



Residents Against Gravel Extraction

Independent Review of Proposed Hampshire County Council Minerals Allocations in South Hampshire

Executive Summary of
Report Prepared by Adams Hendry Consulting Ltd

June 2008

TITLE: South Hampshire Minerals Allocations Review - Executive Summary

CLIENT: Residents Against Gravel Extraction

PROJECT NO: RAGE/813

REPORT NO: RAGE/813/090608/GB/ES

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Executive Summary

- i. This report has been prepared for Residents Against Gravel Extraction (RAGE) by Adams Hendry Consulting Ltd. It includes the results of a critical review of Hampshire County Council's (HCC's) site allocation process incorporating Sustainability Appraisal and Habitats Regulations Assessment (HRA) as undertaken to inform the preparation of the Regulation 26 Draft Hampshire Minerals Plan.
- ii. It also includes the results of independent site visits undertaken by Adams Hendry staff between May and June 2008 as part of a process of applying HCC's site allocation methodology to proposed minerals allocations in South Hampshire.

Hamble Airfield

- iii. It is concluded that Hamble Airfield is erroneously allocated in the draft Hampshire Minerals Plan. An Appropriate Assessment of impacts from this site is not yet complete removing any certainty HCC can have that this site will not affect the River Hamble SAC/SPA/RAMSAR. The site introduces significant transport, amenity, local economic and landscape impacts which have not been correctly assessed by HCC. This site should be deleted.

Other Hamble Area Sites

- iv. The recent decision by HCC planners to recommend for deletion sites at Pickwell Farm and Land North of Old Portsmouth Road is supported. These sites, and the proposed allocation at Hound, all introduce unacceptable transport, amenity and landscape impacts and were concluded by this review report as not being suitable for allocation without further assessments being undertaken.

Brownwich and Chilling Farms and Daedalus

- v. The decision not to allocate these sites for reasons similar to those at Pickwell farm and Land North of Old Portsmouth Road is supported.

Habitats Regulations Assessment

- vi. The HRA undertaken by HCC is incomplete and, consequently, the Draft Minerals Plan includes allocations that are yet to be fully and appropriately assessed. RAGE are advised that the draft Minerals Plan has not been properly assessed in line with the requirement to undertake a detailed Appropriate Assessment of Natura 2000 sites where a development plan policy and / or proposal has the potential to have significant or unknown impacts upon the integrity of that Natura 2000 site.

Integrated Sustainability Appraisal

- vii. The Integrated Sustainability Assessment relies upon a series of objectives that are not flexible or wide ranging enough to fully consider land use and sustainability objectives. Further, the Integrated Sustainability Appraisal does not correctly or fully regard the findings of the HRA and site assessment processes or consider the full range of impacts that may be experienced from the sites proposed.

Inconsistencies within the Site Assessment Process

- viii. There are concerns regarding the consistency of approach adopted by HCC in undertaking their assessment of landscape and visual impacts objectives as part of the site assessment process. The issue of consistency must be re-addressed by HCC in relation to their consideration of landscape and visual impacts at proposed allocations in the Hamble area to ensure such issues are consistently appraised.

Lack of Flexibility within the Site Assessment Process

- ix. The site allocation objectives themselves are in many instances too rigid preventing full and detailed consideration of land use planning objectives necessary to fully understand the potential impacts that might be introduced by mineral development. HCC should revisit their site assessment objectives to ensure that the assessment and allocation process provides a clear means of considering all potential land use planning objectives and development impacts.

Lack of Consideration of Alternatives

- x. In view of the cumulative failings of the site allocations and sustainability appraisal outlined above, clear problems can be identified with the continued reliance upon the allocation of sites in the Hamble area. This warrants further detailed consideration of alternatives by HCC, which has not been undertaken.

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- xi. The approach being taken by HCC towards Appropriate Assessment is not complete despite the need for an Appropriate Assessment being identified by HCC / Land Use Consultants and currently being undertaken. This Assessment is not complete, as stated by HCC's advisors Land Use Consultants in Section 5 of the June 2008 HRA report. Consequently, along with other assessments the Appropriate Assessment of Hamble Airfield is ongoing.
- xii. Where such work is ongoing, it is not possible to allocate that site. It is not appropriate in the absence of the results of the Appropriate Assessment to recommend to the Council that such a site should be taken forward as a preferred allocation.
- xiii. This suggests to elected Members, the Minerals Industry and the local community that the site is suitable when, in fact, there is significant potential it may not be. HCC Members, the local community and the minerals industry are therefore being presented with a site allocation that is inherently flawed and should be deleted.
- xiv. Further, if the Appropriate Assessment process is incomplete for the Minerals Plan, the conclusion above applied to the full document. It should not be published until the findings of the Appropriate Assessment are known and the Council are able to make an informed decision as to the appropriate sites for allocation in their County. At present, the information is not available to take such a decision.
- xv. Continued reliance by HCC on such an approach and its resulting contents included in the draft Minerals Plan will lead to the preparation of a Plan that is flawed through the process it has followed and therefore unsound.