



Registered Office:
Portsmouth Water Ltd
PO Box 8
Havant
Hampshire PO9 1LG

Tel: 023 9249 9888
Fax: 023 9245 3632
Web: www.portsmouthwater.co.uk

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

Applicant:	White Farming Limited
Planning Application Reference:	APP/19/00007
Proposal:	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:	20 February 2019

Portsmouth Water have reviewed 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.

Portsmouth Water's Position

Portsmouth Water have no objects in principle to the proposed development, however due to the sensitivity of the environment of the proposed site (both groundwater and ecological), we would wish to see more detail regarding the proposed foundation solution for the site and on the protection of Bechstein's Bats.

Drainage

The proposed surface water drainage strategy is a sustainable drainage system, the soakaway tests highlight the underlying geology has a low infiltration potential and therefore infiltration drainage techniques are not proposed as the main surface water drainage solution for the site.

If there is no drainage by deep bore soakaway systems then Portsmouth Water have no further comments on the surface water drainage strategy. Portsmouth Water have a presumption against deep bore soakaways within this area. All applications for the construction and installation of deep bore soakaways should be accompanied by an adequate risk assessment demonstrating how the risk to groundwater would be mitigated in the proposed design.

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

Portsmouth Water require details of the proposed foundation solution for the development, the proposed works are situated in a sensitive groundwater catchment and there are potentially risks associated with groundworks in this area.

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. Thus, if piling is required it should be demonstrated that any proposed piling will not pose a risk to groundwater.

Portsmouth Water have a presumption against piling at the site and would request no piling should 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.

Protection of Bechstein's Bats

The Havant Thicket Winter Storage Reservoir site is safeguarded in the Havant Borough Council Local Plan. At the request of Natural England Portsmouth Water has been undertaking extensive bat survey work since 2008 in order to develop a better understanding of the use of the reservoir site and the wider landscape by Bechstein's bats. This survey work has demonstrated that Bechstein's bats are utilising Barton's Copse, Southleigh Forest, Hollybank Wood and Stansted Forest for roosting and foraging.

Importantly, in 2018 a female Bechstein's bat was tracked moving between Staunton Country Park where it was foraging and Barton's Copse and Southleigh Forest, demonstrating that the populations of this species are linked between these 3 woodland areas. Thus, any impact on the bat community in the vicinity of Barton's Copse and Southleigh Forest will also have an adverse impact on the population using the Staunton Country Park/ reservoir area.

The tracked female Bechstein's bat was found to roost in both Barton's Copse and Southleigh Forest. An emergence survey at the Southleigh Forest roost tree found a very large Bechstein's bat maternity roost, demonstrating the importance of the Barton's Copse/Southleigh Forest woodland complex to this species of bat. Similar large roosts have also previously been found in Hollybank Wood which indicates that the trees and hedgerows in the wider landscape around and between the woodland areas will be important commuting routes for bats. As a result it is extremely important that any developer provides the Local Planning Authority ecologist with adequate information to enable them to make a sound decision on whether this development will have an adverse impact on the local/wider Bechstein's bat population and that an appropriate and robust mitigation/compensation strategy is developed.

To assist in this process on the 8th of February 2019 our ecological consultant provided the LPA ecologist with information from our 2018 bat surveys on a confidential basis to ensure that the latest information on the use of Barton's Copse and Southleigh Forest and it's connection to bats using Staunton Country Park can be fully considered in conjunction with the Camp Field planning application. It is important that if the LPA are minded to approve the application for the development of Camp Field that appropriate planning conditions are applied to any consent granted requiring robust survey work to support the design of the ecological mitigation/compensation strategy. The strategy must be approved and fully implemented before development commences to protect the Bechstein's bat population from any adverse impact.

The Portsmouth Water bat survey work has shown the importance of woodland edge and parkland habitat used as foraging habitat. It is noted that the Camp Field biodiversity and enhancement strategy summary recognises the diversity of bats using the site, but does not currently refer to Bechstein's bats using the landscape and only makes provision for a 18m buffer zone around the woodland. This buffer is not as robust as mitigation proposals for other developments. This is a particular concern given references to a proposed second phase of development.

Moreover, it is noted the developer proposes installing bat roosting features. There has been some success with large bat boxes in Dorset being used by Bechstein's bats. The developer could be encouraged to work with Havant Borough Council who own Barton's Copse to place such boxes in the nearby woodland to increase the roosting opportunities for bats. It is important that all existing hedgerows and parkland trees are protected to maintain commuting and foraging routes. A planning condition will need to be included to design and implement a sensitive lighting scheme which will minimise the impact on commuting and foraging bats utilising the landscape.

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catchment.management@portsmouthwater.co.uk