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

Planning Application Reference:	**APP/24/00342**
Proposal:	**Outline Planning Application for the development of up to 190 units, with associated vehicular access, infrastructure and landscaping (all matters reserved except access).**
Location:	**Woodcroft Farm Development Site, Woodcroft Lane, Waterlooville**
Date:	**18 June 2024**

Thank you for consulting Portsmouth Water on the above application, the catchment management team have reviewed the relevant documentation and have the following comments. Our Comments are based on review of the following documentation:

55625_003-Planning_Statement_-_Woodcroft_Farm
55625_003-ADMINISTRATIVE_BOUNDARIES_ILLUSTRATION
55625_003-LOCATION_PLAN
55625_003-ILLUSTRATIVE_MASTERPLAN
55625_003-DRAINAGE_STRATEGY
55625_003-FLOOD_RISK_ASSESSMENT_DRAINAGE_STRATEGY
55625_003-FOUL__SEWAGE___UTILITIES_STATEMENT
55625_003-GROUND_INVESTIGATION_REPORT
55625_003-MIXED_COMBINED_PLANS

Site Setting

The site is located in Source Protection Zone One (SPZ1) for the Havant and Bedhampton Springs, with the Chalk being a Principal Aquifer. The Havant and Bedhampton Springs are used for public water supply and supplies water to approximately 250,000 people, including the city of Portsmouth and the surrounding area. The Springs will also feed the Havant

Thicket Reservoir, once constructed, and therefore the Springs will contribute to the water supply of the wider south-east region.

This area is known to be prone to solution feature formation due to the underlying geology. Within the boundary of the proposed site there is a depression labelled as 'workings (dis)' (named solution feature 5 in the 'Ground Investigation Report'). This depression is known to receive significant inflows of surface water from the surrounding area. This water drains away rapidly and is believed to be a solution feature; therefore, this depression poses a significant risk to groundwater quality during construction.

Portsmouth Water's position

Portsmouth Water has taken an interest in this application due to its location within a highly sensitive groundwater area of SPZ1 for the Havant and Bedhampton Springs and also due to the karstic nature of the underlying geology in the local area. We request that a Construction and Environmental Management Plan (CEMP) be submitted for comment and wish to be further consulted on the final drainage designs and foundation designs for the site.

Surface Water Drainage

Infiltration drainage has been deemed unsuitable due to the local impermeable geology, the presence of solution features and its location with SPZ1. The recommended surface water drainage strategy is to attenuate run-off onsite in attenuation basins; with a total estimated volume of 1878m3 across fields A and B which are then to discharge into a surface water sewer network. Recommended SuDS features are permeable paving, detention basins and subsurface storage features. Swales are proposed as an option on the eastern boundary of field A and along the south of field B to the eastern side of the boundary.

Section 5.7 of the Ground Investigation Report prepared by Geo-Environmental (Ref. GE20772-GIR-DEC23, Version 1.0) mentions that deep bore soakaways are a possible design feature.

Portsmouth Water has a presumption against the use of deep bore soakaways at this location due to the risk to water quality. If the applicant believes this is necessary, then we wish to be further consulted and can provide advice if necessary.

The risk to water quality can be addressed through the following condition:

No development shall take place until a surface water drainage scheme based on sustainable drainage principles and a comprehensive assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water. The scheme shall subsequently be implemented in accordance with the approved details before any building within that phase is occupied.

Details of how the scheme shall be maintained and managed after completion shall also be included.

Reason - To reduce the risk of groundwater pollution and prevent the increased risk of flooding, both on and off site.

Portsmouth Water has a presumption against the use of deep-bore soakaways at this location, due to rapid groundwater travel times in this area as proven by groundwater tracer testing.

Foul Water Drainage

We recommend that the following condition be applied:

No development shall commence until such time as a scheme to dispose of foul water for that phase has been submitted to, and approved in writing by, the local planning authority in consultation with Portsmouth Water. The scheme shall be implemented in accordance with the timetable agreed as part of the approved scheme.

The scheme shall also include:

- ***details of how the scheme shall be maintained and managed after completion.***
- ***details of the sewage pipe work layout and specifications.***

Reason - This is in order to protect water resources. In accordance with position G8 of Groundwater Protection: Principles and Practice, the applicant must use the highest specification pipework and designs to minimise leakage.

Piling and Foundations

Conventional foundations are the recommended foundation design, for the majority of the development, but will require steel reinforcements due to the underlying geology and the presence of solution features. The Ground Investigation report stated that some piled foundations may be needed across some areas of the site. If this is a chosen foundation design for parts of the development, this must be accompanied by an approved method and risk assessment, which we would wish to be consulted on.

We support the recommendation of a watching brief during the excavations and foundation works to monitor for the presence of solution features, which can also help to protect groundwater quality.

The risk to water quality can be addressed through the following condition:

No piling or any other foundation construction using penetrative methods shall be carried out other than with the express written consent of the local planning authority in consultation with Portsmouth Water. The development shall be carried out in accordance

with the approved details. The method statement should detail the equipment, methodology, grout, control measures and monitoring that will be implemented to ensure there is no increased risk to controlled waters or drinking water supplies.

Reason - Piling or any other foundation construction methods using penetrative methods could allow hazardous substances and non-hazardous pollutants to enter groundwater by for example, mobilising contamination, creating preferential pathways or losses of grout into the aquifer.

Thus, it should be demonstrated that any proposed piling;

a. ***Will not result in contamination of groundwater. This is in accordance with National Planning Policy Framework paragraph 109.***

b. ***Nor any increased risk to drinking water supplies (including turbidity).***

c. ***Nor deterioration in the transmissivity of the aquifer***

Solution Features

Solution features, as a pathway for contaminants, constitute very rapid travel times to the Havant and Bedhampton Springs; a vital potable resource to the surrounding area and the City of Portsmouth. Tracer tests have been conducted in the local area, which have proven very fast travel times to the Havant and Bedhampton Springs. Consequently, all measures to prevent pollution during and post construction are required in order to safeguard the local public water supply and subsequently, no waste material should be put into any solution feature on the site.

The risk to groundwater quality from the presence of solution features can be addressed through the following condition:

No building or structure, including drainage infrastructure and utility trenches shall be located within a 10m stand-off zone surrounding any solution feature, unless appropriate mitigation measures are undertaken and approved in writing by the local planning authority in consultation with Portsmouth Water. Additionally, no waste should be placed within any solution feature and hydrocarbons, chemicals or other pollutants should be stored near solution features.

Reason - Paragraph 121 of the National Planning Policy Framework paragraph states that planning policies and decisions should also ensure that the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining.

Construction Environmental Management Plan (CEMP)

To help protect groundwater used for public water supply we request the following condition be applied:

No development shall start on site until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the Planning Authority in consultation with Portsmouth Water detailing 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.

Reason- Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the local public water supply source.

Water Efficiency.

We support the inclusion of water butts in the development design.

Portsmouth Water encourage local planning authorities to consider higher standards of water efficiency in new developments, with all new homes being built to a minimum standard of 100 litres per person per day. Planning policy can help to ensure long-term sustainability and management of water supplies, which is likely to reduce the need to take less water from the environment to protect local streams and rivers and the wildlife which rely on them.

For developments that can demonstrate meeting high standards of water efficiency of no more than 100 litres per head per day, Portsmouth water offer an incentive of a 50% discount on the Infrastructure charge. Based on a development of 200 properties with an occupancy of 3 people per property, there will be a minimum saving of 15,000 litres per day. The guide would benefit covering the importance of water efficient developments and to recommend this for all new dwellings.

Catchment Management Team
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