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Application	V/24/98474
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03 March 2025

Dear Mr Thomas

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Application No: V/24/98474
Description: EIA Scoping Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for Hybrid Planning Application - Outline application for development of the land adjacent to Southampton Airport to provide employment floorspace of up to 92,000 sqm (GIA) within Use Classes E(g) (ii & iii), B2 and B8 with ancillary offices and areas for service yards, car parking, landscaping, ancillary buildings and associated activities, and access from Wide Lane (all matters reserved except for access). Full planning application for initial infrastructure works and construction of new access road including site levelling and other engineering works.
Site: Navigator Quarter, Eastleigh, SO18 2NL

Introduction

I refer to the above request for a scoping opinion under Regulation 15 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations"). The Applicant notified the Local Planning Authority (LPA) under the EIA Regulations that they propose to provide an Environmental Statement (ES) in respect of the proposed development and that the proposed development is considered to constitute 'EIA development'.

The Applicant has provided the necessary information that is required to inform a scoping request under EIA Regulation 15(2) in the form of an EIA Scoping Report (dated 11 November 2024).

This document is the Scoping Opinion (the Opinion) adopted by the LPA. This Opinion is made on the basis of the information provided in the submitted Scoping

Report, reflecting the proposed development as currently described by the Applicant. This Opinion should therefore be read in conjunction with the Applicant's Scoping Report.

Before adopting this Opinion, the LPA has consulted the 'consultation bodies' as specified within the EIA Regulations and as required by Regulation 15(4) with their responses informing the Opinion adopted. In addition, the LPA has taken into account all information provided by the applicant about the proposed development, the specific characteristics of the particular development, the specific characteristics of development of the type concerned, and the environmental features likely to be significantly affected by the development (in accordance with Regulation 15(6) of the EIA Regulations).

The Opinion provided does not prevent the LPA from requesting further information at a later stage under Regulation 25 of the EIA Regulations. It should also be noted that this Opinion is given on a without prejudice basis to any subsequent decisions taken and, thereby, no indication of the likely success of any planning application submitted for this proposed development is implied in the expression of this Opinion.

EIA Methodology and Scope of Environmental Assessment

The Scoping Report sets out that the following topics are proposed to be within the technical scope of the ES:

- Air Quality
- Climate Change
- Ecology
- Landscape and Views
- Socio-Economics
- Transport

The following topics are proposed to be scoped out of the ES:

- Agriculture
- Cultural Heritage
- Flood Risk and Drainage
- Ground Contamination
- Human Health
- Major Accidents and Disasters
- Material Assets
- Noise and Vibration
- Waste

The LPA are in general agreement with the matters that are proposed to be addressed within the ES and those that are proposed to be scoped out, with the exception of Cultural Heritage in so far as this relates to the potential effects of the proposed development on archaeology. The LPA are of the view that these effects

cannot be ruled out on the basis of the information that is currently available and, as such, this topic should thereby be scoped into the ES (further details on this matter are provided within the section below entitled 'Environmental Aspect Comments').

In terms of methodology, Section 6 of the submitted Scoping Report along with the subsequent Appendices set out the proposed structure and format of the ES and the information that it would contain. The methodology prescribed is generally considered appropriate and necessary and should, thereby, be used to inform the preparation of any subsequent ES, with this being subject to the consideration and inclusion of any further detail or clarifications required as set out within the below sections.

Environmental Aspect Comments

Accidents and Natural Disasters

The applicant has taken the view that this should be scoped out, with the submitted Scoping Report concluding that significant environmental effects are unlikely. Whilst the site lies immediately adjacent to the runway for Southampton Airport, it is noted that the development would be designed such as to not result in any interference with operational safety, with structures being located to avoid impacts on electronic communications or protected surfaces. Measures such as exterior lighting, the location of solar PV panels and other external fittings can be suitably controlled by condition and would be required to be designed taking into account established airport safeguarding requirements. The Council therefore agree that this matter can be scoped out of the ES.

Waste

Whilst there will be a waste impact arising from the development both during the construction and operational phases and, at this early stage this is yet to be quantified either in respect of waste generation or waste disposal, having regard to the relevant guidance and the nature of the development that is proposed, it is considered unlikely that there will be significant environmental effects arising from this. Subject to an appropriate Site Waste Management Plan being secured as part of the planning application, therefore, the LPA are satisfied that this matter can be scoped out of the ES.

Landscape and Visual Impacts

The development would wholly alter the character of the site, which is presently a substantively undeveloped greenfield. Whilst the site lies within the built-up area boundary and is within a context which is to a degree already influenced by industrial development and major infrastructure, it is also adjacent to open countryside and an area which is designated as settlement gap within the Council's adopted Local Plan and it is, therefore, considered there is potential for significant effects upon Landscape and Visual Receptors as a result of the proposed development, particularly having regard to the extent of the development and the scale of the buildings that it would incorporate.

The LPA, therefore, agree that this matter should be scoped in to the ES and, in this regard, are in general agreement with the scoping and methodology which is contained within Appendix G of the submitted Scoping Report, subject to some additional / altered representative viewpoints being incorporated. The Council's Urban and Landscape Design Team Leader has provided further advice in this regard directly to the Applicant's appointed Landscape Consultant, with this including annotations added to the Preliminary ZTV drawing provided which represent additional viewpoint locations that should be included as part of the Landscape Visual Impact Assessment.

Air Quality

The Council has designated a number of Air Quality Management Areas (AQMAs), which includes that covering the M3 corridor where it passes through the Borough, as well as, in closer proximity, one covering Southampton Road/Wide Lane (and onwards to the north, Leigh Road and Romsey Road), with these being designated due to high levels of pollutant concentrations, principally as a result of Nitrogen Dioxide emissions from road transport.

The proposed development has the potential to result in a significant increase in traffic movements, including notably from HGVs, with this being both within the designated AQMAs (which vehicles utilising the site may pass through), as well as the surrounding area. This increase in traffic movements has the potential to impact upon local air pollutant emissions which, in turn, could adversely affect sensitive receptors including the occupiers of nearby residential properties, as well as designated sites for biodiversity which lie within particularly close proximity to the site.

Whilst of a temporary nature, there is also potential for significant air quality impacts to arise during the construction phase of the development, both from traffic emissions from associated vehicles as well as, notably, from dust generation from construction activities.

As a result of these potential impacts, the LPA agree that air quality should be scoped in to the ES on the grounds that significant environmental effects cannot be ruled out on the basis of the information that is available at this stage. The LPA are also in general agreement with the proposed approach and methodology to the Air Quality Assessment, including the scope of the proposed study area having regard to IAQM guidance (in respect of human receptors) and the relevant thresholds set out in Natural England's approach to advising competent authorities on the assessment of road traffic emissions under the Habitats Regulations (NEA001) (in respect of ecological receptors), as set out within Appendix A of the submitted Scoping Report.

Ground Contamination

The site is presently greenfield with the Ground Conditions Scoping Note contained within Appendix F of the submitted Scoping Report stating that it is anticipated that it will predominantly be underlain by natural material. There are, however, a number of

areas identified within and/or in the vicinity of the site which have potential to contain made ground, landfill, or be contamination hotspots, with this including in association with operations/ activities associated with the airport and railway/ railway works. In addition, the Council's records show that the southern area of the site has been identified as a potential contaminative land use area (former Stoneham Camp from 1937). There is therefore a risk of contamination in these specific areas.

The Scoping Report sets out that the planning application will be supported by a Phase I Desk Study, as well as a Phase 2 Ground Investigation Report following the undertaking of intrusive ground investigations to assess the site and confirm the assumptions made regarding the nature of the ground conditions, as well as to enable characterisation of the scheme and further assess potential risks to identified receptors, including whether any subsequent monitoring or localised remediation may be required. Construction related impacts are proposed to be further controlled through adherence to method statements and management documents (for example, a Site Waste Management Plan and Construction Environment Management Plan) which would include suitable containment and pollution prevention measures.

Providing that the aforementioned investigations and studies are satisfactorily undertaken to support the planning application, and the prescribed measures and remediation (if required) are adhered to, which could be secured through suitable planning conditions, the LPA agree that significant environmental effects are unlikely and that this matter can be scoped out of the ES.

Flood Risk and Drainage

The site is located within Flood Zone 1, which is defined as having low probability of flooding from fluvial and tidal sources, as well as being an area where industrial development is acceptable in principle. The EA maps for surface water flooding additionally show some limited areas of the site as being medium / high risk which, the submitted Scoping Report sets out, are generally understood to be associated with low lying areas of the existing topography.

The Scoping Report proposes that the planning application be supported by a Flood Risk Assessment (FRA) and Drainage Strategy which will include an assessment of all relevant sources of flooding, an outline drainage strategy and outline hydraulic calculations. These assessments would be informed by an intrusive site investigation including BRE testing, with surface water drainage to mimic greenfield run off rates and incorporate sufficient means of filtration to ensure that water quality is not undermined (and improved where possible) and that there is no resulting pollution of any nearby watercourses. The foul drainage system is proposed to be separate from the surface water system and will be designed to connect into the existing Southern Water sewerage network. Based on this, the Scoping Report concludes that significant effects on the flood risk and drainage on the site or the surrounding area are unlikely during the operational phase, with construction impacts able to be covered within a Construction Environment Management Plan that could be secured by planning condition.

The LPA are generally agreeable to this approach in principle subject to the FRA and drainage strategy being appropriate. It would, however, be highlighted that the hydrological and potential water pollution impacts of the development upon designated sites for biodiversity which lie within the proximity to the site, does need to be specifically considered as part of the Environmental Statement (ES) with it being noted that this particular matter is proposed to be scoped in to the Ecology chapter of the ES (see further below).

Cultural Heritage (Including Built Heritage and Archaeology)

Built Heritage

There are no designated heritage assets within the site or in its immediate vicinity, with the closest being the Grade II Listed Eastleigh Railway Station further to the north, and the Farmhouse in Gaters Mill (also Grade II) which is situated to the opposing side of the M27 motorway. The closest Conservation Areas are Gaters Mill, which lies half a kilometre from the southern end of the airport runway and just south of the M27, together with that of Bishopstoke which is approximately 1.5km to the north of the application site and which are, as such, unlikely to have their settings significantly materially affected by the development.

The other nearby heritage assets are all undesignated, including within the Eastleigh Railway Works site and, in closest proximity, the locally listed dwellings in Campbell Road which lie to the north / north-west and which were built as part of the railway works development to house its employees. The extent of the sidings and loop, as well as the recreation field and children's play area at the end of Campbell Road, give some separation from the site and, whilst there may likely be some intervisibility given the scale of the buildings proposed, it is considered in principle, unlikely that there setting in heritage terms is likely to be unacceptably adversely undermined, with their association with the railway works that surrounds them being substantively unaffected.

The LPA therefore agree that significant effects on Built Heritage as a result of the proposed development are unlikely and that this can therefore be scoped out of the ES, with any impacts of the development in this regard and any mitigation that may be required able to be suitable covered within a Heritage Statement which should accompany the planning application.

Archaeology

The information provided within the Scoping Report highlights that the site does have some archaeological potential, with this relating to the underlying gravel terraces having some potential for Palaeolithic artefactual and environmental evidence, as well as nearby evidence of Bronze Age field systems and cultivation, Iron Age settlements, and Roman activity, which may potentially extend into the site area. In addition, there may be surviving Second World War features within the application site.

The Scoping Report proposes to scope out archaeology on the basis that significant effects are considered unlikely, with the Report outlining that a desk-based assessment and geophysical survey will be undertaken to support the planning application. However, at this stage no evidence has been provided to substantiate that no adverse effects will occur, with the location, extent and character of the archaeology which might be present being unknown. As such, the LPA does not agree that this matter should be scoped out of the ES. The ES should thereby assess the impacts arising from the proposed development upon archaeology, unless more robust justification can be provided to demonstrate that significant effects are unlikely to occur and agreement on this matter should be sought from the relevant statutory consultation body (Hampshire County Council's Archaeologist).

Noise and Vibration

The proposed development has the potential to create additional noise and vibration which could have adverse impacts upon nearby sensitive residential receptors, including notably through transport movements, operations and activities undertaken on site, and through building services plant. In addition, there are also potential impacts that could arise during the construction phase of the development.

Appendix H of the Scoping Report proposes that an Acoustic Survey be undertaken to support the planning application with sound measurements being undertaken across the site to quantify existing background sound levels, as well as at nearby residential locations to determine how representative the measurements made are of the sound climate at these sensitive receptors. The Report concludes, on the grounds that the site is located in a noisy area which is characterised predominantly by transportation noise with the existing railway lines also likely generating moderate levels of vibration, that significant adverse effects associated with noise or vibration are unlikely to arise upon sensitive residential receptors due to the proposed development.

The Scoping Report further concludes that significant adverse effects from building services plant noise and construction are also considered unlikely, with the former able to be designed and restricted to comply with the Council's policy requirements, and the latter able to be controlled through measures stipulated within a Construction Environment Management Plan, both of which can be covered through suitable planning conditions.

On these grounds, the Scoping Report proposes that noise and vibration impacts upon sensitive residential receptors be scoped out of the ES. The LPA are agreeable to this approach. It should however be noted that potential impacts of the development from noise and vibration upon sensitive ecological receptors should, in the view of the LPA, be considered within the Ecology chapter of the ES.

Ecology

The site is situated adjacent to the River Itchen Special Area of Conservation (SAC), a European designated nature conservation site. This land is also identified as a Site

of Special Scientific Interest (SSSI), a national designation which is protected under the Wildlife and Countryside Act 1981, with the southern portion of the application site additionally bordering the Itchen Valley Nature Reserve Site of Importance for Nature Conservation (SINC). It is also noted from the information set out within the Scoping Report that, amongst other things, the site supports a range of habitats and protected species, with high levels of bat activity having additionally been recorded within the site. Given this context and the nature and extent of the development proposed, the LPA are in agreement with the Applicant that there is likely to be significant effects on ecology as a result of the construction and operational aspects of the proposed development and that this should therefore be scoped into the ES.

The LPA are generally agreeable to the assessment criteria and methodology set out within Appendix D of the submitted Scoping Report, subject to the following additional comments/matters that the LPA consider should be included within the ES:

- Section 2.3, Table 2.1 makes no reference to any veteran or ancient tree as having been identified on site to date. Should any veteran, ancient or significant tree(s) be found during further surveys (either ecological/habitat related or arboricultural) then it must be considered as an irreplaceable habitat within the assessment.
- Sufficient offsite ecological survey data must also be obtained to enable an effective assessment of impacts to be carried out.
- The ES should consider impacts from noise and vibration from the construction and operational phases of the development upon identified onsite and nearby offsite sensitive ecological receptors.
- The ES must also assess additional potential impacts during the operational phase of the development (Sections 3.2 and 3.3):
 - Disturbance to protected/notable species and habitats (visual, noise, vibration, lighting) – on and off site.
 - Fragmentation of habitat on and adjacent to the site resulting from land take.
 - Shading on retained on-site and off-site habitats from proposed buildings.

Climate Change

Schedule 4 of the EIA Regulations requires that Environmental Statements include a description of the likely significant effects of development and the impacts of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change. Taking account of the existing site context (a greenfield with no current operational energy use or operational emissions) and the nature and scale of the proposed development, the LPA concur with the Applicant's conclusion that significant climate change effects resulting from the project are likely to occur during both the construction and operational phases, and therefore that climate change should be scoped in to the ES. In this respect, the LPA are in general agreement with the scoping and proposed

assessment methodology as set out within Appendix B of the submitted EIA Scoping Report.

Transport

The proposed development has the potential to result in a significant increase in vehicle flows, including HGVs, across the highway network, both locally as well as in respect of the Strategic Road network, including at Junction 5 of the M27 motorway. Additionally, the development will result in an increase in the use of public transport and cycling and walking in the local area. The LPA therefore agrees with the Applicant that likely significant effects cannot be ruled out on the basis of the information currently available and, therefore, that transport should be scoped in to the ES, with this covering both the construction and operational phases of the project.

In terms of the scope of the Transport Chapter of the ES and the matters covered within Appendix J of the submitted Scoping Report, the LPA are aware that the Applicant is currently engaged in discussions with the Highway Authority (Hampshire County Council) through their pre-application process, with additional engagement having also been undertaken with Southampton City Council (whose area of jurisdiction lies within nearby vicinity of the site) and National Highways (who are responsible for the Strategic Road network including the M27). The ES should explain how this consultation, along with the relevant Institute of Environmental Management and Assessment (IMEA) guidance, has informed an appropriate methodology for assessing the likely significant effects from traffic and transport as a result of the proposed development.

Human Health

The submitted Scoping Report sets out that, whilst Human Health is proposed to be scoped out as a standalone topic, it will be addressed within the Environmental Statement where it is relevant to other topics which are within scope (for example, in relation to the air quality impacts arising from the construction and operational phases of the development). It will also be considered within other assessments which will accompany the planning application for topics that are proposed to be scoped out of the ES and where human health is of relevance to their impacts (for example, noise and vibration, ground contamination, etc.). The LPA are agreeable to this approach.

Socio-economics

The proposed development has the potential to generate significant additional employment opportunities both during the operational phase, as well as on a temporary basis during the construction phase. The development would also be likely to generate additional Gross Added Value (GVA) resulting from increased economic activity associated with and resulting from the project. The LPA therefore agrees with the Applicant that socio-economics should be scoped in to the Environmental Statement. As set out within the Scoping Report, the economic impacts of the development will be based, in some respects, on estimations and assumptions and, where this is the case, this should be clearly acknowledged within the ES chapter.

Assessment of impact should also take account of the range and proportion of the potential uses which could occur on site in light of the flexibility which is sought as part of the planning application in this respect (i.e. it should acknowledge a range of scenarios and potential effects where there is variation between the employment densities and economic outputs of the different uses).

Socioeconomics is generally taken to refer to the interrelation between economic activity and social behavior/effect. In this respect, impacts can be positive or negative and the social implications of development can, in general terms, include displacement, social determinants with regard to transitional arrangements for education and family structures, impacts on social care services etc. The Scoping Report proposes to scope out the social aspects of the topic on the basis that, taking account of the nature of development proposed, these are unlikely to be significant. The LPA agrees that this matter can be scoped out on this basis.

Material Assets

Material assets, in the context of Environmental Impact Assessment, can be taken to include those which are either of human or natural origin and the value that they have can therefore be related to either economic or cultural reasons.

Assets of human origin may include such elements as transport infrastructure, foul and surface water disposal, water, electricity and gas supplies, telecoms infrastructure, municipal waste facilities, etc. Whilst it is understood that the site contains a gas pipeline and a water main, lies adjacent to a safeguarded waste site, and will both impact on local transport infrastructure and place additional demand on electricity supplies and other utilities, the LPA are in agreement with the Applicant that this matter can be scoped out on the grounds that any potential impacts will either be considered through other assessments supporting the planning application, or would require the separate agreement from the relevant utility provider in relation to any protection measures and additional connections that may be necessitated. The impacts of the development on transport infrastructure will be considered in the separate Transport chapter of the ES.

Material assets of value for cultural reasons, along with those of natural origin are generally proposed to be addressed either elsewhere within the ES or within reports and assessments that will support the planning application. The one additional aspect in the latter respect, however, which is not referred to within the submitted Scoping Report, is with respect to mineral reserves.

In this regard, the site lies within a minerals safeguarding area for superficial sand/gravel. Hampshire County Council (HCC) are the Minerals and Waste Authority for the area and have advised that they consider that the site has significant mineral potential and, as such, have requested further exploratory work to be undertaken on site. Whilst the LPA do not necessarily consider that this matter should be scoped into the ES, nonetheless the application should still be supported by a Mineral Resource Assessment (MRA), the methodology of which should be agreed with the relevant consultation body (HCC). In addition, and as any prior extraction that may as a result

be undertaken would likely occur during the construction phase of the development, any relevant site assessments in this regard (for example but not limited to, noise and vibration assessments, air quality / dust assessment, construction environment management plan, etc.) would need to consider the relevant associated impacts of this.

Agricultural Land

The LPA are in agreement with the Applicant that this matter can be scoped out of the Environmental Statement.

Cumulative Effects

The EIA Regulations require that the cumulation of effects of the proposed development along with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources, be considered as part of an Environmental Statement (ES). In this respect, professional judgement should be used to identify potential cumulative effects that could occur across the aspects of the project. The ES should set out the methodology for the assessment of cumulative effects on individual receptors in combination with other environmental aspects, in particular how the sensitive receptors would be selected. This should also include the potential effects of the different anticipated timescales for construction and completion of the proposed development, when compared to that or other known proposals within the identified study area.

The Applicant is advised to seek agreement regarding the developments to be included in the assessment with the relevant consultation bodies for the topics that are proposed to be scoped into the ES. The assessment should be undertaken to an appropriate level of detail, commensurate with the information available at the time of assessment. It is acknowledged in this regard that information on some proposals may be limited at this stage and such gaps should be acknowledged within the assessment. It should also be noted that additional information may be required in the ES if new development comes forward during the course of the determination of the planning application or where new information becomes available for already consented development(s).

Summary of LPA Response

The above information forms the LPA's Scoping Opinion. In summary, the LPA are broadly in agreement with the Environmental Statement (ES) topic areas set out in the submitted Scoping Report and the identified areas of environmental impact subject to the above technical matters being addressed and other matters that have been highlighted that should be scoped into the Environmental Impact Assessment.

The LPA would again reiterate, however, that the fact that the Scoping Opinion has been provided does not prevent further information from being requested at a later stage under Regulation 25 of EIA Regulations. It should also be noted that this

Opinion is given on a without prejudice basis and no indication of the likely success of any planning application submitted for this proposed development is therefore given or implied.

Yours faithfully

A handwritten signature in black ink, appearing to read "N Parker", with a horizontal line drawn underneath the name.

Nicholas Parker
Planning Manager