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**CONSULTATION UNDER THE TOWN AND COUNTRY PLANNING
(DEVELOPMENT MANAGEMENT PROCEDURE ENGLAND) ORDER 2015**

Applicant:	Havant Property Investment LLP
Planning Application Reference:	APP/21/00200
Proposal:	Demolition of existing buildings and redevelopment of site comprising erection of distribution warehouse (class B8) with ancillary offices and related facilities, vehicle storage deck, new access, landscaping and associated infrastructure
Location:	32 New Lane, Havant, PO9 2NG
Date:	23 March 2021

Portsmouth Water's Position

Portsmouth Water have reviewed the full application APP/21/00200 for the site. Our response is based on the review of the following documentation:

- Drainage Strategy Report by Pinnacle Consulting Engineers, February 2021
- Phase I Environment Assessment, January 2021
- Construction Management Plan, January 2021

The site is a brownfield site and ground contamination is suspected from the previous land uses. The site is located within the Source Protection Zone 1c (SPZ1c) for an essential Public Water Supply Source. The SPZ1c relates to subsurface activity only, where the Chalk aquifer is confined and may be impacted by deep drilling activities. Subterranean activities such as deep drainage solutions and/or piling may pose a risk to groundwater quality at the local public water supply source. The confined 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.

Drainage

The proposed surface water drainage strategy for the site is utilising the existing surface water sewer network for final discharge. Car parking bays will be permeable paved to treat car park drainage. Run-off from the impermeable areas will be directed through drainage channel with a petrol interceptor prior to entering the attenuation tanks with final discharge to existing surface water sewer. Due to the sensitivity of the groundwater environment, infiltration is not proposed to be suitable solution for the site. Portsmouth Water agree with this assessment and would have a presumption against deep infiltration drainage due to the previous use on the site and the sensitivity of the underlying principal aquifer. The proposed foul water drainage strategy for the site is the connection to the existing public foul water sewer following confirmation from Southern Water.

Both drainage proposals are acceptable to Portsmouth Water in relation to groundwater protection. If there is any deviation from these proposals Portsmouth Water would wish to be further consulted.

Piling & 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, this should detail the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including pollution prevention measures. Piling or any other foundation designs using penetrative methods can pose a risk to potable supplies from, for example, turbidity, mobilisation of historical contaminants, drilling through different aquifers and creation of preferential pathways for contaminants.

Pollution Prevention & CEMP

The Construction Management Plan submitted as part of the application does not cover all the environmental pollution risks of construction. There is no detail on the management of overland runoff (including the drainage proposal for the wheel washing facilities), 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. The current plan could be updated with this information or alternatively a separate plan could be prepared.

Reason- Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the local water supply source if not appropriately managed.

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