

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

Our ref: HA/2024/126040/02-L01
Your ref: APP/24/00405
Date: 11 October 2024

Dear Sir/Madam

FURTHER INFORMATION: HYBRID APPLICATION SEEKING:

1) FULL PERMISSION FOR DEVELOPMENT OF NEW PIPELINES TO TRANSFER WATER FROM BEDHAMPTON SPRINGS TO FILL THE RESERVOIR IN THE WINTER AND DRAW IT OFF TO TREAT AND SUPPLY WHEN NEEDED IN THE SUMMER, COMPRISING: CONSTRUCTION OF TWO PREDOMINANTLY UNDERGROUND PIPES IN TUNNELS LINKING THE RESERVOIR WITH THE EXISTING PUMPING STATION AT BEDHAMPTON WITH ASSOCIATED INFRASTRUCTURE INCLUDING: EMERGENCY DRAWDOWN DISCHARGE STRUCTURE AT HERMITAGE STREAM; CONSTRUCTION OF EIGHT ACCESS SHAFTS; UPGRADES TO EXISTING CULVERTS CLOSE TO SHAFTS FIVE, SIX AND EIGHT TO MANAGE FLOOD RISK; WASHOUT AND AIR VALVE CHAMBERS (TYPICALLY BELOW GROUND), NEW PLANT AT BEDHAMPTON PUMPING STATION, MODIFICATIONS TO BEDHAMPTON 2 OPERATIONAL BUILDING AND PERMANENT DIVERSION OF FOOTPATH 34 AT BEDHAMPTON PUMPING STATION.

2) OUTLINE APPLICATION FOR AN ASSOCIATED UNDERGROUND CROSS-CONNECTION CHAMBER AND ABOVE GROUND KIOSK AT THE RESERVOIR SITE WITH VEHICULAR ACCESSSES FOR MAINTENANCE.
AN ENVIRONMENTAL STATEMENT HAS BEEN SUBMITTED WITH THE APPLICATION UNDER THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017.

HAVANT THICKET, ADJACENT TO SIR GEORGE STAUNTON COUNTRY PARK, MIDDLE PARK WAY, HAVANT

Thank you for consulting the Environment Agency on the additional information regarding the above planning application.

Environment Agency Position

Having reviewed the technical note from AtkinsRealis dated 17th September 2024 the Environment Agency is now in a position to **remove our objection**. We have **no objection** to the above proposal as submitted but would however request that the following conditions are added to ensure that the development meets the requirements on the National Planning Policy Framework

Condition 1

No development shall take place until details of the culvert configuration and construction methodology has been agreed and approved in writing by the LPA. This detailed configuration should include assessment to ensure that the proposed works do not adversely affect fish passage, and where required/practical fish passage is improved.

Reason

To ensure that proposed culvert upgrades do not pose a risk to hydromorphology or ecology, specifically relating to fish passage. Information should be included demonstrating how the culverts interact with the up and downstream bed level of the Riders Lane Stream. The culverts should be designed to allow fish passage ensuring longitudinal connectivity within the watercourse. This means that the culverts need to be designed in a way as to not impede fish passage, if passage (for all species) is already possible. If passage is not possible the culverts must be designed to facilitate fish passage. A full construction methodology should be provided. The requirements to protect and enhance biodiversity are set out in the National Planning Policy Framework (NPPF).

Condition 2

The development shall be carried out in accordance with the submitted flood risk assessments (ref: A15.2 Flood Risk Assessment Report – Atkins HTR-ATK-XX-XX-RP-Z-0042 Rev.C02 and A15.5 Flood Risk Assessment Addendum (Pipeline) – Atkins HTR-ATK-XX-XX-RP-Z-0091 Rev.C01 and the following mitigation measures it details:

- Culvert upgrades must be carried out at Middle Way Park, Dunsbury Way and Purbrook Way road crossings as specified within sec 4.1.1, Table 4.1 of the Flood Risk Assessment Addendum (Pipeline) – Atkins HTR-ATK-XX-XX-RP-Z-0091 Rev.C01

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

Reason(s)

- To prevent flooding by ensuring that sufficient channel capacity and conveyance is created to accommodate the reservoir emergency drawdown flow.

Condition 3

The development hereby permitted must not be commenced until such time as a detailed scheme to ensure the development will not increase the risk of flooding has been submitted to, and approved in writing by, the local planning authority. Specifically further details should be provided including:

- Detailed site level information demonstrating that there will be no permanent raising of ground levels or above ground structures located within areas of flood zone 3, as specified on the Environment Agency's Flood Map for Planning (Rivers & Sea), unless satisfactory compensatory floodplain storage is provided.

- Detailed information including the long-term maintenance scheduled for the proposed development, including but not limited to the proposed pipeline and culverts.
- Detailed information for the crossing of watercourses where these are proposed, including depths below watercourse bed levels.

The scheme shall be fully implemented and subsequently maintained, in accordance with the scheme's timing/phasing arrangements, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

Reason(s)

- To ensure that there are no detrimental impacts to flood storage volumes and/or flood flow routes.
- To ensure infrastructure is maintained throughout its lifetime and does not increase flood risk.
- To ensure that there is no impact upon watercourses from the crossing infrastructure.

Condition 4

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 a remediation strategy detailing how this contamination

Reason

To ensure that the development does not contribute to and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the National Planning Policy Framework.

Condition 5

Prior to each phase of the development a suitable Construction Environmental Management Plan, shall be provided demonstrating that the risk to controlled waters that the risks to controlled water will be appropriately managed. This should be submitted to, and approved in writing by, the Local Planning Authority

Reason

To demonstrate that activities associated with the construction of the scheme will not pose pollution risks to ground or surface waters.

Advice to the LPA and Applicant

Flood Risk

The FRA and FRA addendum together with the accompanying modelling information demonstrates that the pipeline can be constructed and operated without increasing flood risk. However, it is considered necessary to condition the upgrades to the existing culverted road crossing as this is fundamental to ensuring that the emergency drawdown flow from the reservoir can be safely conveyed through the crossings without increasing risk to residential receptors.

There should be no permanent land raising or siting of above ground infrastructure within areas shown as Flood Zone 3, unless equivalent flood plain storage volume can be provided. Any loss of floodplain storage could potentially increase risk to nearby receptors.

Flood warning and emergency response

An Emergency Flood Plan (HTR-WAB-PI-ZZ-PL-W-0004 Rev.S4-P03) has been submitted. We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network.

Groundwater Protection

The majority of the works associated with this development are on greenfield locations and underlain by unproductive strata or secondary aquifers. As such there are not likely to be many groundwater quality/contamination issues with the proposed development. There will be some interaction with the underlying chalk aquifer and associated inner source protection zone for the Havant and Bedhampton springs. It is in the area where interaction could occur that we would have greatest concerns regarding risks to groundwater resources. We are largely satisfied that sufficient regard for this is included in the Environmental Statement accompanying the application we would however make the following comments.

2 landfills are present along the route, both of which are in the vicinity of and relate to Portsmouth Water Works at the Havant and Bedhampton springs. There is no information to indicate that any higher risk material were deposited at these site. We note that the works in this area are stated to be above ground level. If any groundworks are proposed at any point which may result in disturbance of these landfills, then we should be consulted at the earliest possible stage to confirm acceptance of the work.

We remain of the opinion that shaft tunnels that penetrate through aquifers have the potential to pose a significant risk, in terms of issues such as turbidity and mobilising contamination. We are however reassured that the shaft tunnel nearest the springs is expected to remain fully above the chalk. We agree that this will greatly reduce the risks. It would not however totally eliminate the risks, particularly if tunnelling was to proceed too close to the base of the overlying Lambeth group. While the risk of contamination sources at shaft tunnels locations are not high, a careful watching brief should be maintained during any tunnel construction for any sources of contamination.

Informatives

All wastes arising from this development must be dealt with under an appropriate regulatory framework.

Dewatering activities need to be done under an appropriate regulatory framework, and may require an environmental permit.

A watching brief should be maintained throughout the development for the evidences of any Dolines/swallow holes or solution features. If any features are identified they should be appropriately managed so there is not risk of impact to the underlying chalk aquifer or associated Source protection zone.

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culverted main river (16 metres if tidal)
- on or within 16 metres of a sea defence

- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in the floodplain of a main river if the activity could affect flood flow or storage and potential impacts are not controlled by a planning permission

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environment-agency.gov.uk.

For site specific permitting advice please contact email: robert.waite@environment-agency.gov.uk.

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

If you have any queries regarding the above please do not hesitate to contact me.

Yours faithfully

Mrs Laura Lax
Senior Planning Advisor

Direct dial 0208 4745902

Direct e-mail laura.lax@environment-agency.gov.uk