

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/23/00420	Your Ref:	APP/22/00576
EH Case Officer Extn:	44 6677	Date:	08 August 2024
DC Case Officer:			
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Application Number:	APP/22/00576		
Site Address:	The South Downs College, College Road, Purbrook, Waterlooville, PO7 8AA		
Proposed Development:	Construction of a new college car park.		

Observations / Comments:

It is understood that this application forms part of a wider development scheme on land currently used for car parking, alongside a strategic optimisation of college facility use & student travel, with a goal of shifting trips from those made by private motor car to more sustainable and active modes of travel.

It is understood that the wider development is to integrate into the Campdown proposal and a 'future vision' for college road, consisting of LTN1/20 complaint improvements to cycle & pedestrian infrastructure, as well as some bus waiting facility enhancements, and improvements to site porosity/desire lines.

This application was reviewed alongside the iterations of those related developments as they stood in June 2024.

It is acknowledged that the overall effect of proposals is a substantial permanent reduction in net parking quantum, which requires management.

Air Quality

It is noted that the travel to learn strategy contains framework-travel-plan-like provisions to discourage student travel by car, and to encourage travel by active & public transportation. Curriculum and timetabling optimisations are to be implemented to manage demand throughout the operational hours. Substantial reductions in vehicle trips are expected as a result.

The strategy is ambitious, but is considered to be plausible, and likely to result in mode-shift close to target levels. Supported on Air Quality grounds.

I also note that the application cover mentions that the college intends to make provision for a number of EV services parking bays 'at various locations' around campus, to include 'car park 6' (this development proposal). The travel to learn strategy is focussed upon mode shift, and does not address zero-tailpipe-emission transport. It would also appear unlikely that EV charging

provision would be covered by the applicable building regulations, given the nature of this development. We currently lack the policy basis upon which to seek to secure a reasonable or specific provision by condition, as the relevant NPPF provisions refer to plan making, and do not apply to development reliant upon the presumption in favour where local plans may be considered to be out of date. I would express support for the aspiration to provide a quantum of charging bays, on air quality grounds.

Lighting

Considering this development in isolation, there would be no particular reason to object to the lighting scheme proposed. However, it is not reasonable to consider this application as a stand-alone development, given that the need for additional parking arises directly from the loss of existing parking spaces expressly for the purpose of a residential housing development.

I note that the lighting scheme places 6m columns directly adjacent to the rear fenceline of the dwellings proposed under APP/22/00439. Whilst the total lux values are not high, the luminaires will be close to eye level when viewed from habitable rooms, and both the lighting tone and glare could harm the amenity of the proposed dwellings.

I note in particular that the luminaire selected is 4K kelvin 'cool white' specification, with C2 optics. Manufacturers details indicate that C2 optics are suitable for car parks, having even distribution of light, however, this makes the optics unsuitable for boundary installation as it does not limit light spill to non-target areas to the rear.

'A' class optics, and either 3K or 2.7K (warmer) temperature might be better suited for columns installed at the boundary of domestic properties (both available on this luminaire). Potentially, appropriate mitigation of foreseeable amenity impacts might involve a re-positioning of columns (e.g. to between the bays in the centre of the site), or a hybrid scheme which makes use of lower level (e.g. bollard, or boundary fence mounted lighting) at the southern boundary.

I am unclear on how we might go about the approval of a lighting scheme with a condition to secure amendments to mitigate the impacts upon a proposed residential scheme in the event that it gains consent. The residential scheme will be unable to mitigate the impact as the lighting columns fall outside of the redline area. Ideally, the scheme should be designed as if the proposed dwellings were in place.

I would recommend that the lighting scheme be considered in the context of the proposed residential scheme. Whilst policy DM10 does not directly address intrusive light, it is acknowledged that the 2011 Core strategy is commonly regarded to be out of date, and NPPF '23 para 191 c) does relate directly to planning decisions under such circumstances; providing that *'Planning ...decisions ...should ... limit the impact of light pollution from artificial light on local amenity...'*. At present, it is not clear that the current proposal meets this policy requirement.

I think that this probably justifies a holding objection pending further detail on the acceptability of the scheme design when considered as an integrated component of the wider scheme.

Mr. Jonathan Driver
Environmental Control Officer