected contamination shall be dealt with and obtained written approval from the local planning authority. The remediation strategy shall be implemented as approved.

Reasons: The site lies above the Lewes nodular chalk formation, a principal aquifer and within the groundwater Source Protection Zone 1 for the Bedhampton and Havant Springs water supply. Contamination may be present at the site as a result of its historical use(s). Any contamination present may pose a risk groundwater underlying the site and potable supplies.

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: The site lies above the Lewes nodular chalk formation, a principal aquifer and within the groundwater Source Protection Zone 1 for the Bedhampton and Havant Springs water supply. Piling or any other foundation using penetrative methods can result in risks to potable supplies from, for example, mobilising contamination. Thus it should be demonstrated that any proposed piling will not result in contamination of groundwater.

Advice to Local Planning Authority / Applicant

The proposed development is located within an area shown as Flood Zone 1 on the Environment Agency's indicative flood zone map. The site is therefore considered to be at a low probability of flooding over its lifetime.

The increase in impermeable area resulting from the development will need to be managed to ensure that runoff rates and volumes are not increased and the site does result in an increase in flood risk to offsite areas.

A drainage strategy incorporating property soakaways and porous paving linked to a detention/infiltration basin for the private and public roadways has been put forward. If the principle of infiltration drainage is accepted it must be established that these

options are feasible, can be adopted and properly maintained and would not lead to any other environmental problems. Where the intention is to dispose to soakaway, these should be shown to work through an appropriate assessment carried out under Building Research Establishment (BRE) Digest 365.

If infiltration methods are used to manage surface water runoff the Agency would expect to see the system designed according to the following criteria:

- There should be no surface flooding resulting from the surcharging of the drainage system for storm events with a return period of up to 1 in 30 years.
- For storm events exceeding this surface flooding may be acceptable for short periods providing water is routed away from buildings, access ways and does not increase risk off site.
- There should be no flooding of buildings as a result of storms up to the 1 in 100 30% (climate change allowance) event.

If surface water runoff is going to be managed by attenuation to a watercourse or sewer system the following additional criteria should be adhered to:

- The drainage system should be designed so that surface water runoff rates from the developed site are no greater than the greenfield runoff rates from the site, for a range of storms including the 1 in 2, 1 in 30 and 1 in 100 30% events.
- Long term storage must be provided to cater for the additional runoff volume generated by the development compared to the volume that would have been contributed from the site in its Greenfield state.

We have reviewed the Phase 1 Desk Study and Ground Investigation Report on the Land South of Ranelagh Road, Havant (Report refs 13284/DS and 13284/GIR) submitted by Soils Limited.

We can confirm that the reports are broadly acceptable.

The Desk Study refers to the Groundwater Regulations (1998) which have since been superseded by Environmental Permitting Regulations (2010). To bring the reports in line with current legislation this should be rectified.

The Desk Study does not refer to the sensitive nature of the site location, as this lies on a Principal Aquifer (Lewes Chalk Formation) which lies below the Secondary A aquifer (superficial deposits). We would like to stress the importance of protecting the groundwater in this location (SPZ1) due to the position of the nearby potable water abstraction. In addition to this we consider the distances to groundwater potable abstractions to be less than stated in the report. We estimate that the distance from the edge of the proposed site to the nearest abstraction to the north east is approximately 129m, and the distance to the abstraction to the west is approximately 186m (and not 218m as stated in the report).

The Ground Investigation Report provides some information on soil and groundwater sampling. The report shows that a limited number of samples have been taken and at shallow depths. The east of the site has not been sampled, in an area of potential contamination. As recommended in Section 5.2 of the Ground Investigation Report, we insist that further investigation of the area to the east of the site is carried out to identify

any contamination sources.

It has not been possible to interpret the groundwater contamination of the Ground Investigation Report as the data has not been provided in the appendix, and the results from WS2 have not been reported in the summary in Section 7.2. We require that groundwater data is provided from all borehole locations (WS1-WS4).

We agree that further groundwater monitoring is undertaken immediately prior to commencement of site works, and again post demolition to ensure potential groundwater contamination is not mobilised as a result of the site works.

We recommend that developers should:

- Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination, when dealing with land affected by contamination.
- Refer to the Environment Agency Guiding principles for land contamination for the type of information that we required in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
- Refer to our website at www.environment-agency.gov.uk for more information.

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

Direct dial 01794834590

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