



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

Applicant:	Seaward Properties Limited
Planning Application Reference:	APP/16/01036
Proposal:	Construction of coffee unit (Starbucks) (class A3)
Location:	Langstone Gate, Solent Road, Havant, PO9 1TR
Grid Ref:	Eastings: 471573, Northings: 106054

Portsmouth Water Response

Overview

Thank you for consulting Portsmouth Water on the above planning application. Portsmouth Water has reviewed the available information on the Havant Borough Council (HBC) planning portal. It is of note, and concern, that none of the applicants submitted documents recognises that the site is located within an Environment Agency designated Source Protection Zone.

The site is located within SPZ1 of the Havant and Bedhampton springs, a critical public water supply that supports the City of Portsmouth and Havant Borough. A spring that contributes to the public water supply is located in close proximity of the proposed development.

Portsmouth Water objects to the proposed development based upon a general lack of information provided, specifically around the proposed surface water drainage scheme design details, and the building foundation solution.

Surface water drainage at the site constitutes a risk to groundwater quality (car parking) and no design details have been provided. Should the LPA be minded to give permission for the development prior to the submission of any drainage scheme design details, we support the HBC Environmental Health Officer's request for a condition preventing any construction until the developer has submitted foul and surface water drainage scheme design details; we request to be consulted on any submitted designs.

Portsmouth Water would object to the use of piled foundations in such close proximity to one of the springs used for public water supply. The piling process has the potential to alter the hydrogeological regime in the immediate area of the piling, and thus potentially affect the output from the adjacent spring. As there has been no proposed foundation solution submitted by the applicant, Portsmouth Water objects to the current planning application until further information is provided. Should the LPA be minded to give planning permission for this development prior to the submission of the foundation design, Portsmouth Water supports the HBC Environmental Health Officer's proposal for a condition related to deep excavation, boring and piling.

Surface water drainage strategy

As already outlined above, the site is situated above the Chalk, a Principal Aquifer, and lies within Source Protection Zone 1 (SPZ1) of the Havant and Bedhampton public water supply abstraction. A SPZ1 denotes a travel time of less than 50 days to our abstraction; therefore, this site is very sensitive with regards to any development and groundwater must be protected against pollution.

Consequently, car parking for private vehicles poses a risk to groundwater from any spills of hydrocarbons, alongside PAHs and heavy metals. The applicant has not provided any design details of the surface water drainage strategy and thus we object to this development. In the event that LPA are minded to give permission for this development, we support the Environmental Health Officer's request for a condition preventing any construction until the developer has submitted foul and surface water drainage scheme design details; we request to be consulted on any submitted designs.

Should permission be granted prior to a drainage scheme being submitted, and that an infiltration design for surface water is proposed, we wish to highlight Table C1 of the DEFRA report entitled "*National Standards for sustainable drainage systems: Designing, constructing, operating and maintaining drainage for surface runoff*" (December 2011 – please see Appendix 1) which identifies that the discharge of this car park is categorised as having a MEDIUM level of hazard. Table C2 states that as this development is located in SPZ1, 3 treatment phases are required to treat the infiltration discharge.

Geotechnical – foundation solution

The HBC Environmental Health Officer, Jonathon Driver, highlighted that the developer may opt for a piled foundation solution for this site due to the uncertain load bearing and plasticity properties of the of the superficial alluvial deposits that overlie the Chalk (Principal Aquifer).

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As there has been no proposed foundation solution submitted by the applicant, Portsmouth Water objects to the current planning application until further information is provided. Should the LPA be minded to give planning permission for this development prior to the submission of the foundation design, Portsmouth Water supports the HBC Environmental Health Officer's proposal for a condition related to deep excavation, boring and piling.

Portsmouth Water 17/11/2016

APPENDIX 1 - Table C1 of the DEFRA report entitled “National Standards for sustainable drainage systems: Designing, constructing, operating and maintaining drainage for surface runoff” (December 2011)

C5. The discharge of surface runoff from a site categorised as high hazard as set out in Table C1 may not be permitted. It is advisable to consult the Environment Agency about environmental permitting to determine whether a permit is required. If a site is categorised as high hazard but a permit is not required then it is treated as a med hazard.

Hazard Table C1: Level of hazard	
Low	Roof drainage
Med	Residential, amenity, commercial, industrial uses includes car parking and roads
High	Areas used for handling and storage of chemicals and fuels, handling and storage of waste. This includes scrap-yards. Lorry, bus or coach parking or turning areas

Groundwater

C6. A series of treatment stages must be included before the surface runoff reaches the infiltration device. The minimum number of treatment stages must be in accordance with Table C2.

Table C2. Minimum number of treatment stages		low	med	high
G1	Source Protection Zone I, within 50m of a well, spring or borehole that supplies potable water.	1	3	Consult the EA (C6)
G2	Into or immediately adjacent to a sensitive receptor that could be influenced by infiltrated water. Includes designated nature conservation, heritage and landscape sites – including Biodiversity Action Plan (BAP) habitats and Protected Species.	1	3	
G3	Source Protection Zone II or III or Principal Aquifer	1	3	
G4	Secondary Aquifer	1	2	