

**Registered Office:**  
Portsmouth Water Ltd  
PO Box 8  
Havant  
Hampshire PO9 1LG

Tel: 023 9249 9888  
Fax: 023 9245 3632  
Web: [www.portsmouthwater.co.uk](http://www.portsmouthwater.co.uk)

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

|                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
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| <b>Planning Application Reference:</b> | <b>APP/26/00324</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Proposal:</b>                       | Outline planning application, with all matters reserved except for means of vehicular access to the public highway and associated highway improvements, for: the demolition of existing buildings; the erection of new residential dwellings (C3); a Local Centre (comprising local retail (E(a)), financial and professional services (E(c)(i), E(c)(ii), E(c)(iii)), restaurants, cafés, and drinking establishments (E(b) and Sui Generis), hot food takeaways (Sui Generis), medical services (E(e)), offices (E(g)(i)) and community facilities ((E(d)), E(f), F2(b), F2(c))); a Primary School (F1(a)); early years provision (E(f)); informal and formal public open space including community park; community food-growing space; Active Travel routes; drainage infrastructure; utilities infrastructure; and all other associated and necessary infrastructure. Accompanied by an Environmental Statement. |
| <b>Location:</b>                       | Land to the east of Denvilles, Havant, known as Southleigh                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Date:</b>                           | 26/10/2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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.

## Site Setting

The site is situated upon London Clay Formation, comprising clay, silt and sand, with some superficial deposits mapped across most of the site, comprised of either River Terrace deposits in the central and southern sections or Head deposits in the northern parts. The site is located in Source Protection Zone 1c (SPZ1c) for the Havant and Bedhampton Springs catchment, an essential public water supply source. The SPZ1c is at risk from subsurface activity, where the Chalk aquifer is confined and may be impacted by deep drilling activities. Subterranean activities such as infiltration drainage solutions, site investigation boreholes and/or piling may pose a risk to groundwater quality and the local public water supply source.

## Portsmouth Water's Position

Thank you for providing the required information to address our concerns. Following a review of the submitted documentation, Portsmouth Water is satisfied that the matters relating to our previous objection have been resolved.

We therefore withdraw our objection to the application and request that the following conditions are attached to any planning consent, should permission be granted by the Local Planning Authority. Information in accordance with these conditions to be submitted to, and approved in writing by the Local Planning Authority, in consultation with Portsmouth Water.

## Conditions

### Surface Water Drainage Strategy

*No development shall take place until a surface water drainage scheme based on sustainable drainage principles and a comprehensive assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority in consultation with Portsmouth Water. The scheme shall subsequently be implemented in accordance with the approved details before any building within that phase is occupied.*

*Details of how the scheme shall be maintained and managed after completion shall also be included.*

**Reason** - *To reduce the risk of groundwater pollution and prevent the increased risk of flooding, both on and off site.*

### Foul Water Drainage Strategy

*No development shall commence until such time as a scheme to dispose of foul water for that phase has been submitted to, and approved in writing by, the local planning authority in consultation with Portsmouth Water. The scheme shall be implemented in accordance with the timetable agreed as part of the approved scheme.*

*The scheme shall also include:*

- details of how the scheme shall be maintained and managed after completion.
- details of the sewage pipe work layout and specifications.

**Reason** - This is in order to manage the quantity of foul sewage and protect water resources. In accordance with position G8 of Groundwater Protection: Principles and Practice, the applicant must use the highest specification pipework and designs to minimise leakage.

### **Construction and Environmental Management Plan (CEMP)**

No development shall start on site until a construction environmental management plan (CEMP) has been submitted to and approved in writing by the Planning Authority in consultation with Portsmouth Water detailing all pollution mitigation measures to be adopted during the construction phase. This should include management of overland runoff, storage of hazardous materials, chemical and hydrocarbons on site and temporary drainage infrastructure to ensure that water resources are not put at risk from leaks or spillages.

*Reason-* Fugitive emissions from the site during construction could pose a significant threat to groundwater and therefore the local public water supply source.

### **Piling and Foundation Designs**

No piling or any other foundation construction using penetrative methods shall be carried out other than with the express written consent of the local planning authority in consultation with Portsmouth Water. The development shall be carried out in accordance with the approved details. The method statement should detail the equipment, methodology, grout, control measures and monitoring that will be implemented to ensure there is no increased risk to controlled waters or drinking water supplies.

Thus, it should be demonstrated that any proposed piling;

- a. Will not result in contamination of groundwater. This is in accordance with National Planning Policy Framework paragraph 109.*
- b. Nor any increased risk to drinking water supplies (including turbidity).*
- c. Nor deterioration in the transmissivity of the aquifer*

**Reason** - Piling or any other foundation construction methods using penetrative methods could allow hazardous substances and non-hazardous pollutants to enter groundwater by for example, mobilising contamination and creating preferential pathways.

### **Land Contamination**

If, during development, contamination not previously identified is found to be present at the site then the local planning authority must be notified immediately. No further development (unless otherwise agreed in writing with the local planning authority in consultation with Portsmouth Water) shall be undertaken in that phase until the developer has submitted and had approved a site investigation, risk assessment and remediation strategy report, detailing how to mitigate the contamination identified. The remediation strategy approved by the local planning authority shall be implemented in full before development in that phase recommences.

**Reason** - To ensure that risks from land contamination to drinking water supplies are remediated.

## **Recommendations**

### **Water Efficiency**

*Portsmouth Water encourages local planning authorities to consider higher standards of water efficiency in new developments, with all new homes being built to a minimum standard of 100 litres per person per day. Planning policy can help to ensure long-term sustainability and management of water supplies, which is likely to reduce the need to take less water from the environment to protect local streams and rivers and the wildlife which rely on them.*

*For developments that can demonstrate high standards of water efficiency of no more than 100 litres per head per day, Portsmouth water offers an incentive of a 50% discount on the standard Infrastructure charge. Based on the development of 200 properties with an occupancy of 3 people per property, there will be a minimum saving of 15,000 litres per day. The guide would benefit covering the importance of water efficient developments and to recommend this for all new dwellings.*

## **Commentary**

We welcome the Surface Water Drainage Strategy produced by Stantec dated April 2026.

The surface water drainage strategy utilises several sustainable surface water drainage (SUDS) techniques including swales, gullies and attenuation basins with volume-controlled discharge into nearby surface water networks.

The report has stated that the final strategy for pollution control is to be provided at the detailed design stage. If planning permission is to be granted, Portsmouth Water would therefore wish to review these detailed designs once they become available.

We note that at this stage, grass swales and grass retention basins are proposed to address water quality mitigation. We recommend that this is further assessed to include more enhanced measures, particularly during periods that the swales and retention basins are full of water where the grass area would have minimal water quality mitigation effects. We recommend that the applicant considers more robust solutions such as reedbed systems in appropriate locations. This will help with parameters such as nitrate and phosphate reduction. Also the applicant should consider proprietary systems such as enhanced filtration, smart sponges, sediment filters etc.

### **Section 5.4.2 – 5.4.4 - Collection for Non-potable Use**

Portsmouth Water encourages measures that increase the capture and use of non-potable water on-site, to help reduce household demand on mains water supplies during dry periods.

Portsmouth Water's Final Water Resources Management Plan 2024 identifies the South East as a region facing increasing pressure on finite water resources from population growth, climate

change and environmental requirements, highlighting the need for developments to support the long-term resilience of public water supplies

The plan also tackles the environmental emergency facing the region's waters. It considers how water companies could further reduce their reliance on sensitive sources, such as chalk rivers and groundwater, that could be vulnerable to climate change.

Therefore, we recommend that the applicant strongly considers rainwater harvesting, rain water gardens and other green blue infrastructures within the development to encourage sustainable water resources and personal consumption.

Catchment Management Team  
*Portsmouth Water*

[catchment.management@portsmouthwater.co.uk](mailto:catchment.management@portsmouthwater.co.uk)