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Please ask for
Our Ref
Your Ref

9th May 2016

Dear Sir/Madam,

Planning Application: APP/16/00380

Variation of Condition 43 of Planning Permission APP/12/00772 to enhance the viability of the site.

Thank you for consulting Portsmouth Water on the above planning application. Portsmouth Water has provided comments in relation to the above application as part of our role of protecting public drinking water supplies.

Portsmouth Water has concerns regarding this site and the potential for groundwater quality deterioration, as outlined by our response dated 6th November 2015, related to piling and the surface water drainage strategy. As such, we would request that the following planning conditions from APP/12/00772 be transferred to APP/16/00380:

- Condition 4 – foul water drains and sewers
- Condition 5 – surface water drainage (*amendment required*)
- Condition 6 – contaminated land
- Condition 7 – verification reporting
- Condition 8 – contamination not previously identified
- Condition 9 – piling (*amendment required*)
- Condition 23 – construction management plan

Surface water drainage – condition 5

Portsmouth Water do not support the use of an infiltration drainage solution at this site due to the location immediately adjacent to the public water supply springs within SPZ1. Discussions between the developer, Havant Borough Council and Portsmouth Water in November 2015 led to an agreement that infiltration drainage would not take place. The agreed solution would be that surface water would be directed to an attenuation pond followed by discharge to the Hermitage Stream. We would request that the surface water drainage condition be amended to account for this, and that Portsmouth Water are to be consulted on the submitted design details.

Piling – condition 9

Condition 9 of APP/12/00772 states that *“piling shall not be permitted other than with the express written consent of the Local Planning Authority.”* Portsmouth Water views the use of piling at this site as a risk to groundwater quality and we urge the Local Planning Authority to refuse consent for piling.

Due to the sensitivity of the site, piling should be avoided. The groundwater that is at shallow depth is used for public drinking water supply for the City of Portsmouth and the Havant area. Alternative foundation solutions should be used and piling should only be considered as a last resort if other less intrusive forms of construction, which do not involve penetration of the aquifer, are not viable.

CFA piling is currently being used on the site of the original planning application which involves the injection of cement/grout into the underlying strata and aquifer to form the piles in-situ. There are inherent risks from this methodology, however, control measures were agreed to reduce the risk to groundwater used for public water supply and thus, Portsmouth Water reluctantly removed the objection to the use of piles, provided the work was completed in accordance with the risk control measures.

Should the LPA be minded to permit the use of a piled foundation design for APP/16/00380, we would expect that these agreed control measures be carried over to the new phase of this development. These measures were outlined in the Piling Method Statement and Piling Risk Assessment (Rev 1.03, February 2016).

These control measures include:

- Communication plan to be set up between site manager and Portsmouth Water.
- Toolbox talk to be completed prior to commencement of further piling.
- Real-time monitoring of the volumes of concrete and pumping pressure and comparison with the expected volumes/pressures required to form the pile. The volume injected should be logged. Should there be any change of pressure or loss of concrete the piling works should be stopped and Portsmouth Water informed.

Portsmouth Water would like to request that we are consulted on the submitted foundation design details and should piling be proposed a detailed supporting document specifying the reasoning for a piled foundation design should be provided by the developer. A piling risk assessment should also be submitted identifying the depth of each pile for the new phase of development, with expected concrete/grout volumes required to form the pile to allow for real time monitoring by the piling contractor. If CFA piling is used for this phase of development and a turbidity event occurs at the springs, Portsmouth Water will wish to view the concrete injection volume logs.

We trust the comments provided are of use and if you wish to discuss our comments please feel free to make contact via the details provided below.

Yours sincerely

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