

Winchester District Local Plan Part 2 – Development Management and Site Allocations

Examination – July 2016

Winchester City Council

Response to Inspectors Questions:

Matter 12 Wickham
Question i) and ii)

Library Reference: WCC FS Matter 12



Matter 12: Wickham

Inspector's Questions:

- i) Are the policies and proposals for growth and change in this area appropriate and justified, including in relation to the NPPF/PPG, and in terms of environmental, economic and social impacts?
- ii) Are they clear and deliverable, including in respect of the associated infrastructure requirements?

Introduction and background:

1. The development requirement for Wickham is established in LPP1 under Policy MTRA2, which specifies 'provision for about 250 new homes' and also requires that development needs should be met 'within existing settlement boundaries in the first instance'.
2. The capacity for development within the existing settlement boundary was assessed at paragraph 4.8.5 of the Local Plan:

| Category | No. of dwellings |
|---|------------------|
| a. Requirement (2011-2031)* | 250 |
| b. Net Completions 1.4.2011 to 31.3.2015 | 5 |
| c. Outstanding permissions at 31.3.2015 | 49 |
| d. SHLAA sites within settlement boundary | 0 |
| e. Windfall allowance | 0 |
| f. Total supply (b+c+d+e) | 54 |
| Remainder to be allocated (a – f) | 196 |

3. Following community involvement during 2013 and 2014, there was a clear preference for development to be spread across 3-4 sites. The nature of the available and suitable sites resulted in 2 site allocations being made to meet LPP1 development requirements and the need for sustainable development in line with the NPPF/PPG. Details of the community involvement are set out in the [Council's Regulation 18 Consultation Statement \(OD5\)](#): section 3 provides a summary for Wickham, up to the Draft Plan stage.
4. The [Housing Site Assessment Methodology](#) (EBT4) sets out the approach to identifying sites, with the settlement specific summary for Wickham at section 13. Specific evidence was collated for various matters such as open space (EBW4), historic environment (EBW5), transport (EBW1, 2) and landscape sensitivity (EBW3), see also [Background work with Parishes on LPP2](#). A shortlist of 4 potential sites was developed in conjunction with the Parish Council and there were discussion with the respective site promoters. Two sites were selected which best met the selection criteria and local needs (listed at paragraph 13.11 of EBT4) and there was public consultation on these.

5. The majority of respondents supported the proposed development strategy (61%). There was significant objection (20%) to the development of land at The Glebe (site 2438), with land at Mill Lane (site 1908) being the main alternative suggested (14%). Whilst there are some planning merits to site 1908, the Winchester Road site (1909) and The Glebe (site 2438) were considered to form the most suitable strategy and included in the Draft Local Plan, as mixed housing and open space allocations.
6. The issue of drainage and flooding was also raised from the outset and during the public consultation exercises and LPP2 includes a policy specifically relating to drainage issues in Wickham (WK1).

Key issues during consultation

7. Most respondents' comments are supportive of the Plan, including Hampshire County Council, Fareham Borough Council, the Environment Agency, Historic England and several residents. In general, the main objections raised in the representations on LPP2 are:
 - the site selection process;
 - the justification for policy WK1 on drainage; and
 - the detailed site allocation policies (WK2 and WK3).

Site Selection

8. One respondent questions whether the sources of housing supply in the above table will be achieved, and promotes a site at Wickham Golf Club (Tanfield Lane) for about 70 dwellings. There is clear development interest in bringing forward the WK2 and WK3 sites and Appendix 3 of Background Paper 1 (OD15) provides details. The only other source (apart from completions) is outstanding permissions of 49 units, which mostly comprises a sheltered housing scheme at Winchester Road which is now largely complete (McCarthy & Stone).
9. Accordingly, the housing requirement for Wickham is likely to be met or exceeded. In any event, the Wickham Golf Club site performed badly in terms of the site selection criteria – see Report to Cabinet Local Plan Committee 16 September 2015 (WCC3) Appendix G. Accordingly, it does not warrant allocation, whether instead of or in addition to land at Winchester Road and The Glebe.
10. The other 'omission' site at Mill Lane (SHLAA site 1908) is promoted by Bloor Homes as an alternative to The Glebe (WK3). The matters raised by the respondent were addressed in Appendix G of the Report to Cabinet Local Plan Committee 16 September 2015 (WCC3).
11. There was extensive consultation during the site selection process and a full report of the process and results was produced – see [Wickham LPP2 Consultation Report](#) (EBW16). The consultation was objective, well-informed, and widely publicised, with a leaflet and comment form delivered

to all households in the village and the evidence studies available on the Council's web site. The proposed strategy was supported by over 60% of respondents to the consultation and, while the respondent claims to have carried out an independent community consultation, it is not clear how wide this was.

12. Whilst there is objection to The Glebe proposal, there would also be objection to a strategy which concentrates development to the north of the village, as promoted by Bloors. Ultimately Wickham Parish Council is the elected representative body of the local community and supports the development strategy and Local Plan.
13. The Council has undertaken an objective assessment of the sites and has not used the results of public consultation to the exclusion of planning evidence. The shortlisting of 4 sites was based on the evidence base for Wickham, including assessments of accessibility, landscape sensitivity, historic environment, etc. Public consultation was undertaken so that account could be taken of the public's views, alongside (not instead of) planning considerations. Appendix 1 to Appendix G of WCC3 assesses each site against the selection criteria, with the results of community consultation forming one criterion.
14. WCC3 acknowledges that the Mill Lane and Glebe sites are finely balanced, but concludes that Mill Lane performs slightly less well in terms of site access and contributing to identified community needs. Contrary to the respondent's suggestion, the smaller (southern) part of the Mill Lane site has been assessed and, like The Glebe, is considered 'good' in terms of accessibility. Although Mill Lane is close to the community centre and primary school, both sites are similar distances from the village centre and other facilities are closer to The Glebe than Mill Lane, such as the church and garage. The respondent's proposed footpath link between the Winchester Road site and the Mill Lane open space is not a significant benefit and, for residents of the western part of the Winchester Road site, the existing route via The Circle/Elizabeth Road, Buddens Road and Garnier Park would be comparable in length.
15. The Glebe is accessed directly from the A32 and upgrading of this junction is necessary to accommodate development at Welborne. The development will provide improved pedestrian crossing facilities on School Road. In contrast Mill Lane is a narrow rural lane and, while 'improvements' may be achievable, the works required and 'gateway' feature suggested would impact its rural character.
16. The open space offered by the Mill Lane site does not include sports provision, unlike the allocated sites. The respondent refers to contributing via CIL and S106, which any site could do, and proposes open space types which the allocated sites provide in any event. Open space provision in the northern part of the Mill Lane site would be less well related to the rest of the village than that at The Glebe.

17. Therefore, WCC3 is right to conclude that the Mill Lane site performs slightly less well than The Glebe on certain factors and that the sites are finely balanced on others. Given that only one site is needed, it is appropriate that the views of the public and the Parish Council should be taken into account in deciding which site to allocate.

Policy WK1 – Drainage

18. Flooding and drainage issues featured strongly in consultations on the Local Plan and policy WK1 was included to ensure that future development took proper account of them. The Wickham Flood Investigation Report (EBW15) was commissioned to investigate the causes of flooding in Wickham, by Hampshire County Council (as land drainage authority) in consultation with the Environment Agency, Southern Water and the City Council. It will be noted that the Environment Agency supports policy WK1 and Southern Water also welcomes the policy, while proposing detailed changes to its explanatory text. These suggestions provide welcome clarification and are accepted (see proposed Modifications at Appendix 4).
19. Appendix 1 responds to the issues raised in relation to drainage matters in more detail. Given the drainage problems, which are specific to Wickham, it is necessary to apply a policy which controls development. There is no basis, or evidence, for either failing to have a policy to address the known drainage problems, or for seeking to apply an artificial threshold to allow for specific developments.

Policies WK2 and WK3 – Site Allocations

20. Bewley Homes suggests that the site allocated by policy WK2 cannot accommodate 125 dwellings and that further land to the north (part of SHLAA site 1910) should be allocated for 25 dwellings. This issue was considered in WCC3 (Appendix G), where paragraphs 49-53 indicate that the density proposed is typical of the Local Plan's allocations and that there are no abnormal constraints. The unfavourable comments made by the Council on the pre-application schemes is a reflection of the poor design of the proposals, not an inherent issue with their density.
21. The respondent's evidence shows simply a market preference for larger units, not that smaller units could not be developed or sold. Indeed they accept that the site could accommodate 125 dwellings. LPP1 clearly favours 2 and 3 bed units (policy CP2), as did the outcome of community consultation on the Local Plan. The developer may choose to provide a greater number of larger units and to reduce the site capacity if they wish, provided the proposal is within the terms of policy CP2 and is not wasteful of land. Even if only 100 units were developed on the site, provision for 'about 250' units would still be achieved in Wickham:

| | |
|--|-----|
| Completions / permissions - | 54 |
| WK2 current application (at 100 dwellings) - | 100 |
| WK3 current application (82 dwellings) - | 82 |

TOTAL -

236

22. There would be a 'shortfall' of 14 units if the site were developed for 100 units and a 'surplus' of 11 units if it is developed for 125 dwellings, either of which falls within the scope of 'about' 250.
23. Even if it were considered that additional land should be allocated to make up an alleged 'shortfall', site 1910 would not necessarily be the site chosen. It performs poorly against other sites and the first course of action would be to look at increasing the capacity of the preferred sites. The planning applications for 25 units on site 1910 and 100 units on the WK2 allocation will be refused due to the inefficient use of land, poor design, and drainage issues. It is understood that Bewley Homes intend to submit a new application for close to 125 units on site WK2.
24. Bewley Homes support the allocation of land at Mill Lane for open space and agree to provide it. This will help provide Wickham's need for open space, not simply meet the needs of the development, hence WK2 is a mixed use allocation for housing and open space. This approach has been taken in various settlements and the open space provision can be secured by a S106 obligation, which is necessary to implement the development allocated by the Local Plan. 'Payment in kind' for CIL is discretionary and the Council has not applied it for other Local Plan allocations (e.g. Lovedon Lane, Kings Worthy). However, this is a detailed matter which it is not appropriate to reference in the Local Plan itself.
25. Croudace Strategic supports the allocation of The Glebe site through policy WK3 and comments on drainage matters (addressed at Appendix 1). Croudace also seek an amendment to the settlement boundary to either include all of the proposed access to the site, or to include the open space area to the south as well.
26. The Local Plan allocation is based on the original SHLAA site submitted and it is accepted that it does not include all the land that has been shown (by subsequent work) to be needed for the access. However, this situation is not unique, with other allocations also likely to require access/works outside the proposed settlement boundary, e.g. BW2, BW5, WC3. Similarly, the open space elements of various allocations (including WK3) are outside settlement boundaries, e.g. BW4, KW1, NA3, SW1, WK2. While the Council has no strong objection to the respondent's 'option 1' it does not consider this to be a 'soundness' issue or that modifications are necessary to facilitate satisfactory access, given that this is a requirement of policy WK3.

Status of allocated sites

27. The above demonstrates that sufficient development opportunities exist in Wickham (even if WK2 were developed only for 100 units) and that it is not necessary to allocate further land. The following table provides an update of the status of the site allocated for development in Wickham as at 1 July 2016:

Table 1

| Policy Ref | Site | Status |
|------------|-----------------|--|
| WK2 | Winchester Road | Full planning application for 100 dwellings, etc, ref:15/01980/FUL (along with separate application for 25 dwellings on adjoining site, ref: 15/01981/FUL). Expected to be refused and revised application expected for up to 125 units on WK2 site. |
| WK3 | The Glebe | Outline planning application for 82 dwellings, etc submitted Nov 2015, ref: 15/02523/OUT. |

Response to Further Statements

28. The Further Statements submitted in relation to Wickham generally repeat matters covered in representations on the Pre-Submission Local Plan. The only significant new/additional matters raised relate to drainage issues (policy WK1).
29. Croudace suggest that Southern Water advises that new development can proceed and that any improvements are essentially ‘maintenance’ matters to which new development should not be expected to contribute. They refer to statements from Southern Water saying that development can proceed providing it does not make the situation worse, but this ignores the clear advice from Southern Water on the planning applications at Winchester Road and The Glebe: *‘the proposed development would increase flows into the wastewater sewerage system and as a result increase the risk of flooding in and around the existing area’*.
30. A water company cannot refuse new foul water connections and Section 98 of the Water Industry Act 1991 provides a legal mechanism through which infrastructure can be requested by a developer. Southern Water’s Further Statement confirms that it is *‘unable to refuse new foul water connections to our network even if there is a pre-existing risk of flooding. Such refusal would be contrary to our statutory obligations. It is our role to find solutions to mitigate any adverse effects and deliver those solutions in collaboration with developers, the planning authority and other stakeholders. As a minimum we seek to ensure that the existing risk of sewer flooding is not made worse. We look for opportunities to bring down the risk of sewer flooding where funding allows’*.
31. Croudace’s Further Statement appends a S98 sewer requisition letter from Southern Water (October 2014), containing a quote for a ‘solution’ (valid for 3 months). Although this is more up to date than that relied on by Bewley Homes (see Appendix 1 below), the ‘solution’ (‘scope of works’) appears to be simply to upgrade 31 metres of sewer and improve 2

manholes between the development and the Fareham Road pumping station. The subsequent Wickham Flood Investigation Report (June 2015) identifies overloading and failure of this pumping station as a key element of the 'problem', so it is clear that improving the capacity of the sewers leading to it is no 'solution' at all. This demonstrates that, while Southern Water may legally be required to develop a theoretical 'solution' to allow connection of the development, in practice this may relate just to part of the system (e.g. between the development and the pumping station). Far from avoiding the risk of flooding elsewhere, this approach increases this risk.

32. Given that Southern Water cannot refuse connection, and cannot direct the planning authority to refuse development for drainage reasons, the only means of avoiding an increased risk of flooding as a result of new development is through a policy such as WK1. In view of the legal restrictions on Southern Water, it is for the planning authority to consider whether the risk of flooding would be increased and, therefore, whether planning permission should be granted (at all, or subject to conditions). It is essential to have a local plan policy basis for this.
33. In Wickham a variety of factors contribute to flooding problems, particularly surface water entering the foul drainage system. Although this impacts on Southern Water's network, it is not solely within its powers or responsibility to resolve this issue. This requires cooperative working between Southern Water, Hampshire County Council (as land drainage authority) and possibly the City Council (using environmental health powers) to overcome illicit connections and progress other necessary measures, as recognised in Southern Water's Further Statement: *'it is our role to find solutions to mitigate any adverse effects and deliver those solutions in collaboration with developers, the planning authority and other stakeholders'*.
34. This is not an issue that can be resolved simply by invoking the legal responsibilities that apply to Southern Water, which is unlikely to single-handedly be able to deliver a solution that will avoid increasing the risk of flooding elsewhere (when this is known). Any real solution is likely to go well beyond what Croudace seek to classify as 'maintenance' matters and will involve action by various stakeholders. Therefore, WK1 is right to expect that:
 - (i) a multi-agency strategy is produced to identify the solution;
 - (ii) development makes *'an appropriate contribution'* to necessary measures (this does not require development to resolve all issues or existing problems); and
 - (iii) development does not proceed until the agreed solution can be delivered.
35. Policy WK1 remains 'sound' – it is entirely necessary to achieve essential infrastructure ('positively prepared' and 'justified'), able to achieve the necessary control over development ('effective'), and reflects the policies of the NPPF and LPP1 ('consistent with national policy'). In contrast, the revised wording suggested in the Croudace Further Statement (paragraph

5.1) starts from the flawed assumption that the legal requirements on Southern Water will produce a solution, failing to recognise that a multi-agency solution is likely to be needed, and does nothing to require that development does not proceed, and contributes to, the necessary works. As such it cannot be 'sound' as it is ineffective, does not respond to the evidence nor resolve a clear infrastructure issue.

Conclusion

36. The Council considers that the strategy and proposals for Wickham are sound. The preparation of this part of LPP2 has an extensive evidence base, both factual assessments and local community engagement. The policies express the necessary detail to achieve well planned and considered developments without being overly prescriptive and allowing for some flexibility, in accordance with NPPF. The policies and supporting text were amended to reflect the results of the sustainability appraisal and representations received, particularly those from the statutory agencies.
37. The policies require the provision of infrastructure which is justified, and policy WK1 effectively addresses the particular drainage problems in Wickham. The Council considers that this part of LPP2 complies with the requirements of the NPPF, reflecting local circumstances and aspirations whilst providing for a balance of economic, social and environmental considerations to achieve sustainable development.

Appendix 1 – Wickham Drainage Issues

Policy WK1 seeks to ensure that future development in Wickham takes proper account of the particular drainage problems and constraints applying there. The Wickham Flood Investigation Report (EBW15) was commissioned to investigate the causes of flooding in Wickham, by Hampshire County Council (as land drainage authority) in consultation with the Environment Agency, Southern Water and the City Council. It sets out Recommended Actions for 'Flood Cell' (sections 5 – 9) and concludes with 17 'Short Term Options for Flood Mitigation' and 12 'Medium to Long Term Options for Flood Mitigation' (section 11).

The Flood Investigation Report (FIR) shows that several areas are affected by flooding, with no single cause or solution. Particular areas are affected by significant and frequent flooding issues, such as the Riverside Mews, but the Report was not able to identify precise locations of the infiltration nor recommend specific solutions.

The promoters of both allocated sites (WK2 and WK3), as well as the Mill Lane 'omission' site, raise objections to policy WK1, as set out in detail in the representations by Bewley Homes (50314). These include Counsel's advice in relation to the evidence base, NPPF/PPG compliance and policy wording which allege the evidence base is inadequate because it does not specify the 'solution' required to overcome drainage problems. The FIR contains clear and substantial evidence of the flooding problems existing in Wickham, including the nature and frequency of events in each of the 'Flood Cells'. The fact that the study was commissioned at all shows that drainage is a substantial issue.

Flooding was also an issue at the time of LPP1, when the Parish Council and residents sought to reduce the development target for Wickham because of concerns about the impact of additional development on flooding. The LPP1 Inspector's Report confirms that *'there are existing local development constraints relating to surface water flood risks and the capacity of the waste water treatment works'* and that these are *'matters for consultation, consideration and conclusion as part of the LP2 process'* (LPP1 Inspector's Report, paragraph 111). There is, therefore, substantial evidence of drainage problems.

Bewley Homes appear to suggest that, because the FIR could not define exactly what is causing the drainage problems, or the precise solutions needed, there is a lack of evidence to justify WK1. The Council take the opposite view and consider that, given the clear evidence of flooding problems and lack of knowledge of their precise cause or solutions, further development inevitably risks exacerbating flooding problems. The FIR concludes that further work is needed on improvements and solutions, which is perfectly legitimate, and the authorities are acting on the recommendations, e.g. by Southern Water developing a Drainage Area Plan.

Bewley Homes' (and other developers') approach implies that some (or all) development should be permitted but, in the absence of a drainage solution, this would clearly increase the risk of flooding elsewhere. The NPPF and LPP1 policy CP17 refer to avoiding increasing the 'risk' of flooding elsewhere, rather than requiring definitive proof that flooding will actually increase. There is no evidence of any 'spare capacity' in the system to allow some development to come forward, nor of how any capacity limit could be set. At the time of LPP1 the advice from Southern Water was that the constraint was in the sewerage system and at the treatment works, limiting the capacity for development to 50 dwellings prior to any improvements (planned for 2017). Despite subsequent developments being subject to conditions requiring approval of drainage methods by Southern Water, flooding events have continued.

Indeed, the situation has worsened as evidenced by local residents' records of flooding incidents at the worst affected area, Riverside Mews. This is attached at Appendix 2 and shows that there were no flooding incidents prior to 2000 and only infrequent incidents prior to 2008. Since 2008 these have increased, with multiple and serious incidents in most years. Current thinking is that the main foul drainage issue is the inundation of the pumping station at Winchester Road with surface water from illicit connections to the foul system and by flooding of the water meadows. This causes the pumping station to fail and sewage to back up in the lowest part of the sewerage system, surcharging at Riverside Mews in Bridge Street.

Southern Water does not support increasing the capacity of the pumping station, as this would increase volumes at the treatment works which itself may then face capacity issues. At the time of LPP1, a solution was thought to be a 'holding tank' in the water meadows adjoining the pumping station, so as to accommodate peak flows. This is one of the medium to long term recommendations raised by the FIR, but is not necessarily favoured as it too could be overwhelmed by the ingress of surface water or by flooding of the water meadows. Southern Water's focus is currently understood to be on separating foul and surface flows, rather than increasing capacity.

The development interests suggest that it is for Southern Water to resolve the issue as they have a responsibility to connect new development to the system. It is true that the legal responsibilities on Southern Water mean it cannot refuse new connections in principle, even where there is a known capacity problem. This makes it even more important that planning policies are put in place and used to control development to avoid problems being created or exacerbated. Planning conditions are often applied limiting development until a drainage strategy has been approved, in consultation with Southern Water. However, given that there is currently no approved drainage 'solution' for Wickham, or implementation programme, such conditions would not appear reasonable – Planning Practice Guidance includes the following advice:

'Conditions requiring works on land that is not controlled by the applicant, or that requires the consent or authorisation of another person or body often fail the tests of reasonableness and

enforceability. It may be possible to achieve a similar result using a condition worded in a negative form (a Grampian condition) – i.e. prohibiting development authorised by the planning permission or other aspects linked to the planning permission (e.g. occupation of premises) until a specified action has been taken (such as the provision of supporting infrastructure). Such conditions should not be used where there are no prospects at all of the action in question being performed within the time-limit imposed by the permission.

(PPG, paragraph: 009 Reference ID: 21a-009-20140306 – underlining added)

In Wickham, the ‘specified action’ necessary to meet the requirements of the condition is not yet known and there is also no indication of whether it could be implemented within the timescale of a permission. Therefore, the respondent’s reliance on ‘pre-commencement’ conditions is not realistic. The claim that there is already a drainage ‘solution’ is based on a Southern Water ‘capacity check’ letter dated June 2010 and a ‘foul water requisition’ letter of May 2013. These promote the ‘holding tank’ solution and pre-date the FIR and current thinking on potential solutions in Wickham. Much of the respondent’s drainage evidence (Opus Consultants) relates to surface water drainage from the site, which the County Council as land drainage authority accepts could be accommodated.

Attached at Appendix 3 is Southern Water’s response to Bewley Homes’ planning application on the WK2 site, which confirms that:

‘Southern Water cannot accommodate the needs of this application without the development providing additional local infrastructure. The proposed development would increase flows into the wastewater sewerage system and as a result increase the risk of flooding in and around the existing area...’

This recommends applying a condition to any consent, but for the reasons above, this may not be appropriate. The same comment was made by Southern Water in relation to the planning application by Croudace for The Glebe.

Bewley homes suggest WK1 is not consistent with the NPPF and PPG, as these allow for development under certain circumstances. However, this is only where development would be safe and would not increase the risk of flooding elsewhere (NPPF paragraphs 100 and 102). WK1 also allows for development, provided appropriate requirements are met to ensure that it will not increase the risk of flooding elsewhere. Most of the NPPF/PPG advice relates to applying the sequential test, but it also refers to avoiding increasing flood risk elsewhere and, where possible, reducing it (NPPF paragraph 102).

While none of the proposed development sites in Wickham are in flood zones 2 or 3, the nature of Wickham’s foul drainage system means that they would all feed into the pumping station at Fareham Road, which already fails at times of heavy rainfall. Therefore, any of the sites promoted for development would increase the risk of flooding elsewhere and their impact would be

significant, given the overall scale of development planned at Wickham. There are just under 1000 dwellings existing in the built-up area of Wickham, so the Local Plan proposals for about 250 extra is an increase of at least 25% (or 20%+ taking just sites WK2 and WK3). The sewerage system is plainly already unable to cope during periods of heavy or prolonged rainfall, so these significant developments will inevitably 'increase the risk of flooding elsewhere' and not, as claimed, 'flood risk neutral'.

Policy WK1 does not seek to defer consideration of development until the coordinated strategy is produced, as alleged by Bewley Homes; it resists development because there is evidence that the risk of flooding would increase. Southern Water's response to the current planning applications confirms that the system cannot currently accommodate development and that the risk of flooding elsewhere would be increased. Given the nature of the problem and its seriousness, the alleged 'moratorium' imposed by WK1 is justified for so long as the risk applies. Southern Water confirms that it is bringing forward its drainage strategy with a view to resolving the problems at the earliest opportunity, enabling development to go ahead.

The suggestion that CP17 only applies by reference to the sequential and exception tests is incorrect. CP17 (first main bullet point) seeks to avoid flood risk by applying any of the measures listed in its sub-bullet points. The CP17 references to ensuring flood risk is not increased elsewhere, and taking opportunities to reduce the causes and impacts of flooding, can be applied whether or not this is through the sequential test.

Whichever approach is taken to ensuring that new development is appropriate in terms of its impact on drainage and flooding, there must be a policy basis within the Development Plan. Given that the problems are specific to Wickham, it is necessary to apply a policy which controls development. The Local Plan would be failing to respond to the evidence if it did not have a policy to address the known drainage problems, or if it sought to apply an artificial and un-evidenced capacity threshold.

Appendix 2 – Riverside Mews, Wickham – Sewage and Surface Water Flooding Incidents

The following information has been provided by the Riverside Mews Management Company:

RM = Riverside Mews areas: sewage & surface water floods to door entrance level, requiring flood gates /sandbags and residents (some elderly) having to climb over flood gates into sewage to leave home/get into cars parked in sewage. This is a serious health and safety risk and very distressing.

No incidents reported before 2000

| | |
|--------------------|--|
| 5-Nov-00 | Major Flood, all Riverside Mews (10), Dale Cottage. River + sewage and groundwater, RM residents moved out for 1 yr |
| 6-Nov-00 | Major Flood as above |
| 12-Dec-00 | Flooded again |
| 5-Dec-06 | Major sewage and surface water flooding - water from Mill Lane crossed Bridge Street into RM |
| 15-Jan-08 | Major sewage and surface water flooding |
| Multiple incidents | No 6 R Mews flooded with sewage 7 times in 2008, 30 incidents of sewage and surface water flooding at RM in 2008. Depth of sewage and surface water in No 6 4" deep in kitchen & flat and communal hall areas, affecting 3 other flats |
| 22-Jan-09 | No 6 R Mews flooded with sewage to 6" depth - including lounge too, RM sewage and surface water |
| 23-Jan-09 | No 6 R Mews flooded with sewage , RM sewage and surface water |
| 9-Feb-09 | No 6 R Mews flooded with sewage , RM sewage and surface water |
| 10-Feb-09 | No 6 R Mews flooded with sewage , RM sewage and surface water |
| 16-Jan-10 | Major sewage and surface water flooding |
| 22-Jan-10 | Major sewage and surface water flooding |
| 28-Feb-10 | Major sewage and surface water flooding |
| 25-Aug-10 | Major sewage and surface water flooding |
| 9-Nov-10 | Major sewage and surface water flooding |
| 20-Dec-12 | Major sewage and surface water flooding |
| 21-Dec-12 | Major sewage and surface water flooding |
| 22-Dec-12 | Major sewage and surface water flooding |
| 23-Dec-12 | Major sewage and surface water flooding |
| 23-Dec-13 | Major sewage and surface water flooding - this continued through to February 2014 |
| 6-Jan-14 | No 5 & 6 RM flooded with sewage: No 6 dining room also flooded in addition to other rooms, 6" sewage and water. No 5 2-3" sewage and water |
| Multiple incidents | 2014: flooding of 5 & 6 RM continued to 8th Jan, major sewage and surface water flooding of RM until February. Sewage and surface water blocking access to Nos 10 & 14 |

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13-Nov-14 Major sewage and surface water flooding

14-Nov-14 Major sewage and surface water flooding

7-Jan-15 major sewage and surface water flooding, manholes outside 10, 9 14

Work Jan 12th 2015 12/1 Manhole cover next to Morgans replaced, bolted and sealed, issue with non return valve outside no 6 tackled,

Jan 13th 2015 2 manholes cleared one in Morgans garden and one at pumping station

6-Oct-15 Downpour approx 3.30 pm 30 mins: Mill Lane bottom grid blocked debris, flooding into RM stopped by Est Ag+ Dale C

3-Jan-16 sewage from 2nd manhole from rear of RM (less outflow than previous incidents)

7-Jan-16 sewage from 2nd manhole and 3rd manhole (less outflow than previous incidents)

26-Jan-16 sewage from 2nd manhole from rear of RM (less outflow than previous incidents)

Appendix 3 – Southern Water Consultation on Winchester Road Planning Applications

Planning Control
Winchester City Council
City Offices
Colebrook Street
Winchester
Hampshire
SO23 9LJ

Developer Services
Southern Water
Sparrowgrove House
Sparrowgrove
Otterbourne
Hampshire
SO21 2SW

Tel: 0330 303 0119

Email: developerservices@southernwater.co.uk

Your Ref
15/01980/FUL
Our Ref
PLAN-011531
Date
04/11/2015

Dear Sir

Proposal: Residential development comprising 100 dwelling units, garages, parking spaces, new access from Winchester Road, new roads, public open space, landscaping and drainage works.
Site: Land To The East Of Winchester Road, Wickham, Hampshire, PO175HF.
15/01980/FUL

Thank you for your letter of 15/10/2015.

Following initial investigations, Southern Water cannot accommodate the needs of this application without the development providing additional local infrastructure. The proposed development would increase flows into the wastewater sewerage system and as a result increase the risk of flooding in and around the existing area, contrary to paragraph 109 of the National Planning Policy Framework. Section 98 of the Water Industry Act 1991 provides a legal mechanism through which the appropriate infrastructure can be requested by the developer to accommodate the above mentioned proposal.

Should the Local Planning Authority be minded to approve the application, Southern Water would like the following condition to be attached to any permission. "Development shall not commence until a drainage strategy detailing the proposed means of foul and surface water disposal and a implementation timetable, has been submitted to and approved in writing by, the local planning authority in consultation with the sewerage undertaker. The development shall be carried out in accordance with the approved scheme and timetable."

We suggest the following informative: 'The applicant/developer should enter into a formal agreement with Southern Water to provide the necessary sewerage infrastructure required to service this development. Please contact Southern Water, Sparrowgrove House, Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119) or www.southernwater.co.uk'.

Our initial investigations indicate that there are no public surface water sewers in the area to serve this development. Alternative means of draining surface water from this development are required. This should not involve disposal to a public foul sewer.

The planning application form makes reference to drainage using Sustainable Urban Drainage Systems (SUDS).

Under current legislation and guidance SUDS rely upon facilities which are not adoptable by sewerage undertakers. Therefore, the applicant will need to ensure that arrangements exist for the long term maintenance of the SUDS facilities. It is critical that the effectiveness of these systems is maintained in perpetuity. Good management will avoid flooding from the proposed surface water system, which may result in the inundation of the foul sewerage system. Thus, where a SUDS scheme is to be implemented, the drainage details submitted to the Local Planning Authority should:

- Specify the responsibilities of each party for the implementation of the SUDS scheme
- Specify a timetable for implementation
- Provide a management and maintenance plan for the lifetime of the development.

This should include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime.

The application details for this development indicate that the proposed means of surface water drainage for the site is via a watercourse. The Council's technical staff and the relevant authority for land drainage consent should comment on the adequacy of the proposals to discharge surface water to the local watercourse.

We request that should this application receive planning approval, the following condition is attached to the consent: "Construction of the development shall not commence until details of the proposed means of foul and surface water sewerage disposal have been submitted to, and approved in writing by, the Local Planning Authority in consultation with Southern Water."

We also suggest the following informative: 'Due to changes in legislation that came in to force on 1st October 2011 regarding the future ownership of sewers it is possible that a sewer now deemed to be public could be crossing the above property. Therefore, should any sewer be found during construction works, an investigation of the sewer will be required to ascertain its condition, the number of properties served, and potential means of access before any further works commence on site. The applicant is advised to discuss the matter further with Southern Water, Sparrowgrove House, Sparrowgrove, Otterbourne, Hampshire SO21 2SW (Tel: 0330 303 0119) or www.southernwater.co.uk'

Yours sincerely

Developer Services

Appendix 4 – Proposed Minor Modifications

The following Minor Modifications are proposed in relation to the Wickham section of the Plan, in response to representations by Southern Water:

4.8.16 There have been localised but serious flooding problems, especially ~~including at the lower end of Bridge Street, at times of heavy rainfall, apparently caused by infiltration of surface water into the foul drainage system.~~ The Wickham Flood Investigation Report (2015) was commissioned by Hampshire County Council to investigate and make recommendations on flooding issues in Wickham and involved several stakeholders, including the City Council....

4.8.17 ...The relevant agencies are working to develop ~~such a strategy and the key measures are expected to be incorporated into a strategy for flood risk reduction and mitigation in Wickham.~~ Southern Water is producing a the Wickham Drainage Area Plan (DAP) currently being prepared by Southern Water for the wastewater catchment of Wickham, this will consider flood issues and identify potential improvement options, which would be considered in light of Southern Water's overall investment programme. The DAP may include schemes where several stakeholders have responsibility and collaborative working with other stakeholders would be involved. In the meantime, the nature of the drainage system in Wickham, and uncertainties over the exact causes of flooding, mean that significant new development without appropriate mitigation measures would increase the risk of flooding to existing properties.

4.8.18 ...Currently, it is expected that the Wickham DAP will provide ~~such a strategy and its completion is planned during 2016. The strategy should clarify consider the causes of flooding, and identify the potential measures that could are needed to address them, and taking account of the implications for releasing further significant housing development...~~