

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/23/00802	Your Ref:	APP/23/00004
EH Case Officer Extn:	44 6677	Date:	22 March 2023
DC Case Officer:	Tina Pickup		
DC Case Officer Extn:	44 6461		
Application Number:	APP/23/00004		
Site Address:	Bowls Pavilion, Bidbury Lane, Havant, PO9		
Proposed Development:	Temporary use of land to carry out ground investigation works comprising the drilling of 2 no. boreholes and the installation of headworks and equipment to monitor ground conditions for a period of 18 months including mobilisation, decommissioning and full restoration periods. RECONSULTATION REQUEST for revised plans and/or documents received		

Observations / Comments:

I have reviewed the revised application documents, alongside a sample of the public objections.

No comments are made here in respect of the merits of the wider Wastewater Recycling project, this application for investigation boreholes has been considered in isolation and on its merits.

I would support the comments from objectors which refer to the Broadmarsh Landfill site as being considered to be unsuitable for the Water Recycling Plant (WRP), insofar as my current understanding of its engineering requirements and construction form. This is relevant for this application only insofar as the reference in the covering letter as to the narrow corridor within which exploratory boreholes must be placed – it follows that if an alternative preferred WRP site is selected (as has been recommended by this service), the origin of the pipeline will change and this will necessitate consequential amendment of the pipeline route. For this reason, it is not entirely clear that the proposed Bidbury Lane development will be required.

I would also acknowledge however that the above observation speaks only to the need for this consent (or to implement any consent awarded-), and not to the appropriateness of the proposed use of the land. It is my understanding that the NPPF dictates that the latter is the primary purpose of the planning system. With this in mind, I see no material reason to block the applicant from securing a consent that may not ultimately be required.

Public Objections Raised

I note the objections which concern the potential risk to water quality. This risk is interpreted to be related to short-term turbidity during the drilling phase, and is not a contaminated land issue *per se*. There could be risks in the event that the land is currently affected by the

presence of contaminants, or in the event of future spills if the boreholes are not decommissioned so as to prevent the conduit serving as a pathway for preferential vertical migration of pollutants from the surface to the aquifer.

I have reviewed the site history, and note that the land does not have any prior history of potentially contaminating landuses, and that it's current use does not give rise to any immediate concern about future spills being likely. The historic presence of Bidbury Springs at the site would suggest that the principal aquifer is artesian at this location, and hydraulic gradients would probably not facilitate significant vertical migration of contaminants; this lends some degree of comfort with respect to preferential pathways.

Escape of liquid slurry has also been raised. I don't regard this to be significant concern, whilst the proposed boreholes are relatively deep, I don't anticipate specialist drilling fluids (lubricants) being required. I am mindful that the area around the headworks will be fenced for a period of at least 12 months, both preventing direct contact between members of the public and any residues, and exposing those residues to weathering processes during this time.

It would appear that the application documents rightly anticipates artesian conditions, and it is therefore expected that appropriate management measures would be implemented during drilling & headworks construction.

Observations

There is no drilling method statement, but cover letter indicates that standard rotary core techniques are to be used, which should permit extraction of arisings as coherent cores (rather than as a slurry of raised cuttings at the surface). The schematics indicate that the well bore will be sleeved to at least 1m below the chalk horizon, and there is no indication that clean drilling techniques are to be employed. Given the anticipated low risk of encountering contamination at the well sites, the omission of clean drilling is not considered to be problematic.

Perhaps of greater concern is the ambiguity about the material represented by the legend entry described as 'grout'. This material is referred to in both the construction and decommissioning illustrations. Bentonite pellets are represented in the legend/key, but do not appear on the schematic. The appearance of both 'grout' & bentonite within the legend would suggest that grout may not have equivalent resistance to vertical migration of water. It is assumed that notation would use the description 'made ground/head deposits' where it is intended to (grout or -) backfill with arisings, so another material is anticipated. What material is used, and where it is used within the vertical depth of the trail hole, will determine whether it is effective in preventing the well bore acting as a preferential pathway at some point in the future.

The bores are located within a groundwater source protection zone, and so my expectation would ordinarily be for decommissioning to include grouting with appropriately prepared bentonite pellets across the chalk (aquifer unit-) horizon.

As for whether this would justify the imposition of a planning condition to control the construction or decommissioning process is another question – given the above-referenced mitigations (lack of source, likelihood of future spills, artesian conditions), this is probably not justified under contaminated land policies. I am mindful that I would not normally seek to control site investigation processes using such instruments, and that the activities of other bodies (e.g. the BGS, or Portsmouth Water) are similarly not typically controlled in this manner (I am not aware of any examples where such controls have been applied).

I also note in particular the statement given by Portsmouth Water Company in it's consultation response stating that *"[Portsmouth Water Company is-] ...currently liasing (sic) with Southern Water about this development and any potential recommendations that may be necessary"*

Given the nature of the risk to the principal aquifer, and to the public potable supply, it is considered that the LPA may rely upon this statement and assume that any material concerns about impacts to this sensitive receptor will be appropriately and proactively managed by the key stakeholder (Portsmouth Water) through the liaison process referred to in it's consultation response. This is reinforced by the confidence of Portsmouth Water in this process in supporting it's overall response of *'no objection'*.

Noise

The provisions for implementing noise barriers and limiting the hours of operation are considered to be broadly adequate, when considered alongside the prior notification and limited period of works. No objections arise.

Conclusions

For the reasons given above, and notwithstanding the ambiguity about the efficacy of the grout, particularly at decommissioning; no material objections arise on contamination, pollution, or noise grounds, and no conditions are proposed.

Mr. Jonathan Driver
Environmental Control Officer