

Subject: FW: [F/25/100141] Land south east of Kings Copse Avenue, Hedge End - Pollution comments

Sent: 16 October 2025 13:18

Subject: [F/25/100141] Land south east of Kings Copse Avenue, Hedge End - Pollution comments

Good afternoon Rebecca,

Thanks for consulting the Pollution Team on the planning application reference F/25/100141 for the development of 192 dwellings comprising houses and apartments, to include access, parking, landscaping and other associated works, along with off-site footway and bridleway improvements at Land south east of Kings Copse Avenue, Hedge End.

We have reviewed the following documents:

- MH Architects (June 2025) Kings Copse Avenue Proposed Block Roof Plan. Drawing reference 22-148-KCA-MHA-ZZ-XX-DR-A-0002-C01
- Mission Town Planning Consultancy (October 2025). Eastleigh Borough Council. Site – Land south east of Kings Copse Avenue, Hedge End.
- Detailed UXO Risk Assessment (27/09/2024). Detailed UXO Risk Assessment. Reference 3997R
- Soils Limited (July 2025). Mineral Safeguarding Report. Reference 22023/MSR Rev 1.0
- Soils Limited (June 2025). Preliminary Investigation Report. Reference 21876/PIR Rev1.0
- Soils Limited (June 2025). Main Investigation report. Reference 21876/MIR Rev1.0
- Omnia (August 2025). Air Quality Assessment. Kings Copse Avenue. Hedge End. Reference C11149-2/1.0
- Venta Acoustics Noise assessment reference VA5545.250924.NIA2.2 dated 24 September 2025

Please find our comments below:

Contaminated land

The preliminary investigation report comprises the findings of a site walkover, summary of site history and environmental settings. Key findings are described below:

- The site currently comprises an undeveloped field with no structures noted during the walkover survey. A stream running along the northern boundary was noted.
- A review of historical mapping indicates that site was used for agricultural purposes from earliest records until now. A significant increase of residential density was noted to the north and west of the site from 1979 onwards. Tanhouse identified adjacent to the west boundary from 1867 to 1965.
- The underlying geology comprises London Clay Formation (classed as Unproductive Aquifer), with some potential Whitecliff Sand Formation and Alluvium outcrops to the north and northeast of the site (classed as Secondary A Aquifers).
- Radon risk is estimated to be less than 1% below action level, and no protection measures are required in accordance with Building Control Regulations.
- The detailed UXO risk assessment indicates that although a couple of military sites were identified within 1km from site boundary, it is considered that the risk from UXO is low. The report recommends UXO awareness training to all site staff and a site-specific emergency plan for any unexpected UXO encountered.
- Section 6 presents a preliminary conceptual site model, where on-site and off-site sources of contamination were identified, as well as the pathway and potential receptors. The table suggest that only source of contamination corresponds to off-site tanhouse activities; on-site risk of contaminants

from agricultural use on site has not been included. Potential linkage and risk assessment is included in table 6.6; however, only the off-site source was assessed.

- The report suggested that ground investigation was required to confirm ground conditions.

The ground investigation assessment was carried out during April 2025, and comprised the excavation of No.11 dynamic cone penetrometer tests, No.4 cable percussive boreholes, No. 8 trial pits, No.8 windowless sampling boreholes and No.8 dynamic probes. The exploratory hole plan is presented in Figure 3. The ground conditions encountered are detailed below:

- Topsoil up to 0.50mbgl over sands potentially from Wittering Formation (although inclusions of manmade materials such as bricks were noted) up to 1.90mbgl over London Clay Formation up to 30mbgl. Groundwater was encountered in a number of boreholes between 3.30mbgl and 4.00mbgl. No visual or olfactory evidence of contamination was noted. Report only includes records of BH1-BH4 and WS1 borehole logs. Is the applicant able to provide the remaining borehole logs for review?
- A total of No.8 environmental samples were collected for laboratory testing and screened against Residential with home grown produce CLEA scenario. No exceedances were reported, and no asbestos fibres were detected. The report concludes that overall risk from soils to human health and building structures is considered low.
- For controlled waters, it was determined that risk to groundwater is low due to the absence of contaminants within the soil, the impermeable nature of the underlying geology and low groundwater levels.
- Section 8 of the report refers to a 'low to moderate risk from previous usage of the site an offsite sources', which appears inconsistent with the Preliminary Risk Assessment discussed above (Table 6.6 21876/PIR Rev1.0). It also mentions a preliminary ground gas assessment, which does not appear to be included in the preliminary risk assessment report. This should be clarified.
- The report recommends the implementation of a discovery strategy during construction phase.
- The development proposes cut and fill operations (approximately 10,000 m³ cut and 4,500 m³ fill); however, the report does not mention site-specific measures for materials management. This should be addressed to ensure appropriate handling and reuse of site-won materials.

Based on the information provided, the preliminary and site investigation report indicate overall low risk for human health, controlled waters, and structures. Although we agree with the findings, it is recommended that reports be revised to include comments above and resubmitted for final approval.

Additionally, we suggest the preparation of a Material management Plan for the appropriate soil re-use and/or disposal.

Air Quality

The Air Quality Report (Omnia, August 2025) includes reasonable qualitative assessment of potential impacts during both the construction and operational phases of the proposed development. Key points to consider:

- A review of the baseline conditions, including review of data from ASR 2024 report, No2, PM10 and PM2.5 background predictions produced by Defra, and appropriately identifies the nearest AQMAs (High Street Botley and Hamble Lane) for context.
- Meteorological data from Southampton Station 2023 was used to inform the dust assessment, and prevalent wind conditions are presented in Figure 3.
- Construction Phase assessment: An assessment of fugitive dust during construction phase was conducted in accordance with the current IAQM guidance. The assessment concludes medium risk for dust soiling and low risk for human health and ecology from earthworks, construction and trackout activities. Ecological receptors considered include Manor Farm Local Natural Reserve only. However, Tanhouse Meadow, to the northeast boundary of the site is also designated as Site of Importance Nature Conservation (SINC) and should be included as sensible receptor. The report does not include a graphical representation of the sensible receptors. Potential mitigation measures were included in the report. The consultant indicates these measures will be included in any future CEMP. Additionally, a Dust Management Plan is proposed; however, no outline of this plan has been provided.

- Operational Phase Assessment: informs that an additional of 552 LDV daily vehicles movement are predicted during operational phase of the process. Table 17 suggests that on Kings Copse Avenue (south), the increase is approximately 416 AADT, with all other affected road links well below the 500 AADT screening value set out in IAQM (2017) Land-Use Planning & Development Control: Planning for Air Quality. Based on this, the report concludes that, as no individual road link exceeds this indicative threshold, the operational impacts are not significant and that no further assessment is required. However, it should be emphasised that the 500 AADT criterion is only an indicative screening value. Given that the development falls under the category of 'major development' according to The Town and Country Planning (Development Management Procedure) (England) Order 2015 and that the predicted traffic generation is near the threshold, it is considered appropriate that a dispersion modelling assessment should be undertaken to evaluate potential impacts on NO₂ and PM10 concentrations at the nearest sensitive receptors.
- Consideration on PM2.5 exposure reduction has been discussed in section 5.3.2, including a number of mitigation measures to reduce exposure during construction phase and incorporation of measures within the design such as provision of e EV charging points, walking and cycling infrastructure, planting green areas. A travel plan has been submitted.

In summary, while we do not object with the principle of the development in terms of air quality, we recommend that the report is revised to include a dispersion modelling for the operational phase of the development to evaluate potential impacts on nearby receptors and ensure that cumulative impacts are fully addressed. Additionally, we advise incorporating air quality considerations into a detailed Construction Environmental Management Plan (CEMP), including a Dust Management Plan, to address potential air quality impacts during the construction phase.

Noise

We reviewed the noise assessment and can confirm the correct methodology has been used. The duration of the survey is acceptable but would be recommended for at least one weekend period to be included. Both locations of the noise survey are acceptable.

The noise report recommends enhanced glazing and ventilation for some properties facing the main road as identified in the noise maps. This is acceptable for internal noise levels criteria. Most of the site follows good acoustic design and proposes the gardens to be located at the back of the properties while the building screen the gardens of traffic noise. External amenity criteria is achieved and mitigation is proposed in the form 2.5m high fences in some properties facing the main road.

An assessment regarding football noise shows that internal noise levels at the properties will be acceptable and within BS8233 criteria.

The worst cases regarding noise from the proposed air source heat pumps was calculated using the MCS 020 standard and its acceptable. Even comparing the predicted ASHP operating noise to background this is still acceptable and inside criteria.

I would suggest a condition to test the buildings for noise break in after construction. Something like:

Prior to the first occupation of the development hereby approved, a post completion noise report for a small number of plots (worst affected by road noise) shall be submitted to and approved in writing by the Local Planning Authority.

Overall, we find the noise report acceptable and have no additional comments.

Let's us know if you need anything else.

Thank you

Pollution Team

Andre

Andre Pires

Pollution Control Manager

Planning & Environment - Pollution