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Dear Ms. Farrar.

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSEMENT) (ENGLAND & WALES) REGULATIONS 1999 SCOPING OPINION. Development comprising 20.2ha at Dunsbury Hill Farm, to the north west of Havant, Hampshire, for employment development and a link road.

Thank you for your scoping request of 4th March. I understand that the development would include the allocated 20.2ha for the development of a business and technology park, which would accommodate 61,780sqm of employment floor space in two phases for construction between the years 2013 - 2022 including approximately 10,000sqm Enterprise Centre and 5,574sqm of hotel floor space. The area outlined in red in your report includes other land for the provision of part of the link access road, landscaping and green infrastructure.

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

The following sections expand upon some of the areas set out in your report regarding the impacts that this Planning Authority at Havant Borough Council, considers should be covered in the Environmental Statement (ES).

Screening

Firstly, although it is stated in the Havant Borough Core Strategy that the EIA process would apply to this development it is appropriate to confirm here that in the opinion of this Authority, the proposed development falls within the provisions of the Town and Country Planning (Environmental Impact Assessment) Regulations 1999 – the 'EIA' Regulations, in particular Schedule 2 (10). The project is likely to have significant environmental impacts, based on the character of the project, its location and character of potential impacts, which given the size of the development are likely to be permanent, for instance:

- additional traffic and transport,
- noise or vibration, such as from construction work and traffic and in the operational phase from business activities and traffic
- ecology, given that the proximity of Sites of Importance for Nature Conservation which variously adjoin or are within 400m of the site and designated sites of national and international importance for nature conservation at Langstone and Chichester Harbours (SAC/SAP/SSSI & Ramsar sites), which are around 3km to the south,
- landscape and visual changes,
- air and water impacts both in terms of quality of and drainage patterns,
- the use of natural resources both in the construction and operation phases, including the loss of agricultural land and soils and energy use,
- socio-economic; given the proximity to highly-populated urban areas at Havant and Waterlooville

I am also mindful that the 1999 Circular (02/1999) accompanying the EIA regulations notes at para A17 that EIA is more likely to be required for developments of this nature on sites of 20ha or more.

I stress that this opinion should not be taken to suggest that impacts are likely only to be negative, nor that any negative impacts could not be adequately mitigated. Such considerations would be for a subsequent stage of the EIA process.

Scoping

In summary, your scoping report dated 3rd March 2011 identifies a reasonable range of likely significant impacts, subject to some additional issues which should also be covered in the Environmental Statement (ES). These additional considerations and suggestions are given below under the series of topic headings used in your report and under additional headings/sub-headings in part 11 of this letter. The comments result largely from consultations with the statutory EIA consultees and a range of several others who would also be consulted at a planning application stage.

1. Land Use

Soil: The specialist study of 2003 was limited to the north of the site. The extent and nature of field reconnaissance used elsewhere should be described and consideration given as to whether this is sufficient to identify soil grades across the site.

Consideration should also be given to the likely volume and grades of soils which will be moved or removed during construction in the development and how these could be re-used, for instance, for landscaping or other projects in the region

Agriculture: Land severance and changes in access should include consideration of any associated risks of crime risks to agricultural/rural business and activities.

2. Socio-economic

Employment: During the construction phase - consideration should be given to the likely size of workforce, means by which catering needs would be met and rest facilities provided. The extent to which workforce might also live outside the Borough should also be considered, including implications for accommodation (housing, lodgings) and services such as health and education (for example, if incoming families with children are anticipated), use and development of skills. The impacts over the various construction phases should be included.

During the operational phase - consideration should also be given to implications for local businesses, services and housing, in relation to the size and range of the estimated workforce, including use and development of skills.

Security and crime prevention: During the construction phase - vulnerability of plant and materials to theft and anti-social behavior should be considered. Recommendations have been made by the Hampshire Constabulary by letter of 21st March 2011 (supplied); this includes comments on the provision of employment to local people.

During the operational phase – the impact of new employment which includes opportunities for local people, on crime risks should be considered. Crime risk and its management associated with new patterns of access and metalling of Park Lane bridal path should also be included. Advice is given in the aforementioned Hampshire Constabulary letter.

Access and Recreation: Natural England (NE) encourages the inclusion of measures to help encourage people to access the countryside for quiet enjoyment. The reinstatement of existing footpaths together with the creation of new footpaths and bridleways is to be encouraged. Links to the other green networks or urban fringe areas should also be explored to help promote the creation of a wider green infrastructure. Clearly the crime management issues above should also be considered as part of this.

3. Air Quality

The proposed scope of this is generally acceptable. However, I would suggest that the position and representativeness of sampling points is carefully checked, for instance, is the Ramblers Way sample point on the east side of the A3(M)? This would be important given the likely dispersal effect of prevailing winds.

It would be helpful to ensure that any dispersal or concentration effects of topography and structures in the proposed development are highlighted and explained. Account should be taken of the opening of the Hindhead Tunnel in July 2011

I also suggest that the assumptions in 6.8 regarding the increasingly stringent exhaust emission criteria is explained, with reference to any air quality controls in effect or due to coming into effect, if this is to be relied on in the assessment.

Whilst it may be implicit in DMRB documents, please check and demonstrate that air quality projections will cover an appropriate future period.

4. Noise

I note the reliance on the 2003 survey but would question this, given the possibility that traffic and related noise may have changed in the intervening years. Account should be taken of the opening of the Hindhead Tunnel in July 2011. I assume that noise impacts will be projected into future years, using traffic projections in the intended Transport Assessment (I have seen a 15 year projection used in other EIAs).

I also suggest that consideration be given to the question of any noise reflection, for instance, if tall buildings or other tall structures are intended.

5. Cultural Heritage

I note that the site lies approximately 1km to the west of the Sir George Staunton Conservation Area. This is a rural conservation area, which largely encompasses the formal landscape around Staunton Country Park. I suggest that assessment should include consideration of any impacts to the setting of this Conservation Area, for instance, the degree of indivisibility, if any and potential impact of lighting or any tall buildings.

I note that you are in discussion with the Archaeologists at Hants County Council. I suggest that you ensure that they are satisfied with the level of archaeological investigation undertaken at the masterplan stage, as some elements of the development, particularly the access road and associated earthworks, would be fixed or broadly located at this stage.

In light of the guidance in PPS5 regarding heritage assets, I suggest that within any pre-application consultation views should be sought, which may include the wider public, as to the value of assets listed in 6.30 and whether there are other assets as yet unidentified.

6. Landscape and Visual Impact, including Designated Areas

The Council's Landscape Officer is satisfied with the proposed Landscape & Visual Impact Assessment.

Natural England (NE) has recommended that consideration should be given to the following:

- The potential impact of the scheme of the landscape character and visual amenity of the surrounding area;
- The detailed design of the proposed improvements should seek to respect and enhance local character and distinctiveness, and use appropriate materials and designs in all new built features.

Designated areas: The site is within the setting of the South Downs National Park and this should be considered, as should the relationship to Chichester Harbour AONB. NE advises that the potential effect of development on the natural beauty, local character

and distinctiveness of these designations should be fully assessed. Any development taking place within the setting of a nationally designated landscape is expected to be of the highest quality.

NE also wish to see further details regarding local landscape character areas mapped at the scale appropriate to the development site and any relevant management plans or strategies pertaining to the area. The ES should include assessments of visual effects on the surrounding area and landscape together with any physical effects on the development, such as changes in topography, using landscape methodologies.

Arboriculture: There are a number of important trees within the site and several trees adjacent to the site are subject to a Tree Preservation Order. There is limited information regarding landscape quality assessment for trees/woodlands.

Natural England has also confirmed that the site is within/adjacent to the following sites, some of which are woodland:

- Cherry Tree Row
- Neville's Park
- Bushy Lease
- Beech Wood East
- Dunsbury Hill Wood
- Meadow by Bells Copse
- Dunsbury Hill

The following information would be required:

- i. Dedicated section on tree impacts.
- ii. Full arboricultural impact assessment (including full Tree Survey) and method statement undertaken with minimisation of tree loss.
- iii. Replacement planting scheme – with specified tree species
- iv. Arboricultural consultation with Havant Borough Council.

I understand that you already intend to undertake this work.

7. Ground Conditions and Contaminated land

The Council is not aware of any other sources of potential existing ground contamination, other than those mentioned in your report. However, given the presence of made ground I would recommend that you agree the type of further investigation with the Council's Environmental Health officer, in advance.

I note that at your section 6.65 mention is made of the nitrate vulnerable zone under the heading 'hydrogeology and hydrogeology'. I would suggest that this should be included in or cross referred to in the water resources chapter of the ES. Consideration should be given to risks of raised nitrate levels both in the construction phase and operational phase, for example by the use of fertilizers in landscaped areas, which might be most heavily applied when new planting is being established, or from wastes during each phase. Please see 'Water infrastructure' below.

Gas: I note that you have referred to the presence of the gas pipeline. I have an interim comment from Southern Gas Works Networks (SGN) (letter supplied), which refers to the HSE publication HSG47. I suggest that you contact SGN direct for any further requirements relating to this, ensuring that any significant safety and risk issues are included in the ES.

8. Water Resources and Flood Risk

Both the Environment Agency (EA) and Havant Borough Council's (HBC) Drainage Engineer are broadly satisfied with the scope of the proposed assessment, but make the following comments on surface water quality and water infrastructure.

Surface Water Quality: The EA has confirmed that it is supportive of the enhancement and creation of new multifunctional wetland habitats. It has also stressed the requirement that development should not cause any deterioration in the current status of the Hermitage Stream and if there are opportunities to improve the status, as part of the development, that these are undertaken.

HBC's Drainage Engineer notes that there is no mention that the whole of the Hermitage Stream is Main River, as is the Park Lane Stream below the site of the 'Giant Steps'. Between the 'Steps' and Calshot Road the owner responsible for the stream is Havant Borough Council, the next section belongs to Portsmouth City Council, including the area within the proposed site boundary. The suggested decanalising the section of the Hermitage Stream is supported by the Council's engineers but as this was done to limit flow rates through Leigh Park the EA should be involved in this part of the proposal, with consideration of this included in the ES, to avoid otherwise unforeseen issues. The stream corridor of the Park Lane Stream within PCC ownership should also be considered for enhancement.

The engineer adds that the reference to the Steps themselves (para 6.89, page 38) needs to reflect the fact that the EA has now replaced the old structure with a new arrangement albeit with equivalent flood storage capacity. Any discharge to the Park Lane Stream will need to reflect the need to minimise additional flow into this structure.

In addition to these comments, I note in your section 6.113 the assumption that risks of pollution to run-off are regarded as low, due to the nature of the development in the operational phase. As the range of uses would include B1 and B2 uses, I suggest that it is important to explain whether it is the actually the nature of these uses which limits the risk, or whether it is proposed mitigation or other control regimes which lead to this conclusion.

In the construction phase- I suggest that measures to reduce risks of a pollution event or its mitigation are explained, for instance a summary version of the proposed CEMP could be appended.

Water Infrastructure: The waste water catchment is Budds Farm. The EA has advised that discharge from Budds Farm Waste Water Treatment Works (WWTW) will be limited, in terms of nitrogen removal, to below the Industry's current Best Available Technology level (defined in this context as the best available effluent quality using conventional treatment technology) to protect the integrity of Habitat Directive sites in the Solent and the Harbours. Although it has been estimated that the works can accept

proposed in the catchment, the ES needs to identify sustainability measures to clearly state the level of water efficiency to be achieved in order to limit the impact of this development on Budds Farm WWTW.

Other matters: I would strongly recommend that you include the potential cumulative impact of the allocated development site for a reservoir at Havant Thicket, approximately 600m to the east/north east of the site, and any associated pipelines. This may also be a matter for consideration in the hydrogeology section of the ES.

I also suggest that it is clearly demonstrated in the ES that surface water drainage system (SWDS) would have adequate capacity to accommodate a stated maximum level of development and built coverage, with allowance for climate change assumptions, as would be advised by DEFRA or the Environment Agency. Maintenance arrangements for any SWDS/SUDS should also be described.

I note that it is assumed in your report that no water abstraction licences exist within 1km of the site but I suggest that you check whether any licences are likely and whether any unauthorised abstractions are known to exist.

In the construction phase - I suggest that consideration be included of any off-site impacts from the laying of pipelines.

9. Ecology and Nature Conservation Designations

Natural England (NE) has confirmed that the site is within/adjacent to the following wildlife sites:

- Cherry Tree Row
- Neville's Park
- Bushy Lease
- Beech Wood East
- Dunsbury Hill Wood
- Meadow by Bells Copse
- Dunsbury Hill

The ES should therefore include an assessment of the likely impacts on the wildlife interests of these sites, including proposals for mitigation of any impacts and if appropriate, compensation measures.

SSSI and sites of European or International Importance: The development site is within 3.5km of the following designated nature conservation sites:

- Chichester & Langstone Harbours Special Protection Area/SSSI
- Solent Maritime Special Area of Conservation

European sites fall within the scope of the Conservation of Habitats and Species Regulations 2010. Government Policy, stated in PPS9 and Ramsar Sites in England: A Policy Statement (DETR 2000), stipulates that Ramsar Sites be treated as if they are fully designated European sites for the purpose of considering development proposals that may affect them.