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**CONSULTATION UNDER THE TOWN AND COUNTRY PLANNING
(DEVELOPMENT MANAGEMENT PROCEDURE ENGLAND) ORDER 2015**

Applicant:	Kingsbridge Estates Ltd
Planning Application Reference:	GEN/20/00451
Proposal:	Redevelopment of industrial land for the erection of a distribution warehouse building and a vehicle storage deck (Use Class B8), construction of an additional access, car parking and associated works.
Location:	32 New Lane, Havant, PO9 2NG
Date:	20 July 2020

Portsmouth Water have reviewed the pre-application (GEN/20/00451) and have the following comments.

Portsmouth Water's Position

Portsmouth Water do not object to the proposed development in principle, however recommend the following conditions on full planning permission in order to reduce the potential risks posed to groundwater and our resource as a result of the proposed development. Without these conditions we would object to the development due to the risk to groundwater quality and the local public water supply.

The site is located within the Source Protection Zone 1c (SPZ1c) for 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 at the local public water supply source. The groundwater area is of high sensitivity and consequently all measures to prevent pollution during and post construction are required in order to safeguard the local public water supply.

Recommended Planning Conditions

1. ***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 ensure that any proposed surface water drainage scheme does not harm groundwater resources in line with paragraph 170 of the NPPF and to reduce the risk of groundwater pollution.

2. ***No development shall commence until such time as a scheme to dispose of foul water 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 manage the quantity of foul sewage in order to minimise the risk to controlled waters and the public drinking water supply.

3. ***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.***

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.***

Reason- 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.

4. ***If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with the Environment Agency and Portsmouth Water)***

shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified.

The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences.

Reason - To ensure that risks from land contamination to drinking water supplies is controlled and mitigated.

5. *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 water supply source.

Informatives

Drainage

The Flood Risk Assessment and Drainage Strategy should clearly identify the means of foul and surface water drainage for the site.

Portsmouth Water would have a presumption against the use of deep bore soakaways at this site and the discharge of foul and surface water into ground where adequate pollution prevention measures are not in place. If deep bore soakaways are proposed the application must be accompanied by detailed plans and a hydrogeological risk assessment stating how risk to groundwater have been assessed and mitigated through design.

Portsmouth Water will only agree to the use of deep pit based systems (including boreholes or other structures that bypass the soil layers) for surface water disposal if the developer can show that all of the following apply:

- there are no other feasible disposal options such as shallow infiltration systems (for surface water) that can be operated in accordance with current British Standards;
- 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
- there are sufficient mitigating factors or measures to compensate for the increased risk arising from the use of deep structures.

Portsmouth Water request that no development shall commence until a scheme for surface and foul water drainage has been submitted to and approved in writing by the Local Planning Authority in consultation with Portsmouth Water, in line with recommended Conditions 1 and 2.

Piling & Foundations

Portsmouth Water would have no objection to piling at this location if the piles terminate within the Clay cover. If the piles penetrate the full depth of the Clay cover we would expect a piling risk assessment and method statement, this should detail the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including pollution prevention measures. Portsmouth Water should be consulted on the piling design and risk assessment in line with recommended Condition 3.

Pollution Prevention & CEMP

Portsmouth Water wish to be consulted on the Construction Environmental Management Plan (CEMP) for comment in line with recommended Condition 5. The CEMP should specifically outline the proposed means of surface water management during development.

Portsmouth Water requests that storage for fuels, oils or other chemicals be contained within a bund capable of holding 110% of the total capacity. The hook up/discharge points should be within the bunded area.

Portsmouth Water would require further information on the fire prevention plan for the site in regards the potential drainage of fire water and associated substances. This detail can be provided at full planning/ detailed stage of the development.

Catchment Management Team
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