

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/20/01203	Your Ref:	APP/20/00314
EH Case Officer Extn:	44 6677	Date:	03 June 2020
DC Case Officer:	Tina Pickup		
DC Case Officer Extn:	44 6461		
Application Number:	APP/20/00314		
Site Address:	Fernwood House, 45-47 London Road, Cowplain, Waterlooville, PO8 8DJ		
Proposed Development:	Second floor extension to form 2 x 2 bedroom and 6 x 1 bedroom flats with associated refuse and cycle stores, landscaping and parking. (Resubmission).		

Observations / Comments:

I have reviewed the resubmission, and for completeness, would like to make some brief comments as an update to those provided informally under the prior withdrawn application.

Risks from Land Contamination

Advice is unchanged. As the development is at first floor and includes no major groundworks or provision of private soft-landscaped amenity space, the Contamination risk is considered to be negligible.

Urban Drainage

Advice is unchanged. Given nature of development, and it's location – I don't see any pollution issues arising. It is anticipated that extant connections to the public system will be exploited.

Exposure to Pollution

In terms of road sources; kerbside exceedance of NO₂ standards is not unlikely at this location, but I also note that the development is well set back from the kerb, by a distance of approximately 12.5m. Accounting for local background levels, Industry-standard concentration-distance curves indicate that the exceedance at kerbside would have to be unrealistically high in order for road sources of air pollutants to prejudice the development (or to require significant exposure mitigation).

In terms of local sources, I note that the restaurant extract flue terminates just below a window to the West elevation of the proposed development. The design & access statement indicates flexibility on specification of this glazing unit, with obscured glazing &/ or non-opening glazing both referred to as options. The window serves a communal access corridor only, and I note that there are no openings to habitable rooms above the flue level on the West Elevation of the

development. I would therefore raise no objection to this unit being specified as an opening unit, or unit fitted with trickle-vents on emissions / pollutant-exposure grounds. From an 'impact to amenity' perspective however (odour ingress), it might be helpful to specify non-opening glazing (assuming that this can be done without detriment to means-of-escape).

Air Quality / Air Quality Relevant Policy

Comments previously provided referred to both existing & emerging policy, referring specifically to policies E1, E2, E12, E23 & IN3 as being those which may confer requirements on the development which could serve to mitigate the contribution of the development to air quality objectives (i.e. to resist upward pressure on local emissions via transport and local combustion / energy use). The Design & Access Statement indicates that the applicant considers that the development would be in line with both adopted & emerging policies, as well as the principles of the NPPF 2019.

E23 is not referred to as a result of the 'major development' qualifier. I would highlight that proposed development at Fernwood House would have met this threshold if forming part of a comprehensive scheme under a single application, so exemption from these requirements arises from a policy 'loophole' rather than being 'in the spirit' of the policy objectives. As the policy is based upon the principles outlined within the NPPF (which have effect to policy formulation as well as to individual decisions), I am not sure that there is a strong argument for the development Having met the requirements of the NPPF, taking full account of the local context.

The application emphasises the economic & social aspects of it's sustainable development credentials, and does not make any significant environmental provisions. For example, the design & access statement does not address provisions for electric vehicle charging (IN3, j, ii), or provide a strong contribution against E12 (low carbon design). These factors are as relevant to air quality as they are to carbon & climate objectives – especially where avoiding combustion processes (in transport, or domestic heating & cooking appliances). The status of emerging policies is recognised, but so too is the close link to adopted national policy. Raise no formal objection on these grounds, my intent it merely to highlight the relatively weak environmental offering relative to the more structural aspects of sustainable development (e.g. relating to the location, position & context of the site, and it's brownfield status).

I note that SPD-compliant cycle and vehicular parking is to be provided, assuming unallocated vehicle parking. I agree that local public car parking facilities are adequate (and sufficiently close) to address visitor parking requirements, and ground floor cycle parking provision is welcome (to make sustainable travel choices reasonably convenient).

This notwithstanding, I would support the landscape consultee's call for a comprehensive soft landscaping scheme. Roadside planting can be very effective in encouraging air mixing, capture of particulates, and absorption of gaseous pollutants. At a site such as this, structure & form of vegetation is likely to be as important as species – though pollutant tolerant species would be recommended, as would species with medium-dense foliage and planting schemes providing foliage at various heights (shrubs and small trees). I acknowledge that the proposals represent an improvement over the existing street environment, but it would appear that the landscape architect believes that enhancements could feasibly be achieved. There is a significant width of street frontage which does provides opportunity for planting between a source of non-threshold pollutants, and (both consented & proposed-) new 'pollution-sensitive receptors', and so the landscapes intervention is supported on air quality grounds.

Noise

I acknowledge that noise exposure could be a material issue at this site, and that agent of change principles will apply to this development – I am relying on my colleagues to review and provide technical comment on the submitted noise assessment (which I have not reviewed).

Mr. Jonathan Driver
Environmental Control Officer