

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

Our ref: HA/2018/120977/01-L01
Your ref: APP/18/01226
Date: 07 January 2019

Dear Sir/Madam

**CONSTRUCTION OF AN 81BED, FOUR-STOREY HOTEL (CLASS C1),
ASSOCIATED CAR-PARKING, LANDSCAPING AND ANCILLARY WORKS LAND
OFF LARCHWOOD AVENUE (FORMER STANTONS YARD), LARCHWOOD
AVENUE, HAVANT**

Thank you for the consultation on the above application, please quote our reference on all correspondence.

We have reviewed the information as submitted and have the following comments.

Environment Agency Position

We have **no objection** to the proposed development, subject to the inclusion of the below **conditions** in any permission granted. Without the inclusion of these conditions we consider that the development would pose an unacceptable risk to groundwater quality.

The site rests on Head deposits (Interbedded Sands, Silts, Clays and Gravels) underlain by Lambeth Group Bedrock (London Clay [Predominantly clays with minor silt and sand lenses]). The previous use of the site is, as yet, undetermined and is located in the SPZ1c for the Bedhampton & Havant Springs. Some minor contamination was discovered in discrete points across the site with asbestos being discovered in the made ground across the site.

Planning Conditions

The Environment Agency requests that the following conditions be attached to any planning permission granted, and that the details in relation to these conditions be submitted and approved by the Local Planning Authority.

Environment Agency
Guildbourne House Chatsworth Road, Worthing, West Sussex, BN11 1LD.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

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Condition 1

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

Reasons

To ensure that the development does not contribute to, 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.

The lack of information about the previous uses of the site increases the risk of unsuspected contamination. Additionally, given the sensitivity of groundwater in the area, any new sources of contamination should be thoroughly investigated and the results of which should be submitted for review.

Piling

Piling & investigation boreholes using penetrative methods can result in risks to potable supplies from, for example, pollution / turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways.

Groundwater is particularly sensitive in this location because the proposed development site is within a Source Protection Zone 1c. In light of the above, the proposed development will only be acceptable if a planning condition controlling disturbance of the aquifer is imposed. Without this condition we would object to the proposal in line with paragraph 170 of the National Planning Policy Framework because it cannot be guaranteed that the development will not present unacceptable risks to groundwater resources.

Condition 2

Piling & investigation boreholes using penetrative methods shall not be carried out other than with the written consent of the local planning authority. The development shall be carried out in accordance with the approved details.

Reason

To ensure that the proposed piling and/or investigation boreholes, does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework and Position Statement of the [‘The Environment Agency’s approach to groundwater protection’](#).

The Lambeth Group overlies the Upper Chalk, which is considered a principal aquifer and has karstic properties. As such, groundwater is very sensitive in the area.

Whilst boreholes in this area suggest a significant thickness of Lambeth Group above the Chalk, care must be taken not to penetrate the Principal Aquifer (so as not to create a potential pathway into the aquifer).

In addition, whilst perched water within the Head Deposits is not used for public abstraction, it may have ecological significance to local water courses.

The EA would expect to review the piling risk assessment prior to the discharge of the condition.

Advice

We would advise the applicant to keep Portsmouth Water informed of their intentions

regarding the development.

Please do not hesitate to contact me on the number below should you have any queries on the above information.

Yours faithfully

Mrs Sophie Brown
Sustainable Places Planning Advisor

Direct dial 02030 257250

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