HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	**Environmental Health**	**To:**	**Development Control**
Our Ref:	PR202510-105034	**Your Ref:**	APP/25/00639
EH Case Officer Extn:	44 6677	**Date:**	19 December 2025
DC Case Officer:	David Eaves		
DC Case Officer Extn:	44 6549		
Application Number:	APP/25/00369		
Site Address:	Proposed Development site (former Electricity Board site), Bartons Road, Havant		
Proposed Development:	Erection of 90 dwellings with associated landscaping, parking and improved access		

Observations / Comments:

I have now reviewed the application supporting documentation, alongside comments made by Environmental Health in respect of prior schemes, and comments from a selection of relevant third-party consultees.

Air Quality – development as receptor

In line with previous comments, it is considered to be very unlikely that the proposed development would create new unacceptable exposure to existing poor air quality.

Air Quality – development as source

The development quantum of this revised scheme also now falls below the screening level for industry air quality guidance for assessing the significance of the magnitude of emissions changes resulting from development; there is no need to comment on the traffic demand or distribution as it is not necessary for these assumptions to underpin an air quality assessment.

It is also noted that the Design & Access statement states at 3.2 7) that it is proposed that the properties use heat pumps as the primary means of meeting space/water heating demand, and savings against Part L requirements (section 5.1 of the statement) rely heavily on this proposal. It is not stated whether the properties will be provided with a domestic gas supply, or whether this will be a cost-offset which helps facilitate the domestic heating solution – if electric cooking appliances are also selected, then development building emissions will be significantly reduced relative to a scheme which uses gas as a primary fuel for space/water heating & cooking.

Air Quality – emissions offsetting

Given that the current application pre-dates the codification of the future homes standard under UK building regulations (which would make the specification of air source heat pumps more or less mandatory), the proposal to specify this water/space heating solution makes a positive contribution towards the emerging Air Quality policy.

Otherwise, I note that significant concerns have been raised by others in respect of these proposals that can only be resolved though a significant revision to the development layout, potentially affecting deliverable quantum, and so also viability.

I similarly note that the comments I have seen pre-date a material revision to the proposed development layout, dated December '25. It is anticipated that those consultees will need to be reconsulted on the revised layout. In my informal/interim response, I had highlighted some of the concerns raised by other consultees that would find support within the emerging air quality policy; summarised below alongside an additional comment where the revised layout makes a material change;

Landscapes (consultee comments) -

- Insufficient landscape buffer, breaking up of parking massing (with planting)
    - Landscape buffer improvement is noted south of parking to plots 59-90
    - Parking massing may remain a problem, especially around plots 34 & 35
- Lack of footpath link to/via NW corner of site – extending sustainable & active travel distances (not serving obvious desire-lines)
    - A footway provision to Martin Road is depicted, though as references in the a point above, the standard of connection that can be achieved under the revised proposals is unclear.

County Highways (consultee comments) –

- Bus stop improvements not integrated with active travel (pedestrian link to S)
    - Revised layout appears to confirm a pedestrian link to the South, but is reliant upon an 'existing footpath', which is a relatively narrow hardstand.
    - It is unclear whether it is proposed to upgrade the existing hard surface, or to simply to exploit it's presence.
    - It would be desirable to renew & widen the existing provision – ideally to make it suitable to accommodate cycles
- Safety issues (various) associated with site access and internal road layout – discourages active travel modes, both cycling and pedestrians.
    - I will defer to the County Highway Authority to comment authoritatively on the revised road/parking layout and associated vehicle tracking.
    - The revised layout does provide a solution to the football club access that appears capable of addressing the concerns highlighted in this specific respect.
- No proposal for development to assist in priority sustainable & active travel infrastructure enhancements (shared use footway provision from Petersfield Road to Martins Road, connection to Martin Road and the sparrow crossing of Bartons Road)
    - The revised proposal depicts both the sparrow crossing at Bartons Road and the creation of a shared use footway between Petersfield Road and Martin Road, on the South side of Bartons Road.
    - A footway provision to Martin Road is depicted, though as references in the a point above, the standard of connection that can be achieved under the revised proposals is unclear.
- Lack of provision of visitor cycle parking – particularly for flats
    - Design & Access statement section 3.8 appears to confirm adequate provision.
- Right-turn stacking lane omitted from proposals – a previous requirement borne of concerns about disproportionate network flow effects which are not development-quantum dependent (e.g. blocking of extant network traffic during periods of peak demand).

- The revised layout appears to reinstate the Right-turn stacking lane junction arrangement for development access, incorporating in addition a yellow-box arrangement for Westbound traffic.
- A Right-turn stacking lane for Knightwood avenue is also included on the layout, alongside pedestrian refuge between the development access and Moorgreen Rd.
- It appears that that this is achievable within the available width of green verge, it is assumed that is within the jurisdiction of the Highway authority to authorise/implement.

The revised proposals address a number of the air quality- (sustainable & active travel-) relevant issues raised by others against the superseded proposed layout. Safety aspects associated with large vehicle tracking, and the internal link between Bartons Road and Martin Road (or in particular, the quality of the link from the site, to the South, to Martin Road) remain the only outstanding issues which might find support under the emerging air quality policy – notwithstanding considerations of proportionality relative to achievable quantum.

I would suggest that the air quality policy carries insufficient weight at this stage to sustain any objection to the revised layout without substantial policy support in other areas (e.g. travel, access, landscape), and so as a result, no objections arise.

Noise – Air Source Heat Pumps (ASHPs')

I note that prior comments submitted by my nuisance & amenity colleagues on 14/10/2025 did not identify the proposal to specify ASHP's for all units, and consequently did not address these as a material source of noise.

Neither the superseded nor revised site plans indicate the proposed positions of ASHP units, and none are shown on building elevations, floor or roof plans.

The noise report pre-dates the material change to the proposed layout, and was in any event produced in the absence of a detailed design for any 'proposed mechanical plant' (section 7). It is evident from this section that the BS4142 assessment, and consequently the values given in Table 8, relate to the impact upon receptors external from an assumed noise source. The report has not addressed the impact of external plant on the proposed noise-sensitive receptors represented by the future occupants.

In the absence of detailed spatial proposals (or principles), it's not possible to undertake an MCS 020 compliant assessment for each unit, to ensure compliance with the 42 dB LAeq limit; and indeed, none appears to have been presented. It is worth noting that the above-quoted limit is the centrally defined test applied for permitted development purposes, and is regarded by our Officers as high (possibly insufficient for the purposes of detailed planning), and that it does not account for background noise levels, multiple similar noise sources (e.g. whose operation will have a common driver – e.g. external air temperature-), or reflections from hard surfaces (building facades, hard standings – reflections have a multiplication effect) – all of which could be potentially relevant on a relatively high density scheme.

Notwithstanding that the Future Homes Standard may in future make these matters for Building Control, it is my understanding that they are presently material planning concerns.

From a planning perspective, the visual impact, and/or impact on private amenity spaces can't be understood without detailed proposals – given the possibility that this might affect layout and appearance of buildings; detailed proposals may be needed prior to the determination of the detailed scheme.

Given the status of the application, it is possible that some plot specific MCS 020 assessments may be required alongside a BS4142 assessment for other areas of the site (e.g. for multiple units installed on the NE residential accommodation block, or for a conceptual noise exposure worst case), to consider the impact upon the nearest within-development residential receptors.

It is also worth noting that that specification of ASHP's may raise additional/related material planning matters, e.g. the impact of the externally mounted equipment on the aesthetic quality of the elevations (&/or the internal layout where service risers are required) – particularly in respect of the NE accommodation block.

Pollution/Drainage

I note that Portsmouth Water has recommended a related drainage condition, and that the LLFA has conversely required information prior to determination on grounds of inadequately demonstrated capacity (timetable for improvements). The LLFA did not make any comment on pollution control, though I note that the general surfacewater management scheme described in the Design & Access Statement relies heavily on permeable paving, which will provide a substantial contribution pollutant treatment.

Notwithstanding the overall capacity issues highlighted by others, I am comfortable to address C759 compliant pollution control by means of a condition, as recommended by Portsmouth Water.

Ground Contamination

I have reviewed the following documents;

- Forge Environmental Management Ltd. Interpretive Site Investigation and Remedial Strategy Report Ref HAV164.D/SI/002 (March 2020)
- BRD Environmental Ltd. Phase 1 Geo-Environmental Desk Study Ref BRD4469-OR1-B (July 2025)
- BRD Environmental Ltd. Phase 1 Geo-Environmental Site Investigation Ref BRD4469-OR2-C (July 2025)

The following report was *not available* at the time of writing;

- SoilTechnics Ltd. [Phase 2] Ground Investigation Report Ref STM3168D-GD1 (May 2016)

I broadly agree that the additional Phase 2 Investigation undertaken by BRD has not identified any contamination of particular concern.

However, I also note that the work did not review prior planning comments, and whilst the desk study did note the presence of a possible storage tank ('contents unknown'), this feature was not targeted by the investigative work.

Some research shows that the feature in question represents a large fuel storage tank serving an (adjacent) high capacity containerised generator set, present at the site from ~1991-~2010. It's position corresponds to the private rear gardens of 4 no residential units under the superseded layout, and the footprint of plots 17-20 under the revised layout.

I note that Groundwater results taken across the 2020 & 2025 investigations have identified fuel derived contaminants in two different locations – in 2020, potentially down-gradient of the on-site source (former diesel tank), and in 2025, potentially down-gradient of the off-site garage. The former is of greater concern, as it hints at a possible significant local source in an

un-investigated area of the site that is coincident with a sensitive receptor. The reported results (showing no significant contamination impact) should not be assumed to be representative of that area of the site, for the principal reason that the trial holes in this region of the site (as reported in the available documents) were advanced for the purpose of determining the quality of the material within the stockpile, and not for the purpose of investigating the underlying ground.

I do not agree the reports recommendation to implement an engineer-supervised watching brief to address this risk as the sole risk management measure – I would instead consider that this feature requires formal investigation.

It is noted that this region of the site remains covered by a large stockpile of crushed concrete, and cannot be investigated until this has been moved/distributed.

I would highlight that I have had the opportunity to review the 2016 intrusive investigation referenced in the desk study. That report was undertaken prior to demolition (when the stockpile was absent) and it may have targeted the area of the fuel storage/generator. Submission of this report may be sufficient to address my objection, given the otherwise favourable (or at least, agreed to be 'not significant') results reported in the 2025 BRD report.

In the even that the 2016 report cannot be made available, I would suggest that any positive determination of this application should be conditional on the completion of a proportionate investigation & assessment of this potentially contaminating feature, and where appropriate, the remediation of affected land. Suggested bespoke wording, below;

Contamination (omitting EDS) [1]

Prior to the commencement of any development within a 5m external buffer to plots 16-20 (as shown on Drawing no. 1110 rev D 31/07/2025, revdate 04/12/2025), an assessment of the presence, nature and extent of contamination shall be submitted to- and approved in writing by- the Local Planning Authority. The assessment shall account for the findings of prior site investigation reports, be undertaken by competent persons, and the findings be presented as a written report.

The assessment may comprise separate reports as appropriate, but unless specifically excluded in writing by the Local Planning Authority, shall include;

1) *Site investigation appropriate to the potentially contaminating landuse features formerly present in this region of the site; to provide sufficient data and information to adequately identify & characterise any physical contamination on or affecting these plots, and to inform an appropriate assessment of the risks to future occupants.*

2) *The results of an appropriate risk assessment based upon (1), and where unacceptable risks are identified, a Remediation Strategy that includes;*
    - *appropriately considered remedial objectives,*
    - *an appraisal of remedial &/or risk mitigation options, having due regard to sustainability, and;*
    - *clearly defined proposals for mitigation of the identified risks.*

3) *A verification plan providing details of the data that will be collected in order to demonstrate that the works set out any Remediation Strategy required under (2) are complete, identifying any requirements for longer-term monitoring of pollutant linkages, maintenance of engineered mitigation measures, and arrangements for contingency action.*

All elements shall be adhered to unless agreed in writing by the Local Planning Authority

***Reason:** To ensure that the development does not contribute to, and is not put at unacceptable risk from- or adversely affected by-, unacceptable levels of contamination, in line with policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011, DM17 of the Havant Borough Local Plan*

(Allocations) [2014], and paragraphs 183-185 of the National Planning Policy Framework 2021. The specified region of the site has not been included within the scope of investigations submitted in support of the application, and has previously hosted storage tanks, equipment and services which represent potentially contaminating landuse (&/or activity). Contamination could pose a risk to future occupiers of the affected plots"

Verification (Standard) [2]

*Prior to the occupation of any relevant part of the permitted development, any verification report required in accordance with **condition [1]** shall be submitted to and approved in writing by the Local Planning Authority.*

The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan, and must demonstrate that site remediation criteria have been met.

***Reason:** To ensure that the development does not contribute to, and is not put at unacceptable risk from- or adversely affected by-, unacceptable levels of contamination, in line with policy DM10 of the Havant Borough Local Plan (Core Strategy) 2011, DM17 of the Havant Borough Local Plan (Allocations) [2014], and paragraphs 183-185 of the National Planning Policy Framework 2021. The specified region of the site has not been included within the scope of investigations submitted in support of the application, and has previously hosted storage tanks, equipment and services which represent potentially contaminating landuse (&/or activity). Contamination could pose a risk to future occupiers of the affected plots"*

Mr. Jonathan Driver
Environmental Control Officer