



3 September 2015

FAO: Heather Lealan
Planning Department
Havant Borough Council

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Please ask for Mr. J. Bucknall
Our Ref
Your Ref

Dear Sir/Madam,

Site Address: Former site of St Andrews House, 59-61 West Street, Havant, PO9 1LB
Proposed Development: Discharge of Condition No's. 2,3,4,5,7,19 of Planning Permission APP/12/01234.

Thank you for consulting Portsmouth Water on the discharge of Condition 2 relating to site drainage for the above development. I note that condition 5 relates to hard surfacing and that this is also relevant in the context of the response below.

This development site is very close to the Havant and Bedhampton Springs, a very important public water supply source, and lies within Source Protection Zone 1 for the springs. The site is known to be contaminated and as such poses a potentially significant risk to the public water supply. I note that the developer has not yet provided the Havant Borough Council Contaminated Land Officer with the post demolition site investigation report, and as such the conceptual model and remediation strategy for the site is not fully developed. However, mobile liquid and solvent contamination has been found at the site. Given this shortfall in information we do not believe that it is possible to recommend approval of the final design for the drainage strategy at the site at this time. Instead we would request that the developer be asked to provide additional information before the drainage scheme is approved. Further details are provided below.

1. The post demolition site investigation report needs to be provided in conjunction with the updated conceptual model and remediation strategy, to demonstrate how groundwater and the public water supply will be protected. If any contamination is to remain on site then the areas must be clearly identified and information should be provided on how the surface water drainage system will be protected from any residual risk.
2. While we are pleased to note that infiltration drainage (SuDs) incorporating soakaways has not been adopted for the site, residual risks to groundwater have not been completely designed out. We are concerned that a permeable paving solution is proposed for car parking areas, where there is a residual risk of hydrocarbon pollution. The jointing between blocks will be permeable and underlain by a permeable base. If block paviour is to be retained for other reasons (e.g. aesthetic landscaping) then the developer should provide further information on how the car parking areas will be made impermeable, so that any spillage cannot seep in to the ground and contaminate the groundwater.
3. All surface water drainage is to be routed into the Brockhampton Stream on the western boundary of the site, via a by-pass separator. No information has been provided on who will regularly maintain the interceptor to remove any hydrocarbons which accumulate in it to prevent contamination of the stream / springs. As the drainage system is completely reliant on this one feature to be considered fit for purpose, we believe that it is essential that the LPA has information to demonstrate that an appropriate person or body will take responsibility for cleaning out the by-pass separator in accordance with a robust regular maintenance procedure. We would ask that the LPA request this information.

Portsmouth Water utilises spring water that emerges from underground at our Head Office, which is adjacent to the development site. The Brockhampton Stream is in close proximity to the springs and there is potential that during drought conditions the stream may be in hydraulic continuity with the springs. It is essential to ensure that any existing ground contamination, or future pollution at the site cannot enter the stream via the site surface water drainage system. More information is needed from the developer as set out above before we can have confidence that this will be the case.

It is disappointing that given the significant risk to the springs that the developer has made no effort to contact Portsmouth Water since works commenced at the site. Can you confirm that you did provide the developer with a copy of our letter to the LPA dated 9 June 2015?

Given the potential risks to the public water supply from the redevelopment of this site it would be helpful if you could encourage the developer to;

- Provide Portsmouth Water with copies of any site investigation and remediation strategy reports prepared, including providing information on the plans for the underground tanks at the site where some contamination was previously noted.
- Keep Portsmouth Water informed about his planned programme of work, with advance notification about any higher risk activities such as tank removal, or contamination remediation, in order that we can implement an enhanced raw water quality monitoring programme.

I hope that these comments are helpful and that the LPA will support our request for more information in order to ensure that the public water supply is protected in the short and long-term.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'J. Bucknall', written in a cursive style.

James Bucknall

DWSP Scientist
Portsmouth Water

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