

Havant Borough Council  
Development Control  
Civic Offices Civic Centre Road  
Havant  
Hampshire  
PO9 2AX

**Our ref:** HA/2020/122349/02-L01  
**Your ref:** APP/20/00285

**Date:** 04 September 2020

Dear Sir/Madam

**REVISED PLANS/DOCUMENTS RECEIVED - LAND RAISING OF THE RECREATION GROUND AT HOBBY CLOSE FIELD USING INERT CLEAN SOIL MATERIAL TO SOLVE INHERENT DRAINAGE PROBLEMS IN GROUND AND PROVISION OF SPORTS FIELD. TEMPORARY CONSTRUCTION ROUTES FROM EAGLE AVENUE TO THE EAST AND NORTH OF THE SITE. THESE WORKS WOULD ALSO ALLOW FOR NEW PLAY AREA AND SKATE PARK TO REPLACE THE EXISTING ONES ON SITE (THE PLAY AREA AND SKATE PARK WORKS DO NOT REQUIRE PLANNING PERMISSION).**

**RECREATION GROUND, HOBBY CLOSE, WECOCK, WATERLOOVILLE**

Thank you for the consulting the Environment Agency on the above application.

We have reviewed the information as submitted and set out our position and comments below.

**Environment Agency Position**

We maintain our previous **objection** to the above application as submitted on the following grounds; the applicant has not supplied adequate information to demonstrate that the risks of pollution posed to groundwater quality in the underlying inner source protection zone and the associated drinking water supply can be safely managed.

**Reason(s)**

Insufficient information has been provided to demonstrate that Surface water drainage from this site will not have the potential to impact on the underlying source protection zone 1 and associated strategically important public water supply this is in line with paragraph 170 of the National Planning Policy Framework.

Our approach to groundwater protection is set out in 'The Environment Agency's approach to groundwater protection'. In implementing the position statements in this guidance we will oppose development proposals that may pollute groundwater especially where the risks of pollution are high and the groundwater asset is of high value.

**Overcoming our objection**

To ensure development is sustainable, applicants must provide adequate information to demonstrate that the risks posed by development to groundwater can be satisfactorily managed.

We previously objected due to lack of detail. The principal grounds for the objection related uncertainties on the leachability of contaminants from the PFA derived material on the site.

As per our original application we raised the following;

“Drainage from aggregate material derived from waste Pulverised Fuel Ash (PFA) could potential contain elevated levels of contaminants. In particular water leaching from PFA can contain elevated contaminants such as metals.

We would as such need sufficient information to demonstrate that PFA derived material we not leach contaminants which could pose any risk to the underlying aquifer, the SPZ or Portsmouth’s water supply.”

There is nothing apparent in the additional submitted information to demonstrate that the PFA derived material will not leach contaminants which could pose any risk to the underlying aquifer, the SPZ or Portsmouth’s water supply. This would be needed in order for us to remove our objection.

It is important to highlight that the objection due to lack of detail is driven, not because of an inherent concern about the use the PFA material for drainage mediums in general, but rather because of the exceptional sensitivity of the underlying aquifer in this location. This sensitivity has necessitated additional control on many aspects of developments in the area.

### **Advice to the Local Planning Authority**

If you are minded to approve the application contrary to our objection, we would be grateful if you could re-notify us to explain why material considerations outweigh our objection, and to give us the opportunity to make further representations. Should our objection detailed above be removed, it is likely we will recommend planning conditions to be included on any subsequent approval.

We will always support and substantiate our objections to major development proposals at appeal wherever a refusal is lodged in line with our advice. If you are minded to grant permission against our advice, please contact the Sustainable Places Advisor named below before making a formal decision to discuss the conditions and advice that we would wish to apply to this proposal.

In accordance with the Planning Practice Guidance (Ref. ID: 20150415), please notify us by email within 2 weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Please do not hesitate to contact me using the contact details shown below should you have any queries regarding the above information.

Yours faithfully

Cont/d..

**Mrs Sophie Brown**  
**Sustainable Places Planning Advisor**

Direct dial 02030 257250

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