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

Applicant:	Homes and Community Agency
Planning Application Reference:	APP/18/00244
Proposal:	Outline application with all matters reserved. Mixed use development comprising up to 100 new homes, including up to 40% affordable, 2860sqm of employment floorspace, access off New Lane and Martin Road, on-site parking for residential and employment uses, provision of acoustic bund to rear of employment units and naturalisation of existing water course (full landscape details to be submitted at a later stage).
Location:	Colt International Ltd, New Lane, Havant, PO9 2LY
Grid Ref:	SU72670 07970
Date:	02 May 2018

Portsmouth Water have reviewed the outline application with all matters reserved for a mixed use development comprising up to 100 new homes, including up to 40% affordable, 2860sqm of employment floorspace, access off New Lane and Martin Road, on-site parking for residential and employment uses, provision of acoustic bund to rear of employment units and naturalisation of existing water course and have the following comments. Our response is based on the review of the following documents:

- APP_18_00244-APPLICATION_FORM-1116129;
- DESIGN_AND_ACCESS_STATEMENT-1112827;
- FLOOD_RISK_ASSESSMENT-1112825; and
- GROUND_INVESTIGATION_REPORT_V2-1112824.

The site lies within a Source Protection Zone 1C (SPZ1c) for the Havant and Bedhampton (H&B) Springs, relating to subsurface activity only, where the Principal Chalk aquifer is confined and may be impacted by deep drilling activities. The Ground Investigation Report, in places, incorrectly identifies the SPZ1c as a SPZ3a (Outer Zone) and this must be rectified to re-address the risk assessment and reflect the actual sensitivity of the site.

Conceptual Site Model and Site Investigation

There are superficial deposits overlying the unproductive London Clay Formation and these consist of Head (Secondary A Classification and Secondary Undifferentiated) that are potentially in hydraulic continuity with chalk groundwater at the springs south west of the site. The risk of mobilising the existing contamination in the subsurface, identified during the works to date, must be risk assessed in the context of the H&B Springs along with the interconnectivity at the site and off-site.

Portsmouth Water therefore request that this potentially complete source, pathway, receptor linkage is assessed in detail.

At this phase of the investigation, with more intrusive works proposed, Portsmouth Water would wish to see the anticipated risk score remain as *Moderate* for groundwater. There is contamination on site and the full extent has not been characterised during the limited investigation. Once all data is available it may be feasible to revise the risk score.

Risk mitigation measures, particularly if a deeper investigation borehole is proposed, must incorporate reduced diameter drilling and clean drilling techniques. A method statement outlining all the pollution prevention measures that will be adopted must be provided for approval prior to the works commencing.

Piling and Foundations

Portsmouth Water currently have significant concerns over the potential for piling.

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.

Reason: The proposed works are in a sensitive groundwater catchment and there are potentially significant risks associated with groundworks in this area. Piling has the potential to impact on the drinking water source and therefore the applicant is advised to contact Portsmouth Water to discuss the details of the piling method statement.

Portsmouth Water require 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 addition to the above Portsmouth Water request that a Construction Environmental Management Plan (CEMP) is produced prior to development to demonstrate how spills, incidents and site drainage will be managed during the proposed development.

We look forward to reviewing the next phase of proposed site investigation, method statements, CEMP and appropriate groundwater risk assessment.

Catchment Management Team
Portsmouth Water

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