

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/18/00739	Your Ref:	APP/18/00357
EH Case Officer Extn:	44 6666	Date:	17 May 2018
DC Case Officer:	Daphney Haywood		
DC Case Officer Extn:	44 6513		
Application Number:	APP/18/00357		
Site Address:	Dunsbury Park, Fitzwygram Way, Havant, PO9 4EE		
Proposed Development:	Approval of Reserved Matters in respect to Phase 1 Plot 3b of APP/15/00732 (new employment uses, hotel and access road) comprising construction of 3,528 sqm B1(c)/B2/B8 commercial premises for plot access, layout, scale, appearance & landscaping and Condition B5 Other Matters criteria A to G inclusive.		

Observations / Comments:

I have reviewed this application with regards to it's relevance to air quality, contamination, and potential to cause-, or be affected by- physical pollution.

It is understood that the Contamination Assessment, Details of the drainage / SuDS strategy, and CEMP are to be addressed under a separate conditions discharge application, and are not relevant to the reserved matters under condition B.5. It is also worth noting that the traffic / transportation assessment has been addressed at the outline stage (and subsequently under APP/17/01324), alongside the directly associated transport emissions & matters relating to travel planning. As a result, I have very few comments to make as regards this reserved matters application.

I would however like to make a general comment in relation to Sustainable Design and the consideration of renewables & low carbon measures outlined on page 23 of the Design Statement. As has been highlighted by the Policy Consultee, the wording of 7.4 is confusing. I note that it is as the D&A statement for plot 3a, where I have previously highlight that it is not clear which, if any, of these measures assessed are being proposed for approval. This is particularly pertinent, as my Policy colleagues point out, as the preliminary BREEAM assessment falls some way short of the standard required for this development.

If we are to deliver sustainable improvements in local air quality, especially through a transition to vehicles and services which are zero emission at point of use (e.g. electric vehicles, space & water heating), it is necessary to dramatically increase provision for renewable energy generation across the board. This is an important indirect measure for improving local air quality, through support for the uptake & adoption of technologies which directly reduce emissions in the local area.

In order to achieve this, opportunities for clean renewable energy should be maximised wherever possible. Whilst there is no specific Air Quality policy in place, indirect measures such as this are supported by a suite of other policy measures (CS14, CS15(6), CS20(1), DM11 and DM12), and I note that the NPPF encourages an approach to air quality which is not only goes beyond the avoidance of deterioration of local Air Quality or creating new unacceptable relevant exposure (relative to the LAQM regime), to pursuing an approach of achieving incremental reductions in emissions / improvements in local air quality which serve to reduce aggregate / ambient ('background') concentrations. The NPPF does not make a direct requirement upon individual developments, instead placing the requirement on local policy. In this way, the NPPF requires that we interpret 'Air-Quality-Relevant' policy in a manner which secures measures which serve to '...sustain compliance with and contribute towards [the meeting of current and future-] EU limit values or national objectives for pollutants'.

I regard provision of renewables as being of no less importance to the improvement of air quality than measures which directly target emissions reduction, as ultimately emissions reductions are achieved through demand reduction and energy source substitution. It may (for these reasons) be reasonable to exercise these policies to seek clarify on the provision of renewables within the approved scheme, to make a conditional requirement, or alternatively, to encourage the applicant to adopt a strategy for meeting condition B5 d) which specifies a green energy solution / LZC technology as a principal contributor to the BREEAM rating.

I recognise that determination of whether the proposals do enough to satisfy the existing policies is a planning decision. However, I felt it worth highlighting (in line with the comments above), that the provision of LZC technologies would be firmly supported by this service for it's contribution to the aim of improving Air Quality within the borough.

Mr. Jonathan Driver
Environmental Control Officer,