

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

Applicant:	Reside Developments Ltd
Planning Application Reference:	BN/50/20/PL
Proposal:	Demolition of existing structures on-site & erection of 42 No. dwellings with access, parking, landscaping & associated works. This application is a Departure from the Development Plan.
Location:	Land west of Fontwell Avenue Fontwell Avenue Eastergate PO20 3RX
Date:	10 July 2020

Site Setting

The site lies 151 meters south of a potable abstraction owned by Portsmouth Water and is located within the Source Protection Zone 1c (SPZ1c) for this Public Water Supply Source. The SPZ1c relates to subsurface activity only, where the Chalk aquifer is confined and may be impacted by deep drilling activities. Subterranean activities such as deep drainage solutions and/or piling may pose a risk to groundwater quality at the local public water supply source.

The site lies superficial Head deposits overlying the Lambeth Group bedrock. The geology beneath the site is classified as a Secondary A Aquifer. Deep groundwater flows north towards the Source Protection Zone abstraction source. Therefore, all measures to prevent pollution during and post construction are required in order to safeguard the local public water supply.

Portsmouth Water's Position

Our concerns regarding groundwater quality protection can be addressed through the addition of appropriate planning conditions to reduce the potential risks posed to groundwater and our resource as a result of the proposed development. Without these conditions we would object to the proposal due to the risk to groundwater quality and the local public water supply.

Recommended Planning Conditions

- 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. The scheme shall subsequently be implemented in accordance with the approved details before any building within that phase is occupied.***

Details of how the scheme shall be maintained and managed after completion shall also be included.

Reason - To ensure that any proposed surface water drainage scheme does not harm groundwater resources in line with paragraph 170 of the NPPF and to reduce the risk of groundwater pollution.

- 2. No development shall commence until such time as a scheme to dispose of foul water for that phase 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.***

Reason- This is in order to manage the quantity of foul sewage in order to minimise the risk to controlled waters and the public drinking water supply.

- 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 risks from land contamination to drinking water supplies is controlled and mitigated.

4. *No development shall start on site 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.*

Reason- Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the local water supply source.

5. *No piling or any other foundation construction using penetrative methods shall be carried out other than with the express written consent of the local planning authority in consultation with Portsmouth Water. The development shall be carried out in accordance with the approved details.*

A piling risk assessment and method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, vibration and the programme for the works) should be submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water.

Thus it should be demonstrated that any proposed piling;

- a. Will not result in contamination of groundwater. This is in accordance with National Planning Policy Framework paragraph 109.*
- b. Nor any increased risk to drinking water supplies (including turbidity).*
- c. Nor deterioration in the transmissivity of the aquifer.*

Reason: Piling or any other foundation designs using penetrative methods can pose a risk to potable supplies from, for example, turbidity, mobilisation of historical contaminants, drilling through different aquifers and creation of preferential pathways.

Informatives

Drainage

The proposed surface water strategy is disposal via SuDs (permeable paving & swales) and trench soakaways.

Portsmouth Water would have a presumption against deep bore soakaway disposal in this area as deep infiltration systems can provide a pathway for contaminants. Any contamination present may pose a risk to groundwater underlying the site and to the surrounding potable supplies. If deep bore soakaway(s) are the proposed drainage solution, the application for the construction and installation should be accompanied by an adequate risk assessment demonstrating how the risk to groundwater would be mitigated in the proposed design.

Portsmouth Water wish to be further consulted on the final surface water drainage design in line with recommended Condition 1.

The proposed foul water strategy is discharge into the exiting foul main sewers; this is acceptable to Portsmouth Water in relation to groundwater protection. Portsmouth Water require the use of the highest specification pipework and designs for schemes involving new sewerage systems in SPZ1 to minimise leakage. If permission for the connection to the existing foul main sewer is not permitted, Portsmouth Water wish to be further consulted on the alternative foul water drainage strategy in line with recommended Condition 2.

Land Contamination

A preliminary site investigation has been undertaken on the site and reported in the 'Preliminary Investigation Report', by Soils Limited ref: 18158/PIR_R26. From the preliminary investigation, there is no evidence of a credible pollution source and no pollutant linkage identified. Portsmouth Water would wish to be consulted on unexpected contamination in line with recommended Condition 3.

Construction Environmental Management Plan (CEMP)

Portsmouth Water wish to be consulted on the Construction Environmental Management Plan (CEMP) for comment in line with recommended Condition 4. The CEMP should specifically outline the proposed means of surface water management during development.

Piling & Foundations

Portsmouth Water would have no objection to piling at this location if the piles terminate within the Clay cover, if the piles penetrate the full depth of the Clay cover we would expect a piling risk assessment and method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, vibration and the programme for the works). This in line with recommended Condition 5.

Catchment Management Team
Portsmouth Water

