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**CONSULTATION UNDER THE TOWN AND COUNTRY PLANNING
(DEVELOPMENT MANAGEMENT PROCEDURE ENGLAND) ORDER 2010**

Applicant:	White Farming Limited
Planning Application Reference:	APP/19/00007
Proposal:	Re-Consultation Outline Application for access with all other matters reserved, for up to 72 new homes plus associated green infrastructure including community orchard
Location:	Camp Field (land to the west of Havant Crematorium), Bartons Road, Havant
Date:	24 June 2019

Portsmouth Water have reviewed the revised plans and documents for the outline application for up to 72 new homes plus associated green infrastructure including community orchard, Havant and have the following comments.

Site Setting

The site is located in Source Protection Zone 1c (SPZ1c) for the Havant and Bedhampton springs- 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 and our supply at Havant and Bedhampton Springs. The site is also located less than 2km south west of the proposed Havant Thicket Water Storage Reservoir site.

Portsmouth Water's Position

Portsmouth Water have no objects in principle to the proposed development, however due to the sensitivity of the groundwater environment and local habitats for protected species we would wish to see more detail regarding the proposed foundation solution for the site, in addition to the protection of Bechstein's Bats.

Drainage

The proposed surface water drainage strategy is a sustainable drainage system comprising of attenuation basins/tanks and swales with discharge to an existing ditch. Portsmouth Water have no further comments on the surface water drainage strategy.

The proposed foul water drainage strategy is the connection to an existing main sewer system, 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. Portsmouth Water have no further comments on foul water drainage for the site.

Foundation Design

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 if the piles penetrate the full depth of the Clay cover. We would have no objection to piled foundations that terminate within the Clay cover; in this instance we would expect 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) to be submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water.

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.

Protection of Bechstein's Bats

You will be aware of our previous comments with regard to the protection of Bechstein's bat, and the on-going studies that we have been carrying out on this matter. We have reviewed the supporting information and also the comments made by the Borough Council's ecologist and note that no new ecological information on this matter has been provided as part of this latest consultation, therefore our previous comments remain valid. To summarise, we provide the following comments;

- Myotis or 'mouse-eared' bats are generally woodland species and some are particularly susceptible to light pollution, the Bechstein's bat *Myotis bechsteinii* being one of those. It is therefore essential that any development proposals consider the impacts at a site and at a strategic level, in order to ensure that important foraging or commuting corridors are not impeded. It is acknowledged that the applicant's ecologist has tried to do that, using trapping surveys, but were unable to catch any Bechstein's bats. However, our data has confirmed the use of Barton's Copse by Bechstein's bat during 2018 and also confirmation of a functional link between Barton's Copse, Southleigh Forest and Havant Thicket.
- Barton's Copse is evidently an important component of the landscape for the local Bechstein's bat population with roosts recorded in both 2009 and 2018. We acknowledge that, with appropriate mitigation, it may be possible to minimise the impacts of this development on the local Bechstein's population, but we are concerned that any future development of the northern part of the site could have significant impacts. We acknowledge that any future development on that part of the site is not being considered at this point, however we consider it crucial that any mitigation measures should consider the site as a whole if they are to be effective. Such measures should include large buffers along woodland edge habitats, that are protected from any spill from artificial lighting. Such measures could include the planting of scrub species to create an enclosed corridor for bats to commute and forage along.
- Portsmouth Water are currently working with the Borough Council's ecologist and Natural England to develop a Bechstein's bat strategy/action plan. The aim of this document will be to provide guidance for development in the local area, where it is considered inappropriate and example mitigation measures in order to ensure that the favourable conservation status of the species is maintained.

Portsmouth Water