

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	N/A	Your Ref:	APP/24/00578
EH Case Officer Extn:	44 6677	Date:	25/09/2025
DC Case Officer:	Kayleigh Taylor		
DC Case Officer Extn:	-		
Application Number:	APP/24/00578		
Site Address:	Town Park at the Berewood Phase 2 Development Site, London Road, Purbrook, Waterlooville		
Proposed Development:	Reserved Matters application pursuant to outline application APP/10/00828/ (and WCC 10/02862/OUT) and approval of conditions 6 (i) a), b), c), and d), and conditions 3, 6 (ii) a), b), e), f), i) o), 7, 10 and 11, for approval of landscape detail and access for the town park and layout and appearance of the park and multiple sports area.		

Observations / Comments:

Comments here relate to the application to discharge c.7 (Phase-Specific Contaminated Land Assessment) and c.11 (Reserved Matters Area Construction Environmental Management Plan, CEMP). Documents reviewed:

- LEAP Environmental Ltd. Phase 1 Extended Geoenvironmental Desk Study Report Ref: LP002962rev89, 26/07/2022
- T&P Regeneration Ltd. Phase 2 Ground Investigation Report, Barewood, Town Park Phase B Ref: CS-J-0161rev3 31/10/2019
- Mayer Brown Ltd. Construction Traffic Management Plan (CTMP) Town Park Phase B Ref: CTMP01R2, XX/03/2025

c.7 – Contamination

It is noted that the T&P Regeneration report included the Phase 2B site within it's study area, and that Environmental Health reviewed this report in 2021 in connection with APP/20/01055, concluding that no 'planning controls are [considered to be] required to formally manage contamination risks'.

It is not entirely clear why a phase 1 study was subsequently commissioned, but it is implicit that this was considered prudent given the low sampling density relative to the scale of the site. The submitted report is an 'extended' phase 1 study, including some additional non-targeted shallow soil sampling (without logs) to supplement the 2019 report findings.

Whilst the results were favourable, the report reiterates that the sampling density is considered to be insufficient, and highlights that agricultural contaminants have not been included in sampling suites to date. This is compounded by a lack of factual information relating to the nature & intensity of agricultural use of Plant Farm through it's recent history (>1970). The report concludes that further (additional) Phase 2 intrusive investigation is required.

This notwithstanding, I would consider further intrusive works to be largely unnecessary – the development is relatively low risk, comprising a large averaging area and lower dwell-times (visitation frequency, duration of visitation), consequently attracting elevated GAC's relative to more sensitive uses. In all likelihood, the targeted sampling reported in the 2019 is broadly representative of the risks associated with the periphery of the Plant Farm Complex and the constructed/improved farm tracks & footpaths.

I note that APP/10/00828 c.9 is a compliance condition relating to the discovery of deposits of suspected contaminated material that is out of keeping with that characterised in prior assessments (e.g. as documented in the 2019 T&P regen report). Given the nature of the development, its environmental context, and the site conceptual model presented in the above-listed reports – I would consider c.9 to afford sufficient surety.

I do not consider any further investigation works to be warranted, and would therefore recommend that c.7 be discharged in relation to Town Park Phase B.

c.11 – CEMP

I note that the submitted CTMP makes several references to details contained within Table 5.2 of 'the CEMP'. It is implicit therefore that the CTMP does not comprise the only document intended to satisfy the requirements of c.11, yet it appears to be the only document registered to the current application.

I have been unable to locate a relevant overarching CEMP which contains the referenced provisions – the ones I have on file in relation to previous reserved matters applications are phase-specific, and the Town Park Phase A CEMP does not appear to include a Table 5.2.

I have reviewed the CTMP against the condition requirements, and note that it does omit provisions, comments, or statements in respect of some of the specific requirements. It may be that omissions imply that the condition provisions are not relevant to the Town Park Phase B development, but that this is not stated (e.g. information on piling, in accordance with c.11 iv), but this is not clear in all cases. Brief summary below;

- iv. Piling Techniques: not covered, assumed not relevant.
- vi. Programme of works (reserved matters development): 3.1 covers the basics (duration of works, establishment of the site compound), and 3.2 refers to a detailed programme of works being deferred to the contractor's project manager. It is implicit from 3.2 that c.11 vi requirement has not strictly been met, as the detailed plan had not been authored at the time of writing (the CEMP)
- vii. Restriction of horse of both Deliveries and Building Works: 3.2 meets this requirement in relation to construction works & plant, but does not extend to deliveries, nor does it restrict site opening hours. Whilst the CTMP includes provisions for avoiding periods of peak travel demand, it remains unclear whether deliveries <08:00am will be permitted/routine.
- viii. boundary hoarding & lighting: The CTMP makes no specific reference to boundary hoarding – it is assumed that given the nature, scale & pace of works, boundary hoarding is unnecessary, but that this is not stated. I note that 7.21 refers to general site & task lighting only, and does not relate to boundary lighting. Boundary treatment for the development area remains unclear.
- ix. Protection of trees, hedgerows etc.: the CTMP contains no provisions in this relation to this requirement
- xiii. Measures to prevent pollution of *the* watercourse: the CTMP contains no provisions in this relation to this requirement. It is unclear whether 'the watercourse' includes OWC's that comprise ephemeral drainage ditches &/or swales, and whether this provision has any relevance to Town Park Phase B.

- xv. Details of surfacewater runoff [management]: the CTMP contains no provisions in this relation to this requirement
- xvi. Construction Lighting: I note that 7.21 refers to 'local task lighting', but would question whether this reference is sufficient to amount to 'details of..'

I also note that the CTMP does not make any reference to a contamination watching brief, or instructing groundworks personnel in the requirements of c.9.

From an Environmental Health perspective, vii, viii & xvi are of greatest relevance, predominantly to residents of Plant Farm Crescent & Whitbourne Way.

Given that the CTMP does not address all of the requirements of c.11, it is assumed that an objection do discharge could be sustained. In the first instance, I would recommend that it be confirmed that there are no provisions within an unsubmitted CEMP which provide clarity on these points. If not, it may be that minor amendments need to be made to the CEMP in order to provide clarity on delivery/site opening hours, and on the nature of boundary and task lighting.

Otherwise, the provisions for control of noise & dust appear reasonable and proportionate.

Mr. Jonathan Driver
Environmental Control Officer