

Houghton, Michelle

From: Blake, Patrick <Patrick.Blake@highwaysengland.co.uk>
Sent: 31 March 2022 10:16
To: Havant Planning and Development Mailbox New
Cc: [REDACTED]
Subject: 90692 APP/21/00189 Brockhampton West, Harts Farm Way, Havant
Attachments: 310222 NHPR Conditioned 20_01555_FUL.PDF

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For the attention of: Ms L Wells

Planning Application: APP/21/00189

Site: Brockhampton West, Harts Farm Way, Havant

Proposal: Outline application for the development of new employment units to provide up to 29,000 sq m (gross internal area) for flexible use across use classes E (light industrial), B2 and B8 with ancillary offices, car parking, service yards, drainage works, landscaping and associated works to prepare the site for development. All matters are reserved except the means of access to the site.

Our Reference: 90692

Dear Ms Wells

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such National Highways works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

In the case of this development proposal, our interest is in the A27 and A3(M).

National Highways has no objection to the planning application subject to the following conditions (which have been agreed with the applicant).

Condition 1

Prior to commencement of development hereby permitted, a Construction Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority (in consultation with National Highways). The CEMP shall include but not be limited to the following:

- (a) Details of transport logistics (including proposed routes on a plan) in accordance with section 6.1.2 of the Delta Simons Air Quality Assessment Report Reference 19-2099.03.*
- (b) Construction Traffic Management (to include the co-ordination of deliveries and plant and materials and the disposing of waste resulting from demolition and/or construction so as to avoid undue interference with the operation of the public highway, particularly during the Monday-Friday AM Peak (0800-0900) and PM Peak (1630-1800) periods);*
- (c) an estimate of the daily movement of the construction traffic, profiled for each construction phase, identifying the peak level of vehicle movements for each day;*
- (d) the hours of construction work and deliveries*

- (e) Procedures for managing deliveries & collections at the site, including parking, loading, materials handover and transport to secure storage areas, and the means of minimising the risk of release of fuel and other materials capable of causing harm to health or the environment
- (f) the storage and dispensing of fuels, chemicals, oils and any hazardous materials (including hazardous soils);
- (g) the proposed maintenance and aftercare of the site;
- (h) measures to avoid impacts on the non-statutory designated sites and retained habitats;
- (i) details of drainage arrangements during the construction phase identifying how surface water run-off will be dealt with so as not to increase the risk of flooding to downstream areas as a result of the construction programme;
- (j) contact details of personnel responsible for the construction works
- (k) Provisions for the segregation & storage of wastes destined for treatment, recycling or disposal, alongside details on how leachate generation from stockpiles will be minimised &/or appropriately managed so as to prevent cross contamination of materials or release of leachate to controlled waters.
- (l) Measures to ensure safe pedestrian movement on the public highway & footpaths
- (m) No bonfires to take place on the site, during any phase of the operation.
- (n) Control measures for dust and other air-borne pollutants, such as smoke and fume emission from the site during construction works. It should advise as to what measures are to be put in place for the control of any dust and other air-borne pollutants that might emanate from the development site. Furthermore, the methods of dust controls should also be in accordance with the guidance as laid down out in the BRE Report 456 – Control of Dust from Construction and Demolition activities. It should also be noted that besides the keeping of haul roads damp during dry weather conditions, any areas where tracked excavators, dozers and the like are working, are also kept damp at all times
- (o) The means of preventing track out of mud & spoil on to the highway and preventing runoff from or excessive infiltration to the site from adversely impacting adjacent surface waters, including wheel washing facilities as appropriate
- (p) Details of measures to be employed to control the emission of noise and vibration during the above phases to be provided. BS5228:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – par 1: Noise, and Part 2: Vibration (BS1<2014v) provide guidance on the requirements and indicative noise and vibration levels and criteria.
- (q) Details of the training of site operatives to follow the Construction Management Plan requirements.
- (r) The Asbestos Management Plan & Surface Water Quality Monitoring Programme, and other specific environmental controls mentioned at section 5.5 of Delta Simons Report 19-2099.07.
- (s) Measures for controlling the use of site lighting whether required for safe working or for security purposes to ensure no impact on neighbouring properties or the strategic highway.

Reason: To ensure that the construction process is carried out in a manner which will minimise disturbance, pollution & nuisance to neighbouring properties and the public realm more generally, and prevent pollution of nearby surface waters, or impacts to sensitive ecological receptors. To avoid inappropriate parking practices or the turning and manoeuvring of construction vehicles which adversely impact either the use or safety of the public highway. This condition is imposed having due regard to policies DM10 & CS15 (Havant Borough Local Plan (Core Strategy) 2011), and the National Planning Policy Framework 2018.

Condition 2

No development hereby permitted shall commence until details of the proposed means of foul sewerage and surface water drainage scheme for the site have been submitted and approved in writing by the Local Planning Authority and in consultation with National Highways. The surface water drainage scheme shall be based on the principles within the following:

- Drainage Strategy by Burrows Graham Version 2 dated 01.06.21 – Ref: 21048-BGL-XX-XX-RP-D-0001
- Flood Risk Assessment by Burrows Graham Version 2 dated 01.06.21 – Ref: 21048-BGL-XX-XX-RP-D-0002
- Drawing No. 21048-BGL-XX-X-DR-C-0250 Rev P1

The submitted details should include:

- a. A technical summary highlighting any changes to the design from that within the approved Flood Risk Assessment & Drainage Strategy.*
- b. Detailed drainage layout drawings at an identified scale indicating catchment areas, referenced drainage features, manhole cover and invert levels and pipe diameters, lengths, and gradients.*
- c. Detailed hydraulic calculations for all rainfall events, including the listed below. The hydraulic calculations should take into account the connectivity of the entire drainage features including the discharge location. The results should include design and simulation criteria, network design and result tables, manholes schedule tables and summary of critical result by maximum level during the 1 in 1, 1 in 30 and 1 in 100 (plus an allowance for climate change) rainfall events. The drainage features should have the same reference that the submitted drainage layout.*
- d. Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria.*
- e. There should be a presumption against disposal by means of infiltration drainage unless compatible with the contamination assessment 'site conceptual model' and remedial/risk mitigation scheme.*

No surface water shall be permitted to run off from the development on to the Strategic Road Network or into any drainage system connected to the Strategic Road Network. No drainage connections from any part of the development may be made to any Strategic Road Network drainage systems.

Reason: To safeguard the amenities of the locality and ensure that all such drainage provision is constructed to an appropriate standard and quality and having due regard to policies and proposals CS16 and DM10 of the Havant Borough Local Plan (Core Strategy) 2011, policy E20 of the Submission Havant Borough Local Plan and the National Planning Policy Framework.

Condition 3

Prior to installation, details of any proposed External Lighting (including location, type and illuminance levels) at the site shall be submitted to and approved by the Local Planning Authority (in consultation with National Highways), to be based on the principles shown on Drawing No. 4856/E/101 –External Lighting Layout. The development shall thereafter be undertaken in strict accordance with the approved details prior to the first occupation of the development hereby permitted and retained in accordance with the agreed specification unless otherwise agreed in writing by the Local Planning Authority (in consultation with National Highways).

Reason: To ensure that the A27 and A3(M) Trunk Roads continue to be effective parts of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

Condition 4

Prior to occupation of any part of development hereby permitted, an Operational Management Plan will be submitted to and agreed in writing by the Local Planning Authority (in consultation with National Highways and Hampshire County Council). The Operational Management Plan will include but not limited to the following:

- Details of HGV routing;*
- Measures to manage down demand for HGV movements during peak periods (Monday-Friday AM Peak (0800-0900) and PM Peak (1630-1800) where feasible;*
- Car Park Management Plan; and*
- Framework Travel Plan for staff on site.*

Reason: To ensure that the A27 and A3(M) Trunk Roads continue to be effective parts of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

Condition 5

Prior to the commencement of construction of the proposed bunds facing the A27, geotechnical submissions (in accordance with DMRB Standard CD622) relevant to the construction of the 3m-5m high earth bunds (set out in the Geotechnical Design Report, associated drawings and Specification) shall be submitted to and agreed in writing by the Local Planning Authority (in consultation with and requiring certification by National Highways).

Reason: To ensure that the A27 Trunk Road continues to be an effective part of the national system of routes for through traffic in accordance with section 10 of the Highways Act 1980 and to satisfy the reasonable requirements of road safety.

Please find attached our NHPR form in this respect.

Kind Regards,

Patrick Blake, Spatial Planning Manager – South East

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**CONSULTATION UNDER THE TOWN AND COUNTRY PLANNING
(DEVELOPMENT MANAGEMENT PROCEDURE ENGLAND) ORDER 2015**

Planning Application Reference:	APP/21/00601
Proposal:	Proposed Portsmouth Water Headquarters building (Use Class E(g)(i) use) and new Employment premises (Use Class B2.B8/E(g)(iii) use); widened access onto Solent Road; and associated access, car parking, landscaping and works; including the felling of 7No. trees the subject of TPO No.1801 in order to improve the access and allow for the development.
Location:	Land north of Solent Road (adjacent to Bosmere Medical Centre) Havant
Date:	31 March 2022

Portsmouth Water's Catchment and Environment Team have reviewed this application from a groundwater quality protection perspective, Biodiversity Net Gain requirements, proximity to designated habitats of national and international importance, and proximity to adjacent company owned land managed for Biodiversity. We have the subsequent comments to make.

Groundwater Protection

The development lies in a highly sensitive groundwater location due to underlying principal chalk aquifer. The site is located within the Source Protection Zone One (SPZ1) for an essential Public Water Supply Source. Therefore, all measures to prevent pollution during and post construction are required in order to safeguard the local public water supply.

We do not object in principle to the proposed development, however due to the sensitivity of the groundwater environment we wish to be consulted on further amendments to the final design and plans for the site and provide the following comments regarding the imposition of conditions.

1. Surface Water Drainage

Portsmouth Water are satisfied in principle with the surface water drainage strategy set out within the flood risk assessment and approve to the inclusion of pollution control measures

(Class 1 petrol interceptor and filter chambers) within the implementation of appropriate Sustainable Drainage. The Catchment and Environment Team agree drainage by infiltration including soakaways would be inappropriate for this site and support that no soakaways are to be used.

Given the proposed SUDs scheme discharges within SPZ1 of the groundwater catchment into Brockhampton Stream, and this flows into Langstone Harbour (which is designated RAMSAR, Special Protection Area, Special area of Conservation, a Site of Special Scientific Interest, and includes Priority Habitats) it's of high importance we ascertain the SUDs scheme - notably the pollution control mechanisms - shall be designed, maintained and managed appropriately after completion. Whilst we are satisfied with the proposed timelines within which SUDs features shall be inspected and maintained set out within Table 7: 'Management and Maintenance Strategy' of the Flood Risk Assessment, the Catchment and Environment team require more information in regard to whom is responsible to maintain the SUDs after construction in the form of a detailed Management Plan. This is because of concern as per 5.3.1 of the Drainage Strategy the new Portsmouth Water Head Office and the Industrial Units shall have separate entities managing and maintaining the drainage despite integrated SUDs infrastructure. Whereby shared pollution mitigation features, attenuation tank and discharge point are all within the Industrial Units area becoming the responsibility of an undesignated third party. We are further concerned there are areas of the scheme, such as under the shared access road, for which it is unclear which of the two management entities are required to maintain the drainage.

Additionally, we note the two car parking areas for the new Portsmouth Water Head Offices' drainage to the attenuation tank will bypass the petrol interceptor in the Drainage layout. This is unacceptable to the Catchment and Environment Team due to the risk posed by hydrocarbons to our potable water abstraction and designated habitat sites. We therefore expect the drainage design to be revised such that all car park drainage flows through a petrol interceptor.

Subsequently it is Portsmouth Waters position that a condition is required for surface water drainage and we do not recommend the discharge of this condition until further information is provided, reviewed and agreed in consultation with the Catchment & Environment Team.

Condition 1:

No development shall take place until a surface water drainage scheme, based on sustainable drainage principles and a comprehensive assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority in consultation with the Environment Agency and Portsmouth Water. Details of how and by whom the scheme shall be maintained and managed by after completion shall be set out in writing within a detailed Management Plan. The scheme shall subsequently be implemented in accordance with the approved details before any building within that phase is occupied.

Reason - To reduce the risk of groundwater pollution in line with paragraph 170 of the National Planning Policy Framework. Note: The drainage scheme design will be required to take account of the location of any solution features present in order to avoid and mitigate risks.

2. Foul Water Drainage

The proposed foul water drainage strategy is the connection to an existing main sewer, this is acceptable in principle in relation to groundwater protection. However we request to see the specification on the foul drainage pipe in order to ascertain it is sufficiently durable to mitigate the potential risk posed by leaks in SPZ1 of the groundwater catchment before we consent to the discharge of the relevant condition. We would expect all foul sewers to be constructed with a secondary Cured in Place Plastic (CIPP) liner or equivalent lining technology.

However we note proposals for the sewer main in the south-west of the site to be relocated along with the Easement to encroach within the Root Protection Zones (RPZs) of the trees covered by Tree Preservation Order areas G2, G1 and G5. This risks causing damaged to the protected trees, undermining the Biodiversity Net Gain requirements, potentially violating the TPO orders and generates a potential groundwater quality risk in very close proximity to potable supply abstractions as root ingress from large established trees may damage the sewer main. Thus we recommend the proposed relocated position of the sewer is reviewed such that it does not sit within RPZs.

We therefore request a condition is required, and request that this condition is not discharged until further information is provided, reviewed and agreed in consultation with the Catchment & Environment Team.

Condition 2:

No phase of development shall commence until such time as a scheme to dispose of foul water has been submitted to, and approved in writing by, the local planning authority in consultation with the Environment Agency, Portsmouth Water and Southern Water.

The scheme shall be implemented in accordance with the timetable agreed as part of the approved scheme. The scheme shall also include:

- *details of how the scheme shall be maintained and managed after completion.*
- *details of the sewage pipe work layout and specifications.*

3. Unidentified Contamination

A Phase I and Phase II investigation has been undertaken on the site, no gross contamination has been identified on the site from these investigations. We support the proposal for a watching brief and discovery strategy during construction for dissolution features/solution features. Both foundations and drainage excavation should be inspected for the solution feature presence and unidentified contamination.

The elevated concentrations of copper and Nickel identified in the groundwater samples have no plausible on-site source and have been classified as background concentrations in the area. Pollution prevention for lateral mitigation into adjacent ponds will be provided via bunds. Details of these bunds are still required to ensure these are structurally sound and provide appropriate mitigation.

We therefore recommend a condition is required and request that this condition is not discharged until further information is provided, reviewed and agreed in consultation with the Catchment & Environment Team.

Condition 3:

If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with the Environment Agency and Portsmouth Water) shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified. The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences.

Reason - To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the National Planning Policy Framework.

4. Piling & Foundations

We have reviewed the piling foundation method statement and find the content satisfactory. The employment of a Controlled Modulus Columns (CMC) system appears to present a low risk of contamination to water quality and therefore in principle its use is acceptable. However there are 2 areas that we require further information:

1. Final depth of columns to be provided. The risk assessment needs to be updated with this information.
2. Risk of turbidity from boring and low-pressure injection of concrete.

The physical nature of boring columns can create turbidity in groundwater, particularly if the columns are going into the chalk aquifer. This presents a risk to water quality. Therefore the assessment needs to be updated to reflect this risk and consideration of how to minimise turbidity should be considered.

We agree that TRC recommends that a contractor implement a Construction Phase Environmental Management Plan to ensure the risk management actions are undertaken to reduce environmental risk. The designer should ensure that construction materials are compatible with the ground conditions encountered.

Subsequently it is Portsmouth Waters position that a condition is required, and do not recommend the discharge of this condition until further information is provided, reviewed and agreed in consultation with the Catchment & Environment Team.

Condition 4:

Piling or deep foundation using penetrative methods shall not be carried out other than with the written consent of the local planning authority in consultation with the Environment agency and Portsmouth Water. The development shall be carried out in accordance with the approved details.

5. Construction Environmental Management Plan (CEMP)

We have reviewed the Construction Environmental Management Plan (CEMP), we support the appropriate management of overland runoff in accordance with the Environment Agency's pollution prevention guidelines. Additionally, we support the proposal for a watching brief during construction for dissolution features/solution features. Both foundations and drainage excavation should be inspected for the solution feature presence. The risk of dissolution should be mitigated appropriately (e.g. stand-off zones and/or ground treatment).

Conversely, limited information has been provided on how the wheel washing drainage will be managed this needs to be detailed in this plan to ensure appropriate management of this drainage. Furthermore details of hazardous material storage is required. We would also seek amendments to the on-site parking policy withing the CEMP such that it is specified no materials or vehicles shall be stored within the Root Protection Zones of any trees.

Subsequently it is Portsmouth Waters position that a condition is required, and we do not recommend the discharge of this condition until further information is provided, reviewed and agreed in consultation with the Catchment & Environment Team.

Condition 5:

No development shall commence until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the Planning Authority in consultation with Portsmouth Water detailing all pollution mitigation measures to be adopted during the construction phase. This should include management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water resources are not put at risk from leaks or spillages.

Further guidance

Our groundwater protection development guidance notes contain further information on the requirements for developments in groundwater sensitive areas. These can be found following the link below:

<https://www.portsmouthwater.co.uk/developers/groundwater-protection/>

Biodiversity

The development is adjacent to the existing Portsmouth Water Head Offices conservation area managed for Biodiversity by the company and is surrounded by multiple Tree Preservation Orders as well as areas of international and national statutory designations. Therefore, all measures to protect Biodiversity, avoid excavations within Root Protection Zones (RPZs), and meet the Biodiversity Net Gain (BNG) requirements during and post construction are expected. We do not object in principle to the proposed development, however the Catchment and Environment Team wish to be consulted on any further amendments to the final design and plans for the site and provide the following comments for consideration.

Given the sites proximity to and surface water drainage discharge upstream of nationally and internationally important designated statutory sites in Langstone Harbour – RAMSAR, Solent Special Area for Conservation, Special Protected Area, Special Site of Scientific Interest, and Priority Habitats - it is the Catchment and Environment Teams position that a regulatory Habitat Risk Assessment is required.

Tree Preservation Orders

The Catchment and Environment Team does not object to the removal of the 8 trees highlighted in the Planning Layout. However we would like to highlight three issues:

1. Two trees requested for removal located on site look to have been removed several years ago when the existing access road was installed. We therefore seek clarification in regard to which trees are intended for removal within TPO group 5.
2. Within documentation associated with this application there has been no mention of how during and after construction the Root Protection Zones (RPZs) of the trees will be protected. We would expect such references to be made in the CEMP and planting plan - especially as TPOs are in effect on the site. We therefore expect the CEMP and Planting Plan to be revised to consider RPZs.
3. Under the Foul Water drainage strategy, the sewer main is to be relocated in the south-west of the site. This relocation and associated easement will encroach within the TPO group areas G2, G1 and G5 and the protected trees associated RPZs. This proximity risks causing damage to the trees, undermining BNG obligations and potentially violating TPOs. Furthermore we are concerned it creates a groundwater quality risk in SPZ1 as future root ingress by trees proposed under the Planting Layout may cause damage to the sewer main. Subsequently we request Condition 2 is imposed.

Site Layout

The Catchment and Environment Team have reviewed the Planting Layout Plan and Bird and Bat Box Layout Plan. We request the Management Plan for the Landscaped areas and Planting Layout is forwarded for review, comment and agreement once they have been amended to address the following concerns:

- We object to the application of any agrochemicals on this site from a water quality protection perspective. This is because the site is located within SPZ1 of the groundwater catchment, in close proximity to potable water abstractions and a watercourse which flows into Langstone Harbour Area of Outstanding Natural Beauty. Portsmouth Water require written assurances no pesticides will be applied on the site during and after construction.
- Within the Planting Layout Maps many 'proposed trees' are to be planted within the Root Protection Zones (RPZs) of existing trees. The Planting Plan is therefore unacceptable to the Catchment and Environment team as planting within RPZs may invalidate the BNG requirements. This is because planting within RPZs risks damaging existing trees and habitat and the close proximity will impede the ability of the proposed trees to grow healthily such that they are able to provide habitat.

Subsequently a revised Tree Planting Scheme is required to address current inadequacies.

- We oppose the planting of non-native species, and species that are not climate change resilient. This includes the planting of cultivar species which do not contribute to BNG requirements.
- We do not support the planting of inappropriate species for the site that are of difficulty to manage and rapidly infringe onto other habitats. Subsequently we oppose the inclusion of Blackthorn (*Prunus spinosa*) in the planting plan.
- The Catchment and Environment Team are not satisfied with the Bird and Bat box layout plan as it does not contribute sufficiently to BNG requirements. A total of two Bat boxes, Swift bricks and nest boxes each is not nearly sufficient. We note there are no proposed boxes or bricks on the Proposed new Portsmouth Water Head Offices, this is unacceptable in terms of the BNG requirements. We expect the quantity of Bird and Bat boxes to be increased and included in the new Portsmouth Water Head Office building. We also advise inclusion of Bee bricks and Bat Bricks is considered.
- The 'plant beds' and 'grass areas' proposed in the Planting Layout cover such small areas they would be difficult to manage correctly. This is because tractors and most mowers cannot fit onto such small areas, and their ability to do so is further impeded by the high concentrations of proposed trees and the lack of access without driving over plant beds. We expect areas to be of a suitable size to allow them to be managed effectively in a realistic timeframe. Portsmouth Water seek amendments to the planting layout such that areas are of an appropriate size to manage and minimise the risk of misinterpretations being made that may result in habitat loss through deviation from the planting layout during maintenance.
- Finally we support the inclusion of solar panels on the new Portsmouth Water head office roof. This will contribute to the companies 2030 net zero target to mitigate climate change and their appropriate location does not disrupt habitat. However we are disappointed they cover such a small area of the roof and wish this is reviewed to increase the roof area covered by solar panels to optimise renewable energy output.

Kind regards,

Catchment & Environment Team

Portsmouth Water

catchment.management@portsmouthwater.co.uk