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

Planning Application Reference:	APP/21/00601
Proposal:	Proposed Portsmouth Water Headquarters building (Use Class E(g)(i) use); widened access onto Solent Road; and associated access, car parking, landscaping and works; including the felling of 7No. trees the subject of TPO No.1801 in order to improve the access and allow for the development.
Location:	Land north of Solent Road (adjacent to Bosmere Medical Centre) Havant
Date:	21 November 2023

Portsmouth Water's Catchment and Environment Team have reviewed this application from a groundwater quality protection perspective.

Biodiversity

We previously sent detailed information regarding biodiversity and landscape design for the proposed development. We have discussed our comments and recommendations with Portsmouth Water's architects and await changes to the overall landscape and planting details. For example, we noted that there were a number of trees that were proposed within the floodplain area to the north of the proposed office that are within the tree root zone of existing trees. We recommend that these should be removed from the design as they are inappropriate. Once the overall amendments have been made, these will be submitted for re-consultation.

Surface Water Drainage

Portsmouth Water are satisfied in principle with the surface water drainage strategy set out within the flood risk assessment and approve to the inclusion of pollution control measures (Class 1 petrol interceptor and filter chambers) within the implementation of appropriate

Sustainable Drainage. The Catchment and Environment Team agree drainage by infiltration including soakaways would be inappropriate for this site and support that no soakaways are to be used.

Given the proposed SUDs scheme discharges within SPZ1 of the groundwater catchment into Brockhampton Stream, and this flows into Langstone Harbour (which is designated RAMSAR, Special Protection Area, Special area of Conservation, a Site of Special Scientific Interest, and includes Priority Habitats) it's of high importance we ascertain the SUDs scheme - notably the pollution control mechanisms - shall be designed, maintained and managed appropriately after completion. We are satisfied with the proposed timelines within which SuDS features shall be inspected and maintained set out in Table 6-7: 'Management and Maintenance Strategy' of the updated Flood Risk Assessment.

The Flood Risk Assessment and & Drainage Strategy: 191925-R01 October 2023 has not been updated to reflect the amendment to the outline planning application proposal; removal of the Industrial Park and associated Industrial Units. For example, section 6.31 of the Flood Risk Assessment states 'The Industrial unit's commercial yard and delivery areas are to be protected by Class 1 bypass petrol interceptor. We know that these have been removed from the development so this Strategy should be updated to remove this information.

As mentioned within our previous response dated 31st March 2022, *'we note that the two parking areas for the new Portsmouth Water Head Offices' drainage to the attenuation tank will bypass the petrol interceptor in the Drainage layout. The latest Strategy doesn't include a layout. Nonetheless, We expect the drainage design to be revised such that all car park drainage flows through a petrol interceptor.'*

Subsequently it is Portsmouth Waters position that a condition is required for surface water drainage, and we do not recommend the discharge of this condition until further information is provided, reviewed and agreed in consultation with the Catchment & Environment Team.

Condition 1: Surface Water Drainage

No development shall take place until a surface water drainage scheme based on sustainable drainage principles and a comprehensive assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water. The scheme shall subsequently be implemented in accordance with the approved details before any building within that phase is occupied.

Reason - *To reduce the risk of groundwater pollution in line with paragraph 170 of the National Planning Policy Framework. Note: The drainage scheme design will be required to take account of the location of any solution features present in order to avoid and mitigate risks.*

Condition 2: Foul Water Drainage

No phase of development shall commence until such time as a scheme to dispose of foul water has been submitted to, and approved in writing by, the local planning authority in consultation

with the Environment Agency, Portsmouth Water and Southern Water.

The scheme shall be implemented in accordance with the timetable agreed as part of the approved scheme. The scheme shall also include:

- *details of how the scheme shall be maintained and managed after completion.*
- *details of the sewage pipe work layout and specifications.*

Reason: This is in order to manage the quantity of foul sewage and protect the Havant and Bedhampton Springs Source Protection Zone 1 in the development area. In accordance with position G8 of Groundwater Protection: Principles and Practice, the applicant must use the highest specification pipework and designs to minimise leakage.

Condition 3: Unidentified Contamination

If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with the Environment Agency and Portsmouth Water) shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified. The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences.

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 4: Piling and Foundations

Piling or deep foundation using penetrative methods shall not be carried out other than with the written consent of the local planning authority in consultation with the Environment agency and Portsmouth Water. The development shall be carried out in accordance with the approved details.

Reason-To ensure that any proposed Piling or deep foundation using penetrative methods, does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework, and position statement N8 Physical disturbance of an aquifer in a SPZ1 of the 'The Environment Agency's approach to groundwater protection'.

Condition 5: Construction and Environmental Management Plan (CEMP).

No development shall start on site until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the Planning Authority in

consultation with Portsmouth Water detailing all pollution mitigation measures to be adopted during the construction phase. This should include management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water resources are not put at risk from leaks or spillages.

Reason- *Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the Havant & Bedhampton Springs*

Supplementary Information

Solution features

We support the proposal for a watching brief during construction for dissolution features/solution features. Both foundations and drainage excavation should be inspected for the solution feature presence. The risk of dissolution should be mitigated appropriately (e.g. stand-off zones and/or ground treatment).

Land contamination

A Phase I and Phase II investigation has been undertaken on the site, no gross contamination has been identified on the site from these investigations. Elevated concentrations of copper and Nickel have been identified in the groundwater samples, however there is no plausible on site source of Copper and Nickel on the site and have been classified as background concentrations in the area. Pollution prevention for lateral mitigation into adjacent ponds will be provided via bunds. Details of these bunds would be required to ensure these are structurally sound and provide appropriate mitigation.

Further Guidance

Our groundwater protection development guidance notes contain further information on the requirements for developments in groundwater sensitive areas. These can be found following the link below:

<https://developers.portsmouthwater.co.uk/groundwater-protection/>

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