

07th July 2025

REF: SSLT1001

By Email: Gary.Osmond@eastleigh.gov.uk

Dear Gary,

RE: Response to Environmental Health (Pollution Control) Comments dated 24th June 2025 regarding planning application 0/25/99534 - Land at Denhams Corner, Snakemoor Lane, Eastleigh, SO32 2BW

We write on behalf of our client (the Applicant) to provide a response to the above-mentioned comments. Our response is detailed below accordingly.

Air Quality

Hawkins Environmental Air Quality consultants have reviewed the comments provided on this application by Eastleigh Borough Council's Pollution Control Manager. In response, a revised Air Quality Assessment (H4457 – AQ – v3, dated 3rd July 2025) is submitted and accompanies this note.

Specifically, the revised report addresses the following points that were raised by Officers:

- Confirms the model version of ADMS software used;
- Provides clarity regarding the Emissions Factors Toolkit (EFT) used;
- Addresses comments raised in respect of AQMAs (M3 Junction & Botley specifically); and
- Provides justification regarding the meteorological data used.

Noise

Hawkins Environmental Noise consultants have reviewed the comments provided on this application by Eastleigh Borough Council's Pollution Control Manager. Please see below, responses to each of the comments made in this regard.

EBC Comment 1:

"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"

Response:

Whilst it is acknowledged that EBC Officers preference is for noise surveys to include more than one night time period, this is not considered to be standard practice; 24 hour surveys are typically acceptable. Nevertheless, if it is considered essential by Officers, in our view, this can be dealt with as a condition. Hawkins Environmental have agreed this with Pollution Control Officers on other sites within the same Authority Area, and consider the same approach should be acceptable here. We would therefore welcome the LPA to draft an appropriately worded condition.

EBC Comment 2:

“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”

Response:

We are very confident that this is unlikely to significantly change conclusions set out within the submitted noise assessment. We know that in general, a doubling of traffic flow on any given road equates to an increase in noise levels of 3 dB. Botley Road adjacent to the site has around 13,000 vehicles per day – there would need to be over 13,000 extra vehicles (which we know is not predicted to occur) for there to be any significant change in noise levels. Given that the BS 8233 calculations already include a 2 dB margin of error, we would consider that we have already accounted for an increase in traffic flow in our calculations.

EBC Comment 3:

“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 1st 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”

Response:

This is incorrect, since 2022, under Approved Document F of the Building Regulations, no rooms can rely on the opening of windows for background ventilation – this is not related to noise level – this is a Building Regs requirement. With regard to a solution being required, to a certain extent that is **a)** a building control issue and **b)** dependant on the overheating assessment (see below). If windows cannot be opened for overheating, the ventilation system is likely to be different than if the windows can remain open to deal with overheating

We do not understand the contradiction stated. The Acoustics, Ventilation and Overheating (AVO) Guide makes the requirements very clear and makes the clear differentiation between ventilation and overheating. The dwellings (as per Building Regs) need a system of background ventilation (e.g. trickle vents); windows can also be opened to deal with overheating, depending on duration. An overheating assessment is required to see the duration that windows need to be opened, then a judgement needs to be made as to whether that duration is acceptable. This (in our view) is very clear and does not contradict.

Further, this is an outline application at this stage. Windows have not been designed in detail at this stage and fixed orientations of buildings not established and agreed with Officers. Internal layouts are also not yet designed in detail. The comments raised could therefore be used to agree parameters for the RM stage.

EBC Comment 4:

“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.”

Response:

It is important to remember that noise in gardens is only one consideration. Flipping the gardens is likely to result in a significantly less attractive development. Also, it is important to remember that BS 8233 does not require all outdoor amenity space to achieve the recommendations. We recognise that a small number of gardens may experience noise levels in excess of the recommendations; however, there will also be quieter shared amenity areas too. Furthermore, this application is seeking outline planning permission and therefore at this stage, the site layout is illustrative and subject to detail being fixed with Officers at the Reserved Matters Stage.

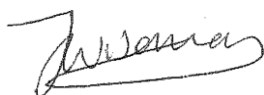
Contaminated Land

We welcome Officers agreement with the findings set out within the submitted information in this regard.

Summary

We trust that the revised Air Quality Assessment as submitted, along with the various responses as set out above with regard to noise are sufficient to address the comments made at this stage. If however anything further is required, please do not hesitate to contact us.

Yours Sincerely



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