

Date: 26/10/2020

Ref: APP/20/00658 proposed mixed-use development comprising 191 apartments and two drive-through restaurants with access, parking and landscaping on former SSE site.

Whilst there is a lot to commend in this development application, mostly originating from its brownfield site status, there are a few points we wish to comment on.

- A) Air Quality
- B) Biodiversity
- C) Carbon efficiency/ climate issues

A) We understand that HBC has undertaken to mitigate any issues around air quality with measures to ensure it stays within required limits.

With reference to **Planning, Design and Access Statement**, it states that projected levels of air pollution or emissions ' would not result in a significant deterioration of current air quality..'.

Since it appears that (2.1), ' .(a series of maps)...showing where monitoring has occurred, **none of which are near to the site..**', **it indicates there is no data on the current levels around the site.**

Therefore, determining future deterioration would be impossible, even if the level were not at the limit, there will be an increase.

It is noted that Havant Borough's air quality is considered 'very good', a subjective qualification as it is HBC's own monitoring, but it is within the proscribed limits .

Two of the road boundaries of the site are busy traffic thoroughfares, especially Petersfield Road, a busy bus route, with traffic lights . Yet we are told that (air quality impact ON the site: 3.1) the site is

' set back..from the Petersfield road...behind a wall and proposed planting..with a gap of 20m..', therefore, 'it is expected that car fumes would disperse and dilute'. With prevailing winds from the SW pushing them

over the site? and a flimsy barrier of trees ?(see also, Biodiversity). There is a lot of wild optimism in that, and if HBC wishes to achieve 'a positive contribution to the natural environment' (NPPF) it must

base its predictions on firm facts.

The Impact OF the site implies that the design will decrease reliance on cars - transport connections are certainly good, walking, cycling and bus, but the reality, as behavioural studies show, is that those

who can will use cars frequently. **There** will be inevitably an **increase** in traffic, and a **decrease** in air quality. The drive throughs , with stationary vehicles, would add to the increase and also impact existing residents

on Bartons Road and , designed, as is stated, to 'bring in passing motorist visits' and to appeal to 'the wider borough residents', it, as it stands, rather makes a mockery of HBC's aim.

We would like to see that monitoring of the area is carried out now, during construction and afterwards when completed.

B) Biodiversity Net Gain (BNG). HBC's Biodiversity Strategy reiterates the NPPF 's expectations that any development must make ..'a positive contribution to the natural environment..' and requires delivery of BNG,

the key word throughout being enhancement, 'a measurably better state'. As it stands the proposal does not appear to deliver this.

Although it could be argued that anything is an improvement on the impoverished state the site was left in, it should be brought back to levels of biodiversity as before any previous building - **and over and above them.**

Trees: The retained trees off site should be TPOs, if not already, as they are invaluable assets. They, as do all trees, contribute to the well being of people and wildlife alike, to the soil and groundwater of the site, providing habitats, wildlife corridors, and shade, and above all, they are much needed carbon capturers.

With this in mind we ask that **Landscaping is reviewed.**

Trees already, or to be, removed should be replaced like for like, with **large, broad leafed, deciduous native trees**, (oak, maple, beech, chestnut - to these could be added Limes - *tila x vulgaris*, great for fragrance and pollinators). Plan for more of these around the perimeter inside, on site, also, in order to maximise their carbon storage abilities and enhance BNG. Every tree and shrub on site has a part to play, an accumulative impact on the health of the landscape.

Tree cover should be doubled: the smaller, less effective ones replaced where possible (not too near buildings) with the aforesaid ones; hedgerows to be of mixed, dense, specimens, some flowering for pollinators, able to give cover for birds, left to grow larger and denser, to provide habitats. The plan shows little variation of species, some smaller oaks, but we ask for a more imaginative and truly biodiverse plan. The areas around and under the large trees on perimeter walls should be left wilder, with log piles provided, and wild flowers introduced to enhance the site for wildlife. Further to this aim, bat boxes and bird nest boxes could be attached to structures where appropriate. According to an HBC report, 15 species of bat live in the environs, including Bechsteins and pipistrelles, and swifts might even be persuaded back.

C) We would challenge the statement (5) in Planning Design and Access that this development provides 'a wide choice of high quality homes'.

Referring to National Design Statement, a minimum size for apartments does not appear to be quoted in the criteria for good design.

We consider **the size** of 1-bed apartments to be too small to be able to say that it conforms to the council's aims for **the well-being of its residents.**

Rather than squeezing in the maximum number of minimum size housing, shouldn't this development be about aiming high for carbon efficiency, well being and enhancement.?

We would like to see the number of dwellings reduced **in favour of increased floorspace, better natural ventilation and use of renewable energy sources**, to provide heating and cooling efficiency.

The aim for a low carbon economy (E!2 : Low Carbon Design in Local Plan 2036) in the borough needs to be enforced by the **use of solar, thermal, PV, heat pumps and an array of new renewable technology like heat recovery etc.,** - if HBC does not want to seem behind the curve of the times in climate action.

There is so much more that could be done to ensure and prove that HBC's own Energy Strategy and Climate Risk Assessments aims, along with their carbon targets, will be fulfilled.

We ask that you consider our comments, made with the best of intentions, and take bolder action in order to produce something truly of a high standard.