FAREHAM
BOROUGH COUNCIL

The Welborne Plan

Issue 9: Energy, Water & Waste (WEL36-WEL40)

Actions arising from hearing session

November 2014

CD-42

Introduction

Chapter 9 of the Welborne Plan deals with energy efficiency, water supply and disposal, flooding, Sustainable Drainage Systems and waste and recycling. At the Welborne Plan Examination hearing session on Issue 9: Energy, Water and Waste (WEL36 – WEL40), a number of pieces of work were requested by the Inspector and some additional work was offered by the Council to address the points raised at the hearing session. These are set out in this note.

Specifically, this note addresses the following;

- Review of policy WEL36 Energy regarding the policy balance between detailed requirements and flexibility.
- Review of policy WEL37 Water Efficiency, Supply and Disposal regarding the policy balance between detailed requirements and flexibility.
- Addition of glossary term for 'environmental standards'.
- Review and reordering of policy WEL39 Flooding and Sustainable Drainage Systems to reflect Inspector's request to move the flood risk assessment requirement to the start of the policy.
- Addition of glossary term for '1 in 100 year event'
- A review of the location of the HWRC and consideration in restricting it to the 'west of the A32' only.

1 Energy

At the Welborne Plan Examination hearing session on Issue 9, the Inspector indicated that he would like the Council to review policy WEL36 – Energy, specifically with consideration to the balance between flexibility and detailed requirements.

Policy WEL36 currently affords applicants a high degree of flexibility in trying to achieve energy optimisation and efficiency, together with a more detailed policy condition that requires 10% of all residential dwellings on site to be built to Passivhaus standard, dependent on viability.

This flexible approach was based upon evidence in the Eco-Opportunities Study (EV22) which concluded that there are a wide variety of options that would deliver the high level principle of achieving high sustainability standards. However, principally the range of options comprised of two potential approaches; The first being a centralised heating and/or power system that provided energy for the development; with the second being technologies applied on individual buildings, such as photovoltaic and Passivhaus, with both options potentially being able to be achieved in a variety of ways.

A flexible approach to achieving energy efficiency was taken in policy WEL36 as the study noted that setting high standards for on-site energy generation within policy may push the development into a certain type of technology, such as Combined Heat and Power (CHP), which reduces flexibility in the masterplan and introduces additional viability and deliverability concerns. By providing flexibility and by not setting specific targets, the Council is allowing the market to determine the most suitable solution based on market conditions, viability and the technology available

at the time.

An additional consideration is the Housing Standards Review that has recently been completed by the Department for Communities and Local Government. This technical consultation seeks to remove the need to set energy standards locally through planning policy, and have carbon and energy targets implemented through changes to the Building Regulations. This approach, although not finalised, demonstrates a clear direction of travel by the Government of moving energy standards away from the planning system, and one which it wishes to see implemented by Autumn 2015.

The Government has indicated that local planning authorities can continue to set energy efficiency policies in local plans, which exceed the energy requirements of building regulations, but only until the zero carbon home policy has been implemented, which is anticipated to be by late 2016. From that point, the Government have indicated that the energy efficiency requirements set in Building Regulations will be at a level equivalent to the current Code Level 4, and as such, local planning authorities should take this into account and not set energy efficiency requirements above Code Level 4.

In response to the query raised by the Inspector, alongside the consideration of evidence supporting the plan and emerging Government policy, the Council proposes an amendment to Policy WEL36 as follows, with deleted text ~~struck through~~ and new text underlined:

WEL36 – Energy

Planning applications for Welborne shall be supported by an Energy Strategy which demonstrates how the development will:

i. **Optimise energy efficiency by minimising the use of energy through design, layout, orientation, landscaping and materials;**
ii. **Achieve high energy efficiency standards for all buildings, including meeting the Passivhaus Standard if appropriate; and**
iii. **Secure energy supply, maximising the use of low or zero carbon technologies including district energy networks.**

Proposals for residential development shall incorporate 10% of dwellings built to ~~'~~Passivhaus~~'~~ ~~s~~Standard, unless it can be demonstrated to be unviable~~.~~ by means of a financial assessment which clearly demonstrates the maximum proportion of dwellings built to Passivhaus Standard which can be achieved.

2 Water Efficiency, Supply and Disposal

The Inspector also indicated that he would like the Council to review policy WEL37 – Water Efficiency, Supply and Disposal, specifically with consideration to the balance of the policy between providing flexibility and making detailed requirements for an applicant.

The approach taken in the Welborne Plan in respect of both water supply and waste water disposal has been to identify and present potential and deliverable solutions for both infrastructure requirements. Through discussion and consultation with the various water companies, the Plan identifies two options for water supply to Welborne (paragraphs 9.12 – 9.16);

- Portsmouth Water (incumbent water supplier for the area); and
- Albion Water.

as well as two options for waste water disposal from Welborne (paragraphs 9.17 – 9.21);

- Southern Water (incumbent sewerage provider for the area); and
- Albion Water.

Additional evidence on two options for waste water disposal from Welborne is provided within the Wastewater Conveyance and Treatment Position Statement (CD-25). The Position Statement (CD-25) also recognises that there may be alternative acceptable solutions for waste water disposal and as such, the policy needs to retain flexibility to facilitate suitable alternative solutions to be delivered.

The approach of the Welborne Plan to present options for both water supply and waste water disposal, rather than to require a definitive solution for both is that due to a de-regulated market, the choice of both water supply and wastewater disposal are commercial decisions, required to be made by the site developers. As such, to show a preference for either solution for water supply or wastewater disposal would be commercially disadvantageous.

It is recognised that infrastructure improvements will be required in order to secure both potable water supply and waste water conveyance for Welborne. For water supply, this consists of the diversion of an existing large diameter water main, in order to facilitate development and the supply of potable water to the new development. These improvement works will be required for both supply options, whilst the cost and timescale of undertaking this work will need to be considered appropriately by the joint site promoters within the outline planning application for the site.

With respect to waste water treatment, Southern Water has confirmed that there is sufficient existing capacity at the Peel Common Wastewater Treatment Works for the additional flows from all 6000 dwellings at Welborne, while Albion Water has also confirmed there to be capacity at the Knowle Sewage Treatment Works to accommodate further dwellings. However, the Plan recognises that new waste water conveyance infrastructure will be required to connect Welborne with either Peel Common Wastewater Treatment Works, and/or with Knowle Sewage Treatment Works. The precise nature of the infrastructure works required will be dependent on the waste water solution identified by the joint site promoters as part

of the outline planning application for the site.

The plan does not preclude both waste water solutions being brought forward, should the combination of both options represent the most appropriate solution in terms of facilitating the joint site promoters' desired phasing of the site. The position of the plan is however clear in that proposals for development will only be permitted where those proposals include the provision of new and or upgraded waste water infrastructure, to ensure that sufficient waste water capacity exists to serve Welborne. Furthermore, the treatment of the waste water associated with Welborne must not worsen water quality or increase flood risk.

In consideration of the above and in response to the query raised by the Inspector, the Council proposes to make an amendment to Policy WEL37 in order to provide further clarity to applicants and the public. The amended policy WEL37 is as follows, with deleted text ~~struck through~~ and new text underlined:

WEL37 – Water Efficiency, Supply and Disposal

Demand for water should be minimised in all new development through the installation of water meters, water efficient fixtures and the appropriate reuse of water. All new residential development at Welborne shall be designed to achieve good practice standards of water efficiency by ensuring that internal potable water consumption does not exceed 105 litres per person per day (l/p/d).

Proposals for each phase of development shall be permitted only where they include the provision of infrastructure for ~~adequate~~ sustainable potable water supply.

Planning application(s) for development will only be permitted where they include details of a comprehensive ~~and~~ waste water conveyance and treatment solution for Welborne, including details on the phasing of new waste water infrastructure. Development of any phase must ~~which~~ meet~~s~~ the required environmental standards and not result in an adverse impact in water quality or increase the risk of sewer flooding as a result of the waste water flows from the development.

Proposals for residential development at Crockerhill Industrial Park should demonstrate how the existing nearby dwellings at Crockerhill may be connected to the Welborne ~~sewerage~~ waste water network.

The Council also proposes a minor modification to the 3rd sentence of paragraph 9.19 as follows, with deleted text ~~struck through~~ and new text underlined:

If connection of Welborne to the Knowle STW is to be pursued, the site promoters will need to demonstrate that the STW could be expanded and gain planning permission from ~~Winchester City~~ Hampshire County Council as the waste disposal authority ~~STW is in their area~~.

Furthermore, an addition to the glossary of the term 'environmental standards' is proposed as follows, with deleted text ~~struck through~~ and new text underlined:

Environment standards: As set out in legislation or regulation regarding acceptable levels of pollutants or other hazards. For all water issues, the appropriate standards are monitored and regulated by the Environment Agency.

3 Flooding and Sustainable Drainage Systems

During the Welborne Plan examination hearing session on Issue 9, there was significant discussion on appropriate flood management and Sustainable Drainage Systems (SuDS) at Welborne.

The approach taken by the Council is in accordance with paragraph 100 of the NPPF. The principle of this approach was not questioned by the Inspector at the hearing session; however he did ask the Council to review the order of the wording in policy WEL39.

Following the Inspector's comments, the Council is minded to propose a modification to policy WEL39 to provide further clarity of the Council's requirements in terms of the assessment of flood risk and the delivery of a Sustainable Drainage System. Amendment as follows, with deleted text ~~struck through~~ and new text underlined:

WEL39 – Flooding and Sustainable Drainage Systems

~~The site promoters shall carry out~~ Initial or outline planning applications for Welborne must include a site-specific flood risk assessment for the development site, to demonstrate that the proposed development will not increase flood risk on the Welborne site or elsewhere.

The development of Welborne shall manage flood risk, in accordance with the findings of the site-specific flood risk assessment through the integration of Sustainable Drainage Systems (SuDS). A comprehensive ~~site-wide~~ SuDS Strategy showing the principles of delivery, future management and maintenance across Welborne, shall be prepared and submitted with the initial planning applications.

The type of SuDS proposed ~~at Welborne, based on~~ by the site-wide SuDS Strategy~~,~~ shall:

- **i. Manage surface water arising from the development within the site, with no net increase, and where possible, a reduction in run-off rates and volumes; and**
- **ii. Control run-off and prevent flooding for up to a 1 in 100 year rainfall event with a 30% allowance for climate change; and**
- **iii. Follow the SuDS management train and be fully integrated with the green infrastructure network~~.~~; and**
- **iv. Be designed and built to the appropriate adoptable standard, as agreed with the Council and the appropriate SUDS Adoption Body.**

~~The site promoters shall carry out a flood risk assessment for the development site, to demonstrate that the proposed development will not increase flood risk on the Welborne site or elsewhere.~~

In addition, the Council proposes to insert a glossary definition for the term '1 in 100 year rainfall event', with deleted text ~~struck through~~ and new text underlined:

1 in 100 year rainfall event: This is the likelihood (return period) of a specific

rainfall event occurring. The intensity of rainfall runoff is defined by its return period and a high return period event, such as a 1 in 100 year event, will have greater rainfall runoff. However, although a 1 in 100 year event has very intense rainfall, it has only a 1% chance or greater of happening each year.

4 Household Waste Recycling Centre and Recycling

During the Welborne Plan examination hearing session on Issue 9, the Inspector asked the Council to review the flexibility that policy WEL40 provides in terms of the location of the HWRC to be located 'either east or west of the A32'.

The Inspector asked whether the employment area to the east of the A32 was an appropriate location for the HWRC, due to the higher landscape sensitivities of land east of the A32.

Furthermore, there is the consideration of phasing and the requirement that the HWRC is to be operational 'on the occupation of 1000 homes'. As the Welborne Plan recognises, in paragraph 9.36, the occupation of 1000 homes is estimated to occur during 2021/22, at which point it is likely that only land to the west of the A32 will have come forward for employment use.

Following the Inspector's comments, on balance the Council is minded to propose a modification to policy WEL40 to provide further clarity over the location of the Household Waste Recycling Centre. Amendment as follows, with deleted text ~~struck through~~ and new text underlined:

WEL40 – Household Waste Recycling Centre and Recycling

A new ~~HWRC~~ Household Waste Recycling Centre ~~will~~ shall be developed ~~as part of~~ at Welborne within the main employment area~~s in the south of Welborne, either east or~~ west of the A32. The location of the Household Waste Recycling Centre shall be shown on the comprehensive masterplan that supports the initial planning applications.

Subject to securing the full funding package, land to locate the HWRC shall be ~~completed by the end of Main Phase 3~~ made available to enable delivery of a fully operational HWRC on completion of 1000 dwellings, or as agreed with the Council in consultation with the County Council, as waste disposal authority.

The new facility will require:

i. A site amounting to 0.8 hectares, which is suitable for a split-level facility and at a location agreed with the Council;

ii. Appropriate design and layout to facilitate integration alongside B1, B2 or B8 employment uses;

iii. Direct highway access which avoids any adverse highways impacts on the A32, M27 junction 10 or to internal site routes;

iv. to not be located directly adjacent to existing or proposed residential areas;

~~iv~~v. To be designed to avoid adverse impacts on the amenity of ~~any~~ nearby residential areas; and

~~v~~vi. To incorporate landscape screening to ensure that the facility is not intrusive into significant views from the surrounding area and from the M27 motorway.

Storage space for domestic waste and recyclable materials awaiting collection must be provided for in all domestic and non-domestic buildings.