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

Planning Application Reference:	APP/21/00601
Proposal:	Proposed Portsmouth Water Headquarters building (Use Class E(g)(i) use) and new employment premises (Use Class B2.B8/E(g)(iii) use); widened access onto Solent Road; and associated access, car parking, landscaping and works; including the felling of 7No. trees the subject of TPO No.1801 in order to improve the access and allow for the development.
Location:	Land north of Solent Road (adjacent to Bosmere Medical Centre) Havant
Date:	17 August 2021

Portsmouth Water's Catchment and Environment Team have reviewed this application from a groundwater quality protection perspective.

Our Position

The development lies in a very sensitive groundwater location due to underlying principal aquifer. The site is located within the Source Protection Zone One (SPZ1) for an essential Public Water Supply Source. Therefore, all measures to prevent pollution during and post construction are required in order to safeguard the local public water supply.

We do not object in principle to the proposed development, however due to the sensitivity of the groundwater environment we wish to be consulted on the final design and plans for the site. Our concerns regarding groundwater quality protection can be addressed through the addition of appropriate planning conditions to reduce the potential risks posed to groundwater.

Below are the 5 planning conditions we would wish to be implied should permission be granted:

Condition 1 – Surface Water Drainage

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 the Environment Agency and 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 in line with paragraph 170 of the National Planning Policy Framework. Note: The drainage scheme design will be required to take account of the location of any solution features present in order to avoid and mitigate risks.

Condition 2- Foul Water Drainage

No phase of 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 the Environment Agency, Portsmouth Water and Southern 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 and protect the Havant and Bedhampton Springs Source Protection Zone 1 in the development area. In accordance with position G8 of Groundwater Protection: Principles and Practice, the applicant must use the highest specification pipework and designs to minimise leakage.

Condition 3- Unidentified Contamination

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 the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the National Planning Policy Framework.

Condition 4- Piling & Foundations

Piling or deep foundation using penetrative methods shall not be carried out other than with the written consent of the local planning authority in consultation with the Environment agency and Portsmouth Water. The development shall be carried out in accordance with the approved details.

Reason-To ensure that any proposed Piling or deep foundation using penetrative methods, does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework, and position statement N8 Physical disturbance of an aquifer in a SPZ1 of the 'The Environment Agency's approach to groundwater protection'.

Condition 5- Construction Environmental Management Plan (CEMP)

No development shall commence 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 Havant & Bedhampton Springs

Supplementary information

Drainage

The Flood Risk Assessment outlines the proposed surface water drainage strategy. The proposed surface water drainage strategy is the use of SuDS features with a controlled final discharge to an existing watercourse. The proposed SW drainage system is designed in accordance with CIRIA C753 and appropriate treatment is proposed. This is acceptable in relation to groundwater protection. We would wish to be consulted on the final surface water drainage design details and plans.

The proposed foul water drainage strategy is the connection to an existing main sewer, this is acceptable in relation to groundwater protection. We would wish to be consulted on the final sewer design details and connections.

Construction Environmental Management Plan (CEMP)

We have reviewed the Construction Environmental Management Plan (CEMP), we support the appropriate management of overland runoff in accordance with the Environment Agency's pollution prevention guidelines. Conversely, limited information has been provided on how the wheel washing drainage will be managed this needs to be detailed in this plan to ensure appropriate management of this drainage. Furthermore, details of hazardous material storage is required we note that this will in accordance with the Environment Agency pollution prevention guidelines, however details of storage on the site is required.

Piling & Foundations

The proposed site is situated in a sensitive groundwater catchment and there are potential significant risks associated with groundworks in this area. There would be a presumption against piling at this location. If the piling was the proposed foundation solution, no piling shall take place until a piling method statement and risk assessment (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's Catchment and Environment Team.

Any piling, if proposed, must be undertaken in accordance with the terms of the approved piling method statement.

Solution features

We support the proposal for a watching brief during construction for dissolution features/solution features. Both foundations and drainage excavation should be inspected for the solution feature presence. The risk of dissolution should be mitigated appropriately (e.g. stand-off zones and/or ground treatment).

Land contamination

A Phase I and Phase II investigation has been undertaken on the site, no gross contamination has been identified on the site from these investigations. Elevated concentrations of copper and Nickel have been identified in the groundwater samples, however there is no plausible on site source of Copper and Nickel on the site and have been classified as background concentrations in the area. Pollution prevention for lateral mitigation into adjacent ponds will be provided via bunds. Details of these bunds would be required to ensure these are structurally sound and provide appropriate mitigation.

Further guidance

Our groundwater protection development guidance notes contain further information on the requirements for developments in groundwater sensitive areas. These can be found following the link below:

<https://www.portsmouthwater.co.uk/developers/groundwater-protection/>

Catchment & Environment Team

Portsmouth Water

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