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

Planning Application Reference:	APP/23/00488
Proposal:	Application for mixed use residential development comprising 628 dwellings, community centre, allotments, public open space including play areas, new junction to College Road, related internal access road, footways and cycleways, pumping station and drainage basins.
Location:	Land East Of, College Road, Purbrook, Waterlooville
Date:	14 August 2023

Thank you for consulting Portsmouth Water on the above application APP/23/00488 The catchment and environment scheme have reviewed the associated documentation and have the following comments.

Site Setting

The majority of the site is located in Source Protection Zone 1c (SPZ1c) for the Havant and Bedhampton springs; an essential public water supply source. SPZ1c relates to subsurface activity only, where the Chalk aquifer is confined and may be impacted by deep drilling activities. Subterranean activities such as drainage solutions, site investigation boreholes and/or piling may pose a risk to groundwater quality at the local Public Water Supply Source. The south-eastern section of the site is located within SPZ1.

The bedrock beneath the site is classified as a secondary Aquifer. The aquifer is of high sensitivity and consequently all measures to prevent pollution during and post construction are required in order to safeguard the local public water supply.

Recommended Conditions and Informatives:

Piling and Foundations

Portsmouth Water would have no objection to piling at this location if the piles terminate within the Clay cover, if the piles penetrate the full depth of the Clay cover we would expect a piling risk assessment and method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, vibration and the programme for the works) to be submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water.

Reason: The proposed site is situated in a sensitive groundwater catchment and there is a potential risk associated with groundworks in this area.

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.

Details of how the scheme shall be maintained and managed after completion shall also be included.

Reason - To reduce the risk of groundwater pollution and prevent the increased risk of flooding, both on and off site.

Portsmouth Water has a presumption against the use of deep-bore soakaways at this location, due to the proximity to our public water supply source. All applications for the construction and installation of deep bore soakaways should be accompanied by an adequate hydrogeological risk assessment demonstrating how the risk to groundwater would be mitigated in the proposed design.

Portsmouth Water will only agree to the use of deep pit based systems (including boreholes) for surface water disposal if the developer can show that all of the following apply:

- *there are no other feasible disposal options such as shallow infiltration systems (for surface water) that can be operated in accordance with current British Standards;*
- *the system is no deeper than is required to obtain sufficient soakage;*
- *pollution control measures are in place;*
- *risk assessment demonstrates that no unacceptable discharge to groundwater will take place, in particular that inputs of hazardous substances to groundwater will be*

prevented; and

- *there are sufficient mitigating factors or measures to compensate for the increased risk arising from the use of deep structures.*

No development shall commence until such time as a scheme to dispose of foul water for that phase has been submitted to, and approved in writing by, the local planning authority in consultation with Portsmouth 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 water resources.. In accordance with position G8 of Groundwater Protection: Principles and Practice, the applicant must use the highest specification pipework and designs to minimise leakage.

Construction and Environment 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 local public.

Solution Features

No building or structure, including drainage infrastructure and utility trenches shall be located within a 10m stand-off zone surrounding any solution feature, unless appropriate mitigation measures are undertaken and approved in writing by the local planning authority in consultation with Portsmouth Water.

Reason - Paragraph 121 of the National Planning Policy Framework paragraph states that planning policies and decisions should also ensure that the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining.

Water Resources

Portsmouth Water encourage local planning authorities to consider higher standards of water efficiency in new developments, with all new homes being built to a minimum standard of 100 litres per person per day. Planning policy can help to ensure long-term sustainability and management of water supplies, which is likely to reduce the need to take less water from the environment to protect local streams and rivers and the wildlife which rely on them.

For developments that can demonstrate meeting high standards of water efficiency of no more than 100 litres per head per day, Portsmouth water offer an incentive of a 50% discount on the Infrastructure charge. Based on a development of 200 properties with an occupancy of 3 people per property, there will be a minimum saving of 15,000 litres per day. The guide would benefit covering the importance of water efficient developments and to recommend this for all new dwellings.

Further Information

The proposed surface water drainage design incorporates a number of SuDS systems, attenuation basins with bio-retention wetland areas with treatment of the surface water at the source. The site is sloped to the South, drainage appears to be discharged into basins located at the south and west of the site. It is proposed that surface water will then drain from the basins into the Bedhampton Brook (Hampshire) that is situated beyond the A3(M) motorway.

The document has stated that *“the development will incorporate a number of SuDS system within the site, treatment of surface water is provided at the source within these development parcels within the proposed basins and associated bio-retention areas. This ensures that discharge leaving the site has no adverse effect to the downstream watercourses nor to the underlying Secondary Aquifer”*.

As the location of the drainage basins is within SZ1c and SPZ1, any drainage into the ground presents a significant risk of contamination to water quality and the Havant & Bedhampton springs. Whilst the initial design is to eventually discharge to the Bedhampton Broo, it is unclear whether the basin will naturally discharge through its base. We therefore require further information on the detailed design and pollution mitigation measures proposed.

We request that a written method statement that includes the appropriate pollution prevention measures is submitted. The method statement shall include a water quality assessment for SuDS developments (CIRIA SuDS manual water quality assessment index approach) that provides an indication of the suitability of different combinations of SuDS components to mitigate water quality risks (to both groundwater and surface water) to an acceptable level.

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