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18 April 2018

Site Location: Campdown, College Road, Purbrook, Waterlooville

Re: Scoping Opinion for Environmental Impact Assessment relating to Campdown, College Road site

Dear Ms Banks

I refer to your scoping request of the 23 February 2018. The development would comprise circa 735 dwellings (Use Class C3), sports facilities, formal and informal open space, landscaping, the provision of new access onto College Road and necessary associated works and infrastructure.

The purpose of the requested scoping opinion is to achieve a consensus over potentially significant environmental impacts and the content of the Environmental Statement which should accompany a future planning application.

The following sections expand upon some of the areas set out in your report and adding other areas regarding the impacts that Havant Borough Council as the Local Planning Authority in consultation with relevant statutory bodies and others considers should be covered in the Environmental Statement (ES).

Scoping

The proposed development falls within the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

The description of the proposed development is *“Development of land at Campdown for the provision of circa 735 dwellings (Use Class C3), sports facilities, formal and informal open space, landscaping, the provision of new access onto College Road and necessary associated works and infrastructure”*. Based on the number of dwellings proposed and the overall area of the development, the proposed development exceeds the indicative levels contained within Schedule 2, Part 10, (Infrastructure Projects – Urban development projects, Column 2 (ii)) of the EIA regulations. The proposal requires screening as to whether an Environmental Impact Assessment (EIA) is required.

National Planning Practice Guidance indicates the types of case in which an EIA is more likely to be required. It states:

‘Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.’

National Planning Practice Guidance indicates that only a very small proportion of Schedule 2 development will require an EIA. As the site has not previously been intensively developed, the following indicative thresholds and criteria are relevant:

- i) *Area of the scheme is more than 5 hectares; or*
- ii) *It would provide a total of more than 10,000 m² of new commercial floorspace; or*
- iii) *The development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).*

The following key issues should also be considered for this particular type of development:

'Physical scale of such developments, potential increase in traffic, emissions and noise.'

Havant Borough Council has also given consideration to the characteristics of the development, its location and potential impact as set out in Schedule 3 of the EIA regulations.

In terms of the Status of the site it is relevant to note that whilst Section 2.5.3 of the scoping report highlights that the site is allocated in the Draft Havant Borough Local Plan 2036. It is important to note that it is not. It is proposed as an allocation and was subject to Regulation 18 consultation on that basis.

Planning Practice Guidance states, in general, the more environmentally sensitive the location, the lower the threshold will be at which significant effects are likely. Environmentally sensitive locations are considered to comprise:

- *Sites of Special Scientific Interest and European sites;*
- *National Parks, the Broads and Areas of Outstanding Natural Beauty; and*
- *World Heritage Sites and scheduled monuments*

Though the site is not subject to any of these designations, it should be noted the site is identified as being used by species associated with the nearby Special Protection Areas (a type of European site) at Portsmouth Harbour and Chichester & Langstone Harbours. As such, it may also be necessary to undertake a Habitats Regulations Assessment under the Conservation of Habitats and Species Regulations 2010.

This response focuses on the site's status in the emerging Havant Borough Local Plan 2036, the need for infrastructure to support that development and cumulative effects.

In summary your letter dated 23 February 2018 identifies a range of identified topics that are suggested to be 'Scoped -Out' of the EIA and others that are 'Scoped In'. Other potential areas have also been identified through the scoping process. The considerations and suggestions in relation to your identified topic areas are responded to in part 1 with the additional topic areas identified in part 2 below. The comments result largely from consultations within the statutory EIA consultees and a range of other consultees who would also be consulted at the planning application stage.

PART 1

TRAFFIC AND TRANSPORT

The development could have significant impact on Traffic and Transport and the impact of traffic should be included in the EIA.

AIR QUALITY

Given the proximity to the A3 (M) and concerns regarding air pollution, a chapter on air quality is required.

ARCHAEOLOGY AND CULTURAL HERITAGE

Given archaeological sensitivity to the site including a scheduled monument which will need to be protected along with its setting and Fort Purbrook (scheduled ancient monument and listed Grade II*) archaeology and cultural heritage may prove to be an important material consideration. Therefore, a chapter reflecting the historic environment in the EIA will be essential, and is scoped in.

LANDSCAPE AND VISUAL IMPACT

The site occupies a prominent location and the EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The EIA should also identify if there will be any long distance views from the Chichester Harbour Area of Outstanding Natural Beauty. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

ECOLOGY

Ecological issues will be a significant material consideration at this site and a thorough approach to understanding the constraints and the options for mitigation, compensation and enhancement will be necessary and a chapter on Ecology is required.

WATER ENVIRONMENT

There is existing evidence of high levels of nitrogen and phosphorus in the water environment with evidence of eutrophication at some designated sites and the EIA should consider the impacts of the development on the water environment.

Annex A Advice related to EIA Scoping Requirements

TRAFFIC AND TRANSPORT

Highways England have reviewed Scoping Opinion for Environmental Assessment relating to Campdown and we are content that A3(M) has been identified as key potential receptors and will be fully considered in forthcoming Transport Assessment.

Hampshire County Council advise a full Transport Assessment will be required, which should set out the baseline traffic and transport condition, provide trip generation and distribution information and assessment of local junctions. The assessment should also review the latest available personal injury accident information for a five year period and set out suitable mitigation proposals. A Travel Plan, setting out aims and objectives with a costed action plan of measures to encourage sustainable transport choices to and from the site in accordance with the HCC Guidance Development -related Travel Plans (2009) is also required.

AIR QUALITY

Natural England advise Air quality in the UK has improved over recent decades but air pollution remains a significant issue; for example over 97% of sensitive habitat area in England is predicted to exceed the critical loads for ecosystem protection from atmospheric nitrogen deposition (England Biodiversity Strategy, Defra 2011). A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity.

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. For your information, the Partnership for Urban South Hampshire (PUSH) has commissioned a detailed study on the in-combination impacts of the new housing development on the air quality environment as part of the local plan process.

This assessment work is currently on-going. The assessment should take account of the risks of air pollution and how these can be managed or reduced. We would advise that the air quality assessment fully considers the in-combination effects of the proposal in line with the Wealden Judgement 2017 (CO/3943/2016 Wealden District Council v Secretary of State for Communities and Local Government).

Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System (www.apis.ac.uk). Further information on air pollution modelling and assessment can be found on the Environment Agency website.

Environmental Health note that air quality and traffic / transport impacts are scoped in, alongside the water environment (hydrology, geology and drainage). It is agreed that the development could have significant impacts in these respects, and that they should be considered.

ARCHAEOLOGY AND CULTURAL HERITAGE

County Archaeologist advises that there is archaeological sensitivity to the site including a scheduled monument which will need to be protected along with its setting. Para 8.6.1 'An Archaeology and Cultural Heritage ES Chapter will be produced. This is welcomed. With the presence of the ancient monument indicating some overriding archaeological issues archaeology may well prove to be an important material consideration in the progress of any planning application and support of this discussion by a chapter in the Environmental Impact Statement will be vital.

Principal Conservation Officer comments that with the presence of the Roman Villa (scheduled ancient monument) and Fort Purbrook (scheduled ancient monument and listed Grade II*) archaeology and cultural heritage may prove to be an important material consideration. Therefore, a chapter reflecting the historic environment in the EIA will be essential.

LANDSCAPE AND VISUAL IMPACT

Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography. The EIA should also identify if there will be any long distance views from the Chichester Harbour Area of Outstanding Natural Beauty. The European Landscape Convention places a duty on Local Planning Authorities to consider the impacts of landscape when exercising their functions.

In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.

The landscape team (HBC) are on the whole satisfied with what has been set out in the scoping report, providing the LVIA is carried out in accordance with the Guidelines for Landscape and Visual Impact Assessment (published by the Landscape Institute and Institute of Environmental Management and Assessment, Third Edition, dated 2013).

Reference to published HBC landscape character assessment – we wish to draw your attention to the Havant Borough Townscape, Landscape and Seascape Character Assessment (HBTLSA), which can be accessed following the link below:

<http://www.havant.gov.uk/gaps-between-settlements-and-landscape-studies/hava>

ECOLOGY

The County Ecologist has advised that I am content with the scope of works as set out in the submitted Environmental Impact Assessment, Scoping Report (WYG, February 2018). Ecological issues will undoubtedly be a significant material consideration at this site and a thorough approach to understanding the constraints and the options for mitigation, compensation and enhancement will be necessary.

Natural England note the scope of the ecological assessment in relation to designated sites, non-designated sites, protected species, priority habitat and species and wider biodiversity. Natural England does not hold locally specific information relating to protected species, local or national biodiversity priority habitats and species, local sites (biodiversity and geodiversity) and local landscape character. These remain material considerations in the determination of this forthcoming planning application and we recommend that Hampshire Biodiversity Information Centre and other appropriate bodies are contacted for further information. In some instances, further surveys may be necessary through an ecological appraisal to be agreed by a Hampshire County Council (HCC) ecologist.

The application site is within 5.6km of the Chichester and Langstone Harbours SPA and will lead to a net increase in residential accommodation and the associated recreational impacts on the Solent SPAs. This forthcoming application will need to comply with Local Plan Policy with regard to Solent Recreation Mitigation Partnership (SRMP) contribution. This applies to all new development of one or more dwellings.

As noted in the scoping report, the site is used by brent geese and curlews. These are qualifying features of the Chichester and Langstone Harbours Special Protection Area (SPA) and the site is identified in the Solent Waders and Brent Goose Strategy (SWBGS). The forthcoming update of the SWBGS classifies part of the site as a Primary Support Area and part of the site as a Secondary Support Area. The strategy aims to protect the network of non-designated terrestrial wader and brent goose sites that support the Solent Special Protection Areas (SPA) from land take and indirect effects associated with new development.

The forthcoming update of the SWBGS includes guidance on mitigation and offsetting requirements. Detailed consideration of this issue is required and we recommend that you seek further information from the Hampshire Biodiversity Information Centre and other appropriate bodies to ensure the assessment reviews all existing data available for the site. A comprehensive offsetting and mitigation strategy will be necessary.

Natural England would be happy to advise further, as part of our Discretionary Advice Service, on whether there is sufficient survey information for the site and with regard to the mitigation and offsetting requirements necessary for this development.

The scoping report sets out the protected species ecological surveys being undertaken as part of the EIA. Detailed consideration of these issues within the EIA is required with mitigation strategies, as appropriate.

It is noted that there will be no separate Lighting Chapter. However, the impact of a change in lighting from the development on sensitive species, such as bats, will be assessed in the ecology chapter.

The site lies adjacent to an area of Ancient Woodland and consideration of any direct or indirect impacts on this habitat should be included in the EIA. Information about ancient woodland can be found in Natural England's standing advice http://www.naturalengland.org.uk/Images/standingadvice-ancient-woodland_tcm6-32633.pdf

In order to secure appropriate biodiversity mitigation and enhancements Natural England recommends that the Environmental Statement is supported by a Biodiversity Mitigation and Enhancement Plan (BMEP) that has been agreed with a Hampshire County Council Ecologist.

The BMEP should include measures for mitigating impacts on protected species and habitats and include biodiversity compensation measures for any residual biodiversity losses that cannot be fully mitigated on site. This might include the provision of offsite replacement habitats, or an agreed financial contribution for biodiversity enhancements elsewhere calculated using a Biodiversity Compensation Framework, Environment Bank, or similar mechanism.

In the recent 25 Year Environment Plan, the Government has committed to making sure the existing requirements for net gain for biodiversity in national planning policy are strengthened and the current trend of biodiversity loss is halted. Natural England strongly recommends that this proposal achieves a net gain for biodiversity and we advise that a biodiversity metric is used to help with this process. This approach would ensure that the local planning authority will have met its duties under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'.

Where residual biodiversity losses are considered unavoidable, Natural England recommends that further advice on these aspects is sought through our Discretionary Advice Service (DAS). Further information on the DAS service and how to apply can be found here:

<https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>

The site forms part of a wider ecological corridor that represents an important link between the wader and brent goose sites on the coast and the Bechstein's bat habitat further inland as well as supporting existing sites of importance for nature conservation interest and wider biodiversity including habitat for hazel dormice, reptiles, bats and other protected species.

The significant housing pressure within the Borough will result in the loss of many remaining green spaces. It is important that all development coming forward maintains and enhances these wildlife links and appropriate supporting habitat for protected species is retained, biodiversity enhanced and the fragmentation of habitats and species is prevented.

The ecological assessment should consider the loss of this greenfield site within this network and how the remaining wildlife areas and green infrastructure can be significantly enhanced to support the wider ecological network in the Borough. The NPPF requires that the planning system should contribute to the enhancement of the natural environment 'by establishing coherent ecological networks that are more resilient to current and future pressures' (NPPF Para 109), which should be demonstrated through the ES.

The measures to enhance wildlife areas and strengthen ecological corridors should therefore be incorporated into the BEMP and could be achieved by retaining wildlife areas, mature trees, hedgerows, planting native species, new woodland areas and new hedgerows.

Planning Policy (HBC) advise that whilst the applicant has identified that Ecology and Wildlife should be scoped in, you are strongly encouraged to engage with the Council's Ecologist and Natural England in the preparation of the Wildlife and Ecology Chapter, the scope of any Wintering Bird Surveys and the information to support the HRA.

WATER ENVIRONMENT

Natural England advise that The EIA should also consider the impacts of the development on the water environment. There is existing evidence of high levels of nitrogen and phosphorus in the water environment with evidence of eutrophication at some designated sites.

An Integrated Water Management Study for South Hampshire has been commissioned by the Partnership for Urban South Hampshire (PUSH) Authorities to examine the delivery of development growth in relation to legislative and government policy requirements for designated sites and wider biodiversity. Further details will be provided in due course. However, there is a possibility that measures will be required to mitigate the adverse water quality impacts arising from the new development on a significant number of designated sites in the Solent. Natural England therefore recommends that this issue is examined in the EIA and a nutrient budget for the development is calculated. For confidence that the development will be deliverable, Natural England recommends that the proposals achieve nutrient neutrality. We would be happy to advise further as part of our Discretionary Advice Service.

The EIA should also include a consideration of the availability and source of water resources for the development and set out the water supply provider for the development.

Environmental Health comment that I note that it is anticipated that traditional foundations are likely to be viable for all envisaged structures, and consequently hydrogeological risks should be low - I would caution however that whilst the site is 'only' within the SPZ1c, the presence of nearby chalk pits suggests that the depth of overburden is shallow (at least in places), and 'subsurface' may be penetrated by foundation, drainage features, and other service-related construction.

This may be particularly relevant to SuDS drainage acting as a vector for (new) pollution, and as an erosion / pathway creation risk.

PART 2 OTHER MATTERS

Green infrastructure, access and recreation

Natural England encourages any proposal to incorporate measures to help encourage people to access the countryside for quiet enjoyment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways are to be encouraged. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure.

The EIA should consider potential impacts on access land, public open land, rights of way in the vicinity of the development. Appropriate mitigation measures should be incorporated for any adverse impacts. We also recommend reference to the relevant Right of Way Improvement Plans (ROWIP) to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Natural England recommends that the role of GI to maintain and enhance the biodiversity is fully explored and opportunities identified to maximise the benefits of the GI for both people and wildlife, thereby securing biodiversity enhancement. GI will also play a significant role in preventing the coalescence of settlements, retaining local landscape character.

Cumulative and in-combination effects

A full consideration of the implications of the whole scheme should be included in the ES. All supporting infrastructure should be included within the assessment.

The ES should include an impact assessment to identify, describe and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment, (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, ie projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

Natural England would advise that the cumulative impacts section should also consider impacts on ecologically sensitive receptors such as designated sites, non-designated sites, priority habitats and species, protected species etc.

In relation to point e, **Natural England** would advise that the Environmental Statement should also consider known forthcoming planning applications such as allocation sites, where there is potential impacts on key ecological interests. For example, there are other sites included as allocations in the Draft Havant Borough Council Local Plan that are also listed in the SWBGS. Consideration should be given to the cumulative impact arising from the loss of these sites on the continued ecological function of the network.

The in-combination impacts of a loss of the allocation sites on ecological corridors, wildlife links and wider biodiversity. It is recommended that the HCC ecologist is consulted to ensure sensitivities relevant to the forthcoming Havant Biodiversity Strategy are considered. The landscape and visual assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.

Planning Policy (HBC) advise that:-

Infrastructure planning

The site is located close to a number of other sites (see section below) in the Purbrook area that are proposed for allocation in the Draft Local Plan. This creates a cluster of approximately 1000 new homes in this part of the Borough. It is essential that new infrastructure provision is planned in a coordinated way that takes account of the cumulative effect of this level of development on the Borough's infrastructure networks.

To this effect, section 13.2.3 highlights the need to plan for education provision. It is pertinent that the site will feed in to Morelands Primary School, as noted by Hampshire County Council as Local Education Authority in the Local Plan's Draft Infrastructure Delivery Plan. To this end, the applicant has been successfully engaged in discussions with Hampshire County Council and the promoters of the other nearby sites to make sure that this infrastructure provision is planned for in a coordinated way. This is welcomed.

It is highlighted in the Draft Local Plan that infrastructure provision in this part of the

Borough should be planned in a coordinated way. Given the cluster of development in this part of the Borough, this is key. However it should be stressed that such infrastructure does not necessarily need to be delivered in a coordinated way, bearing in mind the different development timescales. However coordination of infrastructure provision is necessary in order to achieve sustainable development and not overburden the Borough's infrastructure network.

Social infrastructure

Section 13.2.6 highlights the need to investigate health infrastructure. However there is no reference to the need to examine the impact on public health that the development could have. Similarly, given the inclusion of sports facilities in the development description, there is no description of the impact that these could have on public health in particular.

Cumulative schemes

The applicant has requested that HBC confirm the sites that should be considered in a cumulative assessment. These are considered to be:

- Berewood and Wellington Park (KS9 in the Draft Local Plan)
- Forty Acres (H15 in the Draft Local Plan)
- Littlepark House (H23 in the Draft Local Plan)
- Land North of Fort Purbrook (H44 in the Draft Local Plan)
- Former South Downs College Car Park (H45 in the Draft Local Plan)

Given the strategic infrastructure constraints facing this part of the Borough, it is considered appropriate that these are fully considered and that this is done in combination with the impact from other nearby schemes. It is also considered that social infrastructure be extended in scope to include public health impacts and how the development will affect public health.

Factual updates should be made regarding the status of the site and the need to include Special Protection Areas as a type of European site.

Whilst you have identified that Ecology and Wildlife should be scoped in, they are strongly encouraged to engage with the Council's Ecologist and Natural England in the preparation of the Wildlife and Ecology Chapter, the scope of any Wintering Bird Surveys and the information to support the HRA.

Contamination

Environmental Health advise that whilst the conclusions of the report insofar as they apply to the samples taken (i.e. topsoil not contaminated, suitable for re-use on site, and characteristic situation 2 / Green 2 gas risk (etc.)), are agreed, there remain uninvestigated areas of the site that warrant further inspection.

In addition, the preliminary unexploded ordnance (UXO) risk assessment confirmed the preliminary assessment of Environmental Health, concluding a medium (construction phase) risk, and recommending a more detailed study (or substantial precautionary mitigation measures).

For the above reasons, I would not be inclined to conclude that Contamination (& UXO) should be scoped out of the Environmental Statement."

Noise / Light

Environmental Health advise that this development will be right next to the A3M & as such traffic noise will be the predominant noise source for new residential receptors. We have yet to see how the developers plan to mitigate fully against this source; therefore although noise assessments have been carried out there are questions which have not been answered as yet.

Mineral and waste

Hampshire County Council (HCC) as the mineral and waste planning authority (MWPA) advise that the proposed development lies within the mineral and waste consultation area (MWCA) – Sites section. It lies adjacent to the safeguarded site Farlington Redoubt operated by L&S Waste Management.

This area is informed by the safeguarded sites list as defined through Policy 26:

Safeguarding – waste infrastructure of the adopted Hampshire Minerals and Waste Plan (2013) (HMWP).

The purpose of these policies is to protect current and potential minerals and waste sites from pressures to be replaced by other forms of development, including through 'encroachment' where nearby land-uses impact their ability to continue operating.

Whilst we are not raising any objection to the proposed development of this area, HCC would ask you to please consider the impacts to/from this safeguarded site located around 0.25 km to the south west of the site in any future applications.

We are also aware that there is a small amount of mineral resource located to the south of the site, however do not believe this to be of any significance and therefore have no further comments to make.

Drainage

Southern Water's current sewerage records show that there is foul water sewer crossing the site. No new development/building works will be permitted to be constructed over or within 3.0 metres of the existing foul sewer.

Furthermore, due to changes in legislation that came in to force on 1st October 2011 regarding the future ownership of sewers it is possible that a sewer/s now deemed to be public could be crossing the above property.

Due to the size of the development an assessment is required to ascertain an appropriate point of connection to the foul and surface water sewerage network, in order to protect existing premises from the impact of foul and surface water sewage flooding.

Southern Water requires a formal application for a connection to the public foul and surface water sewer to be made by the applicant or developer. It is the responsibility of the developer to make suitable provision for the disposal of surface water. Part H3 of the Building Regulations prioritises the means of surface water disposal in the order

Conclusion

In summary;

The following matters are scoped into the EIA, however, :

- Air Quality
- Transport Considerations
- Water Environment
- Archaeology and Historic Environment
- Landscape and Visual Impact
- Ecology and Wildlife (to include lighting)
- Cumulative impacts (in relation to Ecology/Transport)
- Green infrastructure, access and recreation
- Contamination
- social infrastructure including public health impacts
- Noise

The following matters are scoped out of the ES/EIA but nonetheless should be subject to detailed submissions/assessments in relation to any further planning application:

- Mineral and waste

I trust that the contents of this opinion are clear, but please do not hesitate to contact me if you require any clarification.

This letter should be taken as the local planning authority's scoping opinion under the Regulations.

Your sincerely

Andrew Biltcliffe

Andrew Biltcliffe
Head of Planning
16 April 2018