

**HAVANT BOROUGH COUNCIL**

**Town & Country Planning Act 1990**

**Consultation on Planning Application**

***MEMORANDUM***

|                              |                                                                                                                                                                                                                                                                                                         |                  |                            |
|------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|----------------------------|
| <b>From:</b>                 | <b>Environmental Health</b>                                                                                                                                                                                                                                                                             | <b>To:</b>       | <b>Development Control</b> |
| <b>Our Ref:</b>              | CONS/20/02221                                                                                                                                                                                                                                                                                           | <b>Your Ref:</b> | APP/20/00508               |
| <b>EH Case Officer Extn:</b> | 44 6677                                                                                                                                                                                                                                                                                                 | <b>Date:</b>     | 28 August 2020             |
| <b>DC Case Officer:</b>      | Daphney Haywood                                                                                                                                                                                                                                                                                         |                  |                            |
| <b>DC Case Officer Extn:</b> | 44 6513                                                                                                                                                                                                                                                                                                 |                  |                            |
| <b>Application Number:</b>   | APP/20/00508                                                                                                                                                                                                                                                                                            |                  |                            |
| <b>Site Address:</b>         | Dunsbury Park, Fitzwygram Way, Havant, PO9 4EE                                                                                                                                                                                                                                                          |                  |                            |
| <b>Proposed Development:</b> | Approval of Reserved Matters in respect to Phase 1 Plot 4a of APP/17/01324 (new employment uses, hotel and access road) comprising construction of 11,622 sqm B2 commercial premises for plot access, layout, scale, appearance & landscaping and Condition B5 Other Matters criteria a to h inclusive. |                  |                            |

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**Observations / Comments:**

I have reviewed the supporting documentation and note the scope of the current application. It is understood that a 'discharge of conditions package' will be submitted in parallel which covers the pre-commencement information required by the (APP/17/01324) 'A' conditions & B10 (Drainage). This limits the subject areas strictly relevant to this application.

Essentially, I've treated this as a consultation on 'air quality relevant' aspects of the scheme where relevant to B.3 & B.5. Where other comments may be helpful ahead of the parallel application, these will be briefly flagged.

***BREEAM (Air Quality)***

It appears that the BREEAM pre-assessment targeted a rating of 'Very Good', but Condition B5 d. calls for an 'excellent' rating. No local 'low- or zero- carbon energy' is proposed, which is disappointing given the opportunity afforded by the expansive roof area on developments of this type.

I note that the 'Ene 4 Low Carbon Design' section appears to award a credit for LZC, but the Key performance indicator for 'total on-site or nearby LZC energy generation' is listed as Null, with no notes in the assessor comments box. To the layperson, this appears anomalous, and may represent an error. The design statement (section 7.4) provides an appraisal of various potential technologies, which identifies PV solar as a preferred option, and further notes that inclusion of a PV array would be 'economically viable' in the medium term considering the up-front capital investment, available feed-in tariff's, and low maintenance costs. It is assumed from this that installation would yield a net gain in the medium-long term.

Given the need for additional BREEAM credits to meet the requirements of B5 d., the air quality benefits of lowering the proportion of energy derived from fossil sources, and the inherent compatibility of solar generation with the indicative electric vehicle parking bays (especially so if the occupying business operates an EV fleet) – I would suggest that this design feature be given serious consideration.

#### *Parking Statement (Air Quality)*

I note the argument provided for a marginally reduced space allocation for private motor vehicles. Given the accessibility of the site (proximity of bus services, and potential for travel to work by cycle), I would support a <SPD allocation in support of encouraging sustainable travel choices among employees.

The short-stay cycle parking provision is around +7 against SPD minimum standards, which is supported. Long-stay provision is suggested will be provided for employees 'within the building, together with a staff shower'. The number of spaces is not specified – SPD requires 33 spaces minimum. The principle of long-stay provision together with facilities for cyclists is supported as an important provision to make sustainable travel choices for employees as convenient as possible, however the provision should be confirmed. It is difficult to envisage an argument for <SPD provision of sustainable travel modes parking spaces.

14 spaces are labelled as '*potential*' EV spaces. This is recognised as not necessarily representing a proposal. It is unclear whether listing the site plan as an approved document will serve to secure these spaces, or whether it would obligate the applicant in any way to provide preparatory service infrastructure to facilitate future conversion. Ideally, the potential 14 spaces should be secured alongside preparatory infrastructure for further expansion.

Emerging policy IN3 only requires '*an appropriate number of [EV] spaces in shared parking... at commercial development where long -term parking for staff... [be] provided*'; if the potential spaces can be secured, it could be agreed to be policy compliant (IN3, j). It is recommended that an amendment to the plan is sought which drops the word '*potential*', in order to secure the proposed EV charging facility.

This will serve to support a reduction in emissions from the personal &/or corporate transport demand during the operational phase by 'kick-starting' adoption by making procurement & operation of a zero-emission electric vehicle as convenient and appealing as possible at the outset. There will be mutually positive feedback between provision of on-site generation, and uptake of EV's (by staff or as corporate fleet vehicles), raising the possibility of providing consistent onsite energy sink which allows the business to benefit maximally from out-of-business-hours generation; providing an initial allocation serves as proof-of-concept and provides operational experience of managing such facilities, and should serve to encourage early future expansion as the economics of the technologies improves. There is good air quality justification for these features (under E23) as a co-benefit to achieving good compliance with E12 & IN3.

#### *Drainage (Pollution)*

It is recognised that a condition discharge submission for B.10 is to follow. In the interests of supporting that application however, some brief comments might be helpful;

- The principle that an Imbitex-lined '30% void infiltration drainage with overflow to off-site attenuation basin' provides adequate pollution control for the majority of the site without the need for provision of a proprietary interceptor unit is broadly accepted, with the possible exception of the loading yard area.
- The loading yard is specified to be impermeable concrete, and it is implicit that a surface collection system is to be provided. In the absence of any additional measures, it is difficult to see how the yard drainage will meet the same standard of pollutant attenuation and treatment as the system mentioned in the point above (which benefits from filtration provided by the permeable surface).
- I note that the development is speculative, and that the intended occupant is not known – for this reason, the risk associated with materials likely to be handled in the yard area is not known at this stage.
- The yard area represents the greatest pollutant release risk, both in terms of accidental bulk fuel release from HGV, and in terms of accidental release from materials being stored / handled in the yard area. The drainage system for this area should consider use of;
  - large capacity yard gullies (capable of retaining Silt/LNAPL)
  - a basic multi-stage interceptor (comprising a series of traditional chambers) or
  - a suitably sized proprietary interceptor unit
- Alternatively, confirming that the off-site attenuation SuDS have benefit of good natural surveillance and a pollution valve may be sufficient to demonstrate an adequately low operational pollution risk.

### *Conclusion*

No objection to principle of development. Some shortfall against emerging policy. It is recommended that some application enhancements are sought to secure policy compliant development.

**Mr. Jonathan Driver**  
Environmental Control Officer