

Havant Borough Council
Development Control
Civic Offices Civic Centre Road
Havant
Hampshire
PO9 2AX

Our ref: HA/2016/117925/01-L01
Your ref: APP/15/01435
Date: 24 February 2016

Dear Sir/Madam

OUTLINE: RESIDENTIAL DEVELOPMENT (175 DWELLINGS) WITH ASSOCIATED INFRASTRUCTURE.

LAND SOUTH OF, BARTONS ROAD, HAVANT, PO9 5RT

Thank you for the consultation on the above application received 3 February 2016.

Environment Agency Position

We **object** to the application as submitted because the risks to groundwater from the development are unacceptable.

The applicant has not supplied adequate information to demonstrate that the risks posed to groundwater can be satisfactorily managed. We recommend that planning permission should be refused for the following reason:

Reason

The applicant has not adequately demonstrated that the proposed scheme for surface water disposal can effectively manage surface water or that the scheme will not cause deterioration in groundwater quality.

The site lies within the groundwater Source Protection Zone 1c (SPZ1c) for the Bedhampton and Havant Springs public water supply.

Advice to Local Planning Authority

The applicant has indicated in the FRA that:

'It is intended to utilise infiltration techniques in the form of shallow porous paving, swales and infiltration trenches to recharge the ground water. With no offsite flows for

up to 1 in 100 yr plus climate change storm events.

Where infiltration results from testing have proven to be poor tanked attenuation will be utilised beneath porous paving that will discharge to a pipe network which will in turn discharge to a infiltration structure;

The site lies directly on the London Clay where percolation rates are likely to be slow. As such it is unlikely that shallow infiltration systems will provide an effective means of managing surface water.

We are likely to oppose the installation of deep borehole soakaways/structures to dispose of surface water which penetrate the clay/chalk interface. This is because groundwater in the chalk aquifer supports a public water supply. In SPZ1c, we apply the same criteria as standard SPZ1s where the proposed activity/development will cause the overlying deposits to be bypassed.

We have a presumption against the use of deep infiltration systems for surface water from, for example roads and parking areas, as it reduces the ability for the attenuation of pollutants and may result in the direct input of hazardous substances into groundwater. This is in accordance with position statement G9 in our Groundwater Protection: Principles and Practice.

The application fails to demonstrate that there is a suitable surface water disposal option.

We would be concerned about the use of deep infiltration systems for surface water disposal because:

- The discharge will be directly into the underlying chalk aquifer (the SPZ1 for the Bedhampton and Havant springs). Drinking water supplies will be at risk from any pollutants entering the soakaway(s).*
- The soakaway(s) have the potential to act as a preferential pathway for contaminants to reach the groundwater rapidly,*
- The unsaturated zone will be bypassed so there will be no opportunity for the attenuation of pollutants in the shallow soils.*
- Groundwater in the chalk aquifer is likely to be confined for a considerable part of the year. If this is the case it is unlikely that you will achieve the required infiltration and water will not be able to soak away effectively.*
- If groundwater is confined, this could result in the direct input of hazardous substances into groundwater which is not permitted under the Environmental Permitting Regulations.*

National Planning Policy Framework paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels water pollution.

Overcoming our objection

We do not object to the principle of a residential development at this site. However, the applicant has failed to demonstrate that surface water can be managed in a way which will protect groundwater quality.

For groundwater protection we have a preferred hierarchy of options for surface water disposal which we expect the applicant to work through. This includes discharging to surface water, shallow infiltration systems incorporating SUDs schemes, SUDs schemes which discharge to surface water or connecting to the mains sewers.

If there are no other feasible disposal options we will only agree to the use of deep infiltration if the applicant can show that all of the following apply:

- the system is no deeper than is required to obtain sufficient soakage;
- pollution control measures are in place;
- risk assessment demonstrates that no unacceptable discharge to groundwater will take place, in particular that inputs of hazardous substances to groundwater will be prevented; and
- Sufficient inspection, maintenance and monitoring procedures and arrangements are in place

We expect this information to accompany the planning application.

Advice to the Applicant

We would like to refer the applicant to our groundwater policies in Groundwater Protection: Principles and Practice, available from our website. This sets out our position for a wide range of activities and developments, including drainage.

The site lies within the groundwater Source Protection Zone 1c for the Bedhampton and Havant springs, a public water supply. We therefore encourage the LPA and the developer to engage with Portsmouth Water at the earliest opportunity and prior to the granting of any planning application to discuss any concerns and requirements they may have.

If the Applicant would like any further detailed advice we would be happy to provide this subject to a charge.

As part of this service you would have a dedicated project manager to coordinate the advice from different teams within the Environment Agency. It would also include bespoke technical and planning advice if you request this. This will allow you to have greater clarity about the assessments you need to accompany your planning application and certainty about whether the development is acceptable to us before you resubmit.

Please do not hesitate to contact me on the number below should you have any questions regarding the above information.

Yours faithfully

Mr Jon Maskell
Planning Advisor, Environment Agency

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Direct fax

Direct e-mail PlanningSSD@environment-agency.gov.uk

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