

I've looked over my previous comments, and in the most part they comprise recommendations for achievable enhancements. I am reliant on the planning service (and the highways authority) to take a view on 'appropriate balance' of hard-requirements, as we are presently in an emerging-local-policy grey-area.

Re: the specific comments from David Watney & Partners;

- Compliant cycle parking quantum is welcomed, I see no justification for a <SPD provision at this location.
- Car Club - I've not reviewed the draft travel plan, it doesn't appear to be on the APP/18/00234 case. As I alluded to in my prior response, the success of the Car Club is intrinsically linked to the performance of the Travel Plan Coordinator & to the monitoring & oversight of residential travel plan. In this way (as with the recommendations related to cycle access), I am reliant on the Highways Authority to strike the right balance and to deliver an optimally 'sustainable' development.
- Cycle access – as point above
- With respect to the comment that “the scheme cannot accommodate any further areas of planting”, I would refer you to the final paragraphs of CONS/19/01842 02/10/2019, which describe a way that this could be achieved (at the applicants suggestion that enhancement might be possible on the North elevation). Key Points reproduced below, which I suppose challenge the position that enhancement is 'not feasible'. I would (however) highlight my prior comment that “any landscaping improvement on this verge would be viewed as being a positive change in air quality terms”, and would stress that my comments are seeking to encourage a maximally (environmentally) sustainable development, within reasonable limits. i.e. I won't object on these grounds.
 - the Landscape Consultee supports the Wire Frame / Climbing Plants feature, but would wish to see greater use on the East and North elevations
 - the North elevation has available access to soil (landscaped verge), and is unhampered by either undercroft parking or vehicle ramps (and so is suitable for supporting a Wire Frame / Climbing Plants feature)
 - the North elevation is also roadside adjacent (A3 / Maurepas Way), and so closest to the principle emissions source adjacent to the development red-line
 - Deployment of the green 'curtain' / 'wall' feature on this elevation would likely have the maximum possible positive air-pollution impact (relative to other planting enhancements)
 - Plans instead refer to a '*potential landscaping enhancement to existing verge*'. Such enhancement is not necessarily mutually exclusive to deployment of a green 'curtain' / 'wall' on this façade
 - Any planting enhancement would deliver benefit relative to the existing grass cover in terms of air pollution mitigation performance of the verge
 - Maximum air pollution benefit would likely be achieved by selecting 'Moderate' Urban Tree Air Quality Score (UTAQS - See Woodland Trust Urban Air Quality Discussion Paper, 2012) species (only shrubs / trees are listed, so this comment relates to verge planting only)
 - The location has a negligible risk of unintended adverse air quality impacts (arising from planting / intervention, so no need for detailed consideration of the impact of planting on air flows / mixing rates etc)
- An additional point to highlight is that the Planning statement refers specifically to policy IN3, but does not address IN3 j.(ii) Electric Vehicle Charging. Especially in relation to a scheme involving construction of a new car parking scheme with public access, this is a key air-quality-relevant omission which may warrant control via planning condition (as was highlighted by the PPUD consultee).

Essentially, in the absence of any new information to comment upon – my comments remain applicable, and should be considered alongside any revised information that you receive in respect of the application. If it will be helpful to get together for a quick chat about priorities / limits of scope to require enhancements – please feel free to pop down. As I say, we're in the realms of pursuing the aims of para.9 of the NPPF (*"Planning(...) decisions should play an active role in guiding development towards sustainable solutions"*), and we not in the realms of considering a material in-principal objection to the scheme. I'm happy to assist with drafting of any relevant conditions if required.

I trust that this clarifies my position. Please feel free to make sure that HCC is aware of my comments in case it might be helpful to add weight to it's response in respect of highways / travel plan monitoring role, etc.

It might be helpful if you could keep me updated on the outcome v/v travel plan / cycle access / EV charge points & landscaping – this development is of a scale which is relevant to the Councils Air Quality Reporting (it has already featured in previous reports, and an update on the success or otherwise of the attempt to implement emerging policy is appropriate). Also, just for information, we have now secured permission to monitor air quality at Apsley Lodge, and we deployed diffusion tubes in Jan – results will be included in the 2021 Annual Status Report, but we should have an indication of whether results are likely to be adverse/favourable by Late Spring.

Best Regards,

Jon

Jonathan Driver
Environmental Control Officer