

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

Reference: PA-0012981/01
Customer reference: APP/26/00453
13 October 2026

Outline permission for the erection of a building for employment purposes with associated parking and landscaping. All matters reserved except access, layout parameters and scale parameters.

Vail Williams LLP 1000 Lakeside North Harbour PO63EN.

Dear Planning Officer,

Thank you for contacting us.

This is our response to your consultation APP/26/00453.

Environment Agency position

We have reviewed the submitted document:

Perega (2026), *Dunsbury Park, Havant, Portsmouth, Plots 1, 4 and 6 – Sub Structure Technical Note*, Project No. W24084, Document Ref. W24084-PER-ZZ-ZZ-RP-Z-00002, P1, dated 25 August 2026.

We can confirm that, provided no piling is proposed at any stage of the development, no further piling assessment will be required. We can also confirm that the shallow foundation solution outlined in the Technical Note does not raise any concerns in relation to the potential requirement for additional site investigation.

We maintain our previous position and comments as set out below.

We have **no objection to the proposed development as submitted, provided 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 (LPA).

This site is in a Source Protection Zone 1C (Confined). This refers to areas which are located above aquifers which support potable abstractions, but where the aquifer is protected from surface activities by significant thickness of low permeability strata. In this case the site overlies the chalk principal aquifers, but this is protected by significant thickness of overlying London Clay.

Historic landfills are mapped as being present at this site. The presence of historic landfill could be of concern, if there is the possibility that these could compromise the overlying clay layer.

Investigations to date, have not indicated significant depth of waste/made ground. There has also been little evidence of contaminating material in the waste/made ground.

In light of this we are currently of the opinion that the risks posed by this development are low/moderate in respects to historic contamination and controlled waters. If however deeper waste material is identified, then this could be of far greater concern. With respect to the site investigation condition and contamination risk assessment. Provided no notably deeper waste is identified, then no further assessment of risk to controlled waters would be anticipated. However, if significantly deeper waste material is identified (i.e in geotechnical works), then further assessments of risks would be required.

In light of the above, the proposed development will be acceptable if a planning condition is included requiring the submission of a remediation strategy. This should be carried out by a competent person in line with paragraph P2(1-3) of the National Planning Policy Framework.

Without these conditions we would object to the proposal in line with paragraph P2(1-2) and P3(1-2) of the National Planning Policy Framework because it cannot be guaranteed that the development 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:

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.

Reason(s)

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 P2(1-2) and P3(1-2) of the National Planning Policy Framework.

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.

Reason(s)

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 P2(1-2) and P3(1-2) 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.

Reason(s)

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 P2(1-2) and P3(1-2) of the National Planning Policy Framework. 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 above 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 proposed development in line with paragraph P2(1-2) and P3(1-2) of the National Planning Policy Framework because it cannot be guaranteed that the development will not present unacceptable risks to groundwater resources.

Condition 4 - piling and other foundation designs

The 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.

Reason(s)

To ensure that the proposed development, does not harm groundwater resources in line with paragraph P3(1-2) of the National Planning Policy Framework and Position Statement A2 of The Environment Agency's approach to groundwater protection

If you have any questions regarding our response, please contact planningssd@environment-agency.gov.uk.

Yours sincerely,

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