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

Applicant:	Drew Smith
Planning Application Reference:	APP/18/00244
Proposal:	Outline application with all matters reserved. Mixed use development comprising up to 100 new homes, including up to 40% affordable, 2860 sqm of employment floorspace and improved access onto New Lane and Martin Road. On-site parking for residential and employment uses. Landscaping to be provided, including acoustic bund to rear of employment units and naturalisation of existing watercourse (full details to be submitted at a later stage) (Approved 30.01.19) Request to Discharge Conditions 4 & 18 and partially Discharge Condition 8 (20.02.2019). Request to Discharge Condition 4 (6.01.20). Request to Discharge Conditions 15 & 16 (20.12.19) and Concition 5 (6.2.20. Request to Discharge Condition No.s 6,7,8,11,14,17,18,19,21 & 25 (22.07.20)
Location:	Colt International Ltd, New Lane, Havant, PO9 2LY
Date:	14 August 2020

Portsmouth Water have been consulted on the discharge of conditions 7, 8, 11, 17, 18 and 25 of outline planning permission APP/18/00244. We have reviewed the available documentation and have the following comments.

Condition 7

Prior to the commencement of any specific phase of development hereby approved (or such other date or stage in development as may be agreed in writing by the Local Planning Authority), plans and particulars specifying the layout, depth and capacity of all foul and surface water drains and sewers proposed to serve the same, and details of any other proposed ancillary drainage works/plant (e.g. pumping stations) have been submitted to and approved in writing by the Local Planning Authority. Unless agreed otherwise in writing by the Local Planning Authority, the development hereby permitted shall not be brought into use prior to the completion of the implementation of all such drainage provision in full accordance with such plans and particulars as are thus approved by the Authority.

Reason: To safeguard the amenities of the locality and ensure that all such drainage provision is constructed to an appropriate standard and quality and having due regard to policies and proposals CS16 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

PW comments on Condition 7-

Portsmouth Water have no adverse comments on the discharge of condition 7. There are no proposed foul pumping stations and foul drainage will be the connection to an existing foul water sewer. The surface water drainage will discharge via tanked permeable paving with final discharge to existing surface water monsoon drain. Both drainage strategies are acceptable to Portsmouth Water in relation to groundwater protection.

Condition 8

Prior to the commencement of any specific phase of development hereby approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority) a remediation strategy to deal with the risks associated with contamination of the site has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:

- 1. A preliminary risk assessment which has identified:
 - all previous uses;
 - potential contaminants associated with those uses;
 - a conceptual model of the site indicating sources, pathways and receptors;
 - and · potentially unacceptable risks arising from contamination at the site.*
- 2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.*
- 3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.*
- 4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance, relevant triggers and arrangements for contingency action (a “long-term monitoring and maintenance plan”). Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.*

Reason: Having due regard to policies DM10 of the Havant Borough Adopted Core Strategy (2011) and DM17 of the Havant Borough Local Plan (Allocations) [2014] and the National Planning Policy Framework, contamination may be present at the site as a result of both previous land uses (& / or activities) in areas of the site that have not

previously been subject to investigation, that could pose a risk to future residential occupants, to buildings and to controlled waters.

The applicants 'Ground Investigation Report' (reference A090070-182) has identified potential sources of contamination at the site requiring further investigation once the site is fully assessable. This is needed in order to confirm whether any contamination present poses a risk to groundwater in the chalk aquifer underlying the site and whether remediation is required. The site is located in the groundwater Source Protection Zone 1c for the Bedhampton and Havant springs. Public drinking water supplies may be at risk from contamination at the site.

PW comments on Condition 8-

Portsmouth Water have reviewed the 'Ground Investigation Report' (reference GWPR3514/GIR/MARCH 2020) and 'Validation Report & Further Groundwater Risk Assessment Report' (reference GWPR3514/VGRA/April 2020) by Ground & Water. The ground investigations found contamination in hotspots within the made ground and contamination risk to the perched groundwater. During intrusive site investigations, the shallow groundwater encountered was considered to be perched within the Made Ground overlying the superficial Head deposits and the London Clay Formation. No specific remedial works were planned to protect groundwater due to the conclusion the underlying thickness of London Clay Formation would offer sufficient protection to the underlying Principal Aquifer from the perched groundwater contamination.

The identified pollution hotspot (WS1) in the made ground was targeted for remedial works. The works involved the removal of the impacted made ground. The works were verified by a competent person, in addition post remediation groundwater monitoring was undertaken. Water quality testing was undertaken on the sampled groundwater and a number of contaminants were elevated above the EQS Freshwater Standards. The risk to surface/perched waters has been classified as a low-moderate from the groundwater sampling to date. The risk to Principal Aquifer has been classified as negligible due to the thickness of London Clay Formation overlying the Principal Aquifer. **Portsmouth Water are satisfied with this assessment and have no objections to the discharge of condition 8.**

Condition 11

No Piling or foundation works relating to a specific phase of development (or such other stage in development as may be agreed in writing by the Local Planning Authority) shall take place unless and until a method statement for that phase (detailing the depth and type of piling/foundation to be undertaken and the methodology by which such piling / foundation will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure and resources, vibration and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority in consultation in with Portsmouth Water and the Environment Agency. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the proposed development, does not harm groundwater resources in line with paragraph 109 of the National Planning Policy Framework and policy DM10 of Havant Borough Local Plan (Core Strategy) 2011. Piling using penetrative methods can result in risks to potable supplies from, for example, by mobilising contamination and drilling through different aquifers and creating preferential pathways.

PW comments on Condition 11-

Portsmouth Water have reviewed the piling risk assessment and method statement. The proposed piling method is SFA piling. There are 385 no 300mm diameter piles proposed to the max depth of 12.5 m bgl. The intrusive ground investigations on the site have proven the depth of the London Clay to be at least 18 m bgl. The piles should terminate within the clay cover, in addition the method of piling is the least intrusive. **Therefore, Portsmouth Water have no adverse comments on discharge of condition 11.**

Condition 17

Prior to the commencement of any specific phase of development hereby approved (or such other date or stage in development as may be agreed in writing with the Local Planning Authority) a detailed surface water drainage strategy for that stage shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Lead Local Flood Authority, containing the following elements:

Detailed drawings of the entire proposed surface water drainage system, including levels, gradients, dimensions and pipe and manhole reference numbers.

Full calculations detailing the existing greenfield and or brownfield surface water runoff rates for the 1 in 1, 1 in 30 and 1 in 100 storm events.

Full details of the proposed SuDS features and any flow control measures. Information evidencing measures taken to prevent pollution of the receiving groundwater in accordance with the water quality criteria set out in the Ciria Suds Manual C753.

Maintenance regimes of entire surface water drainage system including individual SuDS features, including a plan illustrating the organisation responsible for each element.

Evidence that those responsible/adopting bodies are in discussion with the developer. For larger/phased sites, we need to see evidence of measures taken to protect and ensure continued operation of drainage features during construction.

Exceedance flows are considered in the event of the pipe being nonoperational. Evidence that Exceedance flows and runoff in excess of design criteria have been considered – calculations and plans should be provided to show where above ground flooding might occur and where this would pool and flow.

The development shall thereafter be carried out in accordance with the approved details.

Reason: To ensure that flood risk and pollution to water sources are prevented and having due regard to policies CS15 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework

PW comments on Condition 17-

Portsmouth Water have no adverse comments to make on the discharge of condition 17.

The surface water drainage will discharge via tanked permeable paving with final discharge to existing surface water monsoon drain. This is acceptable to Portsmouth Water in relation to groundwater protection.

Condition 18

Prior to the commencement of any specific phase of development hereby approved (or such other date or stage in development as may be agreed in writing with the Local Planning Authority) a Construction Environmental Management Plan (CEMP) for that phase shall be submitted to and approved in writing by the Local Planning Authority to demonstrate how spills, incidents and site drainage will be managed during the proposed site development. The development shall thereafter be carried out in accordance with the approved details. Reason: The proposed works are in a sensitive groundwater catchment and there are potentially significant risks associated with groundworks in this area having due regard to policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

PW comments on Condition 18-

Portsmouth Water have reviewed the Construction Environmental Management Plan (CEMP) and are satisfied with the content of the plan. However, Portsmouth Water should be the contact alongside the Environment Agency for any pollution incidents on the site which could impact upon groundwater not Southern Water as the site is location in the Source Protection Zone of one of Portsmouth Water supply sources. Please can section 4.6.1 of the plan be amended with this information. **Following this amendment Portsmouth Water have no objections to the discharge of condition 18.**

Condition 25

Prior to the commencement of any specific phase of development hereby permitted (or such other date or stage in development as may be agreed in writing with the Local Planning Authority) plans and particulars specifying the alignment, width, gradient and type of construction proposed for all footways, roads and individual accesses thereto (including all relevant horizontal cross and longitudinal sections) and the related provision to be made for street lighting and for surface water disposal and a programme for the implementation and making up of the same shall have been submitted to and approved in writing by the Local Planning Authority. The implementation and making up of the same shall be completed in full

accordance with such plans, particulars and programme as are thus approved by the Authority.

Reason: To ensure that they are constructed to satisfactory standard and, where appropriate a standard which will enable them to be taken over as publicly maintained highways and having due regard to policies CS16 and CS20 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.

PW comments on Condition 25-

Portsmouth Water have no adverse comments to make on the discharge of condition 25 as this is not in our remit.

Catchment Management Team
Portsmouth Water

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