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01 April 2022

Dear Ms Stephen

TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT)
REGULATIONS 2017 (SI 571/2017) ('THE EIA REGULATIONS') SCREENING OPINION
REQUEST IN RESPECT OF THE DEVELOPMENT

Site Address: Langstone Technology Park, 2B Langstone Road, Havant, PO9 1SA

<u>Proposed Development:</u> Screening Opinion in relation to Proposed Redevelopment of land at Langstone Technology Park, Havant. The proposals include phased demolition of existing buildings (predominantly office but including labs, industrial, data centre and ancillary uses) and construction of up to 52,000 sqm Gross External Area (GEA) flexible use employment floorspace (Use Classes E(g) (i)-(iii) / B2 / B8) and ancillary uses (Use Classes E(b), E(d) and E(f)); and associated works (all matters reserved except access).

This screening opinion is with regard to the request for a screening opinion submitted to the Local Planning Authority under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 - Regulation 6 (1). It should be noted that this screening opinion relates to the currently submitted pre-application proposals and a further screening would be required if the development were to be significantly increased.

It is noted that the overall development to which this proposal relates comprises:

- The redevelopment of 13.9 hectares of land at Langstone Park Havant;
- Phased demolition of existing buildings (predominantly office but including labs, industrial, data centre and ancillary uses);
- Construction of up to 52,000 sqm Gross External Area flexible use employment floorspace (Use Classes E (g) (i)-(iii) / B2 / B8 and ancillary uses (Use Classes E (b), E (d) and E (f)) and associated works.
- Outline Planning Application to cover the above with all matters reserved except access;
- Redevelopment is intended to be phased over approximately a 10 year period.

Having considered the proposal as detailed in your letter of the 4th February 2022 and Environmental Impact Assessment Screening Report February 2022 Job Number: 32283/A5/EIA Screening Report Rev 02. Havant Borough Council is of the opinion that the proposal does not fall within Schedule 1 Development of the Environmental Impact Assessment Regulations 2017.

The development comprises Schedule 2 development for which a screening opinion is required as it is an infrastructure Project comprising an Industrial Estate development in Schedule 2 (10) (a) of the regulations that exceeds 0.5 hectare in area.

It is considered, having regard to the selection criteria in schedule 3 to the Regulations and the associated guidance including screening indicative criteria and thresholds, that the development would not be likely to have significant effect on the environment by virtue of factors such as its nature, size or location.

As a result, it can be confirmed that the development described in your planning pre-application, associated plans and documents is not EIA development.

Statement of Reasons:

The proposals have been assessed against the requirements of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and Planning Practice Guidance Environmental Impact Assessment updated 13 May 2020 (PPG).

Schedule 3 (Selection criteria for screening Schedule 2 development)

Characteristics of development

(a) the size of the development:

The size of the site is 13.9 ha. and therefore, exceeds the threshold for needing screening as set out in The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 Schedule 2. The proposal includes the demolition of existing buildings and the erection of up to 52,000 sqm (GEA) flexible use employment floorspace (Use Classes E(g) (i)-(iii) / B2 / B8) and ancillary uses (Use Classes E(b), E(d) and E(f)); and associated works (all matters reserved except access). It is however noted that the development site already comprises an existing Industrial Estate and it is not intended to extend the site area beyond the existing Industrial Estate site area.

(b) cumulation with other existing development and / or approved development

The proposal in itself is unlikely to lead to further consequential development and is not part of a larger development in the area. It is not considered that the proposal would lead to unacceptable in cumulation impacts.

(c) the use of natural resources

The submission documents confirm the following:

There will be no material physical changes to the topography of the site or surrounding area. The site is brownfield land and is an operational employment site.

The existing units will be demolished and new units will be constructed. The proposed buildings will be of a scale and mass commensurate to that of the existing buildings on site. Some localised regrading may be required to achieve new access routes and landscaping enhancements.

The proposed development is intended to be permanent, so decommissioning is not anticipated for the foreseeable future.

The site itself is brownfield land and is an operational employment site. The existing units will be demolished and new units will be constructed. No greenfield or agricultural land will be lost.

the site is not located within an area of important, high quality or scarce resources which could be affected by the proposed development. The nearest statutory and non-statutory ecological designations are listed in Section 2 of this report.

The site is not within a Sensitive Area i.e.:

Sites of Special Scientific Interest and European sites;

National Parks, the Broads and Areas of Outstanding Natural Beauty;

and World Heritage Sites and scheduled monuments.

The submitted information continues:

As the proposed development is for commercial/industrial uses, there will be no increase in the number of residents in the area. It is considered unlikely that there would be an increase in the number of visitors and vehicles to the designated sites as there is not likely to be an increase in office space or car parking requirements. The designated sites are all well removed from the site and given the separation distances involved due to the site's location surrounded by existing industrial estates and residential development, effects as a result of lighting, noise or dust are not anticipated.

There are no areas of ancient woodland within or adjoining the site. There are TPOs on a group of trees in the north west corner of the site and on individual trees alongside the public footpath to the southeast of the site. These will not be impacted by the proposals. The more significant belt of mature trees which lines the south eastern boundary of the site will be retained. An Arboriculturist has inputted into the design of the proposed development and an Arboricultural Impact Assessment will be submitted with the planning application.

As such, significant effects on any arboricultural or ecological assets are not anticipated.

(d) the production of waste:

The proposals would during the demolition construction and operational stages produce waste. The submitted information addresses this matter as follows:

As with nearly all demolition and construction, the proposed development will result in waste materials from the preparation and undertaking of works. There would be waste generated by the operational phase of the proposed development.

As above... will ensure that demolition, construction and municipal waste is managed carefully to maximise recycling and reuse and minimise waste sent to landfill. This will include the development of a Resource Management Plan to manage all materials at their highest values. The proposed development will maximise the direct reuse of materials onsite, for example through relevelling, and minimise demolition waste transported offsite. Any waste would be managed in accordance with the D/CEMP and all applicable legislation and disposed of in line with best practice.

A Site Waste Management Plan will be prepared on a phase by phase basis which can be secured via planning condition and will set out the measures to reduce waste generation including, the opportunities to re-use and recycle on-site and offsite, agreements with material suppliers to reduce the amount of packaging and avoidance of over-ordering. Waste would be managed and reduced in accordance with all applicable legislation and disposed of in line with best practice.

Operational waste will be disposed of in line with HBC's requirements and managed in accordance with all applicable legislation. HBC's recycling scheme provides recycling bins in which to recycle waste, including, cans, paper, plastic bottles and glass. Significant quantities of construction or operational waste are not anticipated as a result of the proposed development.

(e) pollution and nuisances:

The submissions include the following information:

During the demolition and construction phases of the proposed development, dust would be generated. There would be emissions associated with plant and vehicles (namely NO2, PM10 and PM2.5) during the demolition and construction phases. There would also be emissions associated with the operational phase of the proposed development. As the proposed development is for an industrial development, emissions would be associated with the number of vehicles travelling to and from the site as a result of the future users of the site, primarily employees. The site is an operational employment site.

The existing units will be demolished and new units will be constructed. Preliminary work undertaken by the Applicant's transport consultant identified the vehicle trip generation for the existing and proposed uses on the site. The study concluded that compared to the existing uses at the site, the proposed development is anticipated to result in a negligible change in the total volume of traffic from 6,063 total trips to 6,088 total trips over a 12-hour period.

Trip generation during the AM and PM peaks would result in a net reduction of -29 trips over the two peak hours (AM peak is +27 trips and PM peak is -56 trips), compared to existing uses. As there would be negligible increase in traffic above the existing baseline conditions at the site, significant adverse transport effects are not considered likely.

The proposed uses are not associated with hazardous substances or toxic emissions to air. There is not anticipated to be a requirement to store large volumes of hazardous materials. Any such materials required to be used as part of the industrial floorspace would be stored and handled in accordance with relevant legislation.

In relation to whether a Significant Effect is likely the submission states:

There are residential properties located within Langstone, adjacent to the east of the site, and in Havant, beyond the A27 and industrial estates to the north of the site, and these properties will be sensitive to changes in local air quality conditions and may be adversely affected by an increase in localised emissions.

The existing nursery on the site is being replaced as part of the development and the phasing of the redevelopment will carefully account for this sensitive receptor to ensure that no significant effects are likely as a result of releases to air. During the construction phase, with the implementation of appropriate mitigation measures, significant air quality effects are not anticipated.

Dust generated during construction will be managed in accordance with standard best practice measures, enforced through a D/CEMP and therefore dust is not anticipated to generate significant adverse effects. The demolition and construction phases are expected to be phased, with the arrival and departure of Heavy Goods Vehicles (HGV) dispersed across the working day to avoid a concentration of released pollutants associated with the plant and vehicles required for the demolition/construction phase. All management of construction traffic and access will be carried out in accordance with the CTMP, as set out in Chapter 2 of this report.

It is also considered unlikely that those properties situated nearest to the site will experience significant increases in pollutant concentrations during the operational phase. As there would be negligible increase in traffic above the existing baseline conditions at the site, significant adverse pollution effects are not considered likely.

Car parking will be provided as set out in Chapter 2. Electric car charging and cycle parking will be provided in accordance with HBC Standards. The proposed development will provide opportunities for noncar travel for everyday journeys. Pedestrian footways will link buildings and plots where appropriate.

Footways/cycle routes will be separated from vehicular traffic. It is proposed that enhancements are made to the existing public footpath in the north eastern corner of the site (PRoW 108/51/2), providing new surfacing and increasing its width. This will enhance connectivity for cyclists and pedestrians to the wider area.

As part of wider improvements there is the potential to replace some of the existing pedestrian/cycle route signage beyond the site with new signs incorporating Langstone Park directional signage which would enhance wayfinding and benefit those accessing the site via train. The public transport opportunities afforded by Bedhampton Railway Station and Havant Railway Station, which are 750m to the north west and 800m to the north east of the site, respectively, and the proximity to local bus routes along Langstone Road will ensure travel by public transport is a realistic option for future residents and users of the site. The proposed development also includes the delivery of pedestrian and cycle links, as above which will encourage sustainable travel patterns by future employees.

A Transport Assessment and Framework Travel Plan will be submitted in support of the planning application and will outline initiatives to be implemented to encourage the future employees and users of the site to travel by sustainable travel modes, thereby limiting impacts on emissions to air. The proposed development is not considered likely to release levels of pollutants that would significantly affect the environment during demolition, construction or operation, following the implementation of mitigation measures

The planning application will be supported by an Odour Strategy, Air Quality Assessment and a Sustainability and Energy Statement.

In relation to Noise and vibration etc. the submission states:

The potential exists for noise effects to result from the demolition and construction processes and operational activities associated with the proposed development. The baseline conditions on the site are an operational employment site, therefore significant adverse noise effects above existing levels are not anticipated. The existing noise climate on the site is also influenced by existing industrial uses to the south and west of the site, and traffic on nearby roads including the A27 adjacent to the north of the site and Langstone Road, approximately 150m to the east of the site. The potential exists for intermittent and temporary noise effects to result from demolition and construction activities. The nearest sensitive receptors are residential properties in proximity to the site (outlined in Chapter 2).

The existing nursery on the site is being replaced as part of the development and the phasing of the redevelopment will carefully account for this sensitive receptor to ensure that there will be no significant noise effects.

The nature of the proposed development will not cause vibration. No heat, energy or electromagnetic radiation will be caused or released.

Demolition and construction effects will be managed in accordance with best practice measures, implemented through the D/CEMP and are not anticipated to generate significant adverse effects.

A Noise Assessment has been prepared for the proposed development and will also be submitted with the planning application. An ambient noise survey has been conducted to gather representative ambient and background noise levels for nearby existing residences. The noise emitted from the site from fixed plant and general activity has been calculated for intensive daytime and nighttime scenarios. The impact of this noise at nearby residential locations has been assessed.

The potential noise impact from the night-time scenario results is considered to be suitably low but the predicted rating level from the day-time scenario results in a noise rating level that could potentially result in adverse effects. However, the Noise Assessment sets out the detailed design specifications and noise control measures and (e.g. plant noise level limits and building envelope sound insulation requirements) to demonstrate that any adverse effects can be mitigated to ensure an appropriate acoustic environment for future employees/users of the site and sensitive receptors surrounding the site. Such design measures are standard and well understood. These would be secured via a suitably worded planning condition and significant effects are not anticipated.

If required, planning conditions would be secured on the permitted noise levels of the plant and any machinery needed for the proposed development, following planning approval. These limits would be agreed with the Environmental Health Officer (EHO) at HBC.

As above ongoing ecological surveys at the site will determine the potential of the site to support roosting, foraging and/or commuting bats and a Preliminary Ecological Appraisal will be submitted with the planning application. All external lighting and illumination would be designed carefully in accordance with relevant British Standards and Institute of Lighting Professionals (ILP) 12, the CIE (International Commission on Illumination) report 13 and Bat Conservation Trust guidance.

In relation to risks of contamination of land or water the submitted details state:

A watercourse travels in a north to south direction adjacent to the site's eastern boundary. The site is within Flood Zone 1 (low risk), having less than a 1 in 1,000 annual probability of river or sea flooding.

An area to the south of the site is located within Flood Zone 3 and an area to the south west of the site benefits from flood defences. In addition, the majority of the site is at very low to low risk of flooding from surface water. The site is not located within a groundwater SPZ but is underlain by a Principal Aquifer. The nearest SPZ (Zone 1 – Inner Protection Zone) is 210m to the north of the site.

A Land Quality Assessment will be submitted with the planning application. Potential receptors include future site users and controlled waters including groundwater in the underlying Principal Aquifer and surface water in the watercourse adjacent to the site's eastern boundary. If required, further intrusive site investigation will be undertaken and will be secured by a planning condition. This will fully evaluate the potential effects of the proposed development on receptors and will identify any necessary mitigation to be carried out to will ensure no significant effects will occur.

The disposal of any chemicals within the existing laboratories would be handled in accordance with all appropriate legislation. During demolition and construction, hydrocarbons including plant and vehicle fuel and lubricants will be used as part of the construction phase. The demolition and construction phases will be controlled through the implementation of a D/CEMP and will not result in any significant adverse effects to land or water.

The land uses proposed are not highly contaminative and would not be significantly different to those existing on the current site. Following the implementation of standard mitigation measures such as health and safety procedures for demolition/construction workers and ensuring that any chemicals or oils will be stored in appropriately bunded containers and in accordance with relevant legislation (during demolition, construction and during operation where appropriate, for example within the proposed employment uses) to prevent accidental spillages of contaminants and avoid releases of pollutants, that any potential significant effects will be mitigated. The risks to the health of future demolition and construction workers and site users from the anticipated ground conditions in and around the site are assessed to be very low to moderate. In addition, the risk to controlled waters from the anticipated site ground conditions is assessed to be low.

Surface water run-off and foul water drainage will be managed on-site during the construction and operational phases. As part of the proposed development, the drainage strategy will control the surface water run off. A Flood Risk Assessment (FRA) and Drainage Strategy will be submitted with the planning application. The proposed development will not result in any significant adverse effects to land or water related to contamination.

In relation to whether there are any aresa on or around the location already subject to pollution or environmental damage the submission states:

As previously identified, the site is not located within or within 5km of an AQMA.

The site is not located within a SPZ. The nearest SPZ (Zone 1 – Inner Protection Zone) is 210m to the north of the site.

During demolition and construction, effects will be managed through the D/CEMP which will include standard, best practice measures such as ensuring bulk cement and other fine powder materials are delivered to the site in enclosed tankers. Dust generation would be managed in accordance with standard best practice measures, enforced through the D/CEMP and is not anticipated to generate significant adverse effects. As stated above, further to the implementation of standard mitigation measures implemented through a D/CEMP, significant effects on contamination are not anticipated.

As above, compared to the existing uses at the site, the proposed development is anticipated to have a negligible effect on the total volume of traffic, and therefore significant adverse transport effects are not considered likely. As above, the proposed development is not considered to release levels of pollutants (including traffic related effects) that would significantly affect the environment during demolition, construction or operation, following the implementation of mitigation measures.

An Air Quality Assessment will be submitted in support of each of the planning applications. A Framework Travel Plan will also be implemented during operation of the proposed development which will support sustainable and active travel.

The above measures will ensure that there are no significant effects on air quality.

(f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;

The submitted information states:

During the demolition and construction activities, the contractor(s) will implement measures in accordance with Health and Safety legislation/requirements, and best practice to minimise the risks of accidents that could have adverse effects on people or the environment. All such measures will form part of the D/CEMP which would be secured by condition of the planning consent for the proposed development. There are no anticipated significant risks of accidents during operation as the proposed development will not involve users dealing with hazardous substances. Any such substances required to be used as part of the industrial floorspace would be regulated with all applicable workplace health and safety legislation.

A Design and Access Statement will be submitted with the planning application and will ensure the proposed development is suitable for future users. The proposed development will comply with all best practice safety legislation.

The proposed development will include measures to increase adaptation to climate change. The proposed development will include new landscape planting (and green roofs) that will provide natural cooling and channel surface water runoff.

The drainage strategy for the proposed development will be designed to ensure there is no increase to flood risk on site or elsewhere which will also accommodate an allowance for climate change and extreme rainfall events. The proposed buildings will be designed to adapt to climate extremes using best practice by reducing water consumption and reducing overheating in hot temperatures and improving ventilation whilst retaining heat in cold temperatures. The scale of the proposed development and the implementation of the measures outlined above are such that climate change effects would not be significant.

The site is within Flood Zone 1 (low risk) and the majority of the site is at very low to low risk of flooding from surface water. As above, a FRA and drainage strategy will be submitted in support of the planning application and will include the measures proposed to mitigate the flood risk on the site, including allowances for climate change and will ensure that flood risk to the site and surrounding area from surface water is not increased due to an increase in impermeable surfaces (for example the industrial units, car parks and access routes). Therefore, it is considered that significant effects as a result of climate change are not anticipated.

(g) the risks to human health (for example, due to water contamination or air pollution).

The submission information states:

The nearest sensitive receptors are residential properties in proximity to the site (outlined in Chapter 2). The existing nursery on the site is being replaced as part of the development and the phasing of the redevelopment will carefully account for this sensitive receptor to ensure that no significant effects arise.

During the demolition and construction phase of the proposed development, dust would be generated.

There will be no risks of effects on human health due to contamination of water sources. Surface water run-off and foul water drainage will be managed on-site during the demolition, construction and operational phases, as will be detailed further in the FRA and Drainage Strategy that will be submitted in support of the planning application.

The massing of the proposed development will be carefully designed to ensure that significant effects to any adjacent amenity space, residential properties and pedestrians would not occur. The proposed buildings will be of similar scale and mass to the existing buildings on the site.

The development is not anticipated to significantly affect sunlight access and daylight amenity and as such, significant effects on human health in respect of daylight and sunlight exposure are not anticipated. The proposals are also unlikely to result in significant effects in the wind conditions which would cause any discomfort for pedestrians at street level.

The proposed development would likely generate beneficial socio-economic effects. The demolition, construction and operational phases of the proposed development will increase employment opportunities which will benefit the local economy.

Dust generation and contamination would be managed in accordance with standard best practice measures, enforced through the D/CEMP as outlined above. The proposed development is not considered to release levels of dust or pollutants that would significantly affect the environment during construction or operation, following the implementation of mitigation measures. An Air Quality Assessment will be submitted in support of the planning application. further to the implementation of standard mitigation measures implemented through a D/CEMP, significant effects on contamination are not anticipated.

As above, operational traffic related effects on air pollution and human health are not anticipated. A Framework Travel Plan will also be implemented during operation of the proposed development which will support sustainable and active travel, further reducing effects on air pollution.

As above the Noise Assessment which has been prepared for the proposed development and will be submitted with the planning application sets outs the detailed design specifications required to ensure an appropriate acoustic environment for future users of the site and sensitive receptors surrounding the site. Such design measures are standard and well understood. If required, planning conditions would be secured on the permitted noise levels of the plant and any machinery needed for the industrial units of the proposed development, following planning approval. These limits would be agreed with the EHO at HBC.

In relation to water resources the submitted details state:

There are no drains, watercourses or ponds on the site. The nearest watercourse is adjacent to the site's eastern boundary. Surface water runoff and foul water drainage will be managed on-site during the demolition, construction and operational phases. An FRA and Drainage Strategy will be submitted with the planning application. Information on Flood Zones and groundwater SPZ is presented in Section 2.

Overall, the proposal has been assessed in relation to the Characteristics of Development and it is concluded that whilst the scale of development is significant, the site is an existing industrial site currently in use, the site area is not proposed to be increased and the impacts of the development can be appropriately managed through the demolition, construction and operational phases provided that a sufficient and robust package of information is provided with the planning application to be assed in detail in relation to the planning application and subsequently addressed in relation to any appropriate mitigation.

Location of Development

The site is not located in a 'Sensitive Area' as defined by Regulation 2(1). The application site is within 1km of Langstone Harbour Site of Special Scientific Interest (SSSI), which is also a component of Chichester and Langstone Harbours Special Protection Area (SPA) and Ramsar site, and the Solent Maritime Special Area of Conservation (SAC), as well as being in proximity to Solent Wader and Brent Goose sites H27, H28A, H29, H90. It is noted that these sites are all set beyond other industrial development beyond the site. The Council's Ecologist has stated:

The proposal falls within Schedule 2:10 (a) of the EIA Regulations 2017 and exceeds the 5Ha threshold. The site is in relatively close proximity to sensitive marine habitats, with Chichester & Langstone Harbours Special Protection Area (SPA) and Ramsar and the Solent Maritime Special Area of Conservation (SAC) located c.500m to the south. Areas of terrestrial habitat used by overwinding birds associated with the SPA/Ramsar are situated c.200m to the south and some of these areas are within the Langstone Harbour Site of Special Scientific Interest (SSSI). The Southmoor Reserve Site of Importance for Nature Conservation (SINC) is situated c.200m south. The proposed development will occur over an extended timeframe and will be contained within an area of existing commercial development. Whilst there is potential for various impacts to the natural environment (e.g. through noise, pollution) I am content that these can be managed to acceptable limits within the application site and without resulting in significant effects on ecological receptors.

On that basis I do not consider that the proposal should be subject to full EIA. Ecological assessment will obviously be required and any future application will need to include full details of all measures to avoid and mitigate ecological impacts.

Schedule 3 lists the following matters:

- 2. The environmental sensitivity of geographical areas likely to be affected by development must be considered, having regard, in particular, to—
- (a) the existing land use;

In this case the existing land use is an established Technology Park with extensive areas of buildings and hard landscaping including car parking. It is not considered that the existing site is itself of high ecological value.

(b) the relative abundance, quality and regenerative capacity of natural resources in the area;

The wider impacts and any appropriate environmental conditions will be considered during the course of the planning application, however, subject to suitable controls which can be provided during the planning process it is not anticipated that the wider natural resources of the area would be impacted negatively by the development.

(c) the absorption capacity of the natural environment.

It is recognised that the site is in relatively close to European and Nationally designated sites and it will be important to avoid potential pathways via the water environment to these sites in relation to the development. It is noted that the Council's Ecologist has provided comments in relation to potential impacts and concludes that the development is not considered EIA development.

Overall the location of the development outside of sensitive sites has been assessed and it is considered that any potential impacts on nearby ecological sites can be appropriately managed through the planning application process given the nature and location of the development.

Types and characteristics of the potential impact

Schedule 3 lists the following matters:

- 3. The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—
 - (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);

The scale of the development and the nature of the proposals located at an existing Technology Park which result primarily of the re-development of the existing industrial site with a replacement re-development are not anticipated to result in a significant environmental impact subject to detailed assessment at the planning application stage in consultation with Environmental consultees.

(b) the nature of the impact;

The nature of the proposal is considered to result in local impacts that can be managed through the planning application process.

(c) the transboundary nature of the impact;

Whilst there are likely to be potential impacts beyond the site boundary, these are likely to be limited and can be adequately addressed through the planning application process in consultation with statutory and non-statutory consultees.

(d) the intensity and complexity of the impact;

The proposals would result in relatively limited impacts of a type and magnitude normally associated with this type of re-development. It is not anticipated that any unduly complex issues would be raised by the nature of this development.

(e) the probability of the impact;

Any impacts of the proposed re-development of the site would be likely to be limited and the probability of wider scale significant impacts are considered to be low.

(f) the expected onset, duration, frequency and reversibility of the impact;

Given the assessment above it is not considered that the development would result in an unacceptable impact. Whilst the re-development is likely to be phased over a protracted period this would allow for the detailed management of impacts in particular from re-development / construction operations.

(g) the cumulation of the impact with the impact of other existing and/or approved development;

The submitted details assess cumulative impacts stating:

The site is adjacent to the north east of land with extant planning consent (APP/19/00703, as amended by APP/21/00405) which has yet to be implemented (albeit likely to commence on site in early 2022). (It is noted that this development has now commenced).

The uses proposed are similar in nature to those proposed in APP/21/00405, therefore significant adverse cumulative effects are not anticipated. The remainder of the schemes are of sufficient distance from the site and therefore are not anticipated to be affected by the proposed development. In addition, the proposed redevelopment of the site comprises similar uses to the existing uses on site, therefore significant adverse operational effects, are not anticipated. Any demolition and construction effects would be temporary and controlled through the D/CEMP.

It is considered that given the re-development of existing uses the cumulative impact of other development is unlikely to result in unacceptable in combination impacts, however any planning application would need to fully address highway and other impacts from the development.

(h) the possibility of effectively reducing the impact.

Any planning application will be required to be accompanied by a full suite of information to demonstrate the nature of the development, its impact on the Environment and on and off site impacts.

In consultation with Environmental consultees the impacts will be assessed and controls imposed as necessary by the imposition of planning conditions including Environmental Management Plan requirements. Subject to the detailed planning application assessment it is considered that impacts can be appropriately addressed and reduced.

Finally, during the consideration of this Screening, Natural England, Hampshire County Council Ecologist, Local Lead Flood Authority and Planning Policy provided the following consultation responses which should inform and guide the form of any formal planning application:

Natural England:

It is Natural England's advice, on the basis of the material supplied with the consultation, that there are potential likely significant effects on statutorily designated nature conservation sites or landscapes and further assessment is required.

Schedule 3(2) of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 requires consideration of the selection criteria for Schedule 2 EIA development and identification of 'environmental sensitivity'.

The proposed development is located within or has the potential for adverse effects on the following designated sites:

- Langstone Harbour Special Site of Scientific Interest (SSSI)
- Chichester and Langstone Harbours Special Protection Area (SPA) and Ramsar
- Chichester Harbour SSSI
- Solent Maritime Special Area of Conservation (SAC)
- Solent SPAs Functionally Linked Land

Natural England has not assessed the significance of any impacts on these designated sites or landscapes. The proposed development may therefore be likely to have significant effects on the interest features for which these sites are notified or the purposes of designation and we advise you to consider further whether an Environmental Impact Assessment (EIA) is required.

Should you decide that an EIA is not required, Natural England advises that sufficient information on the potential impacts of this proposal upon these designated sites/areas is submitted with any subsequent planning application. We would be pleased to discuss this further with the applicant through our Discretionary Advice Service.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this proposal is likely to affect protected species to such an extent as to require an Environmental Impact Assessment (EIA). The developer must provide sufficient information for your authority to assess whether protected species are likely to be affected and, if so, whether appropriate avoidance, mitigation or compensation measures can be put in place. Further information is included in Natural England's standing advice on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. This development proposal may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land or on local landscape character that may be sufficient to warrant an EIA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice. We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the proposed development before determining whether an EIA is necessary.

Should you determine that an EIA is not required in this case, you should ensure that the application is supported by sufficient biodiversity, landscape and other environmental information in order for you to assess the weight to give these material considerations when determining the planning application.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Please note that this response relates only to the EIA screening consultation. Natural England may wish to provide advice should your authority consult us on any subsequent planning application and associated environmental assessments. Guidance on when to consult Natural England can be found here.

Council Ecologist:

The proposal falls within Schedule 2:10 (a) of the EIA Regulations 2017 and exceeds the 5Ha threshold. The site is in relatively close proximity to sensitive marine habitats, with Chichester & Langstone Harbours Special Protection Area (SPA) and Ramsar and the Solent Maritime Special Area of Conservation (SAC) located c.500m to the south. Areas of terrestrial habitat used by overwinding birds associated with the SPA/Ramsar are situated c.200m to the south and some of these areas are within the Langstone Harbour Site of Special Scientific Interest (SSSI). The Southmoor Reserve Site of Importance for Nature Conservation (SINC) is situated c.200m south.

The proposed development will occur over an extended timeframe and will be contained within an area of existing commercial development. Whilst there is potential for various impacts to the natural environment (e.g. through noise, pollution) I am content that these can be managed to acceptable limits within the application site and without resulting in significant effects on ecological receptors.

On that basis I do not consider that the proposal should be subject to full EIA. Ecological assessment will obviously be required and any future application will need to include full details of all measures to avoid and mitigate ecological impacts.

Local Lead Flood Authority:

Due to the size of the development, we would expect to see a full Flood Risk Assessment with a surface water drainage strategy. Please direct the applicant to our website https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/planning for full guidance on what is required and further information on recommended surface water drainage techniques.

Also, please note that if the proposals include works to an ordinary watercourse, under the Land drainage Act 1991, as amended by the Flood and Water Management Act 2010, prior consent of the Lead Local Flood Authority is required for this work. This consent is required as a separate permission to planning. Details can be found here

https://www.hants.gov.uk/landplanningandenvironment/environment/flooding/changewatercourse

We would highlight that we would expect all watercourse routes to be retained as close to their current alignment as possible. Culverting of these watercourses will not be permitted unless there are no alternatives.

We would also highlight the flow paths as recognised by the Flood Map for Surface Water. These should also be retained and provisions made to allow this route to continue to flow post development without adversely impacting the development. Consideration should also be given to potential connectivity not picked up by this mapping.

Planning Policy:

The proposed development falls within Schedule 2 of the 2017 Regulations and it is appropriate consider whether the project is likely to have significant effects taking account of the selection criteria in Schedule 3 and cumulative effects under Schedule 4.

In relation to Schedule 3 and the size and design of the whole development; the proposed development would involve the construction of up to 52,000 sqm Gross External Area (GEA) flexible use employment floorspace (Use Classes E (g)(i) - (iii) / B2/B8) and ancillary uses (Use Classes E(b), E(d), and E(f)). This would follow the phased demolition of existing buildings, predominantly office but including labs, industrial, data centre and ancillary uses. It is noted that the redevelopment is intended to be phased, approximately over a 10 year period. The applicant has submitted information which provides a comparison of floorspace. It indicates that there was 58,412 sqm GEA prior to the demolition of B1000, and that the amount of floorspace approved under planning permission reference APP/21/00405 was 63,045 sqm. The proposed development, together with Phase 1 approved under APP/21/00405 would result in a total of 63,290 sqm. On this basis, the small increase in the amount of floorspace proposed on site would be unlikely to constitute EIA development.

In terms of pollution and nuisances; the submitted Screening Report indicates that significant adverse transport effects are not considered likely. There are two vehicular and pedestrian accesses to the site from Langstone Road (A3023) to the east, and Brookside Road to the west of the site. In the case of the former, it should be noted that the Council has undertaken a separate Transport Assessment for Hayling Island reflecting the A3023 is the only road linking the island with the mainland via a bridge, which passes through Langstone connecting the A3023 to the A27 Trunk Road and to the B2149 access to Havant Town Centre.

The <u>Inspectors Interim Findings</u> into the Examination of the Havant Borough Local Plan highlight the importance of the modelling in the Hayling Island Transport Assessment to demonstrate to a reasonable and proportionate degree that the level of housing and other development allocated on Hayling Island would not have any severe impacts on the surrounding highway network. This is of particular relevance to the criteria in Schedule 3 with refers to 'cumulation with existing development'. Significantly, they highlight concerns that they are unable to conclude there would be no unacceptable impacts on highway safety, or that the residual cumulative impacts on the road network would not be severe. This is relevant to the development proposals given that there is presently an overall vacancy level of approximately 40% on the site and there is no indication of whether the development proposals would be likely to result in an intensification of floorspace.

The applicant should address the impacts of their proposals on the local highway network, including summer traffic through pre-application discussions with Hampshire County Council and Havant Borough Council. This analysis should form part of the applicants' Transport Statement, showing how a severe transport impact would be avoided, including during summer and weekend periods.

This letter should be taken as the Local Planning Authority's screening opinion under the Regulations.

Yours sincerely

Simon Jenkins

Director of Regeneration and Place Havant Borough Council and East Hampshire District Council