

## Osmond, Gary

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**From:** Pires, Andre  
**Sent:** 24 June 2025 16:26  
**To:** Osmond, Gary; Boyd, Sarah; Malter, Lisa; Sparks, Cali  
**Cc:** Panza, Yacklin  
**Subject:** [O/25/99534] Land at Denhams Corner, Snakemoor Lane, Eastleigh, SO32 2BW  
Pollution Comments

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good afternoon Gary

Thank you for consulting the Pollution Team on the planning application reference O/25/99534 for the 150 dwellings including 40% affordable housing, with vehicle and cycle accesses from Snakemoor Lane, pedestrian/cycle access from Botley Road, sustainable transport hub, public open space and play area, and associated infrastructure and landscaping (all matters reserved except for access) at Land at Denhams Corner, Snakemoor Lane, Eastleigh, SO32 2BW. The following documents have been submitted and reviewed:

- Advance Investigation Systems (AIS Ltd) (20/05/2025). LCRM Stage 1, Tier 1: Desk Study Report and Walkover Survey. Geotechnical and Geoenvironmental Preliminary Risk Assessment. Land at Denham's Corner, North of Snakemoor Lane. Horton Heath. Hampshire, SO32 2BW. Report reference: AE0503 Issue 1.1
- SLR (16/05/2025). Flood Risk Assessment and Drainage Strategy for Denham's Corner, Horton Heath. Reference: 416.065671.00001. Revision 01.
- AIS Ltd. (06/11/2024). Ground Investigation Geotechnical Factual Report. Land at Denham's Corner. Reference: AD0804.
- Hawkins Environmental (22/05/2025). Air Quality Assessment : Denham's Corner, Horton Heath. Reference: H4457-AQ-v1
- DTA Transport Planning Consultant (09/06/2025). Transport Assessment. Land at Denham's Corner, Horton Heath. Reference: DN/NS/24478-02
- Hawkins Environmental (29/05/2025). Noise assessment : Denham's Corner, Horton Heath. Reference: H4457-NV-v1

Please see our comments below:

### **Contaminated land**

The Preliminary Risk Assessment submitted by AIS Ltd provides a desk-based review of the site, including consideration of topography, geology, historical land use, waste and landfill records, radon potential, hydrology and hydrogeology, as well as findings from a site walkover conducted on 13/05/2025.

The walkover survey did not identify any visual or olfactory indicators of contamination, with the exception of an inspection cover and a partially infilled drain along the southern boundary, presumed to be a redundant soakaway formerly serving an agricultural outbuilding. A small stream and pond were observed along the eastern boundary. There are no recorded groundwater abstractions within 250 metres of the site, and the site is not located within a Source Protection Zone. However, the site lies within a Site of Special Scientific Interest (SSSI) Impact Risk Zone. The underlying geology is reported to consist of sands, silts, and clays of the Wittering Formation.

Supplementary information includes the results of a ground investigation comprising three trial pits, originally excavated in support of a Flood Risk Assessment. Although not designed for contamination assessment, the trial pit logs provide indicative information on ground

conditions. These indicate topsoil to 0.4 m bgl overlying Head Deposits (sandy gravelly clay) to 1.1 m bgl, underlain by sandy silty clay of the Wittering Formation. No evidence of made ground or anthropogenic materials were recorded. No soil or groundwater samples were taken for chemical analysis as part of this assessment.

A preliminary conceptual site model has been developed, which does not identify any potential contaminant linkages. Overall, the risk to human health and controlled waters is assessed as low. However, the report appropriately recommends further investigation/confirmation on the suitability of the fill material used in the areas of soft landscaping. A discovery strategy is also proposed to address any unexpected contamination encountered during development.

We agree with the conclusions of the report and support the recommendation for limited further investigation and the implementation of a discovery strategy to manage unforeseen contamination risks during groundworks. The following conditions are recommended on these regards:

#### Unexpected contamination

In the event that any evidence of potential contamination is found at any time when carrying out the approved development that was not previously identified in the Preliminary Risk Assessment (AIS Ltd, 20/05/2025) report reference AE0503 Issue 1.1, it must be reported in writing immediately to the Local Planning Authority. Work shall then cease until an investigation and risk assessment, and where required a remediation scheme, has been submitted to and approved in writing by the Local Planning Authority. Where a remediation scheme is required by the Local Planning Authority, the development shall not be brought into use until a verification report for the remediation work has been submitted to and approved in writing by the Local Planning Authority. All works shall be undertaken by a competent person in accordance with best practice as outlined in BS10175:2011+A2:2017 and LCRM. Any gas monitoring deemed appropriate is to be in accordance with best practice as outlined in such documents as BS8576:2013, BS 8485:2015+A1:2019, Claire RB17 and CIRIA C665.

Reason: To ensure that the development is not put at unacceptable risk from, or adversely affected by, unacceptable levels of pollution from previously unidentified contamination sources.

#### Re-use of soils

Any soils proposed for reuse within soft landscaping areas as part of the development hereby permitted should be demonstrated to be suitable for their intended use, in accordance with the recommendations of the Preliminary Risk Assessment (AIS Ltd, 20/05/2025) report reference AE0503 Issue 1.1, and meet the approval of the Local Planning Authority prior to use on site.

Reason: To minimise the risk from land contamination for the safety of the future occupiers of the development.

### **Air Quality**

I have reviewed the Air Quality Assessment submitted (Hawkins Environmental, 22/05/2025) Reference H4457-AQ-v1. Please see the key outcomes of the review:

- The assessment confirms the use of the most recent ADMS software. However, it does not indicate what version was used, can the applicant include this information?
- The assessment uses the Emissions Factors Toolkit EFT v12.1; however, the latest version v13.1 is available. Can the applicant explain why they decided to use the older version?
- The assessment refers to data from Transport Assessment (DTA, 09/06/2025). This approach is satisfactory and consistent with best practices.
- Baseline conditions: Section 5.1 indicates that two AQMAs (at the M3 junction and in Botley) were revoked in the last year after five consecutive years of compliance. However, these AQMAs have not

yet been formally revoked by Eastleigh Borough Council and remain designated at the time of writing. We request that the report be amended to accurately reflect the current AQMA status.

- Meteorological data: The assessment uses meteorological data from 2019 sourced from Southampton Airport. Could the applicant please justify the use of 2019 data rather than data corresponding to the baseline?
- Section 5.3 Industrial Emissions states "Both the Environment Agency's register of industrial sites under the EC Integrated Pollution Prevention and Control Directive (IPPC) and the Local Authority's list of registered Part A2 and Part B permitted premises under the Pollution, Prevention and Control Act 1999 and the Environmental Permitting (England and Wales) Regulations 2010 have shown that there are no sites within close proximity of the development site that could be affecting air pollutant levels". This is satisfactory.
- Pollutant concentrations were calculated for 6 representative points (closest to roads and along site boundary. Table 6.1 indicates that predicted concentrations are well below the relevant national objective.
- Table 7.3 presents the assessment on the impacts of increased traffic flow in the existing dwellings identified as sensible receptors. The change in concentrations is shown to be negligible.
- To assess construction impact from the proposed, the latest IAQM guidance (2024) was used. The assessment indicates that the site is considered 'Medium' risk in respect of earthworks, construction and trackout, and indicates the mitigation measures necessary to implement to reduce risks in accordance to the guidance. A dust risk assessment is recommended.

Overall, I suggest the above clarifications are provided to fully support assessment's conclusion that the impact of the development on local air quality is negligible. Additionally, we advise incorporating air quality considerations into a detailed Construction Environmental Management Plan (CEMP) to address potential air quality impacts during the construction phase, including a dust management plan. Please see the suggested planning condition below:

#### CEMP

No development shall start on site until a construction environmental method statement has been submitted to and approved in writing by the Planning Authority, which shall include:

- a) a programme of the development work, including the construction of groundworks, services and buildings; the laying out of the hard-surfaced circulation and parking area, and the planting of any soft landscaping;
- b) the location of temporary site buildings, compounds, construction material lay down and storage, and plant storage areas for the full duration of the construction period, including any period during which final construction works are to be carried out on areas of the site initially allocated in the CEMP for these temporary purposes;
- c) details of routes for construction traffic arriving at and departing from the site, including the off-site waiting areas for such traffic, and arrangements for the turning of lorries if necessary;
- d) the arrangements, including times, for deliveries associated with all construction works, loading/ unloading of plant and materials, and carting away of materials;
- e) the parking of vehicles of site operatives and visitors for the full duration of the construction period, including any period during which final construction works are to be carried out on areas of the site initially allocated in the CEMP for constructor parking;
- f) measures to control the emission and deposit of mud dust and dirt generated by construction activity on the site and traffic associated with it, including wheel wash facilities, and associated dirty water drainage arrangements;
- g) Provide a Dust Management Plan (DMP) with mitigation measures following IAQM guidance.
- h) a scheme for controlling noise and vibration from construction activities which shall include any piling, and which shall limit reversing vehicle alarm use to the broad band white noise type of alarm;

- i) Safeguards to be used within the construction process to ensure surface water contains no pollutants on leaving the site, including suspended solids, and measures to protect nearby waterways from pollution impacts;
  - j) provision for storage, collection, and disposal of rubbish and recycling from the development during the construction period;
  - k) the erection and maintenance of security hoarding including any decorative displays and facilities for public viewing, where appropriate;
  - l) temporary lighting;
  - m) the protection of the nearby public right of way;
  - n) a prohibition on any materials, waste or other substances being burnt on site;
  - o) a limitation of construction working hours to be only between 08.00 and 18.00 Mondays to Fridays and 08.00 to 13.00 on Saturdays, and there to be no working at any time on Sundays and on Bank Holidays,
  - p) Measures to control the emission of dust and dirt during construction should have regard to the current IAQM guidance, namely the 'Guidance on the Assessment of Dust from Demolition and Construction' (IAQM, 2014);
  - q) a prohibition on any materials, waste or other substances being burnt on site;
- Reason: To limit the impact the development has on the amenity of the locality, , in accordance with Policies DM1 and DM8 of the Eastleigh Borough Local Plan (2016- 2036).

(@Malter, Lisa/@Boyd, Sarah any additional comments to add as a SSSI site)

Electric Vehicle (EV) Charging Points (@Sparks, Cali Can you please review this and add anything else)

No building shall be occupied or brought into use until details of EV charging infrastructure have been submitted to and approved in writing by the Local Planning Authority. These details must include:

- a. Total number, type, location, and operation of EV charging points.
- b. Passive provision for future EV charging.
- c. A timeline for installation and maintenance.

The approved EV infrastructure must be installed prior to occupation and retained for the lifetime of the development.

Reason: To promote sustainable travel, reduce air pollution in the Hamble AQMA, and support climate change mitigation efforts.

## Noise

After review Hawkins Environmental dated 29/05/2025 Noise assessment : Denham's Corner, Horton Heath reference: H4457-NV-v1 I the following questions:

- The noise survey was carried out over a short duration and only includes one full night. This is not considered an acceptable duration for the proposed site. Only one full night of noise data is not enough to use as a base for noise assessment calculations. We already comment regarding this point on other projects with yourselves and we would highly recommend that Hawkins Environmental would take this requirement for all future projects;
- There are a few large residential sites proposed (some already under construction other ones with granted planning permission) in this area. Would be important to consider future traffic flows including the new neighbouring residential schemes and correspondent future traffic to ensure the proposed mitigation options for this site still achieve the noise criteria even with the increase future traffic noise;
- The noise reports says the site cannot rely on the windows being opened for ventilation and therefore, an alternative source of ventilation is required. I assume this is only for the 1<sup>st</sup> row of properties fronting the road is this correct ? If so, a solution needs to be proposed at this stage. A figure showing the houses that can rely on windows being opened for ventilation is required.

Additionally the report also states that windows can be opened to deal with overheating. However, the duration that the windows are expected to be opened is a factor when considering whether it is acceptable to rely on openable windows to deal with overheating. Some contradiction there. The report recommends that an Overheating assessment using *Dynamic Thermal Modelling* is required to find a solution for overheating. I share the same opinion, and this assessment is required to be carried out.

- All properties gardens to the south of the scheme are above the external amenity noise levels. This would be very simple to fix if good acoustic design principles are applied. For example, moving the gardens to the other side of the properties and use the houses to screen noise from the road this shows good acoustic design was not applied on this scheme contrary to paragraph 6.4 of the noise report.

Can the consultant respond to the above queries. I would also recommend a post construction noise survey condition for at least one plot, closest to the main road, to ensure the proposed mitigation reach the internal and external noise criteria as below:

Prior to the first occupation of the development, a Post-Construction Noise Report must be submitted to and approved by the Local Planning Authority. This report must include a noise survey over a considerable duration at the closest plot to the main road and demonstrate that internal and external noise levels within the residential unit comply with the noise standards set out in BS 8233:2014 / WHO Guidelines and Hawkins Environmental dated 29/05/2025 Noise assessment : Denham's Corner, Horton Heath reference: H4457-NV-v1.

Reason: To protect residents health and wellbeing and ensure compliance with National Standards and local policies.

Thank you

Pollution team

Andre

**Andre Pires**

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