

Altman, Rebecca

From: Pires, Andre
Sent: 17 April 2025 13:13
To: Altman, Rebecca
Cc: Panza, Yacklin
Subject: [F/25/99169] Land adjoining 4 Brookfield, Providence Hill, Bursledon - Pollution Comments

Follow Up Flag: Follow up
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Categories: Consultation responses

Good afternoon Rebecca,

Thanks for consulting the Pollution Team on the planning application reference F/25/99169 for the Construction of a 68-bed care home (Use Class C2) and 3 x close care cottages (Use Class C3 Age Restricted) with associated access, internal access roads, parking, landscaping and infrastructure (revision to application ref. F/24/97312). The following documents haven't been reviewed:

- WSP (April 2025). Brookfield, Providence Hill. Preliminary Risk Assessment. Reference 70122557-PRA-R04
- WLA (March 2025). Proposed site plan. Reference 6185-WLA-ZZ-XX-DR-A-0010
- Hawkins Environmental noise report reference H4472 – NV – v1 dated April 2025
- Construction Environmental Management Plan (CEMP) Ref: 256 – 02A dated March 2025
- Hawkins Environmental Air Quality Assessment reference H4472 – AQ – v2 Dated April 2025

Please see our comments below:

Contaminated land

The Preliminary Risk Assessment has been updated in accordance with the latest proposed layout (4 storey care-home and 3 close care residential cottages). No significant changes were noted in the report. The risk assessment indicates Moderate risks to human health from asbestos in shallow soils, low to moderate risks from contaminants in shallow soils, ground gas and vapours. In addition, the risks to groundwater and surface water bodies are considered to be Low to Moderate. WSP recommended that further investigation is required, including further characterisation of ground conditions, soil and groundwater sampling, and groundwater and ground gas monitoring.

As mentioned in the previous consultation F/24/97312, responded on 22/05/2024, we agreed with the findings of the report and recommend that any future planning applications to be conditioned by the following:

Ground Investigation Report

No work shall commence on site until the following has been submitted to, and approved in writing by the LPA:

- a. A report of a site investigation (including an amended site plan, site investigation and risk assessment and any subsequent mitigations as a result of findings) documenting the ground conditions of the site and incorporating chemical and gas analysis in accordance with UK Land contamination risk management (LCRM) national guidance, and BS10175:2011+A2:2017, and BS 8576:2013, BS 8485:2015+A1:2019, Claire RB17, CIRIA

C665 and as agreed with the LPA. This document should also include reference to the updated Preliminary Risk Assessment (WSP, April 2025).

b. A detailed site-specific scheme for remedial works and measures to be undertaken to avoid the risk from contaminants and/or gases when the site is developed and proposals for future maintenance and monitoring. Such a scheme shall include nomination of a competent person to oversee the implementation of the works.

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

Verification Report

The development hereby permitted shall not be occupied / brought into use until there has been submitted to the LPA verification by the competent person approved under the provisions of condition X(b) that any remediation scheme required and approved under the provisions of condition X(b) has been implemented fully in accordance with the approved details (unless varied with the written permission of the LPA in advance of implementation).

Unless agreed in writing with the LPA such verification shall comply with UK Land contamination risk management (LCRM). Typically, such a report would comprise:

- a. a description of the site and its background, and summary of relevant site information,
- b. a description of the remediation objectives and remedial works carried out.
- c. verification data, including - data (sample locations/analytical results, as-built drawings of the implemented scheme, photographs of the remediation work in progress, etc.
- d. Certificates demonstrating that imported and/or material left in situ is free from contamination, confirmation of material removal, gas/vapour membranes have been installed correctly.

Thereafter the scheme shall be monitored and maintained in accordance with the scheme approved under condition X(b)

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

Noise

After careful review of Hawkins Environmental noise report reference H4472 – NV – v1 dated April 2025, we have the following comments:

- The noise survey was conducted between the 21st and 22nd of March 2024 only including one night and one day period. This is not considered as a representative period and not enough data to support the noise calculations for this site. Additionally, there is only one noise survey location facing Providence Hill, The site is in close proximity to the M27 and noise data for the east side of the site would be important to consider and present. Paragraph 4.2 of the noise reports defines Providence Hill as the main source of noise but this needs to be backed up with noise data from the northeast part of the site.
- Figure 4.1 shows the monitoring location almost in line with one of the facades of the residential cottages this does not match to the distances in the last paragraph of section 5.1. Is the monitoring location in the figure correct?
- Nighttime LA_{max} calculations/assessment is not present in the report. Can you please provide details on this or explain why BS8233:2014 LA_{max} criteria is not shown in point 6.2.2 as per daytime LA_{eq} in table 6.2. Without calculating LA_{max} how the consultant supports the glazing recommendations achieving the BS8233:2014 LA_{max} criteria for bedrooms?
- The report states " site cannot rely on the windows being opened for ventilation. Therefore, an alternative source of ventilation is required" on point 6.2.3 but then on table 9.1 states "Based on the onsite noise level, any ventilation system should be appropriate ". Does this mean a passive ventilations system (such as trickle ventilators) is appropriate?

I do have concerns regarding noise and this report was not able to demonstrate how noise criteria can be achieved.

I propose the following conditions:

- Prior to the first occupation of the property, a scheme to demonstrate that the internal noise levels within the residential units (main building & residential cottages) and the external noise levels in garden and other relevant outdoor amenity areas will conform to the standard identified by BS 8233 2014, Sound Insulation and Noise Reduction for Buildings - Code of Practice, shall be submitted to and approved in writing by the local planning authority. This shall include details of any ventilation system. The development hereby approved shall then be carried out in accordance with the approved details prior to occupation of the premises and retained as such thereafter.
- The cumulative noise from all external plant including kitchen extract system, mechanical ventilation and flues shall be designed to achieve a rating level (L_{Ar},Tr) below the measured background noise (L_{A90}) as measured one metre from the nearest affected window of the nearest affected residential property, as defined in British Standard BS 4142: 2014 +A1:2019 'Methods for rating and assessing industrial and commercial sound'. An assessment to demonstrate that the design can achieve this standard shall be carried out for three separate periods of interest: 07:00 hours to 18:00 hours; 18:00 hours to 23:00 hours and 23:00 hours to 07:00 hour and submitted to the Local Planning Authority for approval. The external plant and flues shall be constructed in accordance with the approved details and retained as such for the lifetime of the development, unless otherwise agreed in writing with the local planning authority.

Reason: To protect the amenity of future residents and neighbouring residents in accordance with Policies DM1 and DM8 of the Eastleigh Borough Local Plan (2016-2036).

CEMP

Construction Environmental Management Plan (CEMP) Ref: 256 – 02A dated March 2025 has been reviewed as well as the Best Practicable Means to reduce noise impact described in the noise report point 8. The documents provides information on site description, working hours (including delivery hours), site layout (including location of access/egress, storage areas, welfare and site offices, visitor and contractor parking) for each of the two proposed phases, security (including CCTV cameras and fencing), measures of mud control, measures to protect surface water course at the north of the site, waste management.

However, in terms of control of noise/ vibration focus on the pilling / demolition works periods have not been specified, the document only provides general information. We required this information to be tailored specifically to the site and include more detailed information including the proposed locations and duration of the above construction periods.

The air quality assessment (Hawkins Environmental, April 2025) determines that the site is considered as 'Medium Risk' overall. Site specific mitigation measures were included in Section 8.4 of the report; however, these measures do not appear to be included in the CEMP. We recommend that specific site measures on control of dust during construction phase is included in the CEMP, along with a detailed complaint procedure, including implementation of corrective actions.

Air Quality

Hawkins Environmental Air Quality Assessment reference H4472 – AQ – v2 Dated April 2025 has been reviewed. This report is in line with the report (H4106-AQ-v4 dated 12/11/2024) provided and reviewed as part of the previous planning application F/24/97312 but taking into consideration the new proposed layout. Therefore, our previous comments on air quality passed on 19/11/2024 remains valid.

It is noted that the recent report does not reference the ADMS software version used for modelling. Can the applicant confirm the use of the most recent ADMS software version 5.0.1 (February 2022) as per previous report?

In general, we agree with the conclusions of the report. However, considering the site's proximity to the Hamble AQMA, the presence of existing receptors, and the introduction of additional sensitive receptors, the following conditions are recommended:

Details of Extract/Ventilation System

Prior to the commencement of development, details of the proposed ventilation system for the extraction and dispersal of cooking smells/fumes must be submitted to and approved in writing by the Local Planning Authority. The system must include:

- Construction method, odour control measures, noise levels, and aesthetic considerations.

- Flues that:

- a. Terminate at least 1 metre above the ridge height of any nearby building with no obstruction to upward air movement, or

- b. Incorporate odour control measures (e.g., activated carbon filters or electrostatic precipitation).

The approved system must be installed prior to occupation and retained thereafter.

Reason: To ensure appropriate odour control and safeguard the amenity of adjoining properties.

Electric Vehicle (EV) Charging Points

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:

- Total number, type, location, and operation of EV charging points.

- Passive provision for future EV charging.

- 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.

I trust this information is of assistance.

If you have any further queries, please do not hesitate in contact us.

Pollution team

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