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**CONSULTATION UNDER THE TOWN AND COUNTRY PLANNING
(DEVELOPMENT MANAGEMENT PROCEDURE ENGLAND) ORDER 2010**

Planning Application Reference:	APP/24/00405
Proposal:	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 accesses for maintenance. An Environmental Statement has been submitted with the application under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
Location:	Pipeline from the reservoir to the north of Middle Park Way to Bedhampton Pumping Station
Date:	31 July 2024

Thank you for consulting Portsmouth Water on the above application, the catchment and environment team have reviewed the relevant documentation and have the following

comments.

Portsmouth Water's Position

The construction of a new shaft and pipeline within the vicinity of Bedhampton Springs presents a risk to water quality, water resources and biodiversity. The Catchment & Environment Team have been working alongside the Havant Thicket Team and Ward & Burke reviewing, commenting and influencing the design and construction of the proposed scheme, to mitigate against environmental impacts. These discussions have led to improvements to the initial proposals and designs, and we will provide continuous dialogue to make further improvements where applicable.

The following provide specific comments on relevant documents that have been produced on protecting the environment from construction and other activities.

Chapter 15 Water Environment

We have reviewed this document and find the content satisfactory. This document provides a detailed description of the geology, hydrology and hydrogeology of the shaft and pipeline route. It provides information on the sensitivity of the location, potential impacts and proposed mitigation measures. The tables within the document provide further details of the risks, assessment of the effects (before mitigation), and design, mitigation/compensation and enhancement measures. We agree with the information submitted and support the measures being proposed. The outcome of this document is to develop further information, particularly with the CEMP and Pollution Management and Mitigation Plan (PMMP) (see below).

Construction and Environmental Management Plan (CEMP).

Portsmouth Water has worked alongside Ward and Burke in the production of the CEMP to ensure that the required protective measures are put in place to safeguard groundwater quality, for public supply during the construction phase of the pipeline.

The CEMP is a live dynamic document which will require further review and updates, according to changes in environmental risks as the project progresses.

We are satisfied with the content of the Construction Environmental Management Plan (CEMP) dated May 2024 ref. HTR-WAB-PI-XX-HS-W-0006 revision S4-P09. Our concerns with groundwater quality and protection of the Havant and Bedhampton Springs have been addressed in detail.

We and look forward to working alongside Ward and Burk on further reviews to the CEMP and on the updates required throughout the project to address changes in environmental risks.

We have reviewed the Pollution Management and Mitigation Plan (PMMP) which provides further details of mitigation measures and proposed monitoring. This plan includes:

- monitoring of the spring chambers during construction
- assessment of risks and mitigation during the shaft construction and pipeline construction
- Oil & Fuel storage and mitigation measures
- The use of concrete, wheel washing etc
- Drilling fluids and chemicals used during pipeline drilling

The PMMP is very detailed, and the measures proposed provide satisfaction that risks to water quality and water resources will be mitigated.

Construction Methods

We support the methods of construction from a groundwater risk perspective and are satisfied with the details that have been provided within the Construction Method Statement – Main Pipeline dated 22nd May 2024 ref. HTR-WAB-PI-ZZ-MS-W-0001 revision S4-P03.

Biodiversity

We have reviewed and provided comments during the internal consultation on the design of the shaft and pipeline route. Part of the design is to realign the footpath, remove vegetation and trees throughout the development. Where possible, we have advised that minimal disturbance, maximum protection and consideration for the least amount of tree removal, where possible. This process will be ongoing so as to continually make improvements and protect biodiversity as much as possible. Where biodiversity is impacted, Biodiversity Net Gain will be employed.

We have also reviewed and commented on the Invasive Non-native Species (INNS) Biosecurity Strategy. The details are satisfactory, and we will be continually reviewing this during construction to make improvements where applicable.

Catchment Management Team
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