

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

**Our ref:** HA/2020/122486/02-L01  
**Your ref:** APP/20/00441  
**Date:** 03 August 2021

Dear Sir/Madam,

**ADDITIONAL INFORMATION - OUTLINE PLANNING APPLICATION WITH ALL MATTERS RESERVED EXCEPT ACCESS FOR THE DEVELOPMENT OF UP TO 120 DWELLINGS AND ASSOCIATED IMPROVED SITE ACCESS, LANDSCAPING, FOOTPATHS, SUDS AND OTHER ASSOCIATED WORKS ON**

**LAND TO THE WEST OF HULBERT ROAD, HAVANT**

Thank you for re-consulting the Environment Agency in regard to the above application.

We have reviewed the additional information that has been submitted and have no further comments to make. Our previous response dated 26 August 2020 (our ref; HA/2020/122486/01) still stands, and this is copied below for ease of reference:

**“Environment Agency position**

*We request 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.*

**Condition 1 – Remediation strategy**

***No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:***

- 1. A preliminary risk assessment which has identified:***
  - all previous uses***
  - potential contaminants associated with those uses***
  - a conceptual model of the site indicating sources, pathways and receptors***
  - potentially unacceptable risks arising from contamination at the site***
- 2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.***
- 3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation***

**strategy giving full details of the remediation measures required and how they are to be undertaken.**

**4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.**

**Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.**

#### **Reasons for Condition 1**

*To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the National Planning Policy Framework.*

*Localised contamination may be present at this site. Whilst site wide gross contamination would not be expected, there may still be hotspot, of contamination. The site is located in a Source Protection zone 1c (confined). This applies to the chalk principal aquifer that occurs at depth beneath the site. Piling or existing/potential deep borehole could create pathways to this deep aquifer*

*The submitted GeoEnvironmental Assessment Report is largely satisfactory. We would agree that provided no pathways are present/created to the deep underlying chalk aquifer than the risk to sensitive groundwater receptors would be limited. If however any pathways are presence or created (i.e. from existing boreholes or piling), then then risks may be significant.*

#### **Condition 2 – Unidentified contamination**

**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.**

#### **Reasons for Condition 2**

*To ensure that the development does not contribute to, and 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.*

#### **Condition 3 – Verification report**

**Prior to any phase of development being brought occupied, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and verified in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.**

### Reasons for condition 3

*To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 170 of the National Planning Policy Framework.*

### Condition 4 – Piling

***Piling or other deep foundation 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.***

### Reasons for condition 4

*To ensure that the proposed Piling or other deep foundation does not harm groundwater resources in line with paragraph 170 of the National Planning Policy Framework. Contamination may be present on site.*

*Piling or deep foundation, has the potential to mobilise contamination from the shallow soils into the chalk bedrock, and increase the potential of mobilisation/migration to the underlying chalk aquifer and associated Source Protection Zone 1.*

*Run off from areas such roads or car parking areas could contain elevated levels of contamination. Areas of contamination may also be present at this site.*

*Deep infiltration drainage may create pathways to the deep chalk aquifer and associated confined inner source protection zone (SPZ1c)."*

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

Yours faithfully,

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

Direct dial 02030 257250

Direct e-mail [planningSSD@environment-agency.gov.uk](mailto:planningSSD@environment-agency.gov.uk)