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**CONSULTATION UNDER THE TOWN AND COUNTRY PLANNING
(DEVELOPMENT MANAGEMENT PROCEDURE ENGLAND) ORDER 2010**

Planning Application Reference:	APP/25/00964
Proposal:	Request to Discharge Conditions 6, 7, 8, 11, 22(A), 22(B) of Outline Planning application APP/19/00542 (Received 21/11/2025).
Location:	70 West Street, Havant, PO9 1LN
Date:	13 th January 2026

Thank you for consulting Portsmouth Water on the above application. The Catchment and Environment Team have reviewed the relevant documentation and have the following comments.

Our comments are based on review of the following documentation:

- Condition 6 - Foundation Design
- Condition 7 - Construction Management Plan (102B)
- Condition 7 – Construction Management Plan Support Document
- Stage 1 Tier 2 Site Investigation and Generic Quantitative Risk Assessment
- Condition 11 - Drainage Details (11P1)
- Condition 11 - Drainage Plan (10P1)

Site Setting

The site lies on Lambeth Group over Lewis Nodular Chalk Formation, the geology beneath the site is classified as a Principal Aquifer. The site is situated within Source Protection Zone One (SPZ1) for the Havant and Bedhampton Springs; a critical source used for public water supply to the city of Portsmouth and the surrounding area. The Havant and Bedhampton Springs are also a strategic source for the Havant Thicket Reservoir and water resources of the wider south-east.

The Springs are located within 50 metres of the proposed development. Consequently, all measures to prevent pollution during and post construction are required in order to safeguard the public water supply.

Portsmouth Water's Position

Due to the sensitivity of the groundwater environment at this location Portsmouth Water recommended the CEMP is updated with some more details on pollution prevention measures, also to include an incident response plan. We wish to be consulted on the revised CEMP once this becomes available. In addition, we wish to be reconsulted once more information is submitted to satisfy parts 3 & 4 of condition.

Surface Water Drainage Strategy

The surface water drainage plans are to utilise permeable paving and attenuation tanks that discharge into the existing culvert. This is acceptable to Portsmouth Water, therefore we are happy to recommend the discharge of condition 11.

Piling and Foundation Designs

The proposed foundation design for the site are slab foundation. With confirmation that no piling will be taking place we recommend the discharge of condition 6.

Construction and Environmental Management Plan (CEMP)

The CEMP provides limited environmental management measures, for instance it doesn't include any information on storage of fuels oils and chemicals and what pollution prevention measures will be in place. In addition, there is a wheel wash area which could pose a risk. Ideally, we would like to see this is updated with some further information also to include a pollution incident response plan within the CEMP. We would wish to be contacted in the event of pollution incident.

Although the following environmental guidance is not specifically for England Portsmouth Water recommend the following guidance for developments in its Source Protection Zones.

We recommend the following GPPs are read and referenced where necessary, also in toolbox talks, on site personnel should be aware of these along with the sensitivity of the groundwater environment.

GPP6: Working on construction and demolition sites

GPP 8: Safe storage and disposal of used oils

GPP 21: Pollution incident response planning

Available via the link below:

[**NetRegs Environmental Guidance for Pollution Prevention \(GPP\) documents**](#)

Land Contamination

We have reviewed the Stage 1: Tier 2 Site Investigation produced by Impact Geotechnical dated 25th June 2025.

We recommend the discharge of Parts 1 & 2 of Condition 8, but Parts 3 & 4 remain until further information is provided.

Commentary

The report has identified elevated levels of lead and PAHs within the Made Ground material from the samples obtained from the Window Sample locations. The levels present moderate risk to human health. The levels also present a moderate risk to controlled waters if a piling solution is proposed. However, as no piling is proposed, the risk of controlled water is deemed to be low.

The report was unable to conclude on any remediation measures until further information on the construction and ground improvement/piling was provided. As this has not been made available to IGL, we recommend that a Remediation Method Statement is produced and submitted for review and comment to fulfil Parts 3 & 4 of Condition 8.

Notwithstanding the requirements above, we agree with the recommendation for a watching brief to be present during the groundworks to identify any potential contamination not previously been identified. A competent person should undertake this role. We also agree as stated within Section 11.5 if *“material is noted to show visual and/or olfactory sign of contamination this material should be stockpiled separately and tested prior to its appropriate removal off site or re-use where necessary. A suitably qualified environmental specialist should be contacted to advise what further investigation is required”*.

Catchment Management Team
Portsmouth Water

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