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

Applicant:	Bargate Homes Limited
Planning Application Reference:	APP/20/00455
Proposal:	Outline application (with all matters reserved except for access) for the construction of up to 56No dwellings, open space, landscaping, access, the demolition of 149 Lovedean Lane and associated works (part of application site within Havant Borough Council
Location:	Land at Cottage Farm, 149 Lovedean Lane, Waterlooville
Date:	16 July 2020

Portsmouth Water's Position

The development lies in a very sensitive groundwater location due to underlying principal aquifer and the risk of chalk dissolution in this area. The site is located within the Source Protection Zone One (SPZ1) for an essential Public Water Supply Source. Therefore, all measures to prevent pollution during and post construction are required in order to safeguard the local public water supply.

Our concerns regarding groundwater quality protection can be addressed through the addition of appropriate planning conditions to reduce the potential risks posed to groundwater and our resource as a result of the proposed development. Without these conditions we would object to the proposal due to the risk to groundwater quality and the local public water supply.

Recommended Planning Conditions

1. **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 the Environment Agency and 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 ensure that any proposed surface water drainage scheme does not harm groundwater resources in line with paragraph 170 of the NPPF and to reduce the risk of groundwater pollution.

2. ***No development shall commence until such time as a scheme to dispose of foul water has been submitted to, and approved in writing by, the local planning authority in consultation with the Environment Agency, Portsmouth Water and Southern 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 in order to minimise the risk to controlled waters and the public drinking water supply.

3. ***If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with the Environment Agency and Portsmouth Water) shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified.***

The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences.

Reason - To ensure that risks from land contamination to drinking water supplies is controlled and mitigated.

4. ***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 water supply source.

- 5. No piling or any other foundation construction using penetrative methods shall be carried out other than with the express written consent of the local planning authority in consultation with Portsmouth Water. The development shall be carried out in accordance with the approved details.***

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) should be submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water.

Thus it should be demonstrated that any proposed piling;

- a. Will not result in contamination of groundwater. This is in accordance with National Planning Policy Framework paragraph 109.***
- b. Nor any increased risk to drinking water supplies (including turbidity).***
- c. Nor deterioration in the transmissivity of the aquifer.***

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.

- 6. No drainage shall be infiltrated to ground within a 10m stand-off zone surrounding any known solution feature with a surface expression (e.g. surface depression or sinkhole) or where solution features (without surface expression) are encountered during the works. In addition, building structures and infrastructure positions will also be located, where possible, to avoid such solution features, subject to detailed investigation, assessment and development of appropriate mitigation measures.***

A development design strategy for mitigating the hazards of solution features on buildings and infrastructure shall be prepared and approved in writing by the local planning authority in consultation with Portsmouth Water prior to the commencement of development or phase or sub phase of development. The development shall be carried out in accordance with the approved details

Reason -Solution features can create zones of instability that provide a direct connection to the aquifer. Such features in this area have been shown to provide rapid transmission pathways for pollutants direct to the springs at Havant & Bedhampton. As a result, a precautionary approach to development is needed to protect this important public drinking water supply. To ensure that any proposed works, do not harm water resources in accordance with paragraph 170 of the NPPF.

Informatives

Drainage

The proposed surface water strategy is disposal SuDs and final discharge to an existing surface water sewer. This is acceptable to Portsmouth Water in relation to groundwater protection.

It is considered that in addition to the environmental reasons noted above, for geotechnical reasons soakaways shall not form part of any development scheme at this site. Precautions will be required with regards to surface drainage and infrastructure to mitigate the risks of surface water drainage further reducing the geotechnical stability of the ground at this site.

Portsmouth Water wish to be further consulted on the final surface water drainage design in line with recommended Condition 1.

The proposed foul water strategy is discharge into the exiting foul main sewers; this is acceptable to Portsmouth Water in relation to groundwater protection. Portsmouth Water require the use of the highest specification pipework and designs for schemes involving new sewerage systems in SPZ1 to minimise leakage.

If permission for the connection to the existing foul main sewer is not permitted, Portsmouth Water wish to be further consulted on the alternative foul water drainage strategy in line with recommended Condition 2.

Land Contamination

A preliminary site investigation has been undertaken on the site and reported in the 'Desk Study Report', by Wilson Bailey Geotechnical & Environmental ref: J19042. From the preliminary investigation, there is no evidence of a credible pollution source and no pollutant linkage identified. Portsmouth Water would wish however to be consulted on unexpected contamination in line with recommended Condition 3 due to the sensitivity of the groundwater environment in this area.

Construction Environmental Management Plan (CEMP)

Portsmouth Water wish to be consulted on the Construction Environmental Management Plan (CEMP) for comment in line with recommended Condition 4. The CEMP should specifically outline the proposed means of surface water management during development.

Piling & Foundations

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

Portsmouth Water would have a presumption against piling at this location due to the high sensitivity of the groundwater environment. If piling was the proposed foundation solution, no piling shall take place until a piling method statement and risk assessment has been submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water. This in line with recommended Condition 5

Solution features

The site lies on the boundary between the Lambeth group and the Chalk Bedrock, this geological setting is likely form solution features. There are 4 mapped natural solution features (swallow holes and dolines) and a several man-made chalk pits on the site. These can form rapid pathways to the springs, which feed the public water supply abstractions. There are known to be numerous solution features connecting the springs to the area. Therefore, all potential risks posed by the development and its proximity to solution features must be considered as part of this application. Excavation should be inspected for solution feature presence and the risk mitigated where required. This is in line with recommended Condition 6.

Further Ground Investigations

Portsmouth Water would wish to be further consulted on any intrusive ground investigation works and findings.

Catchment Management Team
Portsmouth Water

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