

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:	21/10/2025
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.		
	[Reconsultation on revised/updated/additional documentation relating to c.11]		

Observations / Comments:

These comments are additional to-, and supersede- those dated 25/09/2025.

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, Berewood, 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
- Mayer Brown Ltd. Outline CEMP (Construction Environmental Management Plan) Town Park Phase B Ref: 28028-GTWvilleTPB2(CEMP).9, 16/10/2025 Rev4

c.7 – Contamination

Comments from 25/09/2025 remain applicable. I do not consider any further investigation works to be warranted, and recommend that c.7 be discharged in relation to Town Park Phase B.

c.11 – CEMP

It is noted that both the recently submitted Outline CEMP & the previously reviewed CTMP both relate to the discharge of c.11. Whilst the content of these documents are not mutually exclusive, and do overlap in places, both will need to be listed as approved supporting documents.

There are also some inconsistencies between the two documents, likely deriving from their status as 'live' documents which accommodate the evolution of the development schedule. It is assumed that references in the CTMP to (mitigation measures presented in-) table 5.2 of the CEMP now refer to Table 6.2, and that the duration of the construction schedule is probably more accurately represented by the more recent document.

I have reviewed the CEMP against both the requirements of c.11, and the apparent requirement omissions outlined in my comments of 25/09/2025. Brief summary below;

- iv. Piling Techniques: CEMP confirms none planned in phase B, as expected. Resolved.
- vi. Programme of works (reserved matters development): 4.12 & 4.13 of the CEMP broadly mirror 3.1 & 3.2 of the CTMP. 4.12 covers the basics (updated duration of works, establishment of the site compound is 1st week) and 4.13 refers to a detailed programme of works being deferred to the contractor's project manager. It is implicit from 4.13 that c.11 vi) requirement may not have been strictly been met (depending upon the level of detail that the LPA might have reasonably expected when imposing the condition), as the detailed plan had not been authored at the time of writing (the CEMP). The condition wording is not specific on the level of detail, but it may be inferred that the primary purpose of this provision is the implementation of traffic management measures, which are intrinsically linked to the establishment of the site compound. For this reason, it could be argued that the outline-details are sufficient to signal an appropriate & sufficient response.
- vii. Restriction of hours of both Deliveries and Building Works: 4.14 broadly duplicates the provisions of 3.2 of the CTMP, but extends it's application to (in addition-) explicitly include deliveries. Site opening hours remain unspecified/unrestricted, but this is reasonable (e.g. for staff arrivals) given the clarification & extension of restrictions to include all practical 'work'.
- viii. boundary hoarding & lighting: The CEMP makes no specific reference to boundary hoarding – but does refer to 'boundary fencing' at Table 4.3, and makes ancillary references at 5.9 & 5.10. It is implicit that fencing will be of Heras type, and not to comprise solid hoarding. There are no references to boundary lighting, or lighting at the site access – it is assumed that none is proposed. This provision also refer to construction lighting – duplicating the specific requirement at xvi. See below for related comment.
- ix. Protection of trees, hedgerows etc.: The CEMP contains provisions omitted from the CTMP. Resolved.
- xiii. Measures to prevent pollution of *the* watercourse: Whilst the CEMP does not identify a specific watercourse as the subject of this provision, several provisions relate to the protection of both surfacewater drains and ordinary watercourses (in general). Table 6.2 items 18-20 & 22-35 relate, alongside related provisions for training/briefing personnel at 4.17 & 4.18. Resolved.
- xv. Details of surfacewater runoff [management]: The CEMP contains provisions omitted from the CTMP. Resolved.
- xvi. Construction Lighting: The CEMP contains provisions omitted from the CTMP – Table 6.2 Item 4 relates. Resolved.

It is noted that, similar to the CTMP, the outline CEMP does not make any reference to a contamination watching brief, or instructing groundworks personnel in the requirements of c.9. This is not a specific requirement of c.11, but could imply a risk of it's provisions being overlooked.

I do note however that the site is low risk, save for deliberate depositions/disposals related (or ancillary-) to agricultural use of the land. I also note the provisions 7.12-7.15, relating to CEMP implementation audit procedures, and 7.10 relating to progress meetings.

Environmental Health has previously attended such meetings in relation to earlier development phases, and it is noted that some personnel listed for this phase were also key attendees of those prior meetings. Direct experience of the progress meetings lends considerable confidence, e.g. that minor inconsistencies between documents/provisions, and the omission of contamination provisions from the CEMP (notwithstanding that UXO/UXB is provided for-) does not imply that there is a risk that the purpose of c.11 is at risk of being undermined.

Irrespective of the quality of the contactors detailed CEMP, the Client internal- and Client/Contractor- processes may be expected to ensure diligent implementation.

On this basis, I have no objections to the discharge of c.11.

Mr. Jonathan Driver
Environmental Control Officer