

HAVANT BOROUGH COUNCIL

Town & Country Planning Act 1990

Consultation on Planning Application

MEMORANDUM

From:	Environmental Health	To:	Development Control
Our Ref:	CONS/22/00362	Your Ref:	APP/21/01451
EH Case Officer Extn:	44 6677	Date:	15 June 2022
DC Case Officer:	Steve Weaver		
DC Case Officer Extn:	44 6512		
Application Number:	APP/21/01451		
Site Address:	Southleigh Park House, Eastleigh Road, Havant, PO9 2PE		
Proposed Development:	Reserved Matters application for the scale and appearance of the development, the landscaping of the site and the layout of buildings pursuant to Planning Permission ref. APP/17/00863 (B) (Outline Application (All Matters Reserved except means of access) for the demolition of 1983 office building and associated brick and glass corridor link and development of up to 70 residential units, associated landscaping, parking and infrastructure works). Request to Discharge. Condition 17 of Planning Permission APP/17/00863 (B) as amended by APP/21/01292 (Design Code) and Condition 26 of Permission APP/17/00863 (B) (viability assessment).		

Observations / Comments:

I have briefly reviewed the submissions in support of the discharge of condition 17, insofar as the provisions relate to Air Quality.

The status of the submission draft local plan 2036 is acknowledged, which withdraws the specific provisions of the local air quality policy (draft policy E23). However, the text of draft policy E23 represented the councils view of how the requirements of NPPF paragraphs 93 b), 105, 119, 130 a) & f), 174 e) 185 & 186 should be met (with respect to air quality and the health impacts of relevant emissions to air-), so it serves as an appropriate guide to- and reference to it's requirements is an appropriate shorthand for- the application of adopted NPPF policies. This forms the basis for comments given here.

c.17 Design Code, Design & Access; Air Quality – Offsetting of emissions

Neither the development design & access statement nor the design code specifically address sustainability or design features aiming to mitigate either direct or indirect development emissions (e.g. buildings, transport, energy). I have been unable to review the planning statement, as this does not appear to have been added to the IDOX folder, although I note that it is mentioned on the application attachment summary.

In respect of access, I note that the development is highly permeable to pedestrians, which is both welcome, and supported on the grounds that it supports active & sustainable travel. There does not appear to be any shared pedestrian / cycle routes, which either lengthens desire-lines for cyclists wishing to access the LCWIP key route 4, or encourages use of pedestrian surfaces - particularly for journeys south.

In terms of parking, I note that parking is to be SPD compliant, visitor spaces have been accounted for, and that cycle parking is to be provided for all dwellings alongside direct access to the street without the need to bring cycles through living accommodation. The design documents do not address the requirements of Housing Delivery Position Statement (HDPS), Decision Making Principle (DMP) 5 f), electric vehicle charging. It is considered inconsistent with the air quality policy aims to accept a design statement / code which does not address this important facilitation of the shift to low-to-zero emission vehicles.

In terms of dwelling emissions, I also note that the design code does not address sustainability in either a general sense, or in terms of the requirements of DMP 5 i), local reduction in target dwelling emissions rate (DER). Measures to meet the -19% reduction in DER could contribute significantly to a proportionate offsetting of development contributions of other pollutants (from buildings). I would encourage the applicant to bring forward specific proposals which consider carbon & air pollutants holistically, prioritising measures which avoid or mitigate local combustion (e.g. electrical alternatives, heat recovery technology, or renewables such as solar thermal), or specify low-emission combustion appliances. I would also encourage the applicant to consider specifying electrical dwelling appliances in preference to gas where possible, particularly for cooking & secondary space heating. It is considered inconsistent with the air quality policy aims to accept a design statement / code which does not address building sustainability in terms of the development contribution to local combustion emissions.

Conclusions

Given the current status of local policy, I am unclear as to the scope for formal objections to the current submissions on these grounds. In line with above, I would argue that NPPF provisions provide adequate support in the absence of up-to-date adopted local policy. Given the direction of travel in both policy & legislative terms in respect of air quality (being one of increasing importance looking forward-), I would recommend that enhancements are sought to secure a high-quality development which attributes adequate weight to the environmental limb of 'sustainable development', however, I am aware that the applicant is seeking to discharge both the design code & viability assessment conditions, and that these submissions are to an extent co-dependent. Given this, I am necessarily reliant upon development management to determine the planning balance.

Mr. Jonathan Driver
Environmental Control Officer