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

Applicant:	Hargreaves Properties Ltd
Planning Application Reference:	APP/18/01072
Proposal:	Outline planning application with all matters apart from access reserved for subsequent approval for the erection of Class B1(c) / B2 / B8 development and Class B8 Trade Counter use, Class A1 Retail, Class C1 Hotel, Class D2 Leisure and Classes A3 and A5 Drink / Food Establishments
Location:	Former BAE Systems, Waterloo Park, Elettra Avenue, Waterlooville
Grid Ref:	SU67542 09822
Date:	22 November 2018

Portsmouth Water have reviewed the outline application for the erection of Class B1(c) / B2 / B8 development and Class B8 Trade Counter use, Class A1 Retail, Class C1 Hotel, Class D2 Leisure and Classes A3 and A5 Drink / Food Establishments at Waterloo Park and have the following comments. Our response is based on the review of the following documents:

LOCATION_PLAN-1141498, Drawing number: 1618-PL-100
PROPOSED_SITE_USE-1141501, Drawing number: 1618-SK35 C
DESIGN_AND_ACCESS_STATEMENT-1141561
PHASE_I_ENVIRONMENTAL_ASSESSMENT_REPORT_-_SEPT_2018__COMPLETE_-1140851
FLOOD_ASSESSMENT-1140854
FLOOD_ASSESSMENT_ADDENDUM-1140855

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 site lies on Made Ground and Head deposits overlying the London Clay Formation. 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 drainage solutions, site investigation boreholes and/or piling may pose a risk to groundwater quality and our supply at Havant and Bedhampton Springs.

Drainage

According to the FLOOD_ASSESSMENT_ADDENDUM-1140855 the proposed surface water drainage strategy for the site comprises a combination of attenuation crates and permeable paving with outfall controls. The recommended flow route is via a new SuDs feature (swale) constructed between the open watercourse and existing collector drain at the western boundary of the site.

The site use with the highest pollution hazard indices as delineated from the Flood Risk Addendum is the 'B1(c)/B2/B8 Trade Counter Uses'. The proposed surface water drainage design for this area outlined in the Addendum involves surface water storage areas formed of permeable paving with a granular sub-base with storage discharges directed to the proposed vegetated swale feature.

The area in the south-west corner of the site is designated as Flood Zone 2, the Addendum states the storage designed in this area of the site will not benefit from filtration through either permeable paving or a granular sub-base. It is anticipated another method of treatment will be required, it is recommended that an oil interceptor is installed with the drainage system accompanied by an additional stage of treatment provided by a proprietary treatment product such as a Downstream Defender. The storage is projected to connect to the existing public surface water sewer in Elettra Avenue.

Portsmouth Water would wish to be consulted on the final surface water drainage strategy for the site prior to approval. Information on pollution prevention measures and mitigation from areas such as industrial units and car parking areas prone to contaminants should be provided. Portsmouth Water additionally requires design details of the permeable paving areas proposed. Portsmouth Water are pleased to see a SuDs maintenance schedule mentioned within the Addendum. As part of this application Portsmouth Water would wish to see a drainage maintenance schedule submitted for the proposed SuDs drainage systems.

The foul drainage from the site will be disposed of by mains sewers, however it is unknown if proposing to connect to the existing drainage system. Portsmouth Water require the use of the highest specification pipework and designs for schemes involving new sewerage systems in SPZ1 to minimise leakage. Please provide details of the proposed foul drainage strategy for the site.

Piling & Foundations

No piling shall take place until a piling 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) has been submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Portsmouth Water require further information on foundation design be submitted for detailed consideration. 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.

In the event that piling/excavation works are required on site Portsmouth Water would require an intrusive land contamination investigation and risk assessment to review potential contamination as part of these works.

The method statement outlining the approach to drilling must take into account the sensitive principal aquifer at depth and be provided for comment prior to commencement. Pollution prevention measures and clean drilling techniques must be adopted.

Risk Assessment and Conceptual Site Model

A Phase I Environmental Report (Preliminary Risk Assessment) has been undertaken to support the application. We are pleased to see groundwater acknowledged as a sensitive receptor for the site and the site designation as SPZ1c outlined in the report. The report concludes from the review of previous site investigative work that there are no contamination issues identified to date at the site.

The report states in the event that any olfactory or visual evidence of contamination is encountered during construction of foundation excavations in the future it is recommended that a competent person attend the site and a verification sampling programme of the underlying soils be undertaken to examine contaminate presence. Portsmouth Water support this recommendation and would like to see a strategy plan for verification of contamination not previously identified at the site.

Environmental Management

The proposed re-development of the site is intended for mixed retail and light industrial use, Portsmouth Water request a Construction Environment Management Plan (CEMP) be produced to outline the key environmental processes proposed on site during construction and information provided on what to do in the event of an incident in line with the applicant's Environmental Management Systems (EMS) policy.

During and post construction there is the potential for polluting materials to enter the environment as a result of leaks, spills or pollution incidents. Good housekeeping and environmental management will reduce the risk and regular maintenance of plant and machinery on site will ensure best practices are followed.

Bulk storage of chemicals and hydrocarbons (oils) should be carried out on impermeable surfaces and in accordance with British Standards. Pollution prevention measures should include bunding, secondary containment where feasible and an incident response plan including spill kits on site and training of site staff on how to use them. This information should be presented in the EMS and form part of the CEMP to be readily available to all staff whilst working on site.

The Construction Environmental Management Plan (CEMP) should specifically outline the proposed means of surface water management during development. Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the Havant & Bedhampton Springs.

Catchment Management Team
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