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Please ask for
Our Ref
Your Ref

11th January 2016

Dear Sir/Madam,

Planning Application: APP/14/01225

Outline application with all matters reserved for demolition of existing buildings and redevelopment of site to erect 130No. apartments and 1126sqm of ground floor commercial/retail space (Use Classes A1-A5 and B1(a)) and associated service, access and 58 private residential basement parking spaces (indicative height of building between five and thirteen stories) at Market Parade Development Site, Market Parade, Havant.

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.

We have reviewed the relevant reports and diagrams and wish to make the following comments.

Phase 1 desk study – Soils Limited, June 2015, 14981/DS

- Section 3.1 – Anticipated Geology
 - This report does not mention that Chalk underlies the superficial deposits identified in the report. The Chalk forms part of the principal aquifer that is used for public water supply and provides water for the Havant springs.
 - Borehole logs obtained from the British Geological Survey indicate that in the locality of the Market Parade site there is likely a significant covering of impermeable clay which will protect the underlying aquifer. However, the Chalk is at the surface within 250m to the south west. It is assumed that for the size of the development, piles of significant depth will be required.

Portsmouth Water would like to 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 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. 5m 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).
- Section 3.2 – Hydrogeology
 - Table 3.1 – Hydrogeological Assessment
 - This table identifies that the site is located within an SPZ1c. If the overlying Lambeth Group and London Clay is penetrated, i.e. for piling or disposal of surface water drainage, the site must be counted as SPZ1.
 - This table states that a potable water supply is 764m to the west. This is incorrect as there is a group of springs used for public water supply in close proximity, with the nearest being approx. 380m to the south west.
 - Table 3.2 – Hydrogeological Assessment
 - This table states that a potable abstraction well is to the west of the site; however, for clarification there are no Portsmouth Water abstraction wells in the vicinity. The source of public water supply is a line of springs that transects from east to west from Bedhampton to Havant. These groups of springs are critical to supplying water to Portsmouth and the surrounding area.
 - Section 7 – Preliminary Conceptual Site Model
 - As recommended in Table 7.9 we support the recommendation for a Phase II intrusive site investigation.

Portsmouth Water request a condition in relation to contamination and remediation that includes:

- The requirement to undertake a Phase II site investigation to determine concentrations of any onsite historical contamination;
- If necessary, the development of a remediation strategy giving full details of the remediation measures required and how they are to be undertaken;
- A verification report demonstrating completion of works set out in the approved remediation strategy for each phase and the effectiveness of the remediation.

Reasoning: The site lies within the groundwater Source Protection Zone 1c for the Havant and Bedhampton Springs, a critical public drinking water supply. If the anticipated impermeable Clay overburden at the site is penetrated during the piling process there is the potential for mobilisation and pathway creation for any onsite historical contaminants. To minimise the risk to groundwater

it is expected that this investigation would be completed prior to the site investigation requested in the piling condition to confirm the underlying geology to a depth greater than the maximum pile depth.

- Section 7.6 – Preliminary Conceptual Site Model
 - Linkage No. 5 identifies no risk to deep groundwater due to the underlying geology. As discussed above the anticipated underlying geology should be confirmed to a depth greater than the maximum pile depth.

Flood Risk Assessment incorporating surface water and foul water drainage - Odyssey Markides, September 2015, Report No. 14-006-03A

Portsmouth Water welcomes the proposed surface water drainage proposal of directing discharge to the local surface water system. If the developer were minded to change the surface water drainage strategy to a discharge to ground via a deep infiltration borehole Portsmouth Water would strongly object to this change of strategy.

As the site is situated within SPZ1c of the Havant and Bedhampton springs, any contaminated discharge to ground has the potential to re-emerge at some of the Havant springs that are used for public water supply.

Thus, 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**
- **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.

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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