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

Planning Application Reference:	APP/22/01231
Proposal:	Redevelopment of a brownfield site to include the provision of 4No. Apartment blocks comprising of 90No. residential dwellings (including 27 affordable units) (Use class C3 residential), parking, public open space, landscaping and other associated works, including demolition of existing buildings on site, with access from Palk Road.
Location:	Land at Palk Road, Havant
Date:	09 February 2023

Portsmouth Water's Catchment and Environment Team would like to provide the following advice for the proposed development at Palk Road, Havant.

Portsmouth Water **Objects** to the current Planning Application for the following reasons:

Portsmouth Water were previously consulted on the pre-application consultation GEN2200047 and provided a response that outlined our concerns with risks to groundwater quality. We stated that we had a presumption against piling at this location.

Portsmouth Water have liaised with Bellway Homes with respect to Portsmouth Waters Havant Thicket pipeline route which has planning permission to be constructed underneath this site. We discussed with Bellway Homes that Apartment Block A was originally located on top of the pipeline shaft tunnel and that any piling would intersect with the Havant Thicket Pipeline route. Bellway Homes agreed to move the Apartment Block A so piling would not interfere with the pipeline.

Portsmouth Water also stated that we would have a presumption against piling for Apartment Block C. Apartment Block C is located next to Bedhampton water supply spring chambers and on top of a geological fault that provides the spring flows to Bedhampton pumping station and Water Treatment Work. Any piling or ground improvements methods would have a detrimental effect on the geological fault and spring flows. No detailed piling or ground improvement design has been submitted as part of this planning application. Therefore, we wish to object to this planning application, in particular to the development of Apartment Black C.

We wish to work with Bellway Homes to overcome this objection and agree to the foundation design that does not present a risk to Portsmouth Waters water supply. We propose regular engagement and meetings with Bellway Homes to help support this planning application.

Notwithstanding this objection, we recommend the following information and suggested Conditions if the planning application is approved:

Site Setting

The site lies on Bedrock consisting of Lewes Nodular Chalk Formation. The geology beneath the site is classified as a Principal Aquifer. The site is located in Source Protection Zone 1 (SPZ1) for the Havant and Bedhampton springs; an essential public water supply source. The groundwater area 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 Catchment and Environment Team would request that no development shall commence on this site until a scheme for surface and foul water drainage has been submitted to and approved in writing by the Local Planning Authority in consultation with Portsmouth Water's Catchment and Environment Team.

The Flood Risk Assessment and Surface Water Management Strategy should clearly identify the means of foul and surface water drainage design for the site. We would have a presumption against the use of deep bore soakaways at this site and the discharge of foul and surface water into ground where adequate pollution prevention measures are not in place. If deep bore soakaways are proposed the application must be accompanied by detailed plans and a hydrogeological risk assessment stating how risk to groundwater have been assessed and mitigated through design.

We will only agree to the use of deep pit based systems (including boreholes or other structures that bypass the soil layers) for surface water or effluent 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) or drainage fields/mounds (for effluents) 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.

Reason- The proposed development lies within an area of sensitive groundwater used for human consumption. Deep infiltration systems can provide a pathway for contaminants. Any contamination present may pose a risk to groundwater underlying the site and to the surrounding drinking water supplies.

Piling & Foundations

The proposed site is situated in a sensitive groundwater catchment and there are potential significant risks associated with groundworks in this area.

The Catchment and Environment Team request information on foundation design be submitted for detailed consideration at the planning application stage. This should include as a minimum:

- a) the methods to be used;
- b) the design depths of the various structures involved and rationale;
- c) the density of piling, if any; and
- d) details of materials to be removed or imported to site.

There would be a presumption against piling at this location though we would be seeking a non intrusive method that will pose a minimal risk to water quality and water resources.

No piling shall take place until a piling method statement and risk assessment (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) has been submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water's Catchment and Environment Team.

Any piling, if proposed, must be undertaken in accordance with the terms of the approved piling method statement.

Reason- 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.

Construction Environmental Management Plan (CEMP)

The Catchment and Environment Team request a Construction Environmental Management Plan (CEMP) is provided for comment at full planning application stage detailing all pollution mitigation measures to be adopted during the construction phase. This should include management of overland runoff, storage of hazardous materials, cement washout, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water quality and resources are not put at risk from leaks or spillages.

Reason - to ensure that water resources are not put at risk from leaks or spillages.

Land Contamination

The Catchment and Environment Team request a Land Contamination assessment to be undertaken which should include;

- a) Desk Study
- b) Site Investigation
- c) Risk Assessment
- d) Verification plan and report

It is likely that any scheme will need to deal with the risks associated with the possible contamination associated with the former uses of the site. As the site lies in Source Protection Zone 1, the risk of contamination to the Bedhampton & Havant Springs by developing the site presents a significant risk. However the development can limit the risks by reducing the amount of intrusive construction methods, such as piling if any of the building and foundation can be used.

Security of water resources

This site is located next to our spring sources that we abstract for water supply. There will be specific requirements to ensure the safety of this resource in order to prevent any potential pollution incidents this includes adequate security. We recommend that a security plan is produced and consulted with Portsmouth Water.

Havant Thicket pipeline

Portsmouth Water will have there Havant Thicket pipeline and vertical shaft located within the area of Apartment Block 2. Bellway Home are aware of these assets and have agreed to the location of the new block and proposed piling scheme (details to be agreed). Portsmouth Water seek assurance and clarity on the intrusive methodology around the piling and foundation works (recommended Condition above). We will work with Bellway by incorporating marker points and delineate locations that will allow safe installation of piles so as the integrity of the assets is not impacted. Therefore, Portsmouth Water will need to have a close working relationship and potentially on-site supervision/monitoring during these works. Any ground investigations and surveys will be required to support the piling methodology.

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://www.portsmouthwater.co.uk/developers/groundwater-protection/>

Catchment & Environment Team

Portsmouth Water

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