

HAVANT BOROUGH
COUNCIL

15 AUG 2025

RECEIVED

Ref: APP/25/00512

Documents referenced for objection are:

Havant Core strategy 2011 Policy (CS)

Havant noise policy

Environmental act 2021

Environmental protection act 1990 (EPA 1990)

National planning policy framework 2024 (NPPF)

Objection Grounds

Increased Noise, Pollution, and Environmental Impact (Policy CS11: Protecting and Enhancing the Natural Environment)

These plans conflict with policy, the site is next to a residential areas, this will affect local amenities, adding a second car wash bay could heighten operational noise (e.g., from water jets, vacuums, dryers, or machinery in the new plant room) and pollution risks, such as chemical runoff from detergents, oils, and vehicle contaminants entering local drainage or watercourses. CS11 requires developments to protect and enhance the natural environment, prevent habitat fragmentation, control pollution (including noise and fumes), and maintain biodiversity. The proposal lacks inadequate mitigation (e.g., noise barriers or wastewater treatment). I also have general environmental concerns with car wash extensions, such as harm to water quality and wildlife. The BP Petrol stations proposed planning has insufficient safeguards for surrounding homes and fails to protect [REDACTED] amenities.

A noise assessment was completed by dBx acoustics, this was completed for the jet wash and not the Car wash station, the assessment was done during the week in February 2024, it was done on the Southern entrance onto Park Lane not Purbrook Way entrance, the weather was wet also. This is not a true representation of when people choose to wash their cars, most users pick good dry days, with cleaning done at the weekend and in the evening when people have more free time. I believe this noise assessment to be incomplete of all the data needed to deliver a complete picture on the scale of the noise experienced by the current car wash, this assessment should be discounted for this application, there are also elements in this noise assessment that I disagree with.

Proximity and Impact:

Havant's Core Strategy Policy CS11

Havant's Core strategy policy CS11 requires developments to control pollution, including noise, to protect the natural environment and residential amenities., [REDACTED]

[REDACTED] concerned about secondary effects (e.g., traffic noise from more vehicles), [REDACTED]

[REDACTED] valid concerns under CS11 and CS20 (Transport and Access Strategy).

Potential issues: Higher noise from operations; pollution from runoff (chemicals/oils).

Policy requires: Protect environment, control pollution, maintain biodiversity.

These plans conflict with this policy

Traffic Congestion and Highway Safety (Policy CS20: Transport and Access Strategy)

The extension could increase vehicle queuing and traffic at the petrol station on Park Lane (a busy road), exacerbating congestion, access issues, or safety risks for pedestrians and cyclists. CS20 follows a 'Reduce, Manage, Invest' approach, requiring developments to avoid increasing congestion, improve accessibility via sustainable transport modes (e.g., walking or public transport), and ensure safe highway operations. The application does not include a robust transport assessment showing no net increase in traffic impacts or provisions for better site access/parking.

This plan fails to meet C20 policy.

Adverse Impact on Traffic and Highway Safety (NPPF Paragraphs 110-113)

The NPPF requires developments to ensure safe access, minimize transport impacts, and promote sustainable transport options (paragraph 110).

The proposal increases traffic congestion, lacks adequate parking and compromises pedestrian/cyclist safety. It fails to meet NPPF paragraph 111, which states that development should be refused if transport impacts are unacceptable, already existing congestion amplify these concerns.

There is no defined entrance or exit into BP garage and vehicles routinely drive where they want as the BP garage also has air, water and a Hoover station close to where the car wash exits will be, with traffic coming in and out of both entrances and exits it means there is lack of control and direction in there, as a pedestrian trying to cross the wide entrances/exit it is already difficult as cars pull in and out the BP

garage forecourt trying to navigate the already busy roads of Purbrook Way and Park Lane, crossing the these entrances is dangerous as cars are just looking for a gap in the traffic, it is difficult to cross with a pram and with small children, this is a fact , there is no traffic management controls in the BP petrol station forecourt, meaning it is currently an unsafe place to visit.

NPPF paragraph 110(b), requires safe and suitable access for all users, the BP petrol station at peak times can become very dangerous for all users, adding more reasons to visit is unsafe. We already have issues with the new jet wash stations where people are queuing up Park Lane in their vehicles, it obstructs driveways and is dangerous for other road users, especially as Park Lane entrance to garage is used as an entrance and an exit [REDACTED]

I have not seen any transport assessment for deficiencies (e.g., inadequate parking or access arrangements) that these justify refusal under NPPF and Havant's transport policies.

Potential issues: More queuing/traffic on Park Lane.

Policies require: Avoid congestion, promote sustainable transport, ensure safety.

The plans fail to meet CS20 policy 'Reduce, Manage, Invest'

Lack of High-Quality Design and Integration (Policy CS16: High Quality Design)

The proposed extension (e.g., the new bay and plant room) appears utilitarian or poorly integrated with the existing building and surrounding area, it may not meet CS16's requirements for sustainable, high-quality design that respects local character, enhances the public realm, and minimizes visual or environmental impacts. The policy emphasizes inclusive, well-connected developments that reduce crime opportunities and mitigate noise/pollution. It fails to blend with Bedhampton's character and lacks features like screening to protect neighbouring views/outlook.

Poor Design or Harm to Local Character (NPPF Paragraphs 126-135)

The NPPF emphasizes high-quality design that respects local character and context (paragraph 130). Developments should enhance the area's visual and functional quality. APP/25/00512 proposes a design that is out of scale, uses inappropriate materials, and disrupts the local character, it contravenes NPPF paragraph 130, which requires developments to be visually attractive and sympathetic to local character. NPPF paragraph 134, states that poor design conflicting with local design policies should be refused.

Potential issues: Poor integration with area.

Policies require: Sustainable design respecting local character, minimizing impacts.

The design is utilitarian without screening. It doesn't enhance public realm.

Inefficient Resource Use and Climate Change Mitigation (Policy CS14: Efficient Use of Resources)

Car wash operations are water and energy-intensive, and I feel the proposal does not incorporate sustainable features like water recycling systems, energy-efficient equipment, or renewable energy sources. CS14 promotes efficient use of resources, reduced carbon emissions, and compliance with standards like BREEAM for non-residential developments. The application omits details on how the extension and the new car washers will minimize waste, water use, or greenhouse gas emissions (e.g., from increased operations). I believe it could contravene this policy, with particularly broader concerns about the environmental footprint of car washes in general.

Conflict with Climate Change and Sustainability Goals from the Environment Act 2021

The Environment Act 2021 promotes sustainable development and climate resilience, requiring developments to align with environmental goals like carbon reduction and sustainable land use; the application does not demonstrate measures to minimize carbon emissions (e.g., energy-efficient design, renewable energy use) or address climate adaptation (e.g., overheating risks); it fails to align with the Act's objectives. The Act's focus on environmental improvement and Havant's local plan policies on climate change also make good reasons why this should not be approved. Unsustainable design or lack of climate adaptation measures (e.g., green infrastructure) makes the proposal incompatible with legal requirements.

I have not seen any sustainability assessments or climate resilience strategies in the application, emphasizing non-compliance with the Act.

Potential issues: High water/energy use without sustainability features.

Policies require: Efficient resources, reduced emissions (e.g., BREEAM).

There is no water recycling or energy-efficient measures, these plan contravene Policy

The Environment Act 2021 emphasizes biodiversity net gain, water quality, and environmental protection, Biodiversity Net Gain (BNG)

The Environment Act 2021 mandates that all planning permissions in England (with some exemptions) deliver at least 10% biodiversity net gain, meaning the development must leave the natural environment in a measurably better state than before, this application does not include a robust Biodiversity Net Gain Plan and fails to demonstrate a measurable 10% improvement in biodiversity (e.g., through habitat creation or enhancement), it contravenes the Act.

There is no evidence of how the development achieves BNG, the insufficient measures justify refusal.

Non-Compliance with Biodiversity Net Gain (NPPF Paragraphs 180-185)

The NPPF requires developments to deliver biodiversity net gain (BNG), ensuring a measurable improvement in biodiversity (at least 10%, as mandated by the Environment Act 2021, which aligns with NPPF policy).

APP/25/00512 lacks a robust BNG plan and fails to demonstrate a 10% biodiversity improvement, it contravenes NPPF paragraph 180(c), which prioritizes enhancing the natural environment. For example, the development involves removing trees, hedgerows and habitats without adequate mitigation, so harms local biodiversity. NPPF paragraph 185, requires protecting and enhancing valued landscapes and sites of biodiversity value. The proposal impacts protected habitats so it fails to comply with NPPF policies and Havant's local biodiversity requirements.

I have not seen a BNG assessment and or mitigation measures

Impact on Water Quality (Nutrient Neutrality) The Environmental act 2021

The Environment Act 2021 strengthens protections for water quality, particularly in sensitive areas like Havant, where nutrient neutrality is a critical issue due to the impact of nitrogen on the Solent's protected coastline. My concern is if the development increases nutrient levels (nitrogen or phosphorus) in local water bodies, it may fail to achieve nutrient neutrality, a legal requirement in Havant.

I have not seen a nutrient mitigation or nutrient neutrality assessment and I am worried of the lack of insufficient measures the garage will have in place, so I am concerned that this could be unlawful and non-compliant with the act and local policy.

Inadequate Flood Risk Assessment The Environment Act 2021

The Environmental act 2021 requires consideration of climate change impacts, including flood risk, which is a significant concern in Havant due to its coastal location and vulnerability to tidal, fluvial, and surface water flooding, the application lacks a comprehensive Flood Risk Assessment (FRA) and fails to address future flood risks due to climate change (e.g., sea level rise or increase rainfall), it does not comply with the Act's emphasis on sustainable development. The development may increase flood risk to the site or neighbouring homes, or fail to ensure safety over its lifetime, as required by national guidance.

Inadequate Flood Risk Management and Drainage (Policy CS15: Flood and Erosion Risk)

Although the flood risk at PO9 3HQ is very low, increased hardstanding from the extension could raise surface water runoff risks without proper Sustainable Drainage Systems (SuDS). CS15 directs development away from flood-prone areas and requires no net increase in runoff, incorporating climate-resilient measures.

The proposal lacks a flood risk assessment or SuDS details, especially considering potential pollution from runoff, this is grounds for objection.

Inadequate Flood Risk Management (NPPF Paragraphs 165-173)

Havant is highly vulnerable to flooding (tidal, fluvial, and surface water) due to its coastal location. The NPPF requires developments to avoid increasing flood risk and ensure resilience to climate change (paragraphs 165-167).

APP/25/00512 lacks a comprehensive Flood Risk Assessment (FRA) and fails to address future flood risks (e.g., sea level rise), I feel it contravenes NPPF paragraph 167, which mandates that developments be safe for their lifetime without increasing flood risk elsewhere. The site lacks sustainable drainage systems (SuDS), this is a valid ground for objection.

NPPF paragraph 169, which emphasizes climate change adaptation, and Havant's local flood risk policies, shows this planning request to have inadequate flood mitigation which endangers residents and contradicts sustainable development principles. The Environment Agency has previously objected to Havant applications with deficient FRAs

Potential issues: Increased runoff from hardstanding (low flood risk at site, but still relevant).

Policies require: No net runoff increase, Sustainable Drainage Systems (SuDS).

No flood assessment or SuDS, it risks pollution/runoff.

Harm to Protected Habitats or Species The Environment Act 2021

The Environment Act 2021 supports the protection of biodiversity, the land around BP garage and surrounding properties has slow worms, these are protected under the Wildlife and Countryside Act 1981, by extending the garage they risk losing their habitat and also there is risk of harm to the Slow worms.

Harm to Protected Habitats or Species (NPPF Paragraphs 180-182)

The NPPF prioritizes the conservation of biodiversity, the development risks direct or indirect harm to protected habitats or species (e.g., through habitat loss or recreational disturbance), it fails to meet NPPF paragraph 180(a), which requires avoiding significant harm to biodiversity. Havant requires mitigation for SPA impacts, and non-compliance

Evidence of mitigation measures not supplied which violates NPPF and local policy, risking harm to protected species.

Impact on Local Amenities and Infrastructure (NPPF Paragraphs 92-93)

The NPPF promotes healthy, inclusive communities by ensuring developments support local services and amenities without undue strain (paragraph 92).

The petrol station has grown too big for the site. it already has four petrol pump stands, 8 pumps, 2 jet washes, 1 car wash, it has a washing machine station and a place you can pick up and drop off parcels. it has lost its identity and although I am sure it is useful to people in the area the strain the residents around the site are under due to excessive traffic, excessive noise and light pollution [REDACTED]

[REDACTED], it is a statutory nuisance and I am wondering where this will all end. It is just planning permission after planning permission, I feel if the company want to branch out as a vehicle cleaning business they should buy another piece of land and develop it for that, 4 vehicle cleaning stations on a small piece of land is excessive.

Referencing Havant Noise policy

Unacceptable Noise Impact on Residential Amenity (Policy CS16, DM18)

Havant's Local Plan (Core Strategy) Policy CS16 and (Allocations) Policy DM18

Require developments to ensure that residential amenity is not adversely affected by external noise levels, such as traffic or operational noise. The NPPF (paragraph 185) also seeks to prevent unacceptable noise impacts on health and quality of life.

APP/25/00512 could generate excessive noise (e.g., from increased traffic and machinery operation, which may contravene Policies CS16 and DM18. A recent Havant planning decision (January 2025) emphasized protecting properties from traffic noise, indicating strict enforcement of these policies.

The planning proposal lacks a robust noise impact assessment, the one submitted was for jet car wash station, this was not done at my property for the car wash, it also lacks mitigation measures (e.g., acoustic barriers, car wash in sealed enclosure) to protect nearby residents, violating Havant's policies and NPPF paragraph 185

Traffic and operational noise, risks harming residential amenity, justifying refusal.

Traffic Noise Exacerbation (Policy CS16, DM18)

Havant's noise policies specifically address traffic noise as a key concern, requiring developments to mitigate impacts on residential areas. A recent planning condition for another Havant application was amended to address noise level requirements, showing the council's focus on traffic noise mitigation.

APP/25/00512 could potentially increase traffic, it could potentially also generate unacceptable noise levels for nearby residents, contravening Policies CS16 and DM18. Developments next to Bedhampton's busy roads could amplify existing traffic noise issues.

NPPF paragraph 185 and Havant's precedent of imposing noise conditions (e.g., APP/24/00612) to protect amenity. Lack of a transport assessment underestimates traffic noise or lacks mitigation and it fails to meet local policy requirements. Noise levels will harm residential amenity, so I would like to request refusal or stricter conditions.

Impact on Solent's Protected Habitats (Policy CS16, NPPF Paragraph 180)

Havant's noise policies extend to protecting environmental amenity

Non-Compliance with Statutory Nuisance Regulations (Environmental Protection Act 1990)

Havant's noise policies are supported by the Environmental Protection Act 1990, which defines excessive noise from premises as a statutory nuisance, potentially leading to fines for businesses. APP/25/00512 will introduce additional noise sources to an already noisy premises, that would be deemed a statutory nuisance, as it violates Havant's noise policies and the Environmental Protection Act, a development

without robust noise controls will disrupt nearby residents. Policy DM18 and the Environmental Protection Act, emphasizes that frequent noise disturbances (e.g., loud music, machinery) can cause stress and illness, particularly in residential or ecologically sensitive areas. Leigh park/Havant/Bedhampton's lack of nighttime monitoring increases the need for preemptive noise controls.

The proposal risks statutory nuisance, justifying refusal or stringent conditions.

Environmental protection act 1990

Ref: APP/25/00512 The Environmental Protection Act 1990 (EPA 1990), it says objections must focus on material planning considerations related to environmental impacts, specifically those covered by the EPA 1990, such as statutory nuisances (e.g., noise, dust, odours, or pollution) that could harm human health or the environment. The EPA 1990 provides a framework for controlling pollution and nuisances, which can be linked to Havant's local planning policies (e.g., Local Plan Core Strategy Policy CS16 and Allocations Policy DM18) and the National Planning Policy Framework (NPPF, 2024, paragraph 185).

Statutory Nuisance from Noise (EPA 1990, Section 79)

The EPA 1990 defines excessive noise from premises, vehicles, or machinery as a statutory nuisance if it unreasonably interferes with the use or enjoyment of nearby properties. Havant's Policy CS16 and DM18 require developments to mitigate noise impacts on residential and environmental amenity.

The BP petrol stations car wash generates significant noise from operations, the petrol station itself creates already a lot of noise throughout the day and at night and overnight, so it risks creating a further statutory nuisance under Section 79 of the EPA 1990. The application lacks a robust noise impact assessment and mitigation measures (e.g., acoustic barriers, restricted operating hours) to prevent nuisance, violating the EPA 1990 and NPPF paragraph 185.

Current plan APP/25/00512 risks statutory nuisance, justifying refusal. Havant's lack of nighttime noise monitoring, which heightens the need for pre-emptive controls.

Dust and Particulate Pollution from Construction (EPA 1990, Section 79)

The EPA 1990 identifies dust, grit, or other particulates as potential statutory nuisances if they materially affect nearby residents or the environment. Havant's policies require construction management plans to minimize such impacts.

APP/25/00512 involves significant construction and lacks a construction management plan addressing dust control, so may breach Section 79 of the EPA 1990. Dust could affect residents health.

EPA 1990's provisions on statutory nuisance and Havant's Policy DM18, which requires mitigation of construction impacts.

I have seen no construction management plan specifying dust control measures (e.g., water suppression, enclosed work areas). the proposal risks creating a statutory nuisance, warranting refusal or stricter conditions.

Odour or Fumes from Operations (EPA 1990, Section 79)

The EPA 1990 classifies odours or fumes from premises as statutory nuisances if they unreasonably affect nearby properties. This is relevant for this planned proposal

APP/25/00512 involves activities likely to produce odours or fumes, it potentially will contravene Section 79 without adequate mitigation (e.g., ventilation systems, odour control). This is critical in Leigh Park/Bedhampton and Havant, where coastal breezes can carry odours to residential or ecological areas.

The EPA 1990 and NPPF paragraph 185, requires developments to avoid adverse impacts on health and quality of life. The application lacks an odour assessment or mitigation plan and risks Statutory nuisance and chemical pollutants could harm wildlife.

I have not seen an odour or air quality assessment, this missing assessment potential nuisances violate the EPA 1990 and Havant's policies, justifying refusal.

Water Pollution Risk to Solent Ecosystems (EPA 1990, Section 79 and Part III)

Havant's nutrient neutrality requirements and Solent conservation efforts (e.g., Solent Seascape Project) emphasize protecting water quality in the Solent's SPAs and SACs.

APP/25/00512 risks water pollution through runoff from operational usage, so may breach the EPA 1990 and Havant's policies on nutrient neutrality. For instance, increased nitrogen from residential developments could harm Solent habitats, as noted in the Solent State of Nature Report.

The EPA 1990's water pollution controls link to NPPF paragraph 180 and Havant's Policy CS16, which protect biodiversity. The absence of a nutrient neutrality assessment or runoff mitigation plan threatens Solent ecosystems, violating environmental regulations.

I have not seen a water quality or nutrient neutrality assessment, the proposal risks statutory pollution undermining solent conservation efforts, justifying refusal.

Inadequate Waste Management (EPA 1990, Part II)

The EPA 1990 regulates waste management to prevent environmental harm or nuisances (e.g., litter, illegal dumping). Havant's policies require developments to manage waste responsibly to protect amenity and the environment.

The proposal lacks a waste management plan for construction or operational phases and risks environmental harm or nuisance, contravening the EPA 1990 and local policies so may breach Part II of the EPA 1990.

EPA 1990 link to Havant's Local Plan (CS16, DM18) and NPPF paragraph 185 (noise, pollution) or paragraph 180 (biodiversity). The EPA 1990's focus on statutory nuisances is highly relevant in Havant and

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Bedhampton area due to its residential density and proximity to Solent SPAs. Noise and pollution are frequent concerns in planning decisions and for residents.

APP/25/00512 Conflicts with local development plan policies (e.g. it affects Havant's Local Plan on traffic and environmental protection).

Highway safety and traffic issues (e.g., increased congestion from additional car wash bays at a petrol station).

Design, appearance, and layout (e.g. it will affect the visual character of the area).

Loss of privacy, daylight, and outlook for my property.

Noise, smells, and fumes (e.g. potential increase from the new plant room or car wash operations). Noise is already at an unacceptable level with the current car wash and car wash dryer

Impact on conservation areas, trees, hedgerows, open spaces, or natural habitats.

Flood risk and drainage concerns

The site is near residential areas, potentially affecting local amenities.

Taking all this into consideration I urge the council to refuse permission to the BP petrol station for APP/25/00512.

The BP Petrol station already has 3 wash stations for cars, a fourth one is not needed and is excessive, the local surrounding area already has plenty of other car washes that are not in residential areas.



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15 AUG 2025

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Objection to Planning Application APP/25/00512

Date: 14/08/2025

To: Planning Development, Havant Borough Council, Public Service Plaza, Civic Centre Road, Havant, PO9 2AX

Re: Application APP/25/00512, Petrol Filling Station, 97 Park Lane, Bedhampton

Dear Planning Team,

I object to the proposed extension with addition of two car washes at 97 Park Lane (APP/25/00512) due to its potential noise impact [REDACTED] contravening Core Strategy Policy CS11 (Protecting and Enhancing the Natural Environment).

The Noise Impact Assessment (25044-R01-SW) is not a true representation of the affect the BP Petrol Station's extension will have [REDACTED] this survey was completed at the entrance to the garage on the south side of Park Lane [REDACTED]

[REDACTED] the BP Petrol station's proposal of having a second car wash should be rejected, there are already 3 car washing station on this site and congestion on site is already bad due to no structured entrance or exit, adding more reasons for vehicles to come on site is not a good decision. The noise the blower on the car wash makes is a statutory nuisance [REDACTED]

Although a noise assessment was done it was completed on a wet February 2024 during the week, this is not a true reflection of peak usage which is on dry days in the evening and all day over the weekend and bank holidays. This increase in noise will disrupt residential amenity. [REDACTED]

[REDACTED] The proposed mitigation is inadequate to comply with CS11's requirement to control pollution. Additionally, increased traffic from the car wash may exacerbate noise and congestion, conflicting with Policy CS20 (Transport and Access Strategy). I am also objecting to the extended hours the car wash plans to open, [REDACTED]

[REDACTED] I urge the council to refuse this application or require robust noise mitigation such as high-performance acoustic barriers and to restrict operating hours to 10am-6pm to protect residents.

See additional paperwork enclosed for my objection grounds.

Please confirm receipt of this objection and consider these concerns in your decision.

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