

Osmond, Gary

From: Pires, Andre
Sent: 07 October 2025 15:05
To: Osmond, Gary
Cc: Panza, Yacklin
Subject: FW: [O/25/99534] Land at Denhams Corner, Snakemoor Lane, Eastleigh, SO32 2BW

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon Gary

Thanks for consulting the Pollution Team on the planning application reference O/25/99534 for the Outline application for up to 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).

We have reviewed the following documents:

- Hawkins Environmental (03/07/2025). Air Quality Assessment : Denham's Corner, Horton Heath. Reference: H4457-AQ-v3
- Gilling Planning (07/07/2025). Letter RE: Response to Environmental Health (Pollution Control) Comments dated 24th June 2025 regarding planning application O/25/99534 - Land at Denhams Corner, Snakemoor Lane, Eastleigh, SO32 2BW. Reference SSLT1001

Please see our comments below:

Air Quality

Previous comments sent by the Pollution Team on 24/06/2025 were:

- The assessment confirms the use of ADMS-Roads version 5.0.1.3.
- The Emissions Factors Toolkit EFT v12.1 was used, as the author indicates that the latest version v13.1 (published by Defra in March 2025) has not yet been implemented within the software.
- Section 5.1 has been updated to accurately reflect the current AQMA status within the Borough.
- A justification has been provided for using 2019 Southampton Airport meteorological data due to high missing data proportion in subsequent years (2020 to 2023).
- Pollutant concentrations were calculated for 6 representative points (closest to roads and along site boundary), and 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.
- A dust management plan was recommended as a result medium dust risk for earthworks, construction and trackout activities.

Based on the above, we can confirm that the submitted report satisfactorily addresses the previous raised concerns in relation air quality. We have no further comments on this regard, other than to reiterate the recommendation that a CEMP - including a detailed dust management plan - be secured as a condition of approval.

Noise

For ease of understanding I copied the comments and added my response below each comment in [blue](#)

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 response 07/10/2025

As per my initial comment a noise survey only including one night for a BS8233 assessment is not good practising and should be avoided as this increases uncertainty. The acceptance in the past and the requirement for a condition to safe guard this does not make it acceptable in the future! A condition will be required to make sure the noise assessment on the next stage is carried out properly, during an acceptable duration as per good practise and BS 8233:2014 Guidance on sound insulation and noise reduction for buildings. It's crucial to understand the impact of noise in any project as soon as possible as per ProPG Good Acoustic Design.

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.

Pollution Team

EBC response 07/10/2025

In this particular site is acceptable, but once again not good practising. A post construction noise test report will be required to ensure the proposed mitigation when in place will meet the noise criteria. The location of the plots to be tested will be discussed in the future and will be required to be confirmed by EBC.

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 response 07/10/2025

I am fully aware about the differences between Approved Document F of the Building Regulations, Approved Document O and BS 8233:2014 as well as the requirements of each document.

As you know overheating is often ignored at the planning stage and this can cause issues post planning if windows need to remain closed due to noise as stated in the noise report. The report states that windows can be opened to mitigate overheating therefore is required that the noise criteria in ADO is achieved.

It's not helpful or good practise to propose a solution knowing full well that this solution does not comply with Building Regs but because Building Regs doesn't matter at the planning stage this should be overlooked.

We must understand at this point of the process, as per my initial comment, If ADO noise criteria is met therefore an initial basic assessment that show what properties achieve the ADO noise criteria is required.

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.

EBC response 07/10/2025

External amenity noise criteria is the consideration that we are discussing and the one that should be present on the noise report. Now is the time to alert to this not in the future at Reserved Matters Stage. Solving problems during the initial stage is always better than solving them in the future, this saves, time and money. I don't understand the approach of not solving problems that can be fixed at this stage to be fixed in the future including overheating.

External amenity noise levels are acceptable, and I have no further comments.

I trust the above information is of assistance. If you have any further queries, please do not hesitate in contacting us.

Pollution Team

Andre

Andre Pires

Pollution Control Manager

Planning & Environment - Pollution

Ext.: 8436

Mobile: 07795985497