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Please ask for
Our Ref
Your Ref

12th May 2016

Dear Sir/Madam,

Planning Application: APP/16/00418

Site Address: Land rear of and including The Coal Yard, 178A West Street, Havant, PO9 1LR

Outline application for construction of 9 dwellings with access from West Street following demolition of 178a West Street.

Thank you for consulting Portsmouth Water on the above outline planning application. Portsmouth Water provided comments regarding this site in November 2015 as part of pre-application guidance.

Portsmouth Water herein provides comments as part of our role of protecting public drinking water supplies.

This development site lies within Source Protection Zone 1/1C of the Havant and Bedhampton Springs, a critical public water supply.

1.0 Foundations/geotechnical

The flood risk assessment (FRA) submitted as part of the outline planning application (Baker and Associates, January 2016) identifies in section 2.2 a local borehole (SU70NW246) that indicates that the geology underlying the site is clay (Reading Beds, now termed Lambeth Group Formation) overlying Chalk. The log provided on the British Geological Survey (BGS) website indicates that the Chalk is present at 122 feet (37 metres) not 140 feet (42 metres), as suggested by the FRA. The same borehole log also states that the groundwater rose up the borehole to 2.5 feet (0.7m) below the surface. This indicates that the clay is confining the groundwater and thus the groundwater is under positive pressure. Should the clay be penetrated there is potential for the borehole to go artesian i.e. water could flow out of the top of the borehole under the natural pressure contained within the aquifer. This is supported by the numerous springs that are located in this area that are used for public drinking water supply.

Considering the information above, should planning permission be granted Portsmouth Water would request a condition on piling that includes:

- Submission to the LPA and Portsmouth Water of a piling risk assessment undertaken by competent consultants identifying anticipated depths for each pile for the proposed development, with the piling risk assessment being shared with Portsmouth Water for consultation;
- Associated geotechnical site investigation that confirms the underlying geology is structurally sound impermeable clay to a depth that is beyond the maximum depth of anticipated piles (e.g. 1m below the maximum pile depth);
- Submission, approval and implementation of a piling method statement detailing how potential risks will be minimised.

Reasoning: The site lies within the groundwater Source Protection Zone 1c for the Havant and Bedhampton Springs, a critical public drinking water supply. 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 and creating preferential pathways. Thus it should be demonstrated that any proposed piling;

- Will not result in contamination of groundwater (this is in accordance with National Planning Policy Framework paragraph 109);
- Nor any increased risk to drinking water supplies (including turbidity).

2.0 Surface water drainage

The FRA indicates that the surface water will be discharged to the Hermitage Stream via the existing surface water sewers located in West Street. Portsmouth Water supports this strategy. To prevent a change in surface water drainage strategy to that of infiltration, Portsmouth Water would like to request a condition on the surface water drainage strategy:

Infiltration systems for surface water disposal will not be used for this development and a surface water drainage strategy must be submitted to and approved by the local planning authority in consultation with the Environment Agency and Portsmouth Water. The scheme should include details of:

- Pollution prevention measures to be incorporated; and,
- Inspection, maintenance and monitoring procedures and arrangements.

Reasoning: The site lies within the groundwater Source Protection Zone 1c for the Havant and Bedhampton Springs, a critical public drinking water supply. Drinking water supplies are at risk from any pollutants which enter the ground, including increased turbidity. The applicant needs to demonstrate that the surface water drainage scheme will protect groundwater and drinking water supplies in accordance with National Planning Policy Framework paragraph 109, whilst also protecting the surface water environment.

3.0 Contaminated land/verification

The Environmental Health consultation response identifies that the historical land use at this site and the surrounding area means that the site is potentially contaminated land. Portsmouth Water therefore agrees with the EHOs three recommendations: 1) for a contaminated land condition, 2) a condition requiring verification reporting related to the contaminated land condition, and 3) for a condition related to unexpected contamination.

Rainwater harvesting

The FRA states in section 5.2 that in order to mitigate against the increase in volume of runoff, roof water will be collected to rainwater harvesting tanks and will be re-used within the development.

Under the Water Fittings Regulations, this type of system is notifiable to Portsmouth Water in order to protect Water Quality from internal plumbing. There have been examples in industry of cross connections between the potable drinking water supply and rainwater harvesting systems leading to microbiological contamination of potable drinking water supplies.

Portsmouth Water requires the submission of schematic drawings of all plumbing arrangements for each residential unit and each unit will have to be signed off by our Water Regulations team. Portsmouth Water will also request backflow protection for the relevant Fluid Category Risk, which in this case is Category 5.

If you wish to discuss our comments please feel free to make contact via the details provided below.

Yours sincerely

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