

From: Mike Townson
Sent: 12 May 2021 16:38
To: Salter, Tim <TIM.SALTER@planninginspectorate.gov.uk>
Subject: Appeal APP/A1720/W/21/3271412

Tim

Please confirm inquiry start date is August 10 and not 12 as suggested in your recent email to me.

Please formally register the following additional objections with the Inspector

1. Brent Geese do still actively use this site. We heard them on several (at least six) mornings in February and March during the early morning. We do not have evidence of this due to our slumbering however as a Hampshire and Isle of Wight Wildlife Trust, keen bird watchers and daily observers of Brent Geese in Portsmouth Harbour we are both very aware of their call. We were sleeping with windows open during this time and their frequency appeared to coincide with high tides. I would be happy to testify under oath to this.

2. There has been no reference to noise or light pollution mitigation which is increasingly being used legally as either a planning requirement for new development under the Agent of Change principle or as a means to close or place restrictions and enforcement orders on existing community facilities to the detriment of those communities once new housing has been built. The presence of the AFC Portchester Football Club generates substantial noise and light pollution which can be disturbing at Romsey Avenue distance and beyond, this frequently involves mould language. Developers should have anticipated this and put in place mitigation measures even at outline stage to determine if this is a suitable sight for development. As the Bird Conservation Area has been located immediately adjacent to the football ground and directly under their floodlights which of course are in greatest use during the winter this is further evidence that this is the most unsuitable site for a BCA or any increase in biodiversity. The suggestion that kingfishers will be attracted must be dismissed along with most of the ecological benefit claims as fanciful at best! (Evidence can be provided)

3. Nitrate off setting is not a proven scheme however algae growth and evidence of pollution in Portsmouth Harbour is very real and evident. The appellants suggestion that this site does not have any impact on the SPA,SSI,SAC,Ramsar and Natura 2000 site when it is no further than 500 yards at any point and closer in areas is inaccurate. These are supporting networks and all relevant statutory and wildlife charities recognise this and the site fall under the Habitat Regulations Act. Photographic evidence can be provided.

4. Long periods of high water table flooding are increasingly common across this farmland. The appellants data is from a survey in July and I would suggest deliberately misrepresents and misleads decision makers regarding the real high water table issue and flooding /pollution risks. This has not been referenced but all locals can evidence this with numerous photographs of which I have many. The SuDS strategy is inadequate and will cause additional flooding and SPA pollution. Prof John Williams, Professor of Environmental Technology, Associate Head (Research and Innovation), School of Civil Engineering and Surveying states " I am also confused about the reliance on infiltration, there is no storage or exceedance overflow. As for nitrates, the sewage is going to Peel, so that must be acceptable to the EA\Natural England, but this seems strange as an overall increase in N of ~10 mg/l of sewage will follow. . This then boils down to the acceptability of infiltration and nitrates in runoff going to groundwater. If there was a pond and an outfall this would need to demonstrate N removal, but I do not know how the N to groundwater would be viewed. I think the whole infiltration thing is the Achilles heel and they have gone down this route to avoid questions of N in runoff." This SuDS system cannot be talked away by just disagreeing with findings. John Champion Utility Consultant states

"Foul Drainage:

The concept for the development is to utilise the existing sewerage infrastructure. The proposal intends to intercept the existing 225mm dia. sewer draining Romsey Avenue to serve the eastern part of the development and reconnecting downstream before utilising the existing connection to the interceptor sewer that takes flow from the Portchester Castle Area and carries it westwards to Peel Common WWTW. The drawing you supplied only had

manhole cover and invert levels but this strategy looks perfectly feasible providing it is properly designed and the existing infrastructure (main interceptor sewer is adequately sized - the drawing suggests that it is 525mmdia). It's impossible for me to comment further as I cannot determine how many households are connected upstream of the proposed interception. It appears that they are proposing to connect a further possible 100 households to the 225mm dia. sewer serving Romsey Avenue. Southern Water must have been consulted as part of the planning application and have a statutory responsibility to comment, if they are happy then there are no grounds for objection.

Surface Water Drainage:

As I understand the documents you have sent me, the developer appears to entirely depend upon infiltration via soakaways and infiltration ponds to manage surface water run-off. The retention/infiltration ponds located at the SW corner of the site have been sized only to cope with 3/4 of the estimated storm run off, the remainder must be accommodated by soakaways constructed at each property or group of properties. The calculations for the size of the retention ponds are based, in part, on the assumed infiltration rate of 1.797×10^{-5} m/s. This figure is stated as being taken from the Soils Limited Site Inspection and Trial Pit Report you sent me. My comment are as follows:

- The strategy does not state how the figure of 1.797×10^{-5} m/s is derived from the Soils Limited Report. By inspection of the report, I would have thought that the figure should be closer to 4×10^{-6} m/s (FYI the accepted minimum infiltration rate for a soakaway is 1×10^{-6} m/s). I think that the strategy is overly optimistic in this regard.
- The strategy does not allow for any discharge of surface water run-off to a stream, brook or drain. I think that this is an unsafe concept, I would have thought that there should be a wire and outlet to a drain that takes surplus water to the harbour.
- The Soils Limited site investigation was carried out in summer and no mention is made of where the water table was during this time. I would suggest that the water table may be very close to the surface during winter but I have no evidence to support this. Under such conditions the retention ponds would fill after a rain event but not empty by infiltration as assumed (there is no outlet to the ponds) subsequent rain events would cause overflowing and surface flooding. This would not affect Romsey Avenue due to its elevation but the Sports Ground would be affected. I think that Southern Water would be concerned with this design unless they are convinced that the water table is well below the surface throughout the winter period. Have you any anecdotal evidence that the field, sports ground becomes wet and boggy during winter?
- Another aspect of the concept that is unsatisfactory is the reliance on individual soakaways to provide retention and attenuation of surface water run-off I think that it is an overly optimistic concept but this would not concern the planning people as its an engineering detail. Southern Water should be concerned though.

5. Additional Highway pressures are being noticed more frequently on the A27 for cars waiting to turn into Beaulieu Avenue. The turning lane allows for 3 cars however on repeated occasions 4th or 5th cars have had to wait on the main carriageway creating congestion and RTA risks. Evidence can be provided.

6. The Inquiry is planned for the school holidays and the highways case will be greatly disadvantaged should the Inspector site visit take place during the holiday period and would devalue the evidence and contribution residents have made.

7. I haven't previously referenced the presence of red legged Partridge but these are a very welcome addition and seen every day on the farmland.

8. The appellant site separates two other fields which are leased from Hampshire County Council. The West field would be completely land locked and unusable as agricultural land. This would leave just the land to the SE and would not be a viable business proposition. To approve the appellant site for development would remove an additional 20 hectares of BMV land from agricultural purposes at a time of greater dependence on our own productivity and would remove coastal agriculture as a tradition and eco system from Portsmouth Harbour.

9. It is worth noting that the development on Cranleigh Road was on land that had not been farmed for over 30 years, the appellant site has been in continual production for over 30 years (since living here)

Please acknowledge receipt

Michael J Townson
46 Romsey Avenue
Fareham
PO16 9TA