

Havant Borough Council - Development
Control
Civic Centre Road, Havant, PO9 2AX

Reference: PA-0003016/01
Customer reference: APP/26/00154
13 May 2026

**Detailed application for the erection of 111 dwellings at the former Goodwillies
Timber Yard**

154 London Road Waterlooville Havant Borough PO7 5SR

Dear Planning Officer,

Thank you for consulting us on the above application, on 23 April 2026.

We have reviewed the submitted information that is relevant to our remit and set out our position and comments below.

Environment Agency position

The site is located within Source Protection Zone 1 (Confined) (SPZ1C) for the strategically important Havant and Bedhampton Springs public water supply abstraction. These springs are fed by groundwater from the chalk aquifer, which occurs at depth beneath the site. Groundwater within the chalk aquifer is extremely sensitive; however, at this location the aquifer is confined from the surface by a thick layer of London Clay. The site itself is directly underlain by the Wittering Formation. This is an isolated Secondary Aquifer, primarily composed of sands and silts, and has moderate to low sensitivity from a controlled waters perspective.

Previous activities associated with the former timber yard may have resulted in contamination being present at the site. Provided that no direct pathways exist or are created (for example through deep piling or boreholes) through the London Clay, the risk to controlled waters is expected to be limited.

Whilst low-level contamination within the Wittering Formation is unlikely to be of particular concern from a controlled waters perspective, significant or gross contamination within this formation may pose a risk to groundwater and wider controlled waters and could therefore be grounds for concern.

In light of the above, the proposed development will be acceptable provided that the following **4 planning conditions** are included. Without these conditions we would object to the proposed development in line with paragraph 187 of the National

Planning Policy Framework (NPPF) because it cannot be guaranteed that the development will contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate or will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Condition 1 – Remediation strategy

Prior to each phase of development approved by this planning permission no construction 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 including sampling post demolition in areas which will then be accessible, 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 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 187 of the National Planning Policy Framework. The remediation strategy should be carried out by a competent person in line with paragraph 196 of the National Planning Policy Framework.

To ensure the development will contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate in line with paragraph 187 of the NPPF.

Condition 2 – Verification report

Prior to any part of the permitted development being 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 approved 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 2

To ensure that the site does not pose any further risk to 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 187 of the National Planning Policy Framework.

Condition 3 – Previously 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. The remediation strategy shall be implemented as approved.

Reasons 3

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 187 of the National Planning Policy Framework.

Condition 4 – Piling

Piling and other foundation designs using penetrative method hereby permitted by the LPA may not commence until such time as a scheme has been submitted to, and approved in writing by, the LPA.

The scheme shall be based on the information submitted as part of the application and, where necessary, supported by:

- Foundation Works Risk Assessment

- A conceptual site model
- Specification of the type, number and depth of proposed piles/ foundations/ dimensions of shaft/tunnel/ design of heating and cooling system

The scheme shall be fully implemented and subsequently maintained, in accordance with the timing/phasing arrangements contained in the scheme, or any details as may subsequently be agreed, in writing, by the LPA.

Reasons 4

To ensure that the proposed development, does not harm groundwater resources in line with paragraph 187 of the NPPF and Position Statement A2 of The Environment Agency's approach to groundwater protection.

Piling and other foundation designs 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 located upon secondary aquifer A.

Advice to Applicant

Waste to be taken off-site

Contaminated soil that is (or must be) disposed of, is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays (03708 506 506, Monday to Friday 8am to 6pm or by email enquiries@environment-agency.gov.uk).

If the total quantity of hazardous waste material produced or taken off site is 500kg or greater in any 12-month period, the developer will need to register with us as a

hazardous waste producer. Refer to the [hazardous waste pages on GOV.UK](#) for more information.

Waste on-site

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the environmental permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays (03708 506 506, Monday to Friday 8am to 6pm or by email enquiries@environment-agency.gov.uk).

We recommend that developers should refer to the waste management page on GOV.UK.

We will consider any queries in relation to the use of Definition of Waste: Development Industry Code of Practice (DoWCoP) (which is to be updated) through our environmental permitting enhanced pre-application advice service, considering site conditions, the materials that are proposed to be used, and the potential for harm to the environment and to human health. We can also provide advice as to whether an environmental permit is required. Further information can be found on GOV.UK - [Get advice before you apply for an environmental permit - GOV.UK](#)

Final Comments

Thank you again for consulting us on this application. Our comments are based on the best available data and the information as presented to us.

As you are aware, the discharge and enforcement of planning conditions rests with your authority. You must therefore be satisfied that the proposed conditions meet the requirements of the 6 tests in paragraph 57 of the NPPF.

Please notify us immediately if you are unable to apply our suggested conditions, to allow further consideration and advice.

Yours sincerely,

Jo Purvis,
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