

CHRISTOPHER ROBERTS
BOYER PLANNING
CROWTHORNE HOUSE
NINE MILE RIDE
CROWTHORNE
WOKINGHAM
RG40 3GZ

Application	V/25/100369
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Wednesday 28th January 2026

Without Prejudice

Dear Mr Roberts

The Town and Country Planning (Environmental Impact Assessment) Regulations 2011

Application No: V/25/100369

- Description:** Environmental Impact Assessment Scoping Request for;
- Up to 2,200 homes comprising a range of house types and sizes;
 - Market and affordable housing, in accordance with development plan policies;
 - Potential for self-build and custom housebuilding plots;
 - Lifetime homes;
 - Primary school with pre-school;
 - Land reserved for secondary school;
 - Local centre, including a food store, local retail facilities, health and community facilities;
 - Community hub and co-working space;
 - Mobility hub;
 - New vehicular access points – north and south Winchester Road, and Mortimers Lane;
 - New pedestrian and cycle connections;
 - Public open space of over 50 ha comprising play areas, community orchards, allotments, informal open space, formal playing pitches, additional woodland planting and country park;
 - Provision of 10% biodiversity net gain (BNG);
 - Provision of buffers to SINC and ancient woodland;
 - Sustainable urban drainage system (SuDS);
 - Parking provision in compliance with relevant standards; and
 - Building design and sustainability measures.

Site: LAND NORTH EAST OF FAIR OAK, EASTLEIGH

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 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 Request Report (dated 20th October 2025).

This document is the Scoping Opinion (the Opinion) adopted by the Local Planning Authority (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. It must also be read in conjunction with the consultation responses received, which are available to view on the Council’s website.

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 had regard to representations received from non-statutory consultees, including the formal response from Fair Oak and Horton Heath Parish Council and 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.

The LPA are in general agreement with the matters that are proposed to be addressed within the Environmental Statement (ES) and those that are proposed to be scoped out with the following exceptions:

- The LPA does not agree that *nutrient neutrality* or *arboriculture* (insofar as it relates to ancient woodland and any potential ancient or veteran trees) or the loss of best and most versatile *agricultural land* can be scoped out at this stage.
- While the Applicant has identified that the site is partly within the River Hamble catchment, the Scoping Report is silent on this matter in respect of ecological impacts. The LPA considers that hydrological and nutrient pathways to the River Hamble, which drains to the Solent designated sites represent a further mechanism by which significant environmental effects may arise. These effects cannot be ruled out on the basis of the information currently available.

The LPA considers that each of these matters has the potential to give rise to significant environmental effects, which cannot be ruled out on the basis of the information currently available. The position of the LPA has regard to the consultation responses received, particularly those of Natural England, the Environment Agency, the Tree Officer, and the formal response of Fair Oak and Horton Heath Parish Council. This position is also consistent with concerns raised through scoping consultation regarding ecological sensitivity, hydrological linkages and cumulative effects associated with development of this scale.

Accordingly, *nutrient neutrality*, *arboriculture* (including impacts on ancient woodland and ancient/veteran trees), and *ecological impacts* associated with the River Hamble catchment must be scoped into the ES, and assessed proportionately within the relevant ES chapters. Further detail on each matter is set out below.

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:

- a) Air Quality
- b) Biodiversity
- c) Climate Change
- d) Flood Risk and Drainage
- e) Landscape and Visual
- f) Socio-Economic
- g) Transport and Access

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

- h) Heritage and Archaeology
- i) Arboriculture
- j) Agricultural Land
- k) Ground Conditions
- l) Minerals Resource (Natural Resource)
- m) Noise and Vibration
- n) Nutrient Neutrality
- o) Human Health
- p) Waste
- q) Vulnerability to Accidents and Major Disasters
- r) Daylight, Sunlight, Overshadowing and Wind
- s) Light Spillage
- t) Telecommunications
- u) Energy Efficiency and Sustainable Design.

Environmental Aspect Comments

a) Air Quality

The LPA notes the Applicant's proposal to scope Air Quality into the Environmental Statement and agrees that, given the scale of the development and its potential to generate significant construction and operational traffic, significant effects cannot be excluded at this stage.

Construction Phase

The Air Quality Assessment (AQA) must assess construction-related effects in accordance with the IAQM 2024 Guidance on the Assessment of Construction and Demolition Dust. This assessment must include a detailed dust risk assessment for all stages—demolition, earthworks, construction, and trackout—as well as the identification of sensitive human receptors within at least 250 metres of the site boundaries and 50 metres of access routes. It must also include an assessment of impacts on nearby ecological sites located within 50 metres of the works or haul routes. A framework Construction Environmental Management Plan (CEMP) must be provided, setting out site-specific mitigation measures, monitoring requirements, and responsibilities.

Operational Traffic Impacts

The AQA must model operational road traffic emissions using ADMS-Roads (latest version) or an equivalent model. It must incorporate verified baseline data, including the most recent NO₂, PM₁₀ and PM_{2.5} monitoring records from both local authority and national datasets. The assessment should evaluate impacts at all relevant human receptors—both existing and proposed—in accordance with IAQM/EPUK Planning Guidance (2017). Worst-case assumptions must be applied regarding traffic generation, trip distribution, and committed developments. Given the scale of development and the potential for significant trip generation, screening alone is not sufficient.

Ecological Receptors

The assessment must address both nutrient nitrogen deposition and acid deposition on designated ecological sites located within 200 metres of road links and/or within 15 kilometres for large combustion sources. This should include identification of relevant designated sites such as SSSI, SAC, SPA, Ramsar sites, and Ancient Woodland. The following thresholds must be applied: 1% of the relevant Critical Level (CL) or Critical Load (CLO) for screening significance, with both project-alone and in-combination impacts assessed. Deposition modelling should be undertaken using ADMS or ADMS-Extra with appropriate parameters for vegetation, surface roughness, and receptor height.

Cumulative and In-Combination Assessment

Given the extent of ongoing and planned development in the area, the AQA must include a cumulative assessment of traffic emissions from all committed developments, local plan allocations, and strategic growth proposals. It must also consider any cumulative construction impacts where overlapping works are anticipated.

Mitigation and Monitoring Requirements

The ES should outline a clear mitigation strategy that includes measures to minimise construction emissions (Particulates and NOx), measures to reduce operational emissions—including EV charging infrastructure, sustainable mobility proposals, and traffic demand reduction—and the potential need for air quality monitoring, both baseline and post-occupation. Where ecological thresholds are exceeded, proportionate mitigation will need to be secured in consultation with the appropriate bodies, including Natural England and the EBC team.

b) Biodiversity

Having regard to the baseline work set out in Chapter 8 of the Scoping Request the LPA agree that ecology and biodiversity should be a specific topic within the Environmental Statement (ES). The site lies within the fluvial catchment of the River Itchen SAC/SSSI and within the wider zone of influence of the Solent designated sites, and includes, or is immediately bounded by, a number of SINC's designated for ancient woodland, together with habitats and species of acknowledged importance (including priority woodland, hedgerows, badger setts, low populations of reptiles, notable invertebrate interest and locally important wintering and breeding bird assemblages). Scoping consultation responses, including those from local stakeholders, have also emphasised the sensitivity of the site's ecological context and the importance of integrating drainage and water management into the masterplanning process from the outset.

The work completed to date is comprehensive in scope and, at this stage, no further detailed species survey types are considered necessary beyond the Phase 2 surveys already programmed. However, it is essential that the ongoing survey work – in particular the bat activity surveys and analysis of bat roost data – is completed and fully interpreted prior to fixing the masterplan, so that the functional importance of the site for bats (including rarer species such as barbastelle, which are known to use ephemeral roosts in the wider landscape) can be clearly understood and appropriately avoided, mitigated and, where necessary, compensated for.

The ES should therefore:

- (i) draw together all completed survey results,
- (ii) provide a clear evaluation of on- and off-site ecological receptors in line with CIEEM guidance,

- (iii) assess construction and operational impacts (including habitat loss, fragmentation, lighting, noise, recreation and predation pressures) on the SINC's and other sensitive receptors, and
- (iv) demonstrate how the layout, green infrastructure and lighting strategy have been informed and constrained by these findings, including the proposed woodland linkages and buffers to ancient woodland.

Given the site's hydrological connection to the River Itchen SAC and the identified nutrient sensitivities of both the Itchen and the Solent complex, the ES must also be underpinned by a fully integrated surface water and foul drainage strategy, designed from the outset of masterplanning (rather than retrofitted).

In addition, although the Scoping Report focuses primarily on the River Itchen catchment, the ES must also address the site's relationship with the River Hamble catchment, into which part of the site drains. The River Hamble discharges to the Solent European sites and, as the Applicant acknowledges elsewhere (12.5), development draining to this catchment will be required to demonstrate nitrogen neutrality to avoid contributing to eutrophication impacts. This pathway represents an additional ecological impact mechanism that must be assessed within the biodiversity chapter and cross-referenced with the drainage and Habitat Regulation Assessment (HRA) sections, ensuring that the implications for the Solent designated sites are fully understood and appropriately mitigated.

In addition to the matters outlined above, the ES must explicitly address the bespoke advice of both Natural England and the Environment Agency. Natural England confirms that, beyond the River Itchen SAC/SSSI and the Solent designated sites already acknowledged, the development also falls within the wider zone of influence of the New Forest SAC, SPA and Ramsar site. The ES will therefore need to consider whether any pathways exist by which the proposal could affect these designations, either directly or via in-combination recreational, hydrological, air quality or ecological mechanisms. Any areas of functionally linked land that support qualifying species (for example mobile species such as bats or birds) must also be fully assessed. Natural England emphasises that the ES should clearly demonstrate how the Habitats Regulations Assessment has been informed, including the Applicant's approach to nutrient neutrality for both the Itchen and Solent catchments, and how any strategic mitigation solutions relevant to recreational pressures, water quality or air quality have been taken into account.

The Environment Agency's site-specific comments also require incorporation. The Environment Agency draws attention to the ordinary watercourse originating in Hall Lands Copse, noting that this feature is likely to support species such as eel, brook lamprey, bullhead and a diverse macroinvertebrate assemblage. Baseline condition data for this watercourse must therefore be presented within the ES, and it should be included within the HRA as a hydrological pathway of functional linkage to the River Itchen SAC, given its potential sensitivity to changes in nutrient loading.

The Environment Agency also expects the planning application to incorporate appropriate riparian buffer zones—normally a minimum of 8 metres—around both main rivers and ordinary watercourses, together with measures for channel restoration and habitat enhancement. These buffers are essential to protect ecological value, maintain wildlife movement corridors, and deliver the biodiversity outcomes required by the National Planning Policy Framework (Dec 24), The Natural Environment and Rural Communities Act (2006) and the Habitats Directive. Although lighting has been scoped out of the EIA, the Environment Agency advises that the planning application must still demonstrate how lighting impacts will be controlled in areas adjacent to tree lines and watercourses, ensuring the creation and protection of dark corridors for bats and other sensitive wildlife.

Accordingly, the Council's Scoping Opinion is that ecology and biodiversity, together with hydrological and nutrient pathways and their implications for designated sites, are likely to give rise to significant environmental effects and must be expressly scoped into the ES. The ES should clearly demonstrate how the survey work, HRA, drainage and flood risk strategies, and the site-specific advice of Natural England and the Environment Agency have collectively informed and shaped the masterplan, the mitigation hierarchy and the delivery of biodiversity net gain.

c) Climate Change

Schedule 4 of the EIA Regulations requires that Environmental Statements (ES) include an assessment of the likely significant effects of a development on climate (including the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project and surrounding environment to future climate change. The LPA notes the Applicant's intention to prepare a standalone Climate Change chapter addressing both greenhouse gas (GHG) emissions and Climate Change Resilience (CCR), following current ISEP guidance, whole-life carbon assessment principles, and relevant national standards. Given the scale and nature of the Proposed Development, the potential for significant embodied and operational carbon emissions, and the need to assess climate-related risks to receptors using UKCP18 projections, the LPA agrees that climate change should be scoped into the ES.

In addition to assessing the project's contribution to climate change, the ES must identify how the development may affect the ability of the natural environment to adapt to, and remain resilient under, future climate conditions. This includes assessing impacts on habitats, species, ecosystems and natural processes, as well as the capacity of the site and surrounding landscape to support adaptation for both nature and people. The assessment should therefore consider whether the development affects ecological connectivity, species movement, hydrological processes, and the functioning of natural features that contribute to climate resilience. The ES should also evaluate opportunities for nature-based solutions—including green infrastructure, habitat creation, sustainable drainage, and landscape-scale adaptation measures—drawing on guidance from the Committee on Climate Change, UKCP18 projections, the Climate Change Impacts Report Cards, Natural England and RSPB's Climate

Change Adaptation Manual (2020), and Natural England's Nature Networks Evidence Handbook (2020).

The ES should further identify how the proposals may influence the natural environment's capacity to store and sequester carbon, recognising its role in national net-zero objectives. Reference should be made to Natural England's Carbon Storage and Sequestration by Habitat (2021) to ensure that losses, gains and opportunities for enhancement are properly understood and quantified. The LPA is broadly satisfied with the Applicant's proposed GHG and CCR methodology—including the establishment of an appropriate carbon baseline, the use of a 60-year whole-life carbon assessment, comparison against relevant carbon budgets, and the integration of climate risk considerations across related ES topics—but expects the ES to clearly justify all assumptions, transparently report embedded mitigation, and robustly assess the significance of both direct and indirect climate-related effects.

d) Flood Risk and Drainage

The Scoping Report identifies that the site contains multiple hydrological constraints, including areas of Flood Zones 2 and 3 within the southern part of the site, several mapped and unmapped ordinary watercourses traversing and adjoining the land, and defined surface water flow paths which follow the natural topography. It is also noted that parts of the site drain toward waterbodies with differing Water Framework Directive (WFD) status, including Bow Lake, which is currently classified as having 'bad' ecological status.

The Scoping Report proposes that the planning application will be accompanied by a full Flood Risk Assessment (FRA) and detailed Drainage Strategy, incorporating climate change allowances in line with current Environment Agency guidance, assessing fluvial, surface water, groundwater and sewer flood risk, and developing a sustainable drainage solution informed by site-specific ground investigations. The Environment Agency and Lead Local Flood Authority both emphasise the need to retain existing surface water flow paths, maintain open watercourse channels with no culverting other than for essential access, secure minimum 8-metre buffer zones to all ordinary and main rivers, and ensure any proposed diversions preserve the current alignment as closely as possible.

Further assessment is expected regarding the ordinary watercourse originating within Hall Lands Copse, including its ecological function, potential presence of eel, brook lamprey, bullhead and macroinvertebrate populations, and its role as a hydrological pathway functionally linked to the River Itchen SAC. The FRA and Drainage Strategy must therefore fully assess hydromorphological impacts, groundwater recharge implications, nutrient loading risks, and flood risk interactions with adjacent designated sites.

The importance of safeguarding local water resources, including the River Itchen as a sensitive chalk stream and drinking water source, was also raised through scoping consultation and is reflected in the scope of assessment required.

The LPA agrees that Flood Risk and Drainage should be scoped into the Environmental Statement (ES) as proposed, with the expectation that the ES presents a comprehensive, assessment demonstrating that flood risk will not be increased elsewhere, watercourses are appropriately protected and enhanced, and biodiversity and water-quality impacts are fully considered. This shall also include clarification of lighting impacts on riparian habitats and incorporation of appropriate SuDS to mimic greenfield run-off rates and protect water quality.

e) Landscape and Visual

The proposed development would result in a comprehensive and permanent transformation of the site from open agricultural land to built form and associated infrastructure, fundamentally altering its existing landscape character. The site lies within Landscape Character Area 7: Bishopstoke–Fair Oak Woodland and Farmland, which is characterised by a predominantly rural and wooded landscape, an undulating ridgeline, a strong field pattern defined by hedgerows and hedgerow trees, and frequent woodland blocks and copses that contribute to a high degree of perceived naturalness. The site occupies a sensitive transitional location at the north-eastern and eastern edge of Fair Oak, where the settlement currently meets open countryside, and is closely associated with a number of sensitive landscape and visual receptors. These include public rights of way crossing and bordering the site, longer-distance recreational routes, nearby residential receptors, areas of Ancient and Semi-Natural Woodland designated as Sites of Importance for Nature Conservation, and designated and undesignated heritage assets including Grade II listed buildings whose setting is influenced by the surrounding rural landscape. Importantly, the site also lies within the setting of the South Downs National Park, with the designated boundary located less than 1km from the site at its closest point. In this context, and having regard to the scale, extent and urbanising nature of the proposed sustainable urban extension, the LPA considers that there is clear potential for significant adverse landscape and visual effects at both the local and wider landscape scale, including indirect effects on the nationally protected landscape and its Special Qualities.

The LPA therefore agrees that Landscape and Visual Impact Assessment (LVIA) should be scoped into the Environmental Statement. While the high-level methodology outlined in the Scoping Report broadly accords with the principles of the Guidelines for Landscape and Visual Impact Assessment (GLVIA3), the Council's Landscape Officer has identified a number of deficiencies and areas where further clarification and strengthening are required to ensure the assessment is robust, proportionate and capable of informing decision-making. In particular, the Environmental Statement must not rely on untested assumptions within the Scoping Report regarding limited intervisibility or an absence of significant effects on the South Downs National Park. Instead, the degree of intervisibility between the site, including elevated areas such as around Tippers Copse, and the National Park must be clearly and transparently established through evidence-based analysis as part of the baseline assessment.

A Zone of Theoretical Visibility (ZTV) must therefore be prepared using an appropriate methodology that accounts for intervening vegetation, woodland blocks and established boundary features which are a defining characteristic of the landscape. The Council advises that a bare-earth ZTV would not be sufficient or representative in this location, and that the use of LiDAR or equivalent datasets should be employed to demonstrate the influence of vegetation on actual visibility. The ZTV should be used to inform the identification and justification of representative viewpoints, including viewpoints within the setting of the South Downs National Park, along longer-distance recreational routes, and from public rights of way and residential areas surrounding the site. The Environmental Statement should clearly justify any viewpoints scoped out, particularly where the ZTV indicates potential visibility. Where appropriate, wireframe visualisations and photomontages should be included to demonstrate the parameters of development, potential building heights and massing, and the likely visual effects on sensitive receptors, prepared in accordance with relevant Landscape Institute technical guidance.

The LVIA must also assess changes to the landscape and visual environment during daytime and night-time conditions. Particular regard should be had to the designation of the South Downs National Park as an International Dark Night Skies Reserve, and the potential for light spill, additional luminance and sky glow arising from development outside the designated area to adversely affect the Park's tranquillity, dark skies and wider Special Qualities. These considerations should form a core component of the baseline and effects assessment rather than being scoped out. In addition, the assessment should consider temporary effects during construction, residual effects at Year 1 and Year 15 post-completion, and should include winter scenarios where deciduous planting may be less effective at screening development.

The Environmental Statement should clearly demonstrate how landscape and visual considerations have informed site layout, development parameters, green infrastructure provision and the mitigation strategy, applying a clear hierarchy of avoidance, minimisation, mitigation and, only where necessary, compensation or offsetting. Cumulative landscape and visual effects with other consented, emerging or planned development in the area should also be comprehensively assessed, including the potential for sequential effects on key routes and viewpoints. Subject to these matters being satisfactorily addressed, and ongoing engagement with the Council to agree detailed methodology, viewpoints and visualisation requirements, the Local Planning Authority considers that landscape and visual impacts can be appropriately scoped, assessed and reported through the Environmental Statement.

f) Socio-Economic

The Scoping Report identifies that the development of up to 2,200 dwellings, schools, a local centre, community facilities and associated infrastructure has the potential to generate a wide range of socio-economic impacts, including population growth, increased demand for education, healthcare and community services, job creation during both construction and operational phases, and contributions to housing delivery and the local economy. Given the scale of the proposals and the associated increase

in population within Fair Oak and the wider Borough, the LPA agrees that socio-economic impacts should be scoped into the Environmental Statement (ES).

The ES chapter should include a comprehensive assessment of impacts on housing need, displacement, employment, education, healthcare, emergency services, open space, leisure, community facilities and the local economy. The assessment must identify all assumptions, limitations and uncertainties within the methodology and should consider cumulative and combined effects, reflecting the range of potential development parameters and the flexibility within the proposed land uses, including alternative scenarios for education provision.

As the proposal includes a local centre with retail and commercial uses, the ES must also incorporate a Sequential Test and a Retail Impact Assessment, prepared in accordance with the NPPF and Planning Practice Guidance. In addition to identifying whether there are sequentially preferable sites, the Retail Impact Assessment must evaluate the potential impacts of the proposed retail and town centre uses on the vitality and viability of nearby centres, including Fair Oak Local Centre, Eastleigh Town Centre and any other relevant centres within the catchment. This should include consideration of trade draw, turnover impacts, potential diversion of expenditure, effects on existing, committed and planned investment, and any likelihood of significant adverse impacts. It should include any negative and any positive impacts.

The ES should clearly present the findings of both the Sequential Test and the Retail Impact Assessment, outline any uncertainties or assumptions, and identify any necessary mitigation to address significant effects. Mitigation measures, including planning obligations and on-site infrastructure requirements, should be clearly set out and robustly justified within the ES.

g) Transport and Access

The proposed development has the potential to result in a significant increase in vehicle flows, including HGVs, across the local and wider highway network, as well as on the Strategic Road Network (including the M27 and M3 and on more rural roads including within the South Downs National Park). It will also increase demand for public transport, cycling and walking within the surrounding area. The LPA therefore agrees that the proposed development has the potential to give rise to likely significant transport effects during both the construction and operational phases, and that transport and access should accordingly be scoped into the Environmental Statement (ES).

Scoping responses from local consultees have also highlighted the potential cumulative pressure on the local and strategic highway network arising from this and other committed and proposed developments, reinforcing the need for a robust and comprehensive assessment.

In terms of the scope of the Transport Chapter, the LPA is aware that the Applicant is currently engaged in discussions with the Highway Authority (Hampshire County Council) through their pre-application process, with additional engagement also

identified directly with National Highways (who are responsible for the Strategic Road network including the M27 and M3). While the LPA isn't party to these pre-application discussions, it would be expected that advice from the Highway Authority and National Highways would inform the scope of the Transport Chapter.

The Scoping Report identifies baseline data collection, trip generation and distribution analysis, and indicates a study area incorporating numerous key junctions. The Highway Authority has confirmed that any future planning application will require a full Transport Assessment and Travel Plan, including junction capacity modelling using industry-standard tools, review of at least five years of personal injury collision data, and the identification of proportionate and deliverable mitigation measures; the Travel Plan must accord with Hampshire County Council's Guidance on Development-related Travel Plans (2009) and include a costed action plan to support sustainable travel choices.

The ES must clearly and robustly address the reasons why land north and east of Fair Oak was removed from the adopted Eastleigh Local Plan 2016–2036, particularly in relation to accessibility and sustainable transport. In the Inspector's Report (March 2022), it was concluded that the evidence base did not justify the selection of the Strategic Growth Option due to the distance people would need to travel, limited opportunities for walking and cycling, low propensity to use public transport, and the resulting levels of delay on the highway network. As a consequence, the Inspector found that the proposal failed to meet the aims of the National Planning Policy Framework and the overarching objective of promoting sustainable development.

The ES must therefore be explicit in setting out how genuinely sustainable accessibility would be delivered. This should include clear, evidence-based explanations of how walking, cycling and public transport infrastructure would be improved, how realistic and deliverable mode share targets would be achieved, and how these would be secured, monitored and enforced over time. The ES should demonstrate how the proposals materially differ from, and overcome, the accessibility shortcomings previously identified by the Inspector.

In addition, the ES must give particular attention to traffic impacts on the South Downs National Park and its setting. The Inspector's Report (March 2022) concluded that the proposed Strategic Growth Option (SGO) would generate a greater increase in traffic on rural roads within and on the edge of the National Park than other reasonable alternatives. The rural nature of these roads was identified as forming an integral part of the National Park experience, with predicted traffic increases likely to have a detrimental effect on the landscape and on local communities. It is noted that the Scoping request is limited in respect of the 'Geographical Scope' to the east, and that this should be significantly widened.

The Inspector further stated that she was not convinced that suitable mitigation could be brought forward to address these impacts, noting the absence of an agreed strategy with the South Downs National Park Authority. Given the statutory importance of the National Park, the scale of development proposed, and the likely increase in traffic

movements within and adjacent to the National Park, the Inspector was unable to conclude that the SGO represented a suitable option.

Accordingly, the ES must clearly explain how traffic generation, routing and mitigation would avoid or materially reduce harm to the South Downs National Park and its communities.

The ES Transport Chapter should therefore set out how consultation with the Highway Authority and the relevant IEMA/ISEP guidance has informed an appropriate methodology, taking particular account of the reasons for the deletion of the site from the Local Plan by the Inspector, and must robustly assess the magnitude and significance of effects on all identified receptors both before and after mitigation.

h) Heritage and Archaeology

The Applicant has submitted technical notes outlining the baseline position in respect of built heritage, the historic landscape and archaeology, identifying no designated heritage assets within the site and a number of listed and locally listed buildings around its perimeter. These assessments conclude that the proposed development would give rise to no more than less than substantial harm to the settings of these assets, at the lowest end of that scale, and that any such effects can be mitigated through design.

The Council's Built Heritage Consultant concurs with these findings and raises no objection, and Historic England likewise agrees that significant effects in the context of the EIA Regulations are unlikely and that any heritage matters can appropriately be addressed through a proportionate Heritage Statement at application stage.

In respect of archaeology, the County Archaeologist also confirms that, with appropriate mitigation, significant effects are not anticipated, noting that geophysical survey work has already been undertaken and supporting archaeology being scoped out of the ES. However, the planning application must be accompanied by a full heritage statement addressing archaeological potential, proposed evaluation and mitigation, and the historic landscape character, including the potential importance of older boundary features.

On this basis, the LPA agrees that significant environmental effects on cultural heritage (built heritage and archaeology) are unlikely, and that this topic can be scoped out of the ES, subject to the submission of a comprehensive Heritage Statement, informed by the latest HER data, geophysical survey results and proportionate impact assessments, to accompany any subsequent planning application.

i) Arboriculture

The LPA does not agree that Arboriculture can be scoped out of the Environmental Impact Assessment at this stage. While the Applicant's scoping submission refers to "significant" or "notable" trees, the baseline survey undertaken in 2024 did not identify

Ancient or Veteran trees as required by best practice, nor does it appear to have assessed the potential presence of such irreplaceable features.

The site contains or lies adjacent to areas of Ancient Semi-Natural Woodland, and indirect impacts on these habitats—such as changes to hydrology, shading, root protection, edge effects, and recreational pressure—cannot be ruled out through generic design-led mitigation alone. Although standard arboriculture constraints may be capable of being addressed through the normal planning process, this does not apply to ancient woodland or ancient/veteran trees, which require a higher level of assessment due to their sensitivity and irreplaceable nature.

In the absence of a robust identification and assessment of these features, the LPA considers that the Applicant's justification for scoping out arboriculture is insufficient. Accordingly, arboriculture matters, including the potential for impacts on ancient woodland and any ancient or veteran trees, must remain within the scope of the EIA.

j) Agricultural Land

Grades 1, 2 and 3a constitute “best and most versatile” (BMV) land under the NPPF. ADAS/MAFF survey work (1995) recorded a mix of Grades 2, 3a, 3b and 4, and the Council's Local Plan evidence identified SDO A as largely lower-grade agricultural land. The Applicant's recent detailed Agricultural Land Classification survey by Reading Agricultural Consultants indicates that the site comprises a substantial proportion of Subgrade 3a and 3b land, with smaller areas of Grades 1, 2 and 4, and some non-agricultural and unsurveyed areas.

While the Applicant states that any loss of agricultural land would be outweighed by the benefits of the proposed development and therefore considers agricultural land to be scoped out of the Environmental Statement (ES), the Council notes that such planning balance judgements are not material to the scoping process. The purpose of scoping is to identify whether a topic has the potential to give rise to significant environmental effects.

Given the extent of BMV land within the site (now indicated to be more than 55% of the site – with an additional 5% not surveyed and 7% not in agricultural use in any event) and the expectations of NPPF paragraph 187 to recognise its economic and other benefits, the loss of agricultural land is considered to be a potentially significant effect and should therefore be included within the ES.

Concerns regarding the sensitivity of the surrounding rural landscape and the implications of agricultural land loss for local character were also raised during scoping consultation and are material to the consideration of likely significant effects, linking back to the Landscape and Visual Section (e).

k) Ground Conditions

The Scoping Report outlines the findings of a Phase 1 Geo-Environmental Assessment, which confirms that the site has remained predominantly in agricultural use since the late 19th century, with potential contaminative sources limited to normal agricultural activities, former farm structures, minor areas of made ground, infilled ponds, and small-scale point sources such as electricity substations and localised waste or scrap storage. No significant ground gas or radon issues are anticipated, and the environmental sensitivity of the site is assessed as low to moderate based on underlying geology and hydrology.

The Environmental Health Officer agrees that the likelihood of significant adverse effects is low and supports the proposal to scope Ground Conditions out of the Environmental Statement (ES), subject to the submission of a Phase 1 Desk Study, a Phase 2 intrusive ground investigation, and an appropriate Construction Environmental Management Plan (CEMP) at the full application stage. Provided these investigations and mitigation measures are secured and any necessary remediation is addressed through planning conditions, the Council is satisfied that significant environmental effects are unlikely and that Ground Conditions may be scoped out of the ES.

l) Natural Resource

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 such infrastructure, and will both impact on local transport infrastructure and place additional demand on electricity supplies, water supplies, and other utilities, the LPA are in agreement with the Applicant that, these matters 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.

The Applicant's Scoping Report includes a desk-based Minerals Assessment which concludes that, although the majority of the site lies within a Minerals Safeguarding Area (MSA) for soft sands, the underlying London Clay Formation and the limited, discontinuous Whitecliff and Durley Sand Members are unlikely to constitute economically viable mineral resources. On this basis the Applicant proposes that mineral resources can be scoped out of the ES.

Hampshire County Council, as the Minerals Planning Authority (MPA), accept that mineral resources may be excluded from the ES; however, they do not agree that the

submitted desk-based assessment is sufficient to determine the site's mineral potential. The MPA advises that further on-site exploratory investigation is required, comprising empirical evidence of the geological stratigraphy obtained through boreholes or trial pits within the application site, alongside an assessment of opportunities for prior extraction and engagement with a local minerals operator. In the absence of such information, the proposal would be contrary to Policy 15 of the Hampshire Minerals and Waste Plan.

While the LPA agrees that the matter does not warrant inclusion as a specific ES topic, the planning application must nonetheless be supported by a Mineral Resource Assessment (MRA) prepared in accordance with the Minerals and Waste Safeguarding SPD and in liaison with the MPA. Should prior extraction be demonstrated as feasible, any associated construction-phase impacts (e.g. noise, dust, traffic) would need to be addressed within the relevant ES chapters or supporting technical assessments.

m) Noise and Vibration

The Scoping Report presents the findings of a preliminary baseline noise survey undertaken across several monitoring locations, identifying that existing noise conditions at the site are predominantly influenced by road traffic, aircraft movements and general commercial and human activity. The Applicant concludes that noise and vibration can be scoped out of the ES, given the anticipated scale of construction activity, the ability to control temporary construction noise and vibration (through a Construction Environmental Management Plan), and the limited potential for significant operational impacts (with building services plant designed to meet appropriate limits and changes in road traffic flows expected to fall below thresholds for significant effects)

The Council's Environmental Health Officer accepts this approach, noting that a detailed Noise Impact Assessment will be required at planning stage to assess operational noise, and that the CEMP must include active noise and vibration monitoring in accordance with BS 5228-1:2009+A1:2014 to ensure construction impacts remain acceptable.

On this basis, the Council agrees that noise and vibration impacts may be scoped out of the ES, subject to the submission of a full Noise Impact Assessment with the planning application and the incorporation of appropriate construction-phase controls within the CEMP.

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 .

n) Nutrient Neutrality

The LPA notes the Applicant's intention to scope nutrient neutrality out of the Environmental Statement on the basis that a separate Nutrient Neutrality Assessment

and Mitigation Strategy will accompany the planning application, supported by Natural England's calculators and a combination of on-site and off-site mitigation measures.

The proposal lies within the catchments of European sites vulnerable to nutrient impacts and that any development with the potential to affect water quality must be subject to Habitats Regulations Assessment, using Natural England's approved nutrient neutrality methodology. Natural England advises that nutrient impacts cannot be scoped out at this stage and that a full assessment of likely significant effects, alone and in combination, is required, informed by up-to-date baseline data and clarity regarding wastewater treatment arrangements, mitigation delivery, and reliance on strategic solutions or credits.

In light of this statutory advice, the Council concludes that nutrient neutrality must remain within the scope of the Environmental Statement (ES), with sufficient detail provided to enable the competent authority to undertake Habitat Regulation Assessment screening and, where necessary, appropriate assessment. The ES should therefore include the nutrient budget, methodology, mitigation hierarchy, proposed offsetting, and residual effects, demonstrating that no adverse effects on the integrity of the Solent designated sites or the River Itchen SAC would arise.

o) Human Health

The Scoping Report explains that although Human Health is proposed to be scoped out as a standalone ES topic, the Applicant intends for relevant human-health considerations to be assessed within the individual ES chapters where such matters arise (including air quality, transport, noise and vibration, and ground conditions). It is also noted that a separate Health Impact Assessment (HIA) will accompany the planning application, with any relevant findings cross-referenced within the Socio-Economic chapter of the Environmental Statement (ES). On this basis, the LPA is satisfied that a dedicated Human Health chapter is not required; however, Human Health must be expressly and proportionately addressed within each relevant ES topic chapter to ensure that all potential pathways for impact are appropriately assessed. The LPA is therefore agreeable to the approach set out within the Scoping Report.

p) Waste

Whilst there will be a waste impact arising from the development (both during the construction and operational phases) at this early stage the extent of the impact is yet to be quantified either in respect of waste generation or waste disposal. However, 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 waste. The LPA are satisfied that this matter can be scoped out of the Environmental Statement (ES), subject to an appropriate Site Waste Management Plan being submitted as part of any planning application.

q) Vulnerability to Accidents and Major Disasters

The Applicant's Scoping Report sets out the relevant legislative definitions of 'major accidents' and 'disasters' and concludes that, having regard to the nature of the proposed development, the characteristics of the site, and the absence of any known constraints or proximate hazardous installations, there is no reasonable pathway by which significant environmental effects might arise in relation to this topic. No technical discipline contributing to the EIA has identified any potential for significant effects, and the Applicant therefore proposes to scope this matter out of the ES, noting that any relevant considerations will instead be embedded within the individual technical chapters.

Having reviewed the information provided, and in the absence of any identified major accident hazard sites, pipelines, or disaster-related vulnerabilities affecting the site, the LPA is satisfied that significant effects are unlikely. Accordingly, the LPA agrees that the topic of Vulnerability to Major Accidents and Disasters can be scoped out of the ES, with any necessary embedded mitigation addressed within the relevant technical assessments.

r) Daylight, Sunlight, Overshadowing and Wind

The Scoping Report states that the proposed development will include buildings up to five storeys in height, with the tallest elements positioned centrally and to the west of the site. It is asserted that, given the separation distances to existing residential properties on Winchester Road and Mortimers Lane, together with intervening tree belts and the location of most existing dwellings to the south of the site, no significant effects on daylight, sunlight or overshadowing are anticipated. The report also states that the proposed building heights are not of a scale likely to generate significant wind effects.

On the basis of the information provided, the LPA is content that significant effects on daylight, sunlight, overshadowing and wind microclimate are, subject to detailed design and location matters, unlikely to arise, and these matters can be scoped out of the Environmental Statement.

s) Light Spillage

The Applicant indicates that the proposal is unlikely to generate unacceptable levels of illumination and proposes to scope out light spillage.

The LPA consider that both construction and operational lighting have the potential to affect residential amenity, landscape character including the setting of the South Downs National Park (an International Dark Sky Reserve) and ecologically sensitive receptors, particularly nocturnal species such as bats. However, The LPA agrees that light spillage does not require a standalone Environment Statement (ES) chapter provided that the issue is robustly assessed within the Landscape and Biodiversity chapters, where relevant receptors and impact pathways are already proposed to be considered.

The ES should include within the aforementioned chapters a proportionate qualitative assessment of potential lighting effects, undertaken with reference to best practice such as the ILP Guidance Notes for the Reduction of Obtrusive Light (GN01/21). Sensitive receptors must be identified and indicative mitigation measures outlined, including design parameters, curfew hours, luminaire specifications and measures to limit upward and lateral light spill.

Subject to this integrated approach, the LPA is content for light spillage to be addressed within the relevant ES chapters rather than as a separate topic.

t) Telecommunications

The Council is content that telecommunications does not need to be included as a topic within the Environmental Statement, based on the anticipated level of effect outlined.

u) Energy Efficiency and Sustainable Design.

The Applicant proposes that Energy Efficiency and Sustainable Design be scoped out of the EIA on the basis that these matters are more appropriately addressed through a standalone Energy and Sustainability Strategy. The supporting justification explains that energy demand and carbon performance will be assessed using the methodologies set out in Part L of the Building Regulations, with SAP and SBEM/DSM modelling used to compare the proposed buildings against the Part L Notional Building rather than an environmental baseline.

The LPA agrees that detailed energy modelling and sustainability performance can be addressed outside the EIA within a standalone Energy and Sustainability Statement although the conclusions therein may be of relevance to the Climate Change and Socio-Economic parts of the ES, and may therefore need referencing therein.

Other Matters

Reasonable Alternatives

As set out within National Planning Practice Guidance, where alternative approaches to development have been considered, the Environmental Statement (ES) should include a description of the reasonable alternatives studied which are relevant to the proposed development and its specific characteristics and provide an indication of the main reasons for the choice made, including a comparison of the environmental effects (see [regulation 18\(3\)\(d\)](#)). While it is not clear within the Scoping Request Document that this is planned, changes to the developments parameter's should be described (e.g. the change in housing numbers from the Scoping Request).

Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should 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.

As set out by Natural England within their statutory response, the following types of projects should be included in such an assessment (subject to available information):

- existing completed projects;
- approved but uncompleted projects;
- ongoing activities;
- plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- plans and projects which are reasonably foreseeable, i.e. 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. This should include testing of all Strategic Site Options identified in the Eastleigh Borough Issues and Options Consultation.

Local consultation responses have further underlined the importance of considering cumulative effects on infrastructure, landscape and environmental capacity across the wider Fair Oak and Horton Heath area.

However, it is not possible at this stage to comment on the specific sites that should be included within the cumulative or in-combination assessments. This is because the nature and relevance of cumulative impacts will vary significantly depending on the topic area: for example, landscape and visual effects rely on spatial and experiential intervisibility, whereas topics such as nutrient neutrality, ecology, or highways may interact over wider functional catchments or networks.

It is not agreed that sites can be discounted based upon nominal distances indicated within the Scoping Request.

Notable omissions, however, appear to include;

- a) The further parts of the site that are identified within the Issues and Options Strategic Development Option (SDO).
- b) The other SDO sites.
- c) EAST HORTON GOLF CENTRE, MORTIMERS LANE, FAIR OAK, EASTLEIGH, SO50 7EA;

- i. F/25/99007 - Phase 1 (Works to the Greenwood Course) comprising re-siting/ alterations to 1st tee box, fairway and green, enlarging 18th green and creation of event space with associated re-profiling, landscaping, footpath and drainage works following closure of existing driving range – Approved, July 2025
- ii. 25/01229/HCS [County Application] - “Hybrid” planning application comprising: Full planning permission comprising - Closure of 14th, 15th and 18th holes and construction of new driving range building, reprofiling of land to form new driving range target greens and swale with associated landscaping, drainage infrastructure and other associated works (Phase 2, Parkland Course); and Outline planning permission comprising - Appearance and design of the new Driving Range Building (all matters reserved)" – Approved, October 2025.

These are both at and include substantial works to that site, including landscape changes, and HGV movements associated with the importation of waste.

You should also review developments within Winchester City Council's administrative area, and the South Downs National Park for inclusion.

Summary of LPA Response

This Scoping Opinion sets out the Local Planning Authority's (LPA) conclusions on the scope and content of the Environmental Statement (ES), having fully considered the submitted Scoping Report, the characteristics of the proposed development, and all consultation responses received (including representations from Fair Oak and Horton Heath Parish Council where these relate to the identification of likely significant environmental effects.)

The LPA is broadly in agreement with the ES topic areas proposed; however, for the reasons set out in detail above, nutrient neutrality, arboriculture (including impacts on ancient woodland and ancient/veteran trees), loss of BMV agricultural land and the associated impacts, and ecological pathways associated with the River Hamble catchment must also be scoped into the Environmental Impact Assessment (EIA). Additional requirements identified by statutory consultees and technical specialists must also be incorporated to ensure that all likely significant environmental effects are robustly assessed.

The LPA reiterates that this Scoping Opinion does not preclude the need for further information to be requested under Regulation 25 of the EIA Regulations should this be necessary as the application progresses. This Opinion is issued strictly on a without-prejudice basis and should not be taken to imply any indication of the likelihood of planning permission being granted for the proposed development. All matters will be fully considered at application stage in light of the ES, the development plan, material considerations, and any further consultation responses.

Yours faithfully

A handwritten signature in black ink that reads "N Parker". The signature is fluid and cursive, with a horizontal line drawn underneath the name.

Nicholas Parker
Planning Manager