HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	**Environmental Health**	**To:**	**Development Control**
Our Ref:	PR202508-78952	**Your Ref:**	APP/24/00968
EH Case Officer Extn:	44 6677	**Date:**	22/09/2025

DC Case Officer: Lesley Wells
DC Case Officer Extn: -
Application Number: APP/24/00968
Site Address: Beachlands, 5 Sea Front, Hayling Island
Proposed Development: Full planning application for the development of 4 no. commercial units (E Use) and 32 no. residential units (C3 Use) over 4 floors with associated open space, public realm enhancements, demolition of the existing Beachlands Amusement Arcade Buildings and dwelling and associated works

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Observations / Comments:

I have reviewed the application and it's supporting documentation. From a contamination perspective, there is nothing highlighted in the included Groundsure Enviro+Geo insight report which is considered to be relevant to the development redline, given both the environmental context, and the format of the scheme; namely commercial accommodation at the ground floor.

I do note that serious policy objections have been raised by a number of consultees. In particular, I note PPUD's comments about the sequential & exception tests; the latter likely to be needed, and in that case, there is a requirement for the development to demonstrate 'wider sustainability benefits to the community' which outweigh the flood risk.

Given the comments PPUD & others, I would tend to agree that that the development has not successfully made the case for it's exceptional and overriding sustainability credentials. In particular;

- Environmental Health has noted the lack of a robust noise assessment to demonstrate the sustainability of co-locating class E uses with C3 residences
- +1m land raising is implied, applicant does not specifically address what material is to be used for this purpose, or any means to demonstrate suitability for deposit so close to a controlled water with multiple protection designations. This may or may not also be relevant for the final drainage design & water quality.
- Applicant has not considered water quality in it's drainage design (i.e. has not demonstrated C753 compliant pollution control features for controlling pollution).
- The Highways Agency regards the residential portion of this development to represent a 'car free' proposal. It also highlights structural problems with access and servicing, and several issues with travel demand estimates, alongside insufficient WCHAR assessment – all of which would appear to be justified criticisms. In addition, I'd note that the application documents do not make clear that the development form under application is capable of accommodating the cycle parking quantum stated.

Whilst the development redline plot has no specific known associated potential historic sources of contamination, materials imported to the site, or crushed, deposited and retained at the site, have potential to contribute to pollutant loading of the coastal water. Not strictly a policy-pathway contamination issue now, it nevertheless represents potential future contamination for which the developer may be liable (NPPF'24, para 197).

With reference to emerging policy, there is support from an air quality perspective for the comments of the Local Highways Agency in particular – and it is considered that the development has not done enough to demonstrate it's sustainability credentials, especially in terms of active & sustainable travel, improvements to local infrastructure – e.g. bus wating facilities, and integration of the scheme with the overarching LCWIP. The feeling of safety & convenience is also important for the uptake of cycling (in particular), so highway safety issues associated with the identified local junction will also be relevant if it is expected that cycling will be a primary mode of transport for future residents.

Given the context and orientation of the site, there also appear to be missed opportunities for introducing sustainable heating & ventilation solutions, alongside solar-LZC. Again, with reference to emerging policy (for which a parallel argument could be made against adopted national policy, given that this development is reliant upon the presumption in favour-), the development could do more to demonstrate it's contribution to climate & sustainability goals in addition to the air quality (exposure reduction) objectives; both as key components of the environmental limb of sustainable development.

Given the need for this development to demonstrate 'exceptionality' to override the flood risk constraints, air quality & related health/active travel policy deficiencies could justifiably contribute to sustaining a viable objection, alongside the grounds raised by others.

Mr. Jonathan Driver
Environmental Control Officer