

22 February 2021

**MICHAEL
SPARKS
ASSOCIATES**

CHARTERED ARCHITECTS

11 PLATO PLACE
ST. DIONIS ROAD
LONDON SW6 4TU

+44 (0)20 7736 6162
www.msa-architects.co.uk

Lesley Wells
Planning Services
Havant Borough Council
Public Service Plaza
Civic Centre Road
Havant
PO9 2AX

Dear Ms. Wells,

LAND AT BROCKHAMPTON WEST, HARTS FARM WAY, HAVANT

Planning Application submitted via the planning portal (reference PP-09408557)

Outline application for the development of new employment units to provide up to 29,000 sq m (gross internal area) for flexible use across use classes E (light industrial), B2 and B8 with ancillary offices, car parking, service yards, drainage works, landscaping and associated works to prepare the site for development. All matters are reserved except the primary means of access to the site.

This letter accompanies an outline planning application for the development of the former landfill site at Brockhampton West, to provide up to 29,000 sqm (GIA) of flexible employment floor space across use classes E (light industrial), B2 and B8 (with ancillary offices). All matters are reserved with the exception of access whereby a new access point will be created and the site's existing access will be closed. This application is submitted on behalf of Clowes Development UK Ltd and follows pre-application discussions with officers at Havant Borough Council and other stakeholders.

The application has been submitted on the planning portal and payment of the application fee of £19,574.00 has been made via BACS.

MICHAEL SPARKS ASSOCIATES LLP

Partners : Michael Sparks • Ashley Chambers • Anthony White • Neville Campbell • Sam Darwin • Paul Wahba • Lee Page • Rebecca Driscoll

Michael Sparks Associates LLP is a limited liability partnership, registered in England and Wales (registered number OC407250)

We use the word "partner" to refer to a member of the LLP or an employee of equivalent standing.

In addition to the required application forms, in accordance with the requirements of the Development Management Procedure Order 2015 and the Havant Borough Council's Local Information Requirements (October 2020), the following information has been submitted to support this application:

Planning Drawings

1. Site Location Plan – 31383-PL-200
2. Parameters Plan – 31383-PL-201
3. Indicative Site Layout Option 1 – 31383-PL-202
4. Indicative Site Layout Option 2 – 31383-PL-203
5. Indicative Site Layout Option 3 – 31383-PL-204
6. Indicative Elevations Unit 1 Layout Option 3 – 31383-PL-205
7. Indicative Elevations Units 2 & 3 Site Layout Option 3 – 31383-PL-206
8. Indicative Landscape Masterplan – P21-1528-13

Reports and Supporting Information

1. Air Quality Assessment – Delta Simons
2. Tree Survey and Arboricultural Impact Assessment (forming part of the LVIA) – Barton Hyett Associates
3. BREEAM Pre-Assessment Report – Watkins Payne Partnership
4. Built Heritage Assessment – RPS
5. CIL Additional Information Form – MSA
6. Correspondence from DTRE dated 13 February 2021, providing an employment market overview
7. Design and Access Statement – MSA
8. Illustrative Drainage Strategy Drawing 4199 / 50 Rev. P4 – T.R Collier & Associates Ltd
9. Ecological Impact Assessment (incorporating Habitat Regulation Assessment) – Applied Ecology
10. Energy Strategy – Watkins Payne
11. Flood Risk Assessment – T.R Collier & Associates Ltd
12. Framework Travel Plan (forming part of the Transport Assessment) – Vectos
13. Landscape and Visual Impact Assessment – Pegasus
14. Planning Statement – MSA
15. Lighting Strategy – Watkins Payne Partnership
16. Preliminary Geo-Environmental Risk Assessment – Delta Simons
17. Proposed Section 106 Heads of Terms – MSA
18. Transport Assessment – Vectos
19. Utilities Statement – Watkins Payne

Please note that need for an acoustic assessment was scoped out as a validation requirement at pre-application stage.

Due to the size of the Preliminary Environmental Risk Assessment that has been prepared by Delta Simons (120 MB), the appendices to this document have been included on a CD that is enclosed with this letter. The main report and appendices A-C have been submitted via the planning portal.

Environmental Impact Assessment

It is considered that an Environmental Impact Assessment is not required to support this application as no significant impacts are considered likely as a result of the development. In accordance with the requirements of the EIA Regulations, a summary note setting out the reasoning why an EIA is not considered necessary is appended to this letter as an EIA Annex.

I trust that this documentation will allow the application to be validated. Should you require anything further in relation to this submission then please contact me.

Yours faithfully,



Matthew Thomas
Michael Sparks Associates
m.thomas@msa-architects.co.uk

enc

ANNEX – ENVIRONMENTAL IMPACT ASSESSMENT CONSIDERATIONS

Introduction

This note summarises the issues that have been considered in determining that the submission of an Environmental Statement is not considered necessary to support the planning application to redevelop the land known as Brockhampton West.

Allocation plan is enclosed with this note to identify the application site.

Site Description and Background

The site is approximately 8.3 Hectares in size. It comprises land that is a former landfill site, but is now covered with vegetation including trees primarily located around the perimeter of the site. There are no structures on the site, although there are some overhead electricity power lines that run along the southern boundary. There is a small area of hardstanding on the site that was previously used as informal car parking, which is no longer in use.

Access to the site is available from Harts Farm Way, which forms the southern boundary of the site, with the informal car park accessed via this road. To the north of the site is the A27 and to the west is the 'teardrop junction' that connects Harts Farm Way with the A27 and connections north including to the A3(M). To the east of the site is the Hermitage Stream, a tidal watercourse that connects to Langstone Harbour to the south.

The site is not directly adjacent to any other forms of development, with the closest buildings to the site located on the eastern side of the Hermitage Stream, which are in employment use.

To the south of the site is the Broadmarsh Coastal Park, which comprises a variety of open spaces and wooded areas adjacent to Langstone Harbour, including an informal car park, slipway and walking routes around the Harbour area.

Langstone Harbour itself benefits from a number of ecological designations, and is a SSSI, RAMSAR Site and an SPA. The Harbour is located approximately 170 metres to the south on the other side of the Broadmarsh Coastal Park.

The site benefits from an allocation for employment use in the adopted Development Plan, that is to be largely replicated in the emerging Local Plan.

The site is slightly elevated when compared to the surrounding Harts Farm Way and the A27, with the eastern part of the site at a higher level than the western area that lies adjacent to the teardrop junction.

The site is generally self-contained and the proposal will make efficient use of the site to provide for the type of employment premises that are in demand. The site is in an excellent location to meet the needs of businesses looking for new premises in the area and development of the site is a key part of the Council's Regeneration Strategy, with a key component to provide additional supply of high-quality employment land and to create jobs in the Borough to reduce relatively high levels of out-commuting.

Summary of the Proposed Development

An outline planning application has been prepared to develop the site for up to 29,000 sq m (GIA) of flexible employment use within Classes E(g)(iii), B2 and B8. All matters are reserved for future determination with the exception of the primary means of access to the site. The proposed development will benefit from a new vehicular access from Harts Farm Way to serve the employment units.

The assessment of any impacts arising from the development have been considered in respect of the sensitive areas in the vicinity of the site including the Langstone Harbour Site of Special Scientific Interest (SSSI) and Special Protection Area (SPA) as well as any nearby Heritage Assets. An assessment of the local highway network has also been undertaken following pre-application discussions with Hampshire County Council and Highways England, with potential contamination issues arising from the former landfill use having been discussed with the contaminated land officer at Havant Borough Council and the Environment Agency.

A number of technical reports have been prepared to support this application that consider the likely impacts of the development. These have been used to inform the summary of the likely effects of development contained later in this statement.

Principle of Development

The site is allocated for employment use within the adopted and emerging Development Plan and Havant's Regeneration Strategy identifies Brockhampton West as a strategic employment site. A key component of delivering the Strategy's vision is to secure the development of a 'nationally important commercial facility/distribution hub' by providing modern employment premises at the site that will contribute to economic growth. The principle of developing the site for employment uses is therefore in line with adopted planning policy and Council objectives for economic growth.

The site was formerly used as landfill and the proposed development seeks to optimise its use to provide employment units that will meet the needs of occupiers that can't currently be met elsewhere in Havant. The site benefits from existing highway infrastructure and has excellent access to the strategic highway network in the form of the A27 and the A3(M). The proposed development will provide employment opportunities for residents within the Borough and allow business within the development to benefit from existing supply networks and services in the vicinity of the site, such as the existing employment areas to the east. The site also benefits from access to a large residential catchment with a number of existing walking and cycling routes available to allow future employees to travel to the site sustainable modes of transport. It is therefore considered that the proposal will comprise a sustainable form of development.

Construction Related Issues

A construction management plan will be prepared to identify the potential impacts arising during the construction phase and any mitigation measures that are considered necessary. In advance of the construction phase, a pre-tender environmental management plan or CEMP will be prepared to guide the proposed construction works to minimise any impacts on the local environment. As the site is a former landfill then any groundworks required during the construction phase will need to be guided by a remediation strategy and materials management plan to ensure that no impacts to Human Health are likely during this phase of the development, or from the operational stage.

It is envisaged that the CEMP will include measures to:

- Minimise the dispersal of dust and debris, in line with the principles outlined in the Air Quality Assessment;
- Protect retained trees;
- Ensure that ecological precautions are taken to protect fauna on the site such as the slow worm population, who will be moved to a reserved area during the construction phase; and
- Undertake the groundworks in accordance with the approved remediation strategy/materials management plan as required.

It is assumed that the duration of construction works at the site will be in the region of 44 weeks, so it is considered that any impacts during this phase of the development construction process will be temporary and can be appropriately mitigated through the preparation of method statements and other working protocols that are considered necessary.

Layout and Design

Detailed consideration of the design of the development is included within the Design and Access Statement that accompanies the application. The site is in the vicinity of other employment areas and as an allocated strategic employment site its main function is to provide for modern business needs. There are currently a number of requirements from occupiers to secure new premises in this area for units of up to circa 29,000 sq m. There are very few sites that are available to accommodate such units, especially where they have good access to the strategic highway network.

The proposed development therefore seeks to meet this gap in supply and offer the flexibility to provide units of up to 29,000 sq m to meet a range of different requirements. Occupiers will require units of this size to have clear internal heights of up to 15 metres and provide flexibility to operate 24/7. Careful consideration has also been given to the existing landform; the site is at a higher level to the surrounding roads and there are considerable level differences across the site. The access to the site has been identified to the east where site levels are lower, visibility along Harts Farm Road is good and the access would not interfere with the existing overhead power lines that run across the southern boundary.

Levels need to be regraded across the site to create the level plateau needed to accommodate the new employment units and service yard areas, therefore much of the existing tree planting within the site cannot be retained, but important areas of screening have been identified for retention along the southern, northern and eastern areas, which are to be supplemented by new tree planting as part of a comprehensive landscape strategy.

As the application is submitted in outline, the final form of development has not yet been finalised as this will be informed by occupier requirements once these are confirmed. A number of illustrative layouts have been prepared to indicate how development could come forward at the site.

In order to ensure that a robust assessment of the site's development has been undertaken, the layouts have been set out to meet the current requirements of the occupational market.

The illustrative layouts have informed maximum parameters that were then used in the technical assessments that support the development. These parameters are as follows

- Maximum floorspace – 29,000 sq m
- Maximum building height to ridge of the units – 18.5 m from FFL
- Maximum extent of development identified
- Strategic landscape zones and areas for future bunds identified
- Ecology relocation area identified (for slow worms)

Requirements for an EIA

The requirements to undertake an EIA and prepare an Environmental Statement (ES) to accompany a planning application are set out within the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 referred to as "The Regulations". An application that requires an EIA is defined within The Regulations as either:

- Development falling under Schedule 1; or
- Development falling under Schedule 2 that is likely to give rise to significant impacts upon the environment by virtue of its location or factors such as its size or nature.

Development falling within Schedule 1 automatically requires an EIA. The proposed development of this site for employment purposes does not fall under Schedule 1.

Schedule 2 development is defined within the regulations as development that:

- a. Is to be carried out in a sensitive area (defined as: Sites of Special Scientific Interest, European sites, National Parks, the Broads, Areas of Outstanding Natural Beauty, World Heritage Sites and scheduled monuments)
- b. Is above a defined threshold as set out within column 2 of the table within Schedule 2 of the Regulations

The proposal to develop this site is neither wholly or partly within a sensitive area, so on the basis of this criterion an EIA is not required. In relation to the defined threshold, the form of development would be considered an industrial estate development project under Infrastructure Projects. The relevant threshold for this type of development is 0.5 hectares, which is simply an indicator that it should be screened to determine whether an EIA is required.

It is not the case that because the site is larger than 0.5 Ha that an EIA is automatically required. Additional clarification of whether EIA may be required is provided within the Planning Practice Guidance issued by the Ministry for Housing Communities and Local Government.

This threshold simply confirms that Local Planning Authorities should test the application against the provisions of Schedule 3 of The Regulations as a starting point. Schedule 3 of The Regulations details the relevant criteria that should be used to assess whether Schedule 2 Development is likely to have a 'significant environmental impact'.

The three criteria set out in Schedule 3 are as follows:

- i. Characteristics of development (size, accumulation with other development, use of natural resources, production of waste, pollution and nuisances and risk of accidents)
- ii. The Location of Development and the environmental sensitivity of the geographical areas likely to be affected by the development (existing land uses, relative abundance, quality and regenerative capacity of natural resources of the area and the absorption capacity of the natural environment)
- iii. The Type and Characteristics of the Potential Impact, covering extent, magnitude, probability, duration, frequency and reversibility

An EIA is not necessarily required unless the development is likely to result in significant impacts that need to be assessed using an EIA, with the guidance noting that issues relating to traffic generation, emissions and noise will be the key issues to consider. The site area is 8.3 Hectares and the indicative threshold for development of

Industrial Estate Development Projects of this nature where an EIA is considered to be more likely, is identified as 20 Ha. The site area is 8.36 Ha, which is significantly below this threshold and indicates that an EIA is unlikely to be necessary.

In order to determine whether any significant impacts arising from the development are likely, a review of the various matters that may give rise to such impacts is set out below.

Summary of Key Issues from Technical Reports

In accordance with Schedule 3 of The Regulations, the following comprises a summary of characteristics of the development and considers the issues that have been assessed by the reports listed above as well as other matters that may need to be covered as part of an EIA. These have assessed any sensitive receptors in the vicinity of the site and considered any impacts that may arise as a result of the development.

Air Quality

An Air Quality Assessment has been prepared to support this proposal and considers potential impacts at both construction and operational stages.

Construction

Potential impacts are identified during the construction phase arising from the groundworks and other construction activity at the site, where these may affect local air quality. The location of any nearby sensitive receptors has been identified as part of the assessment. For the construction stage, the assessment recommends that a construction management plan is prepared to secure measures to minimise the dispersal of dust and other material that may occur during these works. By incorporating these mitigation measures, no significant effects are considered likely during the construction phase.

Operation

In terms of the operational stage of the development, the assessment considers the number of trips that will be generated by the development during its operation and concludes that this will only have a negligible impact on local air quality. Measures are identified within the Framework Travel Plan for the site so that opportunities to use more sustainable modes of transport other than the private car are identified. As part of the strategy to minimise vehicle emissions arising from the operation of this site electric car charging points will be provided and detailed at Reserved Matters stage.

As a result of the measures proposed within the Travel Plan and the Air Quality Assessment, it is considered that the development will not lead to any significant impacts on the surrounding area and that it will comprise an appropriate form of development.

Acoustics

Consideration has been given to acoustic matters at the site. The background levels of noise in the vicinity of the site are relatively high as a result of the proximity to the existing highway infrastructure, particularly the A27.

Construction

The site is not immediately adjacent to any sensitive receptors and the ecology report notes that there is unlikely to be any impact on the ecological designations at Langstone Harbour during either the construction phase due to the distance between the site and the uses proposed and the temporary nature of the construction works.

Operation

No sensitive receptors were identified that would need to be considered for noise impacts during the operational phase. The site is relatively contained and earth bunds are proposed along the southern and western boundaries to screen the development and these will present physical barriers to minimise any breakout of noise from the site.

The ecology report notes that due to the distance from the site and the type of activities proposed, no significant impacts are likely during the operational phase.

It is therefore considered that the construction and operational phases of the development will not give rise to any significant impacts in respect of noise, including on the nearby SPA.

Contamination and Ground Conditions

A Preliminary Ge-Environmental risk assessment has been undertaken by Delta Simons to support the application, which is informed by an earlier report of intrusive surveys by White Young Green. The report acknowledges the site's previous use as landfill and that this represents a potential contamination risk. The report recommends that additional surveys and testing is progressed to more fully assess the nature of the landfill in the site to establish what remedial actions may be required to the existing site condition and to inform method statements and the approach to developing the site so that it accords with relevant standards and guidance.

Construction

It is proposed that prior to the commencement of construction, detailed investigations will be progressed at the site to fully inform the requirements for working practices and remediation to ensure that contamination risks are addressed. In respect of the ground conditions, any development will likely require some form of ground stabilisation or piled foundations and appropriate measures will be used to ensure that these do not lead to the creation of pollutant pathways.

It is concluded in the Delta Simons report, that following the works on site during construction, that issues with contamination will be mitigated and the provision of an impermeable layer on top of the former landfill will likely result in a betterment to the existing situation by providing a purpose-built drainage system for surface water to minimise future potential contamination from the site.

Operation

The development will be undertaken in accordance with agreed method statements for contamination and remediation, as required including assessing the risk to future occupiers from ground gas. Following the adoption of appropriate construction methods and any required mitigation measures, it is not considered that any specific risks from contamination or ground conditions will arise during the operational phase of the development.

It is therefore considered that from a contamination and ground conditions perspective, the development will not give rise to any significant impacts.

Ecology

An ecological appraisal supports the application including the results of a wide range of surveys at the site during 2020. These surveys identify that the proposal site is not considered to be particularly sensitive in terms of the existing habitat, but it does support various forms of biodiversity, including a population of slow worms. No protected species were identified as being present either on or immediately adjacent to the site.

The site is not subject to any particular wildlife designations although Langstone Harbour, which is some 170 metres to the south, is designated as a SSSI, SPA and RAMSAR site. Whilst the site is identified as a potential habitat for brent geese (classified as a 'lowuse' site in the Solent Wader and Brent Goose Strategy), it is considered that in its current form the site is not suitable habitat and does not support wintering birds.

The submitted ecology report includes a Habitat Regulation Assessment of potential impacts on the nearby SPA and concludes that the development will not give rise to any significant impacts on this designated area.

Construction

In general terms the site has limited ecological value but the presence of nesting birds will need to be considered before any development commences on site and precautions will be required to ensure that the slow worms on site are not harmed during the construction phase.

It is proposed that construction works will proceed in accordance with the recommendations of the ecology report to ensure that wildlife on site is not harmed during this stage of the development. An area has been identified where the slow worms can be accommodated so that they will be clear of any construction activity and the slow worms will be moved to this area once it a suitable habitat has been established.

Operation

The landscaping scheme will be prepared to accommodate different habitats at the site to support biodiversity, with appropriate management and provision of hibernacula, wildlife boxes and shelters. Whilst the area of the site identified as 'low use' for Brent Geese is not considered to be suitable habitat in its current form, a financial contribution for habitat creation or enhancement will be made to account for the 4.47 Ha of land that will be developed that falls within this classification. This payment is to take account of the site's loss as a 'potential' habitat for brent geese.

As a result of the measures identified above, it is therefore considered that from an ecological perspective the development will not give rise to any significant impacts.

Energy and Sustainability

An Energy Strategy and BREEAMpre-assessment have been undertaken to support the application to outline how the operational phase of the development will respond to the prevailing policy framework and objectives of minimising the use of energy and resources.

Construction

NA

Operation

The energy strategy seeks to minimise the energy consumption of the employment units through the specification of a high efficiency building envelope for the proposed units. The strategy also proposes that Air Source Heat Pumps and areas of PV panels will be installed as a renewable energy technology. This approach is anticipated as reducing the amount of carbon dioxide produced through the building's operation, when compared to Building Regulations, by c. 30%.

The BREEAMpre-assessment that has been undertaken to support this planning application identifies a number of measures that will be incorporated to improve the sustainability of the development. The assessment indicates that the shell and core of the proposed development will achieve a BREEAM Very Good rating as a minimum, which will ensure that the proposal accords with the adopted planning policy framework.

The proposal is therefore considered to be an appropriate and sustainable form of development that will not give rise to any significant impacts.

Flood Risk and Drainage

The site lies within Flood Zone 1 and therefore has a low risk of flooding and historical records do not indicate that the site has flooded. Although the site is not sensitive to flooding, given that it is adjacent to a watercourse and is over 1 hectare in size, a Flood Risk Assessment has been undertaken to support the application.

The site is a former landfill area that is now vacant, open land covered by vegetation with limited areas of existing impermeable area. The proposal would therefore increase the amount of impermeable area. The flood risk assessment considers that there will be no risk of flooding from existing watercourses, groundwater and or surface water so no specific mitigation is required to address flood risk. It is also concluded that the development won't increase the risk of flooding elsewhere, even after considering allowances for climate change.

The supporting drainage strategy notes that given the previous use of the site, infiltration is not appropriate. The proposed drainage strategy is to discharge surface water and foul water (after appropriate treatment) to the adjacent watercourse.

The site is not at an elevated risk of flooding and the proposed drainage strategy has been prepared in line with SUDS requirements and will provide attenuation to meet relevant standards and policy requirements. The development is therefore considered acceptable from a flood risk and drainage perspective such that the development will not give rise to any significant impacts.

Heritage

The site is not within a Conservation Area nor does it contain any Listed Buildings or Scheduled Ancient Monuments. The site is a former landfill site and so the presence of below ground archaeology at the site has been discounted.

The closest heritage assets to the site are the Old Bedhampton Conservation Area and the Listed Buildings within this, situated to the north of the A27. There is considerable existing tree planting present in the views from these heritage assets to screen views towards the site and the most open view from the conservation area has been assessed by the Landscape and Visual Assessment that supports this application. This is noted as viewpoint 9 from Lower Road.

To ensure that a robust assessment has been undertaken of any potential impacts on nearby heritage assets, a built heritage assessment has been undertaken by RPS. This assessment concludes that the development will have no impact on the Conservation Area or any other heritage asset.

Therefore, no effects are likely in relation to heritage assets.

Socio/Economic

At the present time the site is vacant and contributes little to the function of the local economy. The development of this site to provide employment units for businesses will realise a number of benefits, primarily in terms of economic growth. In terms of social impacts, the site has had some informal use as open space, however the site is allocated for employment development and is not allocated or designated as formal open space or playing fields.

Construction

The development of the site would comprise an investment of circa £28 million pounds into the construction stage alone, which will support a number of jobs throughout the construction process, both directly at the site and through supply chains of suppliers and sub-contractors involved in the development. The local supply chain is likely to benefit from the construction activity on site to provide materials and services to the development site during this phase of development.

Operation

The site will contribute to the local and national economy through the provision of modern business units that will provide facilities for companies across the industrial, manufacturing and storage and distribution sectors. This will create local job opportunities and help to sustain local services and supply chains. It has been calculated that the development has the potential to support between circa 330-650 jobs at the site, depending upon the operations undertaken at the site.

It is therefore considered that from a socio-economic perspective the development will have a positive impact, particularly in relation to supporting economic growth and job creation and will help to secure the development and regeneration objectives of Havant Borough Council.

Transport and Highways

The application is accompanied by a Transport Assessment and Framework Travel Plan. Respectively, these documents assess the availability of transport infrastructure that will serve the development and identify measures that can be incorporated to promote more sustainable modes of transport for trips to and from the finished development.

The transport assessment has been prepared following discussions with the Highway Authority and Highways England to agree the scope of the assessment. Modelling has been used to assess the likely impacts of the development, particularly on the local junctions and highway network in the vicinity of the site.

Construction

The construction period is anticipated as having a duration of circa 44 weeks, so any impacts on the local highway network will be temporary and are not considered to be significant. Routing of construction traffic to avoid populated areas where possible could form part of the CEMP that guides the construction process.

Operation

The modelling work has assessed the key junctions known as the Rusty Cutter and the Teardrop junction. The development traffic anticipated from the development once operational has been forecast using established methods to determine the number of daily trips associated with the proposals. The modelling work concluded that the development would not have a significant impact upon the capacity of the local network and that junctions would not be materially affected by the additional traffic on the network.

The Transport Assessment also identified a number of walking and cycling routes in the vicinity of the site that provide connections to public transport facilities. The completed development will therefore provide opportunities for employees at the site to use more sustainable modes of transport which will be promoted by the agreed Travel Plan.

It is therefore concluded that in respect of highways the development would not give rise to any significant impacts.

Trees and landscape

The former landfill use at the site is understood to have ceased relatively recently. Therefore, the existing trees on site are not Ancient or mature and none benefit from a TPO. The trees are generally interspersed with scrub areas and brambles that have limited their development. The development of the site will require significant works to the site levels to secure the new employment units, and a number of the existing trees will need to be felled. Important areas of existing tree planting to the northern, eastern and southern boundaries will be retained to provide screening and enhanced with additional landscaping and planting. The retained and new planting will be subject to management to ensure that the trees establish themselves and develop to maturity.

Construction

A number of trees will need to be removed to allow for the development to take place, which is inevitable given the works needed to bring the site forward for development. The trees on site are not covered by a TPO, or classified as Ancient or of any significant merit, their removal would therefore be acceptable. Retained trees will benefit from protection measures during the construction phase to ensure that they are preserved to help screen the development and provide an appropriate landscape setting.

Replacement tree planting will take place as part of the comprehensive landscape strategy for the site.

Operation

The landscape features and tree planting will benefit from management and maintenance to ensure that the landscaped areas develop to maturity and make a contribution to the visual amenity of the area, help to screen the development and provide habitats for wildlife.

It is therefore considered that in relation to trees and landscape, the proposal will not give rise to any significant impacts.

Utilities

There are already utility connections in the vicinity of the site, and it has been confirmed that capacity exists without the need to upgrade any services that the development will need. It is proposed that drainage for foul and surface water will be dealt with in a sustainable and self-contained manner by discharging to the Hermitage Stream. The development therefore won't require a connection to the sewer network.

In respect of utilities, no significant impacts are considered likely in bringing the development forward.

Visual Impact

A landscape and visual impact assessment has been undertaken to consider the effects of the development upon the landscape character and visual amenity of the wider area. Viewpoints have been agreed with officers at Havant Borough Council to identify sensitive areas from a landscape and visual perspective.

Construction

The proposals would inevitably change the character of the site from a former landfill facility with disused areas of open grassland, scrub and trees to modern employment units with offices, HGV loading bays, car parking and service yards. The effects during the construction phase, however, will be temporary and will eventually be mitigated once the formation of the bunds has completed and the landscape works have established themselves.

Operation

At completion of the development and before the proposed planting has matured, views of the new employment units from certain vantage points are likely to be available, but the development would be seen in the context of other glimpse views of existing commercial buildings on the fringes of Langstone Harbour. The proposals would appear as a continuation of this characteristic and therefore not as an unusual occurrence.

Once operational, the landscape provision at the site would establish itself such that by year 15, only parts of the roofline of the development would be visible. The development would benefit from substantial screening to ensure that the development would not result in any significant impacts. The finishing materials for the employment units would have a suitable palette of materials to minimise the perceived mass of the development and use non-reflective finishes.

The proposals would retain the existing boundary vegetation as far as possible and provide strategic woodland buffers to reinforce the existing tree cover. This would reduce the visual effects and mitigate views of the development such that the development would not result in any significant impacts.

Waste Management

The development will lead to the creation of waste, but this will be minimised wherever possible.

Construction

It is anticipated that measures to minimise waste during the construction process will be adopted by the contractor to ensure an efficient build and to reduce the amount of materials that they will need to procure for the development. A system of reduce, re-use, recycle will be adopted where possible, so that the construction phase is carried out as efficiently as possible.

As the site is a former landfill site, elements of the existing waste on site may need to be removed to prepare the site for development. Any waste removal will be undertaken in consultation with the relevant authorities and under the appropriate licensing/permitting regime. Where possible, material will be re-used on site to reduce the material taken off-site.

In general terms, it is proposed that waste generated during construction would be reused or recycled where feasible, and that waste which cannot be reused or recycled would be disposed of in accordance with relevant waste legislation and controls.

Operation

During the operational phase, any waste would be likely to comprise commercial waste that will be recycled where possible. Provision will be made on site for occupiers to safely store their waste, with areas of recycling proposed as appropriate.

As such, the potential likely environmental effects arising from waste are likely to be of negligible or minor significance. It is therefore considered that no significant effects are considered likely.

Human Health

The proposed development has the potential to influence human health through a number of sources during both construction and operational phases:

- Air Quality
- Ground conditions
- Traffic and Transport
- Water resources

Appropriate mitigation measures will be put in place to ensure that the development does not have a significant impact on human health. Control measures will include (but will not be limited to):

- Implementation of a detailed site investigation scheme to identify areas and characteristics of any contamination and identify appropriate remediation and/or mitigation measures,
- Agreement of a construction management plan detailing measures during the construction phase such as: dust suppression measures (including installation of barriers or fences where necessary, site speed limits, sheeting of HGVs when loaded, maintaining surfaces in a moist condition during periods of dry weather, and siting of dust-generating activities away from local sensitive receptors), noise reduction measures and monitoring for noise and vibration where required, wheel washing equipment, traffic management, provision of appropriate parking and loading areas.
- Preparation of an appropriate drainage strategy to identify how surface water run-off will be attenuated, to include any oil/fuel interceptors as required.
- Inclusion of energy efficiency measures to reduce the finished development's impact upon the environment, consumption of resources and to address the effects of climate change (including the attainment of BREEAM Very Good).
- Incorporation of water efficiency measures in the completed units to minimise water consumption.
- Preparation of a Travel Plan to outline how the use of sustainable modes of transport will be encouraged to reduce use of the private car.
- Incorporation of Electric Charging Points within the final form of development to support low/zero emission travel.

As a result of these measures, no significant impacts on human health are considered likely.

Risk of Major Accidents

Whilst the site is located in proximity to the Hermitage Stream and Langstone Harbour, it is at an elevated level when compared to these water bodies and sits at a higher level when compared to the surrounding roads. The site is within Flood zone 1 and it is therefore at low risk from flooding.

The proposed use is for employment units across use classes E (light industrial) B2/B8 and it is not considered that operations at the site would give rise to an enhanced risk of a major accident occurring as the proposal is not for development of a hazardous installation or major piece of infrastructure.

It is proposed that the construction phase of the development will be supported by a construction management plan to detail measures that will be implemented by the contractor to ensure a safe working environment is created. There are no elements of infrastructures such as gas mains or similar that are within the site that could be affected by any construction works.

Furthermore, there are no Hazardous Installations in the vicinity of the site that need to be taken account of.

Therefore, it is concluded that there will be no significant risk of Major Accidents as a result of the development.

Climate Change

The application is supported by technical reports that determine how the development seeks to minimise the impact of climate change through the efficient use of resources. Whilst the site is not regarded as brownfield land, it has been in former use as landfill and the development proposals seeks to optimise the use of the land resource.

The site is in a sustainable location as it already benefits from strategic infrastructure to serve the development and is accessible by sustainable modes of transport via a network of existing walking and cycling routes and has a residential catchment in proximity to the site offering access for future employees at the site. Travel Plan measures will also be implemented to help reduce private car use.

The site is within flood zone 1 and the Flood Risk Assessment and accompanying Drainage Strategy conclude that development of the site can come forward in a way that takes future climate change into account. The information supporting the application demonstrates that the additional impermeable area created on the site can be dealt with in a sustainable manner such that the site will not flood and will not contribute to the risk of flooding elsewhere.

The Development is to be built to meet a minimum target of BREEAM Very Good and the energy performance of the proposed units is identified as performing to an Excellent level in respect of Energy. The units will incorporate Air Source Heat Pumps and areas of solar panels to minimise the energy demand of the development.

Use/Availability of Natural Resources

The site is in a sustainable location as it already benefits from strategic infrastructure to serve the development and is accessible by sustainable modes of transport via a network of existing walking and cycling routes. The development will ensure the efficient use of land by optimising the use of a former landfill site. materials during construction and operation reducing the environmental effects of construction and the depletion of finite, natural resources through:

Construction

- Minimising the overall creation of waste during the construction phase resulting from, for example, over ordering or inefficient design;
- Seeking to minimise the quantity of material sent to landfill during the construction process through effective waste management;
- Seeking to use materials with lower embodied energy in the construction of the development, or use construction materials that can be recycled;
- Recycling materials already on-site into the new construction project where appropriate; and,
- Using recycled materials and mainstream products with higher recycled content.

Operation

- Optimising the use of a former landfill site to help meet local employment needs;
- Inclusion of energy efficiency measures to reduce the finished development's impact upon the environment, consumption of resources and to address the effects of climate change (including the attainment of BREEAM Very Good).
- Adopting measures to improve the energy efficiency of the units and use renewable energy technology as identified in the submitted Energy Strategy; and
- Preparation of a Travel Plan to outline how the use of sustainable modes of transport will be encouraged to reduce use of the private car.

Consideration of Cumulative Impacts

No other 'committed' developments have been identified that need to be taken into account to assess any cumulative impacts.

Summary

Taking the above issues into account, it is our opinion that the proposed redevelopment of the site for employment development will not give rise to any significant impacts and does not require an EIA for the following reasons:

- i. The characteristics and scale of the proposed development are consistent with the allocation for employment use that the site benefits from.
- ii. The site is not environmentally sensitive, does not provide a habitat to any protected species and is not generally of any significant ecological value. The site is adjacent to a Site of Special Scientific Interest (SSSI) and Special Protection Area and RAMSAR site, which has been taken into account in the technical reports prepared to support the application. These conclude that the development will not give rise to any significant effects on these nearby areas.
- iii. The site is not within a Conservation Area nor does it contain any Listed Buildings or Scheduled Ancient Monuments. The development will not give rise to any impacts that would affect nearby Heritage Assets.
- iv. In any event, the characteristics of any potential impacts of the proposed development will be assessed through the planning application process. To this end, specialist reports have been prepared as set out above and submitted with the application. As part of the application process, the relevant agencies and statutory consultees will be consulted and the development, when approved, will be controlled by any necessary planning conditions.



Site Location Plan

