

Planning Policy
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5HZ

BY EMAIL

25530/A3/JE/BT/sw

15th October 2018

Dear Sir/Madam

RESPONSE TO DRAFT AIR QUALITY SPD CONSULTATION (AUGUST 2018)

We write on behalf of our Client, Stoford Developments Limited, to provide a response to the draft Air Quality SPD (August 2018). Stoford Developments Limited manage Spa Park, which is an established industrial estate to the south of Leamington Spa with an extensive planning history of employment uses. Outline Planning Permission W/17/1518 was recently granted to redevelop this important employment site for the creation of commercial units (Use Classes B1c/B2/B8) with ancillary offices. Two Reserved Matters Applications (Ref: W/18/1190 and W/18/1191) for Phases 1 and 2 were submitted pursuant to the Outline in June 2018, which are currently being determined by Warwick District Council.

It is against the above context that we make these Representations and set out our response below using the headings as they appear in the draft Air Quality SPD.

Stage 1 - Development Type Classification

Table 2 (Additional Trigger Criteria for Major Developments) is generally in accordance with IAQM guidance on the assessment of traffic impacts and other Air Quality/Low Emissions Strategies that have been published to date. However, it is considered that the inclusion of demolition and construction criteria is not commensurate with the impacts. Construction and demolition will be associated with fugitive dust generation, which can be mitigated by standard construction techniques. The fact that a development involves demolition and construction may not be related to the level of traffic generated and therefore the need for operational mitigation.

Stage 3 – Mitigation

This section refers to Paragraph 152 of the previous NPPF (March 2012), so needs to be updated to refer to Paragraph 32 of the Revised National Planning Policy Framework (NPPF) (July 2018).

Table 3 (Type 1 Mitigation) lists out a series of mitigation measures related to electric vehicle charging. Stoford Developments Limited agree with the phasing of EV charging points for industrial development.



However, they do not agree that rapid chargers should be provided for industrial development. The parking time for rapid chargers is limited to one hour and this is not practical to enforce on employees that are parking there for longer periods (i.e. for a full working day). It is also not clear what is meant by 'All charging units shall be installed where practical' and we request that this is clarified.

For Type 1 Mitigation, Stoford Development Limited welcome the inclusion of green infrastructure and planting where it can be shown that it will reduce exposure from air pollution.

It is considered that Table 3 relates to Type 1 Mitigation for Minor Development. Table 3 identifies that Construction Environmental Management Plans (CEMPs) should be incorporated into Medium and Major developments. On this basis, a CEMP is not applicable to Minor development and should therefore be omitted from Table 3.

Table 4 (Type 2) Mitigation lists out a series of mitigation measures including: monitored Travel Plan; measures to support public transport infrastructure and promote use; and measures to support cycling and walking infrastructure. Stoford Development Limited support these measures through their development schemes.

Table 4 also sets out commercial development-specific measures. Given that commercial/retail is set out separately to industrial development in Table 3, we presume that commercial development in Table 4 does not include industrial development. Therefore, we request that this is clarified in Table 4.

Section 106 Agreements and the Community Infrastructure Levy (CIL)

This section refers to Paragraph 203 of the previous NPPF (March 2012) so needs to be updated to refer to Paragraph 56 in the Revised NPPF (July 2018). In line with this national guidance, Stoford Developments Limited support the approach to Section 106 Agreements and consider contributions should be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in kind and scale to the development.

We trust that the above comments will be taken into consideration as part of the preparation of the Air Quality SPD and please do not hesitate to contact me if you have any queries.

Yours faithfully,



JESSICA EVANS

Senior Planner

Cc. Alan Stewart - Stoford Developments Ltd