

16 February 2026

Sarah Boyd Esq
Eastleigh Borough Council
Eastleigh House
Upper Market Street
Eastleigh
SO50 9YN

Dear Sarah,

This letter responds to your comments made on behalf of Eastleigh Borough Council (EBC, dated 2nd October 2025) to the outline planning application O/25/99506 on Southampton Airport Navigator Quarter (herein referred to as the “Site”).

Scheme Design

Following the comments received from EBC, several revisions have been made to the scheme design to address the matters raised in relation to ecological constraints, habitat connectivity and drainage. These amendments have been informed by further site review, updated technical assessment and ongoing engagement with relevant stakeholders, including Network Rail (NR). The key design changes are summarised in the sections below, which set out the rationale for each revision and demonstrate how the updated proposals respond positively and proportionately to the issues identified by the EBC.

Revised Reptile Corridor Alignment and Buffer Widths

EBC raised concerns that the internal access road proposed along the northern boundary of the Site would result in a localised narrowing of the east–west reptile corridor, with the potential to reduce its ecological functionality. The alignment of this road is fixed due to engineering, operational and site layout constraints, and therefore cannot be modified to widen the buffer on the development side.

Discussions were undertaken with NR regarding the potential to utilise adjoining land to re-align and broaden the reptile corridor at this pinch-point. Through NR’s formal consultation process, it has subsequently been identified that the relevant parcel of land is subject to a long-term leasehold arrangement with a third-party freight operator. The Applicant is actively progressing discussions with NR and the relevant leaseholder to secure the delivery of the reptile mitigation corridor shown on Map 1, which has been identified as the appropriate and proportionate solution to address the localised constraint at this location. However, the land is not currently available to be relied upon as part of the mitigation package for the purposes of determination, and no reptile mitigation measures have yet been secured on land outside the Applicant’s control.

The Applicant will seek to enable the delivery of an off-site reptile corridor of approximately 0.38 hectares, providing a minimum corridor width of circa 10 metres at the pinch-point, widening on either side where space allows, and linking with reinstated reptile habitat within the Site. If and when secured, this would deliver a resilient and functional east–west connection through enhanced ecological connectivity, habitat structure and refugia provision.

While agreement with the leaseholder is not yet finalised, the Applicant remains committed to seeking to secure this mitigation and continues to engage constructively with the landowner. The mitigation strategy is clearly defined within the application documentation and identifies how habitat connectivity can be achieved, including through land north of the Site should agreement be secured. The application is therefore presented and should be determined in the context of the land not currently being within the Applicant's control.

Updated drainage strategy

In response to EBC's concerns that the previously submitted drainage strategy did not reflect the site's natural hydrology and could therefore alter water availability to the on-site reedbeds, wet woodland and adjacent SSSI, particularly due to the reliance on a single outfall requiring direct drilling and associated habitat loss, the Applicant undertook a detailed review of the drainage design alongside EPR during a joint site walkover. This process confirmed that the natural hydrological regime can be more appropriately supported by utilising the four existing springs within the site boundary as discharge locations, with SuDS features repositioned to intercept and convey surface water along the routes it already follows under current conditions, ensuring it receives sufficient on-site treatment before being naturally discharged into these features (see Indicative Drainage Layout 1 30228-BGL-XX-XX-SK-C-00012, and Indicative Drainage Layout 2 30228-BGL-XX-XX-SK-C-00019).

This revised approach ensures that surface water continues to feed the retained reedbeds and wet woodland to the north of the site in a manner that mimics existing flow pathways, thereby maintaining their ecological function. Most significantly, it also removes the need for intrusive work within the adjacent SSSI, avoiding the loss of habitat in this area required to facilitate the construction of the outfall and headwall.

Greenspace parameters plan

EBC noted that a dedicated Greenspace Parameters Plan had not been provided and requested that the outline submission include a plan that spatially identifies ecological buffers, SuDS zones and habitat retention/creation areas across the Site.

The submitted Illustrative Plans identify areas of strategic landscaping. EBC advised that these should be more explicitly defined to demonstrate how ecological mitigation functions would be secured at outline stage and to ensure that species-specific requirements are embedded within the scheme framework.

In response, the updated Illustrative Plans (NQS-MSA-SI-XX-DR-A-2002 and NQS-MSA-SI-XX-DR-A-2005) now show the 20m and 10m ecological buffer zones as overlays. These overlays demonstrate how the required buffers can be accommodated within the proposed development framework and how habitat retention and mitigation areas can be delivered.

The Illustrative Plans are provided for information purposes at outline stage; however, they clearly demonstrate that sufficient land is available to secure the required ecological buffers and mitigation functions. The 20m and 10m buffer extents have informed the definition of the development plots shown on the amended plans, ensuring that the proposed layout framework respects the required ecological stand-offs. Detailed design and spatial confirmation of these areas will be addressed at Reserved Matters stage.

Impacts of Design Changes to Ecology

Baseline Clarifications Requested by the Local Planning Authority

EBC identified a short section of hedgerow along the northern boundary of the site adjacent to the disused long stay car park, and a treeline adjacent to the Mitchell Way Road, which did not appear in the submitted Biodiversity Net Gain (BNG) metric or baseline plans. Following this query, a Site visit was undertaken to ground-truth the features, and it has now been accurately mapped using the UKHab methodology.

The hedgerow and treeline are now incorporated into the update baseline habitat plan and reflected in the revised BNG assessment ensuring all habitat losses are fully captured and appropriately offset.

Tree Removal Associated with Access Road Delivery

A section of the treeline adjacent to Mitchell Way will require removal to deliver the access road. This loss is unavoidable due to fixed engineering and safety constraints and has been fully accounted for in the updated BNG assessment.

Habitat Misclassification – Hawthorne Scrub vs. Woodland

The vegetation present on the embankment is dominated by Hawthorn *Crataegus monogyna*, with associated scrub species such as Blackthorn *Prunus spinosa*, and a shaded, sparse ground flora. Based on both field survey and interpretation of aerial photography, this vegetation corresponds to the National Vegetation Classification (NVC) community W21 *Crataegus monogyna* – *Hedera helix* (Ivy) scrub (Rodwell, 1991). Occasional Oak and Ash occur as emergent trees above the scrub layer; however, these do not form a continuous canopy and therefore do not constitute woodland.

The distinction between scrub and woodland is well defined within both the NVC and applied habitat classification systems. W21 is a scrub community characterised by dense Hawthorn-dominated vegetation with climbing Ivy and limited ground flora, often occurring on embankments, field margins and disturbed ground. The structure and species composition observed on the site are entirely consistent with this description.

The relationship between NVC communities and UKHab habitat types is set out within the UKHab Habitat Classification Field Key, which assigns NVC type W21 to UKHab H3f – Hawthorn scrub (Field Key, line 13f). This confirms that the embankment vegetation should be classified as scrub rather than woodland.

This interpretation is further supported by the BNG Phase 1 Transition Tool. Under the JNCC Phase 1 Habitat Survey methodology, stands of mature *Crataegus monogyna*, *Prunus spinosa* or *Salix cinerea* (Grey willow) exceeding 5m in height are still mapped as scrub, not woodland

(JNCC Phase 1 Handbook, pp. 38–39). The Phase 1 Transition Tool then assigns such habitats to the BNG category Dense/Continuous Scrub, rather than any woodland type.

In summary, although occasional trees are present, the embankment is structurally and floristically dominated by Hawthorn scrub. There is no closed canopy, woodland ground flora or tree dominance sufficient to meet woodland classification criteria. The habitat is therefore correctly identified as NVC W21 *Crataegus monogyna* – *Hedera helix* scrub, corresponding to UKHab H3f Hawthorn scrub, and not woodland.

Scrub Loss North of the Runway.

EBC noted that the scrub habitat north of the extended runway, present at the time of the 2018 runway extension application, has since been removed and is now modified grassland. This change occurred prior to the current planning application and was not undertaken by the Applicant but appears to most likely relate to airport operational or safety requirements post runway extension works. The site surveys undertaken for the current application accurately records this area as modified grassland, and the baseline therefore already reflects the Site's existing condition.

While the former scrub contributed to east–west connectivity identified in the 2018 application, this function is aimed to be secured through the revised corridor strategy set out in the Scheme Design section above. This approach would secure a continuous and ecologically functional movement route, satisfying the connectivity objectives of both the 2018 runway extension permission and the present application.

Proposed Vehicle Barrier – Implications for Reptile Corridor Functionality

A vehicle acoustic barrier has since submission been proposed along the northern edge of the Site, intersecting the alignment of the east–west reptile corridor. While the barrier does not alter the spatial extent of the designated mitigation area, its standard outline design, as a solid structure without openings, has the potential to impede reptile movement and reduce the ecological functionality of the corridor. Although this would not directly affect the BNG metric, it could compromise the deliverability of the Sites reptile mitigation strategy and therefore the acceptability of the ecological proposals.

To provide reassurance to EBC, we confirm that the barrier will be refined at the detailed design stage to incorporate appropriate permeability features. We will work closely with the design team to ensure the final design maintains full reptile movement and corridor continuity, consistent with the revised mitigation strategy and the requirements of the 2018 runway extension permission.

Hydrologically Sensitive Wet Woodland / Reedbed (NE Corner)

The wet woodland and reedbed in the north-eastern corner were identified by EBC as hydrologically sensitive features. Following the drainage design refinements already described within the above Scheme Design section, no changes to water availability or hydrological inputs to these habitats are predicted. The revised scheme avoids direct works in this area and maintains existing hydrological pathways; therefore, no adverse effects on the wet woodland or reedbed are anticipated, and the ecological function of this habitat will be retained.

Mitigation & Compensation Strategy

Habitat Retention & Buffers

EBC noted the introduction of a 20m buffer to the adjacent SAC/SSSI and requested clarification on whether additional buffers are required to retained scrub habitats, particularly in relation to bats. In response, the Applicant has ensured a minimum 10m buffer to the retained internal scrub belt, in addition to the 20m buffer to designated sites along the east boundary of the Site. These buffers are considered sufficient to protect habitat integrity and maintain ecological functionality, without resulting in unnecessary reduction of developable plots.

The approach to reptile connectivity at the northern boundary is addressed in detail within the Scheme Design section above (Revised Reptile Corridor Alignment and Buffer Widths). In summary, the Applicant has identified an appropriate mitigation solution that is being actively progressed through engagement with third-party land interests, reflecting the physical constraints of the site and the need to maintain functional ecological connectivity. In the interim, the adjoining land already provides a degree of ecological connectivity, which the Applicant would seek to enhance in due course, subject to securing the necessary agreements.

Tree Removal Associated with Access Road Delivery

Delivery of the proposed access road will necessitate the removal of a section of tree line along Mitchell Way. The trees affected are predominantly young, non-native ornamental species of limited intrinsic ecological value. Based on their age, form and structure, the trees are considered to have negligible bat roost potential, with no features such as cavities, cracks, lifted bark or other potential roosting features present. As such, no further bat-specific assessment was considered necessary.

Replacement tree planting is proposed within the development layout and has been incorporated into the BNG assessment. The proposed planting will comprise an appropriate mix of native tree species, selected to enhance habitat connectivity, structural diversity and ecological resilience within the Site.

On this basis, the removal of the existing tree line is fully mitigated through on-site replacement planting and is appropriately addressed and secured through the BNG metric submitted in support of the application.

Species Specific Mitigation

Bats

In relation to Grey Long-eared Bats, mitigation will focus on the retention of suitable foraging and commuting habitat, maintenance of connectivity along scrub/treeline edges, and the provision of sensitive lighting design to avoid light spill into key habitat features. Further detail on this measure is provided later in this response. A marked-up parameters plan illustrating the proposed buffer widths, see Illustrative Plan 1 NQS-MSA-SI-XX-DR-A-2002, and Illustrative Plan 2 NQS-MSA-SI-XX-DR-A-2005, has been provided to demonstrate how these measures are spatially secured within the Site.

Breeding birds

Breeding bird surveys recorded a diverse assemblage of 43 species within and adjacent to the Site, including notable farmland and urban-associated species such as Skylark, House Martin,

Swift and Starling. The proposals will result in the permanent loss of some breeding habitat, including areas suitable for Skylark territories.

Compensation for the loss of breeding habitat will be delivered through off-site BNG provision, in accordance with the statutory trading rules. This approach will ensure that impacts to breeding birds, including Skylark, are appropriately offset through the delivery of higher-quality habitat within the local area. The Applicant acknowledges comments from EBC regarding the presence of Skylark on adjacent EBC-owned land and would welcome further discussion regarding the potential for this land to contribute to off-site habitat enhancement to offset the loss of on-site breeding habitat, where feasible.

In addition, retained habitats within the Site, including woodland edges and vegetated corridors, will continue to provide nesting and foraging opportunities for a range of passerine species, thereby maintaining ecological connectivity and local biodiversity value.

Reptiles

Surveys indicate a medium-sized reptile population associated with habitats along the northern boundary of the Site. The Applicant confirms that the proposed mitigation strategy has been informed by these findings and responds to the identified habitat loss and localised pinch-point along this boundary.

Measures focus on avoiding unnecessary impacts where possible and on increasing the availability of suitable habitat and permeability for reptile movement adjacent to the north, supported by a clear commitment to provide appropriate habitat management and enhancement measures, to be progressed through ongoing consultation following submission.

Invertebrates

Invertebrate surveys undertaken in 2021 and 2023 recorded a diverse assemblage of species across the Site, including a small number of species with conservation designations and one Section 41 Priority Species (Small Heath) No Specific Assemblage Types (SATs) were assessed as being in favourable condition by SSSI standards at the time of survey; however, both reports identify that scrub edge, scrub mosaic and semi-improved grassland habitats, particularly along the northern boundary, provide the greatest value for invertebrates and have the potential to support more important assemblages under optimal survey conditions.

It is acknowledged that the invertebrate dataset is incomplete, with limitations associated with survey timing, weather conditions and the absence of spring/early summer coverage, as noted within the assessment reports. Considering this, and in response to comments raised by EBC, a precautionary professional judgement approach has been applied within the ecological assessment. This approach places particular emphasis on the retention and protection of scrub, scrub-edge and grassland mosaic habitats where feasible, as these areas are most likely to support notable invertebrate assemblages.

Where habitat retention is achievable, these areas will be safeguarded through design and construction controls, including sensitive lighting, habitat buffering and appropriate management. This precautionary approach ensures that potential invertebrate interest is

adequately considered despite survey limitations and aligns with best practice guidance for impact assessment where complete datasets are not available.

Great Crested Newt

Data relating to Great Crested Newt (GCN) presence within the wider landscape is currently out of date. However, consultation with NatureSpace has confirmed that the Site falls within green, amber and a small extent of red GCN impact risk zones under the District Licensing scheme.

As a result, a Development Impact Plan (DIP) covering the entire Site has been issued, along with the associated licence fees, for submission under the relevant District Level Licence. The Applicant has agreed to enter this District Licence for the Site. At Reserved Matters stage, the Applicant will seek to clearly define areas that are *impacted*, *temporarily impacted* and *unimpacted*, with the aim of refining the DIP extent and ensuring that licensing costs are proportionate to the actual level of impact.

Badger

No evidence of Badger utilising the Site was recorded during surveys; however, suitable Badger habitat is present. As such, a pre-commencement Badger survey will be undertaken to confirm whether Badgers have moved onto the Site prior to the start of works.

Should evidence of Badger activity be identified, appropriate mitigation measures will be implemented in accordance with current best practice and legislation, including the establishment of protective buffers around any active setts, timing restrictions where necessary, and, if required, consultation with Natural England to secure any relevant licences or consents prior to works commencing.

CEMP

EBC has reviewed the submitted Outline Construction Environmental Management Plan (CEMP) and confirmed that, in principle, the approach is acceptable, noting that the required level of detail will be provided through detailed CEMPs secured by condition prior to the commencement of each phase of development.

In response to EBC's comments, the hazardous materials buffer within the Outline CEMP has been updated from 10m to 20m, increasing the level of protection afforded to sensitive receptors, including the adjacent SAC and SSSI. This updated buffer will be carried forward and reflected within the detailed CEMPs submitted at the next stage.

The Applicant also acknowledges EBC's comments regarding the importance of forward planning across construction phases. This will be addressed through the preparation of detailed CEMPs that consider the interaction between phases, ensuring that early works do not compromise the ability to deliver appropriate protection measures in later phases.

Drainage/Hydrology

The mitigation strategy incorporates a revised surface water drainage approach that maintains existing hydrological pathways across the Site, ensuring that water continues to support retained wet woodland, reedbed habitats and downstream designated sites. SuDS features are designed to provide a minimum of three naturalised stages of treatment prior to discharge, in

accordance with CIRIA guidance and Eastleigh Borough Local Plan Policy DM6. All surface water discharges will therefore receive appropriate treatment for sediments, hydrocarbons and metals upstream, ensuring that water quality is protected and that no adverse effects on receiving habitats or the adjacent SAC/SSSI are anticipated.

Enhancement Work

Reptiles

In addition to the mitigation measures described above, the scheme will deliver targeted reptile enhancements within retained habitats and the potential widened corridor areas aimed to be secured on adjacent NR land. Enhancements will focus on increasing habitat structural diversity and refugia availability through the creation of log and brash piles, hibernacula features, and locally varied grassland and scrub mosaics within the corridor. These measures will strengthen habitat quality, provide shelter and overwintering opportunities, and support population resilience along this movement route.

Nest boxes

No evidence of Dormouse utilising the Site was recorded during surveys; however, suitable Dormouse habitat will be retained as part of the proposals. To enhance the Site for this species, Dormouse nest boxes will be installed within appropriate retained habitat areas.

Given the Site's proximity to Southampton Airport, all ecological enhancements will be designed and implemented with careful consideration of aviation safety and operational requirements. Bird nest boxes will therefore be limited to species already known to be present on Site, such as Starling and House Sparrow. These boxes will be installed along the northern and north-eastern boundaries of the Site, orientated away from airport operations and overlooking the adjacent SSSI and SAC habitats, thereby minimising any potential health and safety risks to the Airport while still delivering biodiversity enhancement.

Other Considerations

Shading

The Applicant acknowledges the need for a Parameters Plan at outline stage. The Parameters Plan establishes development zones and design principles in relation to layout and scale to ensure that potential shading effects on retained habitats and ecological buffer areas can be avoided. It is considered that potential shading impacts arising from built form can be appropriately addressed through the approved Parameters Plan, with detailed assessment and confirmation of final building heights undertaken at Reserved Matters stage. A suggested planning condition could be as follows:

Prior to the commencement of any phase or sub-phase that includes the construction of buildings, details of layout, scale and built form for that phase shall be submitted to and approved in writing by the Local Planning Authority as part of the Reserved Matters application. The details shall be informed by the approved ecological mitigation strategy and shall:

- *Identify retained habitats and ecological buffer areas that are sensitive to changes in light availability;*

- *Demonstrate, through the proposed layout, scale and built form, that the development would not result in adverse shading effects on retained habitats or ecological buffer areas;*
- *Confirm that the design of the development avoids changes in light availability that could adversely affect the ecological function of retained habitats; and*
- *Demonstrate that shading effects would not adversely affect the integrity of adjacent SAC and SSSI habitats.*

All development shall thereafter be carried out in accordance with the approved details.

REASON: In the interests of protecting retained habitats, ecological buffer areas and adjacent designated sites from adverse shading effects and having regard to the National Planning Policy Framework and Eastleigh Borough Local Plan Policy DM8: Pollution and relevant nature conservation policies.

Noise Impacts

The Applicant confirms that potential noise impacts associated with the proposed development have been fully considered in relation to the adjacent ecological receptors. The submitted assessments demonstrate that the provision of a minimum 20m ecological buffer affords sufficient separation to protect sensitive habitats from construction and operational noise effects. Furthermore, it is our view that the potential noise impacts on adjacent habitats can be adequately dealt with within the approved CEMP (as per paragraphs 10.108-10.116 of the submitted ES chapter) that is secured as part of a planning condition at Reserved Matters. A suggested planning condition could be as follows:

No development within a phased or sub-phase shall commence until a CEMP has been submitted to and approved in writing by the Local Planning Authority. The strategy shall be in accordance with the approved ecological mitigation strategy and shall:

- *Identify those areas/features on site that are particularly sensitive to increased noise;*
- *Predict construction and operational noise levels at identified ecological receptors, including justification that these levels would not result in adverse effects;*
- *Measures to control and minimise noise during construction and operation, including timing restrictions, plant selection, and best practicable means; and*
- *Confirm that noise levels will not adversely affect the integrity of the adjacent SAC/SSSI habitats.*

All works shall be undertaken in accordance with the approved CEMP

REASON: In the interest in protecting ecological receptors and designated sites from noise-related disturbance and having regard to paragraph 170 of the National Planning Policy Framework and Policy DM8: Pollution.

Sensitive Lighting

The Applicant confirms that no lighting is proposed for the buffer areas identified as being in use by rare and sensitive bat species. Furthermore, it is our view that the potential lighting impacts on ecology, including within the commercial areas, can be adequately dealt with in the form of a Lighting Strategy (as per paragraphs 10.108-10.116 of the submitted ES chapter) that is secured as part of a planning condition at Reserved Matters. A suggested planning condition could be as follows:

No development within a phased or sub-phase shall commence until a Lighting Strategy has been submitted to and approved in writing by the Local Planning Authority. The strategy shall be in accordance with the approved ecological mitigation strategy and shall:

- Identify those areas/features on site that are particularly sensitive for nocturnal wildlife such as bats, including those created as mitigation/enhancement measure;*
- Principles of how and where external lighting will be installed so that it can be clearly demonstrated that areas to be lit will not disturb or prevent nocturnal wildlife using their territory or having access to their breeding sites and resting places; and*
- Measures to incur no impacts of lighting upon the adjacent SAC/SSSI habitats.*

All external lighting shall be installed in accordance with the approved strategy.

REASON: In the interest of preserving protected species and their habitats and having regard to paragraph 170 of the National Planning Policy Framework and Policy DM8: Pollution.

BNG Metric Alignment with Scheme Design

EBC requested confirmation that the submitted BNG metric aligns with the proposed outline scheme design, including the location of SuDS features, retained buffers and compliance with statutory BNG trading rules. The BNG metric has therefore been prepared to reflect the current outline layout, ensuring consistency between the scheme design and the biodiversity assessment.

In accordance with the statutory BNG trading rules and having regard to the operational context of the Site, it is recognised that the scope for on-site habitat creation is constrained by the proximity of the airport and the need to avoid habitats that could increase bird strike risk. As such, the BNG strategy allows for the use of off-site compensation, where required, to deliver biodiversity enhancements in suitable locations.

The specific details of any off-site habitat provision will be confirmed at the Reserved Matters stage and secured through the appropriate legal mechanism. On this basis, the submitted BNG metric is considered to be appropriately aligned with the outline scheme design and compliant with BNG policy requirements at this stage of the application.

Recreational Pressure on the Adjacent SAC/SSSI

The Applicant has carefully considered potential recreational impacts on the adjacent River Itchen SAC/SSSI, including the risk of increased public access to the Itchen Navigation path. As such recreational pressure on the River Itchen SAC/SSSI was appropriately scoped out of the submitted HRA on the basis that no public access to the Itchen Navigation would be promoted or facilitated as part of the development. It is our firm view that this conclusion remains valid. Introducing or promoting access at this stage would constitute a material change to the proposals, conflict with the impact pathways assessed in the HRA, and be contrary to the mitigation hierarchy, and should therefore not be considered further.

Furthermore, the Itchen Navigation is an informal, frequently muddy route without a defined surface. As such, it is not a realistic or attractive option for workers or visitors to use this as a commuting or access route, and its physical condition further supports the original HRA conclusion that the development would not lead to an increase in recreational activity within the SAC/SSSI.

For these reasons, the Applicant maintains that no public access to the Itchen Navigation should be provided or promoted, and that the submitted HRA assessment and conclusion remains robust and appropriate.

Summary

The Applicant has responded to EBC's comments through targeted design refinements, updated assessments and a clear mitigation framework. The proposals demonstrate that ecological impacts can be appropriately avoided and mitigated, with detailed measures to be secured at Reserved Matters stage through conditions. On this basis, it is considered that the application is acceptable from an ecological perspective and would not result in adverse effects on the integrity of the adjacent SAC or SSSI.

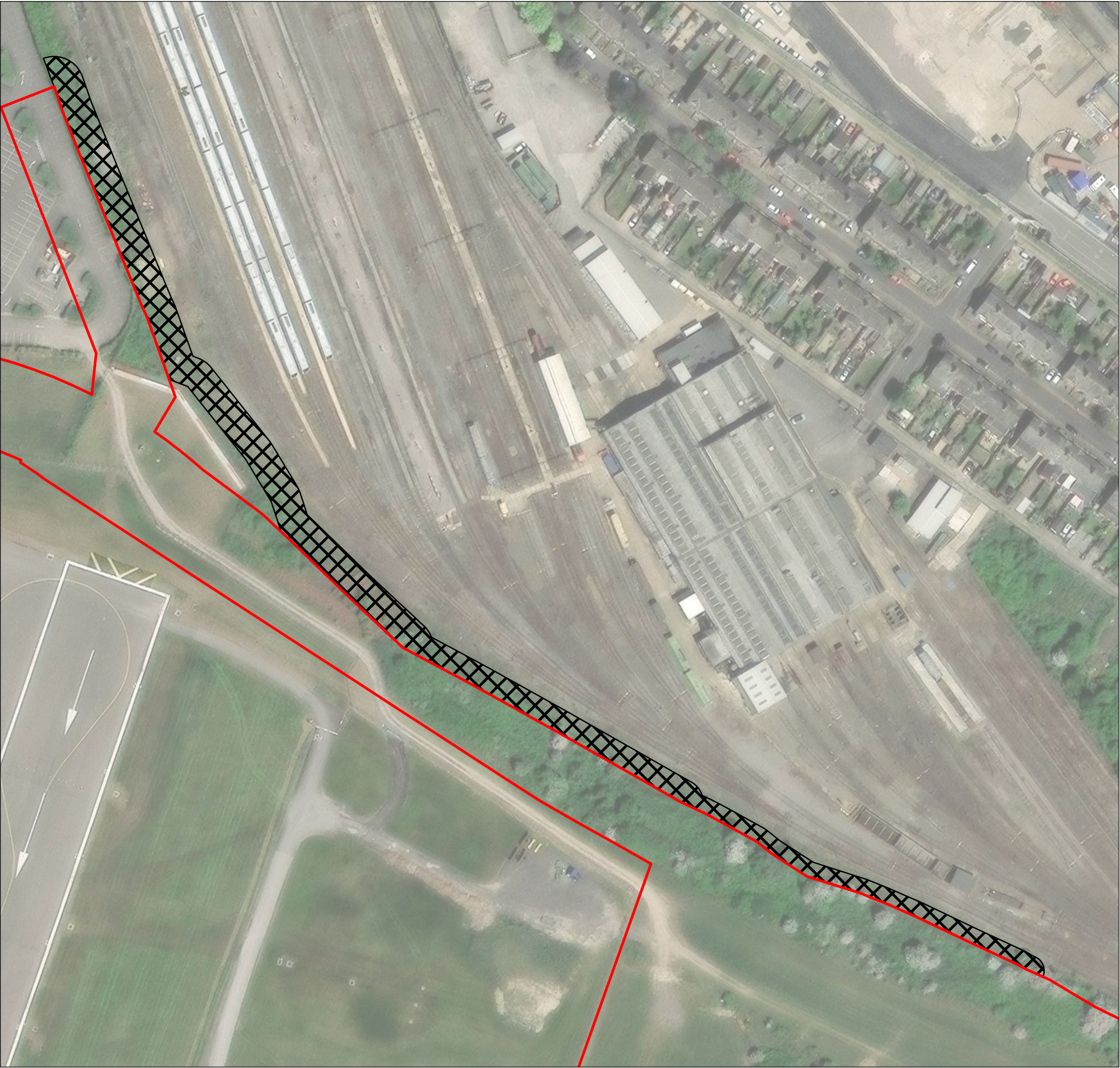
With kind regards

Yours sincerely,



Katrina Diedericks BSc (Hons)
Consultant Senior Ecologist, EPR Ltd

Direct Line: 07940 369 519
Katrinadiedericks@epr.uk.com



MAP 1 Map of Reptile Corridor Area

KEY

Application site boundary

Reptile corridor (0.38ha)

SCALE: 1:1,250 at A3

020406080

Metres

N



CLIENT: Bloc Works

PROJECT: Southampton Airport - Navigator Quarter

DATE: 06 February 2026