NORTH HERTFORDSHIRE DISTRICT COUNCIL
HOUSING AND PUBLIC PROTECTION
MEMORANDUM

To: Tom Rea – Planning Control	From: David Carr, Environmental Protection Ext: 4263
Copy to:	Date: 19/04/2018
Our Ref: PLAN/01573/18	Your Ref: 18/00765/FP
Subject: Pinehill Hospital, Benslow Lane, Hitchin, SG4 9QZ	

Tom

Having reviewed Environmental Protection Team records and the information submitted with the application I have the following advice and recommendations.

Land Contamination

The submitted Phase I report is sufficient for the circumstances of the site and the nature of this specific planning application.

The conclusion that an intrusive contaminated land ground investigation, including ground gas monitoring would be prudent from an ongoing environmental risk and future liability perspective for the Pinehill Hospital site as a whole. However, it would be difficult to justify, as reasonable, the inclusion of a planning condition to require such an investigation on the basis that this planning application is simply for the extension of existing car parking and is not introducing any new buildings or different receptors.

For the above reasons there is considered to be no requirement for a land contamination planning condition in the event that planning permission is granted.

Local Air Quality:

An approach to considering the impact of a development on air pollution and the potential mitigation of such is now in place in the form of the air quality planning guidance that can be found at http://www.north-herts.gov.uk/home/environmental-health/pollution/air-quality/air-quality-and-planning

Application of the guidance to a development of this scale and location defines the site as being a MINOR scale development and so it would be expected that as a minimum the following would be provided as local air pollution mitigation:

- Infrastructure to support the uptake of Low Emission Vehicles

It is noted that Travel Planning is being provided by the applicant and this is fully supported by the Environmental Protection and Housing Team.

It is also acknowledged that the emphasis of travel planning must be on encouraging a shift away from private car journeys. However, the significance of encouraging as many of those remaining private car journeys to be made using ultra low emission vehicles (ULEV) in terms of reducing the emission of toxic air pollutants has been overlooked.

This is an issue that should be of particular relevance to a Hospital given the clear links between exposure to air pollutants from vehicle emissions and adverse public health impacts.

For the above reasons the following deficiencies are perceived in the current application and should be addressed:

- Failure to provide any Electric Vehicle (EV) recharging infrastructure.

- Failure to include the following in the Travel Plan and associated survey(s):

    - ULEV usage objective should added to the current list of objectives
    - Targets included that address ULEV uptake. For example:
        - set a target for above the National or Regional average for ULEV ownership
        - set a target for a year on year increase of ULEV ownership over the 5 year duration of the Travel Plan

    - The associated survey/questionnaire needs to include specific questions related to ULEV.
    - The opportunity needs to be taken to provide specific information about ULEV options for example:
        - alternatives
        – manufactures/makes
        – specifications
        – grants
        – website sources of information
        – maps of refuelling/recharging infrastructure
        – information on the recharging units to be provided at the site
        – availability of incentives local and central government

For the above reasons it is considered essential that the following conditions are recommended:

Travel Plan Condition:

Prior to the commencement of the development details a site specific travel plan shall be submitted to and approved in writing by the Local Planning Authority. Measures within the approved travel plan shall be implemented in full within an agreed timetable set out in the plan, unless otherwise agreed in writing by the Local Planning Authority

Reason: *In the interests of promoting sustainable transport and minimising the impact on local air quality*

EV Recharging Infrastructure Condition:

Prior to occupation, the development site shall include provision for four of its fifty-two car parking spaces to be designated for plug-in Electric Vehicles (EV) and served by EV Recharging Points. As a minimum the EV Recharging Points should be Fast Charging Points.

Reason: *To contribute to the objective of providing a sustainable transport network and to provide the necessary infrastructure to help off-set the adverse impact of the operational phase of the development on local air quality.*

Informative

1) Guidance and Standards relating to the installation of Electric Vehicle Recharging Points

Various documents are available that provide guidance and that reference the appropriate standards for such installations. These include, but are not limited to:

a. BEAMA – A Guide to Electric Vehicle Infrastructure 2015 (www.beama.org.uk)
b. Transport for London Electric Vehicle Charge Point Guidance – April 2010 (www.tfl.gov.uk)

2) The above condition is considered relevant and reasonable for the following reasons:

- Paragraph 120 of the NPPF which refers to the effects (including cumulative effects) of pollution on health, the natural environment or general amenity.
- The aim of Section 4 'promoting sustainable development' of the NPPF, which includes in paragraph 35 'developments should be designed where practical to incorporate facilities for charging plug-in and other ultra low emission vehicles'.
- HCC Local Transport Plan (LTP3) 2011-2031 which includes an aim 'to reduce transport's own contribution to greenhouse gas emissions and improve its resilience'.
- It is consistent with Policies SP6, T2 and D4 of NHDC's 2011-2031 Local Plan and the approach specified in the NHDC Air Quality Planning Guidance Document, which is referenced within the Local Plan in support of Policy D4.

Please let me know if you wish to discuss this advice.

Regards

David Carr
Environmental Protection Officer