



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**

Planning Application Reference:	APP/18/01033
Proposal:	Residential development comprising 69 No. dwellings with access from St George's Avenue together with access, car parking, landscaping, electrical substation and associated works
Location:	Land East of, Castle Avenue, Havant
Grid Ref:	SU73056 06323
Date:	22 November 2018

Thank you for consulting Portsmouth Water on the application for a residential development with access, car parking, landscaping, electrical substation and associated works Land East of, Castle Avenue, Havant. We have reviewed the available documentation provided on the Havant Borough Council planning portal site and have the following comments. Our response is based on the review of the following documents:

APP_18_01033-APPLICATION_FORM-1142350
APP_18_01033-COVERING_LETTER-1141450
APP_18_01033-SITE_LOCATION-1141458
APP_18_01033-SITE_PLAN-1141454
APP_18_01033-GEO-ENVIRONMENTAL_REPORT-1141725
APP_18_01033-FLOOD_RISK_ASSESSMENT-1141726

Site Setting

The site lies on Made Ground and Drift deposits overlying the London Clay Formation. The geology underlying the site is classified as a Secondary A Aquifer overlying Unproductive Strata. 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 drainage solutions, site investigation

boreholes and/or piling may pose a risk to groundwater quality and our supply at Havant and Bedhampton Springs.

Drainage

The planned foul drainage strategy for the site is a connection to the existing public foul sewers beneath St. George's Avenue and Emsworth Road. For foul drainage in SPZ1 we require the use of the highest specification pipework and designs for schemes to minimise leakage.

The Geo-Environmental site investigation works has highlighted soakaway drainage may not be feasible at the site. For this reason the proposed preliminary surface water drainage strategy has been developed based on a non-infiltrating drainage system which will discharge surface water in part to existing public surface water sewers; one beneath St. George's Avenue to the west of the site and the other beneath Emsworth Road to the south.

Portsmouth Water has a presumption against the discharge of foul and surface water into ground where adequate pollution prevention measures are not in place. All applications for the construction and installation of deep bore soakaways must be accompanied by an adequate risk assessment demonstrating how the risk to groundwater would be mitigated in the proposed design and details of pollution control measures in place.

Portsmouth Water would wish to be consulted on the final surface and foul water drainage strategy prior to approval. This should include as a minimum:

- a) the methods / materials to be used;
- b) details of the connections to foul sewers;
- c) details of any discharges to surface water courses; and
- d) any proposals for the use of SUDS (Sustainable Drainage Systems)

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.

The Geo-Environmental report by Enzygo provides geotechnical recommendations in relation to foundations, consideration has been given to the use of conventional strip foundation. Portsmouth Water would welcome this foundation design due to its shallow excavation nature.

Land contamination

The Geo-Environmental report summarises the findings of a desk study and site investigative works. The works comprised window sample holes, trial pits and laboratory analysis. The report concludes no foreseen contamination identified on the site.

If unforeseen contamination is encountered during construction works an assessment of risk must be undertaken by a competent person. If 'unforeseen contamination' is encountered this must be raised with the Local Planning Authority and remedial measures agreed prior to implementation. A validation report should be prepared should any remediation of unforeseen contamination be required in accordance with the NPPF. Portsmouth Water would wish to be consulted on the validation report.

Environmental Management and Pollution Prevention

It is unclear if the proposed development includes the construction of an electrical substation from the recent supporting documents for the application.

If an electrical substation is proposed for the site Portsmouth Water request a Construction Environmental Management Plan (CEMP) is provided for comment outlining 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.

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 and where feasible 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.

Catchment Management Team
Portsmouth Water

catchment.management@portsmouthwater.co.uk