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Fareham Borough Council Local Plan Review Consultation: 10 June to 26 July 2019

Portsmouth Water have taken this opportunity to provide comments on the current local plan, our comments will assist the council's consideration of the issues and options for future development to allow for the preparation of an updated version of the plan.

Spatial Strategy

Portsmouth Water recommends that the siting and timing of development can assist with the economic provision of water resource infrastructure. Safeguarding existing infrastructure, such as water mains and aquifers, is important. Portsmouth Water would urge developers to check for existing infrastructure and for source protection zones that may limit development options as we need to protect the water environment from potential pollution that is caused by development and its ongoing use.

Design Policies

Policy D5: Energy and Water Efficiency

Whilst we support the policy, Portsmouth Waters 'Water Resources Management Plan' is based on lower per capita consumption than that proposed in the Local Plan. Fareham is supplied jointly by Portsmouth Water and Southern Water, and we both have an aspiration for all customer to reach 100 litres/head/day by 2050 to improve environmental protection, reduce wastewater discharge (therefore also contributing towards Policy D6: Water Resources) and improve sustainable and resilient water use into the future. If large new developments, such as those proposed in Welbourne, are constructed with water efficient homes then they would contribute significantly to our ambitious consumption targets.

Portsmouth Water are also proposing that if a Developer Customer can provide evidence of intention to build to a level of 100 litres per head per day, or less, we would provide a 50% allowance on infrastructure charges.

We therefore strongly encourage Fareham as part of their higher standards in the Building Regulations for water consumption, to aspire to lower consumption figures, and to recommend this for all new dwellings, rather than just for those with water supply issues.

Policy D6: Water Resources

10.42- We note that this statement includes that there are “nitrate problems and catchment level nitrate measures are required now...” and “that housing growth will not affect the scale of these measures”. Further clarity on this is needed. The increase of housing and of sewage disposal will lead to pressures on other existing treatment works and potentially an increase in private treatment works that are not connected to WwTW and discharges to surface water or groundwater. This will increase nitrate levels and impact on water quality and ecological receptors in the harbours and in groundwater.

Whilst Portsmouth Water will be undertaking catchment wide work in reducing nitrate levels, other stakeholders including the council and developers must address impacts from nitrates (and other contaminants of concern) and seek to reduce or eliminate sources of contamination to improve water quality. Therefore we recommend that this statement is amended to include more specifics in reducing impacts to the water environment.

10.43- As above, this statement requires more specific details to reduce impacts to the water environment and safeguard water resources. However we do support the statement “Development proposals must not be detrimental to the management and protection of river, coastal and groundwater and will take opportunities to enhance these resources”.

We support the inclusion and requirement to protect water resources in this policy, in addition we would recommend that water quality protection and enhancement is included as a separate Policy and we would be happy to help out in developing this.

We have suggested a Water Quality Policy (D7) and associated supporting statements (10.44 – 10.50) below. This is an important policy inclusion as Portsmouth Water’s abstraction located at Maindell lies within some of the proposed strategic development sites.

Suggested policy

Policy D7: Water Quality

10.44 The chalk that underlies a large part of the Borough is designated as a Principal Aquifer providing crucial groundwater resources for public water supply. Part of the Borough’s public water supply is sourced from a groundwater abstraction at Maindell.

10.45 The chalk aquifer can easily be polluted from development which can be very difficult to remediate. Pollution can originate from a number of sources including:

- *Industry (for example agriculture);*
- *The disposal of effluent in soakaways;*
- *The disturbance of contaminated sites;*
- *Inappropriate storage of oil and chemicals during and post-construction;*
- *Development in the vicinity of solution features in the chalk (e.g. swallow holes) increasing groundwater turbidity;*
- *Piling and inappropriate foundation design;*
- *Inappropriate drainage systems (for example, infiltration drainage into the aquifer or bore hole soakaways).*

10.46 Policy D7 is designed to assist in the protection of groundwater and controlled water. This policy complements the powers and duties of the Environment Agency; the statutory body responsible for the protection of groundwater in England, and the 'catchment management' approach being adopted by Portsmouth Water. This approach aims to address pollution at its origin in the catchment, thereby preventing deterioration and improving the quality of water in the chalk aquifer which supports abstraction for public water supply.

10.47 If a development is within Source Protection Zone 1 this policy will apply, and it is likely that specialised geotechnical advice will be required to support any development proposals.

D7: Water Quality

Proposals for non-householder development in a groundwater Source Protection Zone 1 will be permitted where:

- a. The following key risks are taken into account during the early stage of planning and understood in the context of a Conceptual Site Model and risk assessment:*
 - i. Drainage and Sustainable Urban Drainage Systems (SuDs);*
 - ii. Piling and foundation design;*
 - iii. Contaminated land;*
 - iv. Activities that include large-scale ground disturbance such as excavations;*
 - v. Storage of chemicals and polluting materials;*
 - vi. Waste disposal;*
 - vii. Importation and use of soils.*
- b. Where a risk has been identified as part of a., development proposals must:*
 - i. Provide appropriate mitigation to minimise the risk to groundwater which may include requirements for groundwater monitoring and;*
 - ii. Ensure the ongoing management and maintenance of any mitigation measures.*

10.48 A Conceptual Site Model (CSM) should identify risks and provide a representation of anticipated site conditions and interactions between different processes. A phased approach to the CSM is considered appropriate. This should start with a desk study and literature review identifying all potential source, pathway and receptor linkages. Depending on the findings of the desk study, an intrusive investigation may be required to further establish the risk of contamination in the hydrological setting. Once risk has been established, options can be assessed to ensure that development removes or adequately minimises the risk to groundwater. Portsmouth Water Groundwater Protection Guidance Notes provide appropriate guidance for applicants when considering development on the Principal Chalk Aquifer and within Source Protection Zones.

10.49 Areas of aquifer vulnerability are defined by the Environment Agency Source Protection Zones (SPZs). These zones show the risk of contamination from any activities that might cause pollution in the area. Part of the Borough is situated within a Source Protection Zone 1 (SPZ1) which is defined as the 50-day travel time from any point below the water table to the source.

10.50 The Environment Agency and Portsmouth Water will be consulted at the earliest opportunity on any planning application for new development located within SPZ1. In most cases it will be possible to protect groundwater/public water supply through the inclusion of appropriate planning conditions on any consent granted.

Additional comments

Sustainable Urban Drainage systems (SuDS)

There are no specific statement regarding surface water disposal and the protection of water resources and specifically the encouragement of including SuDS within the design of housing developments. SuDS provide a mechanism to enhance water quality, safeguard water resources and improve biodiversity if developed properly and managed well in the future. We recommend that a specific statement on SuDS is included.

Land Contamination

There is no specific policy or statement on land affected by contamination and the potential impacts on the water environment. A “brown field” first policy would help to achieve remediation of land and improve water quality. In addition to this, the management of land contamination including appropriate investigations, risk assessment and remediation strategies is required. We recommend that a specific statement is included on land affected by contamination.

Portsmouth Water

25/07/2019