

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	PR202601-107444	Your Ref:	APP/25/01022
EH Case Officer Extn:	44 6677	Date:	02 Apr 2026
DC Case Officer:	Jennie Fox		
DC Case Officer Extn:	-		
Application Number:	APP/18/00450		
Site Address:	Land at Forty Acre Farm, Havant Road, Havant		
Proposed Development:	Erection of 320 dwellings (including a 30% provision of affordable homes), 66 bed care home, provision of public open space, habitat mitigation zone, allotments, closure of existing access and creation of 2 new access points and associated infrastructure following demolition of existing buildings (approved 17.1.2020).		
	Request to Discharge Conditions 11 [Contamination] & 12 [Contamination Verification] of Planning Application APP/18/00450 (received 09/01/26)		

Observations / Comments:

I have reviewed the Wilson Bailey Geotechnical & Environmental Post Demolition Inspection and Sampling Letter Report Ref: J16120/db/c12 (03/04/2025).

Notwithstanding it's title, the as-submitted version appears to comprise a statement of valid for the purposes of a groundworks contamination watching brief only, falling significantly short of the expected content of a submission against the approved verification plan for the wider, greenfield portion of the site, pursuant to c.12; or against the outstanding requirements of c.11 in respect of the brownfield portion of the site (land within the cordon marked on the 06/04/2020 c.11 part-discharge exclusion plan).

In particular, the submission lacks;

- Evidence collected in accordance with the earthworks strategy and Materials Management Plan Support Document J16120, October 2019 (approved under c.11) or it's superseding version (v.4) dated March 2020 (approved under c.10), or,
- Any plan showing the location of any samples collected from the brownfield area of the site, post demolition
- Any logs describing soils inspected/sampled within the brownfield areas of the site
- Any results from samples collected in the brownfield area of the site, nor any comparison with generic assessment criteria (GAC)

I would refer you to previous comments (your Ref APP/18/00450, Our Ref CONS/21/02523, Dated 10/08/2021), and in particular;

- 1) *'Discharge of c.11 for areas of the site falling outside the exclusion area was recommended on the basis that the works described within the document would be implemented and evidenced within a verification report (secured by c.12). It follows that the discharge of c.12 requires a submission which demonstrates that those actions have been satisfactorily completed. The relevant actions includes the execution of the earthworks strategy and implementation of the materials management plan, as the .../c08 document describes the verification sampling rates and standards to be applied (to ensure suitability of imported material, to ensure that the site would not be determinable as contaminated land upon completion of the development).'*
- 2) *'I would object to the discharge of either c.11 or c.12 for the area highlighted on the [unreferenced / non-dated] exclusion plan, on the basis that the applicant has not undertaken the works proposed within the approved verification plan J16120/db/c08'*
- 3) *'I would similarly object to the discharge of c.12 for the wider site (the area falling outside the boundary indicated on the submitted exclusion plan), on the basis that the applicant has not evidenced the completion of all relevant works covered by the earthworks strategy and materials management plan, and it is not clear that those works have been completed'*

In respect of 1) – the MMP committed the applicant to provide verification samples at a rate of 1 per 500m³ soil imported (minimum 3/donor site) against a total import volume expectation of approximately 80,000m³ (e.g. ~160 samples, notwithstanding the additionally proposed 'as placed' stratified-random sampling). Additionally, soil movement records were expected. I would draw your attention to prior comments about verification sample quantum – but these notwithstanding, a nil-submission is not considered to be appropriate.

In respect of 2), given the omission of any detailed discussion within the submission about the physical works undertaken in this area, taken alongside the omitted appendices (sample results, plan, GAC comparisons); this comment remains substantially valid.

It is implicit from the submission that the groundworks referred to at 3) have been completed, however it remains fundamentally accurate that the applicant has not evidenced completion of works in line with the approved plans.

Conclusions;

With reference to the above comments, I don't see any way that I could support discharge of the conditions sought, and accordingly it follows that I must object.

Mr. Jonathan Driver
Environmental Control Officer