

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

Our ref: HA/2020/122349/01-L01
Your ref: APP/20/00285
Date: 15 July 2020

Dear Sir/Madam

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 **object** 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

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Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.
Customer services line: 03708 506 506
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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.

This site overlies the inner sources protection zone for the Bedhampton and Havant springs. These springs supply Portsmouth with its drinking water supply. Significant amount of karst features are known from the Horndean/Waterlooville area. Karst feature (i.e. fractures and dissolved channels in the rock) mean that groundwater can travel very rapidly from this area to the springs with little chance of attenuation. As such we would regard this area as extremely sensitive.

While the site itself maybe predominately underlain by clayey material (presumably part of the Lambeth group). This is underlain by chalk principal aquifer which supplies Bedhampton and Havant springs. Drainage from the site may enter the chalk aquifer (i.e. through stream sink into the chalk or through karst features that can occur in the Lambeth group near the boundary with the chalk).

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.

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

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Mrs Sophie Brown
Sustainable Places Planning Advisor

Direct dial 02030 257250

Direct e-mail planningSSD@environment-agency.gov.uk