



Residents Against Gravel Extraction

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

Report Prepared by Adams Hendry Consulting Ltd

June 2008

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TITLE: South Hampshire Minerals Allocations Review

CLIENT: Residents Against Gravel Extraction

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ADAMS HENDRY CONSULTING LTD

RTPI Planning Consultancy of the Year 2005


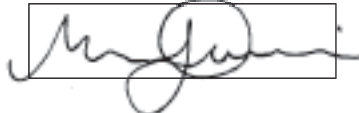
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Executive Summary

- 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.

HCC Minerals Plan Publications 18th June 2008

- 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.

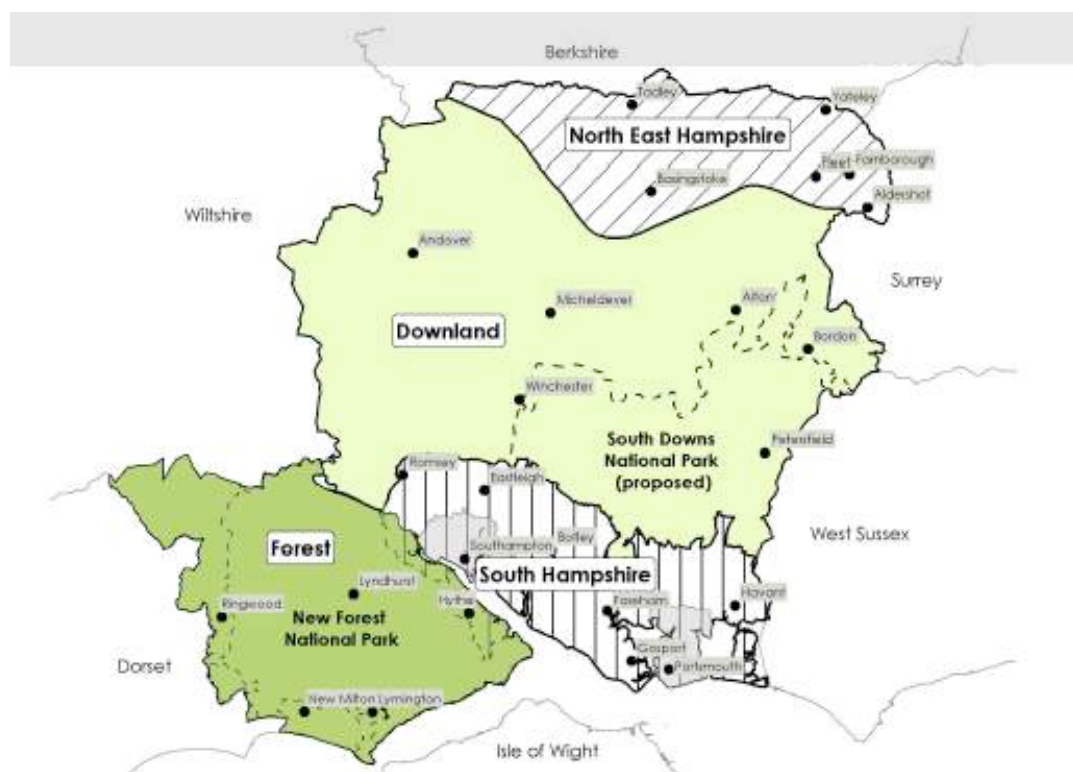
1 Introduction

- 1.1 Residents Against Gravel Extraction (RAGE) commissioned Adams Hendry Consulting Ltd to undertake an independent review and assessment of emerging minerals sites allocations proposed by Hampshire County Council (HCC) in the South Hampshire area.
- 1.2 These allocations are proposed as part of the emerging Hampshire Minerals and Waste Development Framework and are currently presented in the Regulation 26 Consultation Draft Hampshire Minerals Plan. This Draft of the Minerals Plan was consulted upon between October and December 2007. In June of 2008 HCC are due to consider the results of this consultation and further assessment work undertaken by the Minerals Planning Authority in the process of preparing the final Submission Draft of the Minerals Plan in readiness for submission to the Government in October of 2008.
- 1.3 This independent assessment was undertaken between May and June 2008 and is intended to inform the next steps to be taken by RAGE in their consideration of HCC's emerging site allocations. The assessment contained in this report builds upon the following key steps:
- Initial concerns of and ongoing discussions with RAGE;
 - Review of specific site allocations in the Hamble area, at Brownwich and Chilling Farms, and at Daedalus;
 - Review of HCC's Core Strategy and draft Minerals Plan;
 - Review of HCC's site assessment process;
 - Review of HCC's Integrated Sustainability Appraisal, in respect of the above site allocations;
 - Review of HCC's Habitats Regulations Assessment, in respect of the above site allocations;
 - Site visits to each of the allocated sites considered in this report; and
 - A review of HCC's Minerals Plan publications on 18th June 2008.
- 1.4 The result of this assessment is a detailed series of site proformas for each proposed allocation identifying key issues and potential problems at each allocation. From this it has been possible to provide recommendations to RAGE as to specific points of land use planning concern that can be raised with HCC.
- 1.5 The assessment has also allowed for a view to be reached regarding the adequacy of the assessment process itself and, again, to recommend specific points of concern to RAGE that may benefit from further consideration by HCC.
- 1.6 This report represents the professional views of Adams Hendry Consulting Ltd and the staff responsible for compiling its contents. The conclusions of this report are recommended to RAGE as an independent overview of HCC's Minerals Plan Site Allocations process and to inform their next steps in making representations to HCC.

2 Overview of Hampshire County Council's Assessments

- 2.1 HCC's method of approach to allocating their future minerals sites in their emerging Minerals Plan is a suitably comprehensive one. It makes use of quantitative assessment and qualitative judgements to propose a series of allocations across the County that are intended to progress the County towards meeting its minerals apportionments as identified in the now adopted Hampshire Core Strategy.
- 2.2 This methodology has been formulated over a number of years of iterative research and consultation intended to develop an approach that is capable of identifying robust site allocations. Building on the Minerals Resource Areas (MRAs) identified in the County, an approach that has been adopted into the Core Strategy and formulated in consultation with stakeholders, HCC has sought to identify allocations in each MRA, of which there are four and South Hampshire is one. These MRAs will make provision for an identified sub-County apportionment of mineral as specified in the Core Strategy.
- 2.3 Extract 1 below shows the four MRAs in the County and Extract 2 identifies the sub-County apportionment intended to be met through the provision of mineral allocations within each MRAs.

Extract 1: HCC Mineral Resource Areas



Extract 2: HCC Mineral Provisions by Mineral Resource Area

Area	Indicative 'New' Provision (2007 - 2016) (million tonnes)	Indicative 'Strategic Reserve' Provision (2017 - 2020) (million tonnes)
North East Hampshire	1.91	1.732
Downland	5.27	2.572
Forest (excluding the New Forest National Park)	6.08	4.652
South Hampshire	3.69	1.564
Total	16.95	10.52

- 2.4 This report does not intend to consider the merits of adopting this approach to mineral apportionment and site allocation: this has been adopted into the Hampshire Local Development Framework following the adoption of the Hampshire Core Strategy in June/July 2007 and has been considered to represent a sound approach to this issue.
- 2.5 The site assessment and allocation methodology used by HCC and the resulting Minerals Site allocations are still to pass through a process of formal scrutiny afforded by Examination in Public. As such, it has not been determined if the approach taken by HCC is sound or not. Although this report does not seek to assess HCC's site allocation work in this respect, there are a number of conclusions that raise concerns as to how the process has been undertaken. In turn, these place some uncertainty on aspects of HCC's approach to minerals site allocation, and possibly therefore the soundness of their approach.
- 2.6 To this end, six areas of concern have been identified:
- Possible mis-application of the Habitat Regulations Assessment;
 - Lack of comprehensive assessment in HCC's Integrated Sustainability Appraisal;
 - Inconsistencies of approach to appraisal of certain objectives;
 - Lack of flexibility within certain objectives to undertake a robust appraisal;
 - A need for further work to be undertaken to fully consider alternatives available to the proposed sites in South Hampshire; and
 - The allocation of sites beset with a range of adverse land use, planning and sustainability impacts.

These issues are addressed further below.

- 2.7 Appendices 1 and 2 outline the specific key concerns for each site in more detail and provides a potential conclusion as to the ongoing role each site might be expected to play. This has been prepared as if the appraisal and assessment objectives for the site allocation process include the issues raised above and had incorporated a completed HRA process as required.

3 Failings of HCC's Habitats Regulations Assessment

- 3.1 Habitats Regulations Assessment (HRA) is a requirement of the development plan preparation process. Plans must be subject to a HRA and, if identified as required, an Appropriate Assessment under the Habitats Regulations to demonstrate that their implementation would not adversely affect the integrity of sites designated as part of the Natura 2000 network.
- 3.2 As stated by HCC in paragraph 1.6 of their report of October 2007 'Hampshire Minerals Plan Habitats Regulations Assessment', *"HRA is based upon rigorous application of the precautionary principle and therefore requires those undertaking the exercise to prove that the plan will not have adverse effect on the sites' integrity. Where uncertainty or doubt remains, an adverse impact should be assumed"*.
- 3.3 Where such a conclusion is reached as part of the process of screening proposals, including site allocation it is then necessary to proceed to a second stage of assessment, known as the Appropriate Assessment (AA). The following extract from HCC's October 2007 HRA report illustrates the relationship between screening and undertaking a detailed AA, including the trigger point for such an assessment becoming a requirement.

Extract 3: HCC's Stages of HRA

Stage	Task	Outcome
Stage 1: Screening	Description of the plan Identification of potential effects on Natura 2000 sites Assessing the effects on Natura 2000 sites	Where effects are unlikely, prepare a 'finding of no significant effect report'. Where effects judged likely, or lack of information to prove otherwise, proceed to Stage 2.
Stage 2: Appropriate Assessment	Gather information (plan and Natura 2000 sites) Impact prediction Evaluation of impacts in view of conservation objectives Where impacts considered to affect qualifying features, identify alternative options Assess alternative options If no alternatives exist, define and evaluate mitigation measures where necessary	Appropriate assessment report describing the plan, Natura 2000 site baseline conditions, the adverse effects of the plan on the Natura 2000 site, how these effects will be avoided through, firstly, avoidance, and secondly, mitigation including the mechanisms and timescale for these mitigation measures. If effects remain after all alternatives and mitigation measures have been considered proceed to Stage 3.
Stage 3: Assessment where no alternatives exist and adverse impacts remain taking into account mitigation	Identify 'imperative reasons of overriding public interest' (IROPI) Identify potential compensatory measures	This stage should be avoided if at all possible. The test of IROPI and the requirements for compensation are extremely onerous

- 3.4 As can be seen from Stage 1, and from paragraph 1.6 of HCC's HRA report, where effects are judged to be likely upon a Natura 2000 site by virtue of the inclusion and implementation of a particular proposal, it is a requirement that those undertaking the appraisal proceed to Stage 2 and undertake an AA.
- 3.5 This AA would need to undertake a more detailed consideration of the implications of implementing that proposal, including a consideration of alternative options that may be available. Where it is not possible to identify that all effects can be mitigated, and in the absence of alternatives for the provision of minerals development, it is necessary to proceed to Stage 3, although this stage is advised to be avoided if at all possible.
- 3.6 The reason for this warning lies with the requirement, in such circumstances, to demonstrate that in having effects upon the Natura 2000 site as identified through screening and Stage 2, there are 'Imperative Reasons of Overriding Public Interest'¹ warranting the continued inclusion of that allocation. In addition there is an onerous requirement to provide compensation under Stage 3 that would also need to be scoped into the ongoing inclusion of a particular site.
- 3.7 The screening process, Stage 1, undertaken by HCC for each of the proposals in South Hampshire is considered to be robust and detailed. The conclusions reached are clear in respect of impacts that may be experienced at each of the Natura 2000 sites that may be affected and appropriate reference is then made to the intended allocations that have the potential for impacts. This process was then used to inform the subsequent recommendations for the Hampshire Minerals Plan provided in the HRA report in Table 4.2. These recommendations only addressed sites where the potential for impacts upon Natura 2000 sites was identified.
- 3.8 In respect of sites considered in this report, the HRA drew conclusions and recommendations for two of them. The allocation for Hamble Airfield, Hamble was identified as having the potential for impacts upon Natura 2000 sites. It was consequently recommended in the HRA report that the Minerals Plan includes the following text alongside the ongoing allocation of Hamble Airfield:
- "Reference to the requirement for adequate information to be supplied regarding transport volumes and routes in any proposals for extraction specifically in relation to maintaining the integrity of the Solent Maritime SAC, Solent and Southampton Water SPA and RAMSAR" (HCC HRA Report Table 4.2).*
- 3.9 In reviewing the detailed screening conclusions the same recommendation is provided, alongside the impacts upon the Natura 2000 sites that warrant such a recommendation. These impacts are summarised below, as stated for each of the Natura 2000 sites affected:
- *Significant effects from non-physical disturbance and toxic and non-toxic contamination (due to activities at the mineral sites) may be likely over the breeding seasons and winter due to the number of sites (including sand and gravel sites) in proximity to the Natura 2000 sites (500 metres).*

¹ Imperative Reasons of Overriding Public Interest (IROPI) as introduced by the EC Habitats Directive and incorporated into Development Plan making through the requirement for Habitats Regulations Assessment

- *Significant effects due to the transport of aggregate by road (toxic contamination) may be likely due to the proximity of the minerals and waste lorry route to the Natura 2000 sites.*
- *Significant effects from changes to hydrology and some toxic and non-toxic contamination effects are uncertain as they depend on hydrological connectivity / pathways between the minerals sites and the Natura 2000 sites.*

(Adapted from Appendix 4, Table 1 of the HCC HRA Screening Report)

- 3.10 In other words, the screening process identified that significant effects were either likely or uncertain upon the above SAC, SPA and RAMSAR designations by virtue of including the Hamble Airfield site allocation. In addition, the recommendation for further information to be required suggests that there is currently a lack of information to judge that such effects would not be likely.
- 3.11 Consequently, and in accordance with the methodology identified above in Extract 3, this process has not been followed through correctly with the undertaking of the Stage 2 of HRA for the Hamble Airfield allocation, i.e. to complete an AA of that proposal.
- 3.12 The same conclusions were reached by HCC in their HRA report in respect of the Daedalus allocation at Lee-on-the-Solent and, as outlined above in respect of Hamble Airfield, the same concerns are raised by this report.
- 3.13 Should the Brownwich and Chilling Farms potential allocation be considered further then, in noting the same conclusions in the detailed screening appendices to the HRA report prepared by HCC, the same concern would be raised to this allocation if an AA were not undertaken prior to its allocation.

4 Failings of HCC's Integrated Sustainability Appraisal

- 4.1 There is some concern regarding the outcomes recorded in HCC's Integrated Sustainability Appraisal (ISA). As already highlighted above, the HRA makes clear reference to the potential for significant or significant unknown effects upon Natura 2000 sites from the proposed allocation at Hamble Airfield, as well as at Daedalus and Brownwich and Chilling Farms. However, under the ISA objective of biodiversity, only the potential Brownwich and Chilling Farms allocation appears to have been identified as having the potential for significant negative effects upon this objective. Wherever the HRA makes specific reference to this issue, the ISA should also include this too.
- 4.2 Under the conclusions of the detailed ISA matrices (page 132 of the 2007 ISA Report), the report identified under biodiversity that negative impacts upon the integrity of Natura 2000 sites will be *likely* from Hamble Airfield, such impacts from Brownwich and Chilling being *significant*. In the HRA both are considered to be of significance.
- 4.3 Minor negative effects from development of the Hamble area sites are noted in paragraph 7.55 of the ISA report in respect landscape, vibrant communities, amenity, access to open spaces and health and quality of life. However, this is a very broad conclusion and, in respect of amenity, health and quality of life objectives, is based on little consideration of such impacts upon the local communities in the Hamble area.
- 4.4 Appendix 1 of the ISA report refers only to Brownwich and Chilling Farm and Daedalus sites in respect of these issues, although it is unclear why these do not equally apply in the more populated Hamble area. Conversely, the site assessment process identifies that there is clear scope for such impacts.
- 4.5 A final area of concern with the ISA lies with the consideration of air quality and water environment impacts arising from the development of any of the potential site allocations in South Hampshire, particularly those in the Hamble Area. At present, the ISA air quality objective focuses upon Air Quality Management Areas (AQMA) and additional impacts upon these. Whilst valid, this is a restricted view that does not allow for consideration in detail of localised air quality impacts, AQMA or not.
- 4.6 The consideration of flooding and water resources focuses upon designated zones and boundaries relating to Flood Risk Areas and Source Protection Zones, as per the site appraisal process. Again, whilst these are valid, the need to look at indirect effects upon these hydrological and hydrogeological impacts is also key, particularly where large bodies of mineral are proposed to be removed from the ground and the associated groundwater and draw down impacts associated with such activity are unclear.
- 4.7 These two concerns are also raised below in Section 5 in relation to the lack of flexibility with the site assessment process.

5 Inconsistencies within the Site Assessment Process

- 5.1 A key benefit of undertaking site assessments to inform the preparation of minerals plan site allocations documents is the opportunity to contrast the similarities and differences and strengths and weaknesses of the sites being considered, both locally and at a County-wide level.
- 5.2 This helps to ensure that sites are being included and excluded on equal criteria: e.g. if significance is given to the sensitivity of a receiving landscape irrespective of a lack of specific characterisation of designation, this assessment process can be applied in other areas where such impacts may have significant effects.
- 5.3 To some degree, the appraisal and assessment methodology used by HCC does allow for this to occur. However, in the case of the assessment of landscape impacts from sites in the Hamble area the conclusions reached at one site in respect of a particular assessment objective have not been matched by conclusions elsewhere, despite similarities in the receiving environment.
- 5.4 The sites located in the area around and north of Hamble all fall within a clear 'belt' of undeveloped land between Hamble, Old Netley, East Southampton, and Netley. All sites are located close to if not adjacent to housing and other land uses. Along with transport routes in the area, all play a role in defining the current extent of built development in these areas.
- 5.5 The introduction of mineral extraction at all or any of these sites will introduce new impacts upon the landscape in this area and new potentially adverse visual impacts upon those who live and work in the affected areas. Working from north to south through each of the Hamble area proposed allocations the following gradings were provided for each identified parcel of land:

Proposed Allocation	Landscape character grade	Visual impact grade
Land at Portsmouth Road site D	B	A
Land at Portsmouth Road site B	B	A
Land at Portsmouth Road site A	C	A
Land at Portsmouth Road site E	B	A
Land at Portsmouth Road site C	C	A
Pickwell Farm A	A	B
Pickwell Farm B	A	B
Pickwell Farm C	A	B
Hound	B	B
Hamble Airfield	B	A

The gradings reflect the severity of the impact. Grade A is most severe in direct accordance with or significant, whilst lower grades implied reduced concern.

- 5.6 Although the gradings do not differ significantly, it is unclear why, given their close proximity to each other and their location in the same belt of open farmland and undeveloped land there is any change in assessment. Recent site visits reaffirmed that the potential for visual and landscape and character impacts by mineral development at any of these sites would give rise to similar impacts as all are in proximity to and, in some instances, adjacent to housing and other sensitive land uses.

6 Lack of Flexibility in the Site Assessment Process

- 6.1 The ability to consider a wide range of impacts and issues under each objective is key to producing a full assessment of each site. A number of the assessment objectives used by HCC do not allow for this and, as a result, the conclusions reached in the assessment are not necessarily truly reflective of impacts upon the receiving environment.
- 6.2 This chapter reviews HCC's assessment work up to October 2007, whilst further consideration of key recent research and assessments undertaken by HCC to inform their June Cabinet Report is provided in Chapter 8

Water Environment

- 6.3 The first issue of significance is that of hydrogeology, hydrology, groundwater and surface water impacts from the development of the sites allocated. Whilst the current objectives are correct in identifying impacts on known features and designations such as aquifers and source protection zones or flood plains, they do not represent a full consideration of key issues.
- 6.4 For example, whilst flooding is addressed where sites might be restored to landfill, even where that site lies outside of the floodplain, flooding during extraction due to changes to surface water drainage and groundwater flows does not appear to have been assessed, as there is no objective addressing this issue.
- 6.5 Under surface water, the appraisal considers impacts upon controlled surface water and coastal waters. However, it does not appear to allow for the consideration of impacts upon surface water flows, site drainage / off-site drainage and eventual discharge to fluvial or coastal waters, despite the location of sites in South Hampshire in close proximity to such features.

Air Quality

- 6.6 Although the site appraisal process allows for the consideration of air quality impacts, there is little scope for their consideration where they are not relative to an Air Quality Management Area (AQMA) as this is the remit of the air quality objective. Grade E or green (assumed to mean 'OK') is given in the Hamble area as the sites are not within an AQMA. However, this approach removes the opportunity to consider the impacts of mineral extraction upon the local area in terms of impacts upon air quality, irrespective of AQMA status. This issue will be key as dust and vehicle emissions will need to be considered at all sites in South Hampshire, not least those in the Hamble area due to the close proximity of all of these sites to sensitive receptors.
- 6.7 Further, the issue of air quality and the impacts upon the marinas is a very particular concern, as recently outlined in a report by the River Hamble Harbour Board dated 30th May 2008 in respect of mineral extraction in the Hamble area. Among their chief concerns of road congestion and surface water run off is the issue of dust and impacts of extraction upon local businesses. Marina based businesses are estimated by the Board to contribute in the region of £50 million per annum to the local economy and employ in excess of 3000 people.

- 6.8 As Minerals Planning Authority (MPA), HCC should be aware of and apply the provisions of Minerals Policy Statement 2, Annex: Dust. This is applicable to all areas of work undertaken by MPA due to the material weight afforded to impacts arising from dust produced by minerals workings. Paragraph 1.1 sets the scene for this guidance by explaining that dust impacts can be experienced by local communities over areas up to 1 km from the source of dust.
- 6.9 HCC's reliance upon AQMAs does not reflect this potential and further illustrates the lack of flexibility within their objectives to consider key environmental impacts associated with site allocations comprehensively.

Economic Impacts

- 6.10 Any adverse impacts upon the River Hamble, access into and out of the peninsular, use of the river and the condition of boats moored at marinas has the potential to impact upon this business environment, yet the objectives under the site selection process does not expressly address this range of issues. Instead, it focuses on whether or not the site will affect areas of high density employment, accessibility by public transport, and scope for creating additional employment. Had general impacts upon business, employment and economics been assessed under specific objectives it is reasonable to assume that a conclusion of potential for adverse impacts upon these indicators would have been reached.
- 6.11 The issue of impacts from HCC Minerals allocations upon local economies has also been identified elsewhere in the County. Allocations at Downton, Milford and Ashley Manor Farm have all now been rejected by HCC for a range of reasons including impacts upon businesses and the local economy. Given the clear synergy in the Hamble Peninsula, which is serviced by one suitable road, between its business uses, the River Hamble and the local land uses, this review concludes that similar reasons for rejecting the Hamble Airfield allocation apply.

Sensitive Receptors / Amenity

- 6.12 There are concerns regarding the approach taken to identifying impacts upon sensitive receptors through the site allocation methodology. At present, impacts are based upon whether or not the site will be a landfill site, the type of landfill it may be, and how close it is to sensitive receptors. This does not identify the potential for impacts from the mineral extraction operations themselves through noise, intrusion, nuisance, vibration and lighting, all of which can have a wide range of effects and over a varying range of distance.
- 6.13 Coupled with dust impacts, visual impacts and traffic impacts, this range of issues requires consideration to ascertain the level of intrusion minerals development may have: to date this does not appear to have been carried out. One cross assessment concern is that there appears to have been no recognition of this potential under the site appraisal or the ISA process either.

Transport

- 6.14 The existing transport objectives focus on the distance from the minerals and waste lorry route network and the opportunity for integration with alternative modes of transport to road freight. Whilst these are both valid, such an approach does not seem to have identified that, in connecting to the minerals and waste lorry network

through use of the B3397, for example from the Hound or Pickwell allocations, this will have direct impacts upon sensitive receptors at Old Netley. As with amenity and sensitive receptors, this issue is not recognised in the ISA process in the Hamble area.

- 6.15 This issue worsens as the B3397 progresses south into Hamble where it is recognised by HCC in their site assessments that the infrastructure becomes deficient. Instead, reference is made to the potential to make use of intermodal options, utilising the railway links at Hamble, a local station without provisions for minerals storage, siding and distribution operations. Reference is also made to the potential to remove mineral from Hamble Airfield by conveyor, potentially to Pickwell Farm, where it could be possible to distribute the mineral from.
- 6.16 Whilst moves towards use of sustainable transport options should always be supported by site assessment processes, reliance upon rail for the distribution of minerals must also be feasible. This requires consideration of the adequacy of the rail network servicing the site producing the mineral; the adequacy of receiving rail depots for the onward distribution of the mineral, and the associated adequacy of the surrounding road network at those receiving depots. The adequacy of this network must also be considered against the location of the market for the minerals being produced.
- 6.17 Although use of conveyors is a useful way of moving mineral over localised sites, these two sites are in no way connected, separated as they are by several physical features including the railway line and the B3397. It is not clear how HCC envisage conveying mineral from Hamble Airfield, over the B3397, past the land uses alongside the B3397, over the railway line, around Hound and Hound Farm, past Priors Hill Copse and finally onto Pickwell Farm. Even if the mineral can be conveyed to Pickwell Farm it is unclear how it would leave this site. Pickwell Farm is now proposed to be deleted from the Minerals Plan in reflection of significant traffic and transport impacts associated with removing mineral from this site. Such conclusions would apply to mineral imported into Pickwell Farm from Hamble Airfield.
- 6.18 Further concerns may exist in relation to the BP oil refinery located in Hamble. Should a major incident occur at this site there is potential for serious conflict between existing traffic, additional minerals traffic and essential emergency traffic seeking to gain access into the peninsula. Additional cumulative transport impacts may also be experienced should redevelopment of the Vosper Thorneycroft site at Woolston proceed, consequently introducing additional vehicle movements onto Hamble Lane. However, as the objectives do not seem to introduce a qualitative approach to considering these issues, it is unclear how the draft Minerals Local Plan proposes that they are to be overcome.
- 6.19 It is also noted that the minerals and waste lorry routes adopted in the Core Strategy and now being used to inform the process of sites allocation do not represent the emerging classification of lorry routes proposed by the Local Transport Planning Team at HCC. The current draft classification map shows that only the A3024 out of all of the roads close to the Hamble Peninsula is identified as part of the proposed Designated Local Lorry Route Network for Hampshire. The A3025 and B3397 are not currently listed at all.
- 6.20 Further consideration of HCC's traffic and transport assessments, including the outcomes of a recent independent report, are provided in Chapter 8

7 Lack of a Consideration of Alternatives

- 7.1 Site assessment and allocation is not an exact process. The matching of a suitable range of sites to provide all requirements identified to be planned for will not always tally exactly, particularly where the allocations are for the provision of minerals and waste developments. Such shortfalls in capacity can sometimes be made up through investigating opportunities elsewhere in the plan area, but may also remain unmet.
- 7.2 What is certain is that the inclusion of minerals allocations which, on paper meet apportionment requirements but in reality may not be favoured by the industry and would not represent sustainable development is not a sound approach to site assessment or minerals planning.
- 7.3 Where progress has been made in identifying sites with the potential to be accommodated by their host environment and to secure planning permission these are welcomed. They represent a firm starting point in delivering the requirements identified in the Plan, in this case the minerals apportionments for Hampshire.
- 7.4 However, where uncertainties exist and / or problems have been identified that do not appear to have any ready solution then it is the responsibility of the plan makers, in this case HCC, to begin the consideration of alternatives. In the case of the Hampshire Minerals Plan, these alternatives would include looking elsewhere in the each MRA where problems of allocation exist, looking elsewhere in the Plan Area, or, as a final resort, considering an alternative approach whereby the mineral apportionments are not fully met through site allocations alone.
- 7.5 The issue facing HCC in the case of proposed minerals allocations in the Hamble area is that, without exception, all experience sustainability issues not properly addressed in the site allocations process. In the case of Hamble airfield these issues pose risk of significant adverse effects upon the local community through traffic, landscape, amenity and air quality impacts, whilst the significant / unknown significant impacts upon the nearby Natura 2000 sites remains screened but not assessed.
- 7.6 Through the review of assessments included in this report and following consideration of HCC's recent transportation assessments it is clear that the scope for sites proposed within the Hamble peninsula to accommodate the transport movements associated with minerals extraction is low. The recent recommendation that only the Hamble Airfield site should remain illustrates this, whilst further review in Chapter 8 concludes that even this final allocation is unsuitable.
- 7.7 It would be expected, when faced with the range of adverse impacts upon an environment as associated with these sites, that some form of assessment of alternative options would be undertaken. When existing key alternatives in the South Hampshire MRA are considered, it is apparent that the shortcomings of the process that have been experienced in the Hamble area are also present at the Brownwich and Chilling Farm site and the Daedalus allocation.
- 7.8 It is therefore the case that, in the absence of any firm site allocation opportunities amongst existing South Hampshire sites as considered by this report, HCC must undertake a further round of site search and assessment. This would need to focus on identifying new areas of land either in the South Hampshire area or further afield in

other MRAs in the County. The apportionment is identified for the County as a whole and, desirable as it may be to break this down by MRA where this would work, HCC should focus on meeting this apportionment by making the most of their County-wide resources.

- 7.9 Failing this, it may be the case that the Plan must recognise that only an incomplete provision can be made toward meeting the apportionment through site allocations and that these outcomes should be used to frame the strategy and policies of the Minerals Plan and its approach to future sites and development.
- 7.10 What should not be pursued is an approach that seeks to make the best of a difficult situation by allocating sites that are known to have significant sustainability issues. Whilst it is accepted that the development of the Minerals Plan is a 'work in progress' (HCC Draft Minerals Plan, paragraph 1.7), it would be reasonable to expect that policies and proposals of that Plan that are revealed as being in conflict with the Plans' sustainability and assessment criteria would, as work progresses, be either amended, or removed where mitigatory changes are not achievable.
- 7.11 Further need for consideration of alternatives will also arise should HCC progress with full Appropriate Assessments of the Hamble Airfield, Brownwich and Chilling Farms and Daedalus allocations as identified as being required elsewhere in this report. Under this process, HCC will need to consider the alternatives to ensuring the provision of these mineral resources at these allocations, including alternative sites in South Hampshire, the wider County or, if necessary, further afield.
- 7.12 Although there is a statutory requirement placed upon HCC to identify land for the extraction of minerals, as outlined in paragraph 1.6 of the draft Minerals Plan, there are no requirements that state this should be undertaken even where known sustainability issues can be identified. Paragraph 1.6 goes on to explain that the sites put forward in the Regulation 26 Draft Minerals Plan represent the most sustainable and least environmentally damaging portfolio of sites available for meeting the requirements of the Core Strategy for providing for mineral extraction. However, and as outlined through this report, it is clear that a number of key sustainability issues remain at sites identified in the Hamble area, suggesting that this is not the case.

8 HCC Publications 18th June 2008

HCC Cabinet Report / Interim Framework

- 8.1 Recommendation C of the report of the Director of the Environment prepared for the HCC Cabinet meeting on 23rd June 2008 states that HCC wish to see the emerging Minerals Plan adopted as the interim framework for the operation of planning control until the Hampshire Minerals Plan is superseded (presumably by the Adopted version).
- 8.2 There are no provisions published and in force in any part of the 2004 Planning and Compulsory Purchase Act that allow HCC, or any other planning authority to take this step as part of the preparation of their Local Development Framework. HCC are therefore not empowered to *adopt* a planning document prepared as part of the Local Development Framework for the purpose of determining planning applications without it first having been prepared in accordance with the Town and Country (Local Development) (England) Regulations 2004 (SI 2004 / 2204). Similarly, no such provisions are made in the recent amendments to these Regulations as contained in the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 (SI 2008 / 1371).
- 8.3 These regulations do not include a provisions for an interim framework that may be adopted by planning authorities. The process that must be followed, after consulting upon the Regulation 26 draft Plan, is to prepare a revised plan based upon representations received and other relevant changes to their evidence base, which can be issued under Regulation 28 and submitted to the Secretary of State.
- 8.4 Following submission of further documentation including all representations received under the regulation 28 stage of the process, HCC will be required to attend and Examination in Public into the soundness of their Plan which will be chaired by an independent Government Planning Inspector. Only once the Inspectors report has been issued and incorporated into the Plan can HCC or any other local authority begin the process of adoption.
- 8.5 This approach is as referred to in recommendation B, i.e. to consult on the emerging Minerals Plan in its submission draft format and proceed to an Examination in Public whereby the Plan can be appropriately tested by the Government. Following this, the process of Adoption can be undertaken.
- 8.6 There are no provisions for making draft, untested and consequently potentially unsustainable policy documents part of the Local Development Framework for the purpose of taking Development Control decisions. Certainly such emerging documents may be considered as material considerations but they cannot be integrated as part of the Statutory Development Plan or the policy framework contained therein.
- 8.7 The Development Plan is currently as follows for Minerals Planning: the Adopted Hampshire Core Strategy and the components of the Adopted Minerals and Waste Local Plan as saved by the Secretary of State. For Minerals, HCC's website identified these relevant saved policies as Policy 19 Preferred Areas – Minerals; and Policy 21 Safeguarded Areas – Minerals. Decisions will need to be taken in accordance with

these provisions and other relevant guiding provisions provided through regional guidance in the Regional Spatial Strategy for the South East and relevant national Planning Policy and Minerals Policy Statements.

Revised Habitats Regulations Assessment

- 8.8 In seeking to take forward the Minerals Plan to its next consultation stage, HCC have undertaken further research and assessment work to inform the documents contents and proposals. This work is welcomed, although it is appropriate to point out that the delay in making such documents publicly available until immediately (i.e. 3 working days) prior the democratic process is considered unhelpful for stakeholders involved with this process, particularly given the volume of material published.
- 8.9 A key aspect of the next round of consultation is to test the soundness of the Minerals Plan, the key area of scrutiny it will face at Examination in Public. Whilst much of the recent work undertaken is welcomed and considered appropriate, one significant area or work places the current soundness of the plan and its preparation process in serious doubt.
- 8.10 In undertaking the Habitats Regulations Assessment of the Minerals Plan, HCC identified in their 2007 report that significant or unknown effects upon the River Hamble SAC/SPA/RAMSAR could occur. An Appropriate Assessment was not, however, undertaken, despite being part of the recognised approach to considering such issues and part of HCC's own methodology, as advised through Government guidance.
- 8.11 During 2008, this process has belatedly been commenced. To allow for a site to be concluded as suitable for ongoing inclusion in the Plan under these assessments it is reasonable and necessary to require the full results of the Appropriate Assessment to be available before taking the decision to include. Land Use Consultants, HCC's HRA advisors, state clearly in Section 5 of their 2008 draft HRA Report that they have not completed this process, despite the draft Plan being presented to Members in June 2008.
- 8.12 They, and therefore HCC, do not know what the impacts upon the River Hamble may be. Therefore, they cannot conclude that the site would not have any effects of significance, or, if it does, that there are imperative reasons of overriding public interest to continue with this site and that no alternatives exist locally, in the County or regionally.
- 8.13 Consequently, HCC planners are not able to recommend that this site can be included because they do not yet know if it passes the Appropriate Assessment. In turn, HCC's Elected Members cannot approve this site as they do not know if it can be allocated. This site should not therefore be included if HCC wish to progress their Minerals Plan now. It must be deleted.
- 8.14 As this failing applies to several sites in the County, it also suggests that HCC planners have not completed the task of researching and assessing the sites they wish to allocate. Under Appropriate Assessment it is not acceptable to include such allocations as work in progress – there is no such provision under the regulations for such an approach.
- 8.15 This suggests that the document presented is not ready for consultation as HCC's Submission Draft.

Transport and Traffic Assessments

- 8.16 The detailed transport and traffic assessments undertaken by MOTTS Gifford on behalf of HCC is welcomed. It provides a concise and comprehensive review of the traffic impacts that would be introduced by minerals developments in the County and quantifies the increase in road usage and associated acceptability of such usage.
- 8.17 The resulting recommendation in respect of Pickwell Farm and Land North of Old Portsmouth Road and their subsequent deletion by HCC is fully agreed with as an acceptable approach to take in the face of two significant minerals allocations.
- 8.18 Notwithstanding these comments, concern remains that this assessment in concluding that access associated with Hamble Airfield was questionable has not been carried through into HCC's allocations process. Only one access point was identified as suitable from Hamble Airfield requiring the development of a new roundabout junction. Such a solution was identified as expensive and possibly requiring encroachment onto 3rd party land which in turn would influence its feasibility.
- 8.19 When these judgements are considered against the conclusions drawn earlier in this report in terms of effects upon the local community, amenity and the local economy, it is uncertain as to why HCC have continued to include this allocation. Further, as Pickwell Farm was intended for the extraction of 1.3 million tonnes of minerals and Hamble Airfield is identified as providing 2 million tonnes, is it unlikely that traffic impacts from the transportation of minerals from Hamble Airfield will be lesser in volume than at Pickwell Farm, which has now been deleted.
- 8.20 If the findings of the MOTTS Gifford report were to be used in conjunction with the detailed considerations of this review it is appropriate to conclude that, on the grounds of adverse impacts from the operation of and transportation of mineral from the site Hamble Airfield is not a suitable allocation.
- 8.21 Some consideration was also given by HCC to removing the mineral from Hamble Airfield without introducing traffic impacts onto the local roads, clearly recognising that the road infrastructure servicing this site is sub-standard. This would entail either utilising rail, considered earlier in this as likely to be unfeasible, or removing the mineral to Pickwell Farm by conveyor from where it can be distributed via the road network. Clearly, with the removal of Pickwell Farm this is no longer an option.
- 8.22 It is fair to conclude on this issue that, with the HCC acceptance of the need to remove mineral from Hamble Airfield by means other than road if possible; the concerns regarding the feasibility of creating a new junction for Hamble Airfield; the implausibility of rail freight; and the deletion of Pickwell Farm, there are no further means of distributing mineral extracted at Hamble Airfield.
- 8.23 Consequently, due significant traffic and transport conflicts, concerns and impacts, Hamble Airfield should be deleted.

9 Summary and Conclusions

- 9.1 Although considered comprehensive and a useful starting point for site assessment and allocation, concerns regarding the application of the HRA; the consistency and application of the ISA process; the consistency between landscape assessments; the robustness of the site assessments; and the lack of consideration of alternatives, places doubt over the current proposed site allocations.
- 9.2 It is appreciated that HCC must continue to make progress towards meeting their minerals apportionments as identified in their Core Strategy. However, such provisions as proposed by the Minerals Plan must be realistic and achievable, both for the minerals industry and in planning policy, land use and sustainability terms.
- 9.3 Given the uncertainties surrounding impacts upon Natura 2000 sites there is an argument for applying the precautionary principle to these allocations as identified in HCC's own HRA report and continuing to look for more suitable alternative allocations, either in South Hampshire or elsewhere in the County. This need to look for alternatives is amplified when all sustainability issues are considered in combination.
- 9.4 When the potential impacts and concerns raised elsewhere in terms of transportation, air quality, water environment, sensitive receptors and landscape, the question arises as to at what cost would these allocations be developed in the Hamble area? Whilst minerals sites are required, it should not be the policy of HCC to allocate and develop these at any cost.
- 9.5 Following the recent publication of supporting research and assessments it is clear that there are ongoing failings of HCC's HRA process and the resulting site allocations. Where conclusions have not yet been reached, sites still under consideration must be removed if the Plan is to stand a chance of being considered sound. Including un-assessed sites can not be considered a sound approach for HCC planners and elected members to take.
- 9.6 Where conclusions have been reached regarding detailed traffic and transport assessments these are welcomed. However, these too throw into doubt the soundness of HCC's approach to site allocation in respect of Hamble Airfield, warranting further consideration of this site with a recommendation from this review that Hamble Airfield is deleted.
- 9.7 This report makes the following 9 conclusions:
- 1. Hamble Airfield*
- 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.

2. Other Hamble Area Sites

- 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.

3. Brownwich and Chilling Farms and Daedalus

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

4. Habitats Regulations Assessment

- 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.

5. Integrated Sustainability Appraisal

- 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.

6. Inconsistencies within the Site Assessment Process

- 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.

7. Lack of Flexibility within the Site Assessment Process

- 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.

8. Lack of Consideration of Alternatives

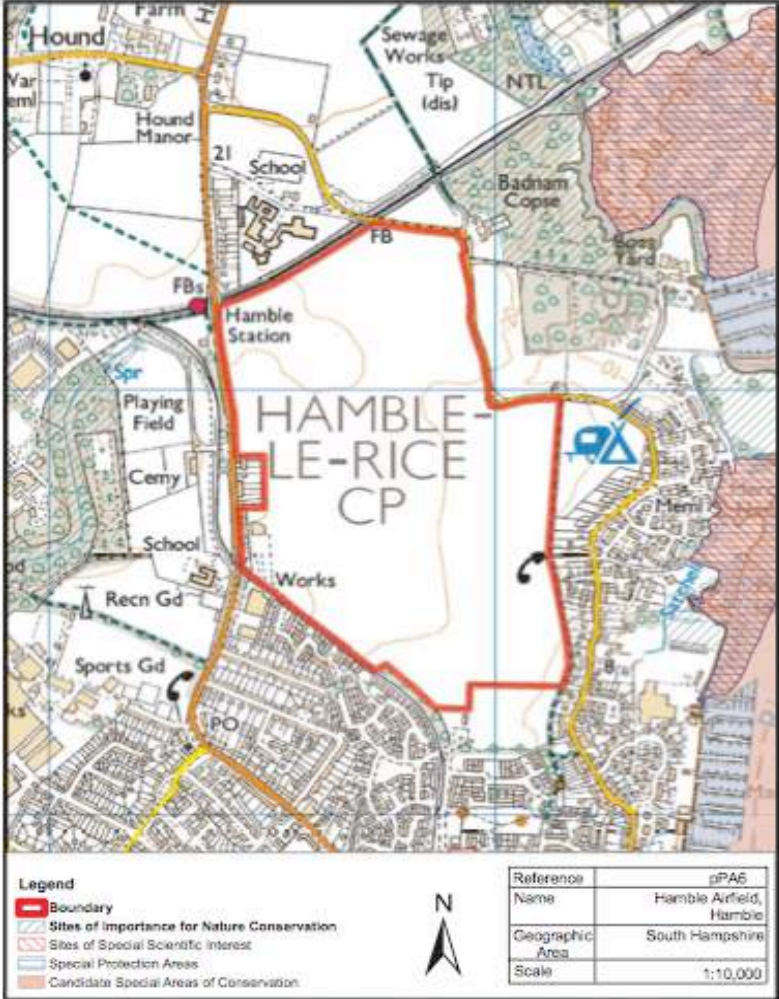
- In view of the cumulative failings of the site allocations and sustainability appraisal outlined above, clear problems can be identified with the continued reliance upon the allocation of sites in the Hamble area. This warrants further detailed consideration of alternatives by HCC, which has not been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

9. HCC Minerals Plan Publications 18th June 2008

- 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 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.
- 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.
- 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.
- 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.
- 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.

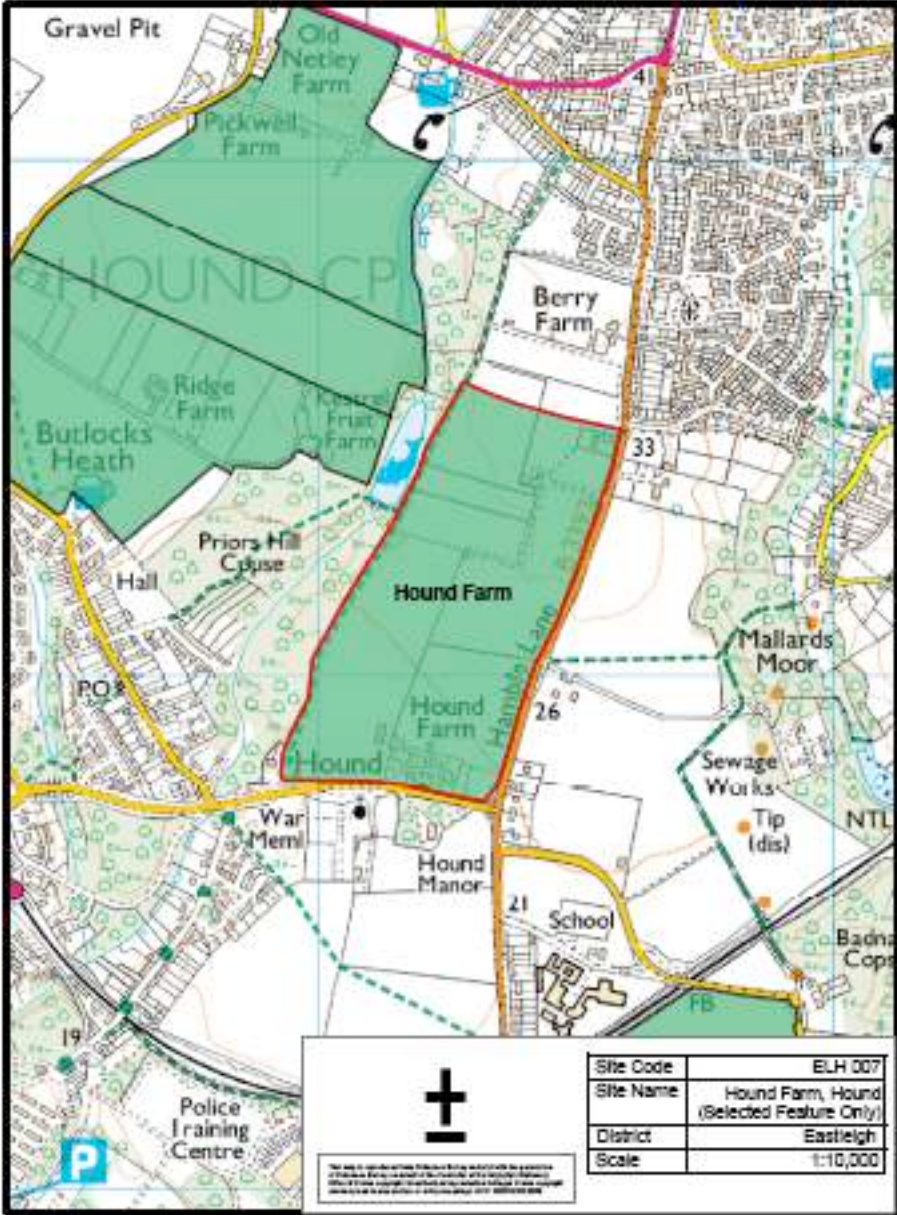
Appendix 1: Comparative Site Proformas

The following 6 proformas detail the results of the independent consideration of each site allocation considered by this study. It provides a response to the findings of HCC in respect of key issues at each site and identifies areas where the appraisal undertaken by HCC may be deficient or requiring further assessment before being suitable for inclusion.

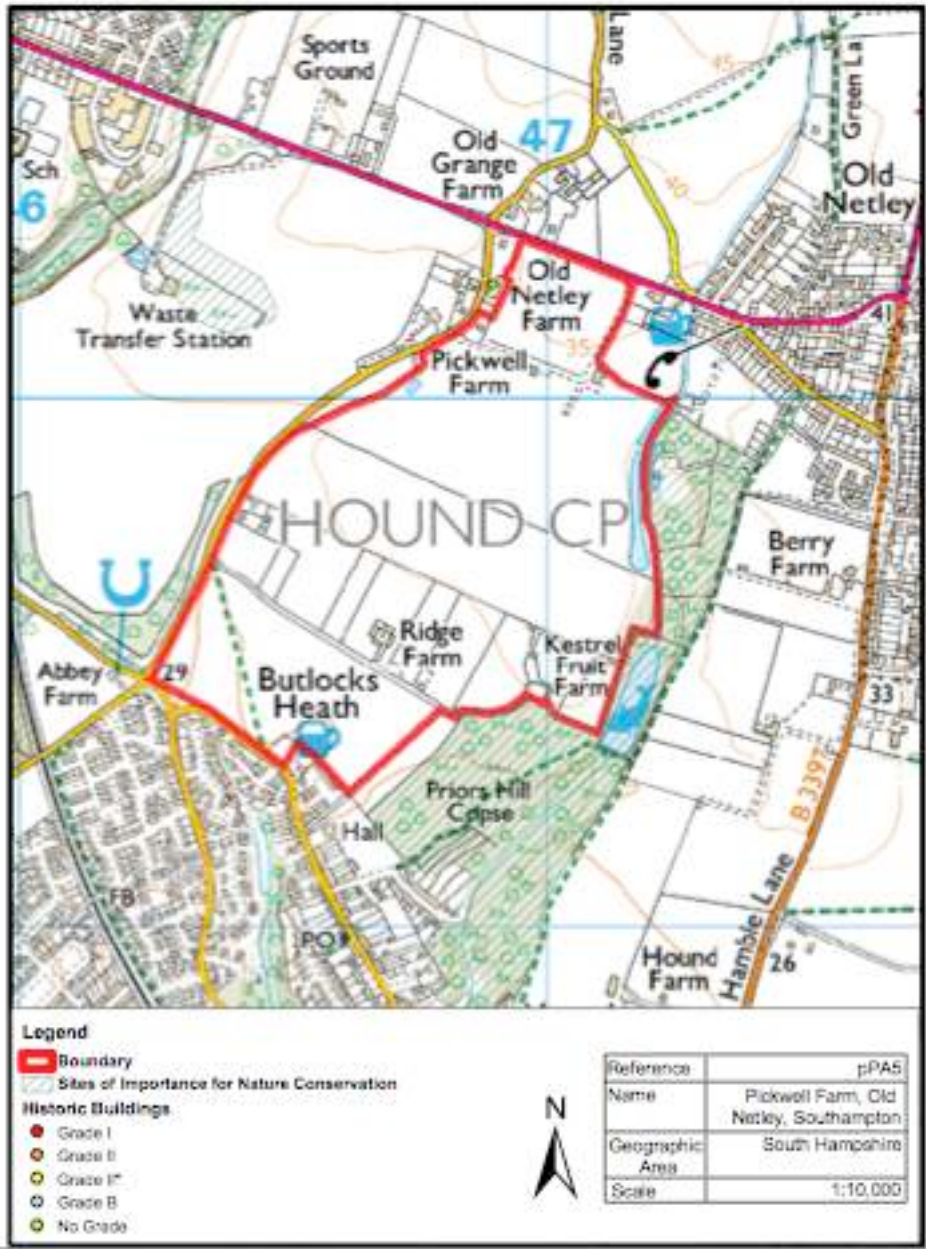
Site	Hamble Airfield, Hamble (pPA6)								
HCC Minerals Plan Allocation Map	 <p>The map shows the Hamble Airfield site (pPA6) outlined in red. Surrounding areas include Hamble Station, Hamble-le-Rice CP, and various residential and commercial areas. The map includes a legend with the following items:</p> <ul style="list-style-type: none"> Boundary (Red line) Sites of Importance for Nature Conservation (Green hatched) Sites of Special Scientific Interest (Blue hatched) Special Protection Areas (Yellow hatched) Candidate Special Areas of Conservation (Orange hatched) <p>Reference table:</p> <table border="1"> <tr> <td>Reference</td> <td>pPA6</td> </tr> <tr> <td>Name</td> <td>Hamble Airfield, Hamble</td> </tr> <tr> <td>Geographic Area</td> <td>South Hampshire</td> </tr> <tr> <td>Scale</td> <td>1:10,000</td> </tr> </table> <p>This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. HCC 10001918D 2007</p>	Reference	pPA6	Name	Hamble Airfield, Hamble	Geographic Area	South Hampshire	Scale	1:10,000
Reference	pPA6								
Name	Hamble Airfield, Hamble								
Geographic Area	South Hampshire								
Scale	1:10,000								
Key Impacts identified by AH using HCC methodology (see also Figure 1 for key impacts)	<ul style="list-style-type: none"> ▪ Landscape / Visual: adverse impact upon local area in terms of planning designations would be low due to lack of constraints. However, the visual impact of mineral extraction in this location would be significant due to proximity of housing to east, south and south west of the allocation. Impacts may continue following restoration, dependant upon restoration process utilised. ▪ Ecology: site is located within 350 metres of SAC/SPA/RAMSAR/SSSI. The potential for impacts is identified by HCC as significant to unknown significant due to the extraction of sand and gravel and the resultant alterations to the geology and hydrogeology of the area, drainage from the site and introduction of noise and vibration impacts / distribution of mineral. Any identified impacts would need to be justified in accordance with the outcomes of a Habitats Regulations Assessment which, in accordance with HCC's methodology, should include Appropriate 								

	<p>Assessment for this site.</p> <ul style="list-style-type: none"> ▪ Archaeology: inconsistencies identified between the gradings and the appraisal by HCC suggest that potential archaeological and heritage impacts may not have been appropriately accounted for. ▪ Groundwater / hydrogeology: there is a risk of impact upon the SAC/SPA/RAMSAR/SSSI by virtue of alterations to geology and hydrogeology of Hamble Airfield being located 350 metres from the designation and any impacts upon drainage. ▪ Surface water hydrology: although the site is not located in the floodplain, there has not been any consideration of indirect surface water impacts though the alteration on site hydrology following mineral extraction. In addition, surface water drainage does not appear to have been assessed, although drainage from the site has the potential to be introduced into the Solent Maritime SAC/SPA/RAMSAR/SSSI. ▪ Air quality: part of the site lies immediately adjacent to residential land use, whilst the site is also within 350 m of one marina and 450 m of another. Concerns centre on wind borne dust from site operations / vehicle circulation upon residential properties and marina businesses and boats. ▪ Sensitive receptors: the site is adjacent to residential land uses, two schools, a health centre, a playing field, a cemetery, a recreation ground and a camp site, all of which may be directly affected by noise, vibration, dust, and visual intrusion. Residential, business and marina uses located nearby will also be affected by these impacts. In addition, Solent Maritime is also designated as an SPA and the introduction of additional noise and vibration impacts has the potential to impact upon the integrity of this designation. ▪ Transport: although the site lies within a mile of the A3026, which links to the A27 and M27, linked by the B3397, the B class road is also the only route from the primary route network to the Hamble and its marinas, housing and businesses. In addition to the strategic conflict, localised conflicts occur between the use of the land for mineral extraction and the ongoing use of existing schools, residential properties, leisure uses, businesses and importantly (in economic terms) the marinas. ▪ Restoration: although this is dependant upon the restoration pursued, anything other than a return to current surface levels through inert landfill would alter the visual appearance of the area permanently.
Primary Impacts	<p>Landscape: due to the significant change in the appearance of the land that will be required by mineral extraction there is little opportunity to screen the impacts of this development from immediately adjacent land uses such is their proximity to the site and potential for overlooking views. This impact should be considered to be severe with the potential to warrant deletion of this site.</p> <p>Ecology / Groundwater / Hydrology: mineral extraction has the potential to upset the hydrological and hydrogeological regime that may support features protected by the SAC/SPA/RAMSAR designation, particularly when within 350 metres. Further, introduction of mineral operations at this site would introduce noise and vibration impacts which have the potential to effect the Solent and Southampton Water SPA.</p> <p>A screening process as part of an Appropriate Assessment undertaken by Land Use Consultants appears to have concluded that, in the case of this site, there is a need for the minerals plan to include a requirement alongside this allocation for the provision of adequate information to be supplied regarding transport volumes and routes in any proposals for extraction specifically in relation to maintaining the integrity of the Solent Maritime SAC, Solent and Southampton Water SPA and RAMSAR site.</p> <p>Such a conclusion suggests that LUC and HCC recognise that, as part of allocating this site, and assessing the potential for effects upon Natura 2000 sites, as identified above, effects are likely or there is a lack of information to prove otherwise. Consequently, additional information is required to identify the true nature of any such unknown effects.</p> <p>However, in conflict with the guidance for undertaking a Habitats Regulations Assessment,</p>

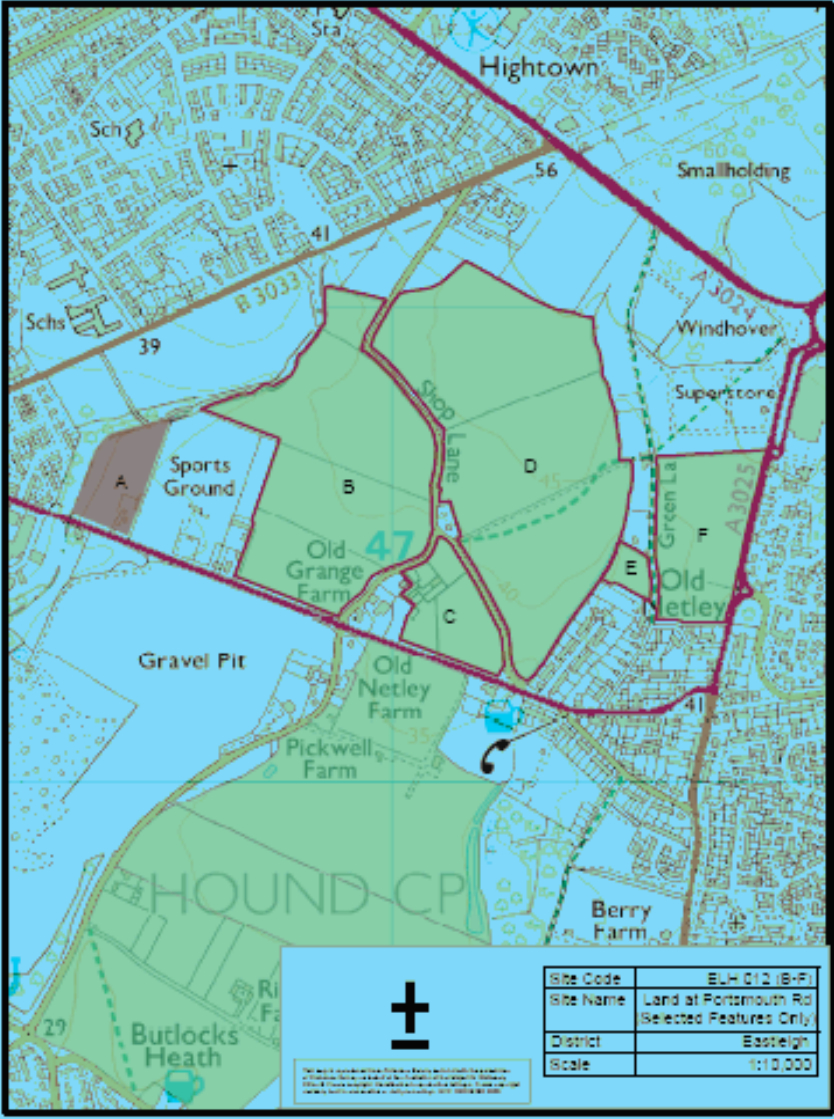
	<p>and their own methodology on page 5 of the HRA report, HCC/LUC recommend the site to be included and issues to be addressed at planning application stage, rather than proceeding to an Appropriate Assessment of impacts from the site allocation upon the identified Natura 2000 sites as required under legislation.</p> <p>Sensitive Receptors: due to the immediate proximity of sensitive land uses as identified the effect of these impacts should be considered high. Whilst mitigation may reduce these impacts, the scale of the site and its intended use introduces difficulties in comprehensively mitigating noise and vibration effects for all sensitive receptors.</p> <p>Transport: unless alternative means of removing the minerals from the site are found, then road borne minerals will introduce potentially significant conflicts with existing road users. Minerals movements must be able to react to market demand and so cannot be restricted so as to avoid other road users. The B3397 is the essential arterial route into the Hamble area and therefore existing movements, including schools and domestic traffic and all traffic associated with the business operation and tourism activities generated by the marina must use this route and face conflict with the mineral site traffic.</p>
Secondary impacts	<ul style="list-style-type: none"> ▪ Surface Water Hydrology: although consideration must be given to the indirect effect of developing this site upon the adjacent flood plain, such effects can be mitigated and satisfactorily controlled. ▪ Air Quality: as with flooding, despite the potential for severe effects to arise if unchecked, mitigations can be provided to reduce the effect of dust and air quality impacts following development of the site. ▪ Restoration: dependant upon the process pursued, although inert infill could be used to restore the site to current levels followed by agricultural after use. Key issue is availability of material and impacts of bringing material into the site.
Influence upon allocation	<p>Site should be assessed in line with HRA Appropriate Assessment requirements to ascertain the effects upon the integrity of the adjacent Natura 2000 sites and conclude whether this site can continue to be included as an allocation in relation to these issues.</p> <p>Sites considered unsuitable due issues including impacts upon the marinas; lack of suitable road infrastructure; conflicts with sensitive receptors, especially schools; and landscape impacts.</p> <p>In combination, this site should be deleted due to the concerns raised.</p>

Site	Hound Farm, Hound ELH 007
HCC Minerals Plan Allocation Map	
<p>Key Impacts identified by AH using HCC methodology</p> <p>(see also Figure 1 for key impacts)</p>	<ul style="list-style-type: none"> ▪ Landscape: Site is an open, flat significant area of land running from the southern edge of Old Netley to Hound and the eastern edge of Netley. Currently in agricultural use for market gardening and grazing, the site also immediately abuts the B3397. To the west lies a small woodland strip running along the western site boundary within which is located a fishing lake. Beyond this lies the open fields associated with Pickwell Farm, again in use for market gardening and grazing. These characteristics define much of the undeveloped land between Old Netley and Southampton East. ▪ Air quality: part of the site lies immediately adjacent to residential properties and part in close proximity to Old Netley. Concerns centre on wind borne dust from site operations / vehicle circulation upon residential properties. ▪ Sensitive Receptors: use of a 250 metre buffer is arbitrary. Impacts at 275 metres or 300 metres likely to be of similar significance. Site is immediately adjacent to residential areas in Old Netley and Netley which lies 250 metres to west. Impacts such as noise, vibration, visual intrusion in a flat landscape from extraction, stockpiles and plant, dust, vehicle movements and (if restoration is by non-hazardous landfill) litter /


	<p>odour / vermin / nuisance impacts will all be significant in such a location.</p> <ul style="list-style-type: none"> ▪ Transport: Site is only 800 metres from the junction between the B3397 and the A3025 – the A3025 is part of the HCC Minerals & Waste Transport network. However, to reach this network will bring vehicles into conflict with movements of private and business traffic, schools traffic, and business and tourism traffic associated with the marinas
Primary Impacts	<p>Landscape: due to the significant change in the appearance of the land that will be required by mineral extraction there is little opportunity to screen the impacts of this development from immediately adjacent land uses such is their proximity to the site and potential for overlooking views.</p> <p>Sensitive Receptors: due to the immediate proximity of sensitive land uses as identified the effect of these impacts should be considered high. Whilst mitigation may reduce these impacts, the scale of the site and its intended use will introduce difficulties in comprehensively mitigating noise and vibration effects for all sensitive receptors. This issue places doubt over the appropriateness of seeking to achieve mineral extraction at this location.</p>
Secondary impacts	<ul style="list-style-type: none"> ▪ Transport associated with the use of this site for mineral extraction will introduce additional lorry movements that will take access to the lorry routes by passing through Old Netley, in conflict with existing road users. Although the distance of this conflict is relatively short it involves passing through a residential area. ▪ Air quality impacts upon the adjacent residential land uses will be a concern, particularly in terms of fugitive emissions of dust from the site.
Influence upon allocation	<ul style="list-style-type: none"> ▪ Major concern lies with the impact upon residential amenity ▪ Site should not be considered as a preferred allocation at this stage. Instead it should be held in reserve whilst other sites are sought in either (a) south Hampshire or (b) wider Hampshire before revisiting reserve sites such as Hound as part of stage (c) which would involve reconsidering site that may play a role but which face a number of significant issues.

Site	Pickwell Farm, Old Netley pPA5								
HCC Minerals Plan Allocation Map	 <p>This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. HCC 100019160 2007</p> <table border="1" data-bbox="1066 1361 1374 1518"> <thead> <tr> <th>Reference</th><th>pPA5</th></tr> </thead> <tbody> <tr> <td>Name</td><td>Pickwell Farm, Old Netley, Southampton</td></tr> <tr> <td>Geographic Area</td><td>South Hampshire</td></tr> <tr> <td>Scale</td><td>1:10,000</td></tr> </tbody> </table>	Reference	pPA5	Name	Pickwell Farm, Old Netley, Southampton	Geographic Area	South Hampshire	Scale	1:10,000
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Name	Pickwell Farm, Old Netley, Southampton								
Geographic Area	South Hampshire								
Scale	1:10,000								
<p>Key Impacts identified by AH using HCC methodology</p> <p>(see also Figure 1 for key impacts)</p>	<ul style="list-style-type: none"> ▪ Landscape: as the site is located in a belt of open flat farmland the potential for adverse landscape and visual impacts is high, as graded by HCC. Whilst screening with bunding and planting would offset inward views the presence of such features themselves are likely to be incongruous in this flat agricultural landscape. ▪ Air quality: part of the site lies immediately adjacent to residential properties and part in close proximity to Old Netley. Concerns centre on wind borne dust from site operations / vehicle circulation upon residential properties. ▪ Sensitive Receptors: Site is immediately adjacent to residential areas at Butlocks Heath to south, within 200 metres of Old Netley to north east / east. Impacts such as noise, vibration, visual intrusion in a flat landscape from extraction, stockpiles and plant, dust, vehicle movements and (if restoration is by non-hazardous landfill) litter / odour / vermin / nuisance impacts will all be significant in such a location. 								


	<ul style="list-style-type: none"> ▪ Transport: site is immediately adjacent to M&W Lorry Route although this then requires access through Old Netley.
Primary Impacts	<p>Landscape: due to the significant change in the appearance of the land that will be required by mineral extraction there is little opportunity to screen the impacts of this development from immediately adjacent land uses such as their proximity to the site and potential for overlooking views.</p> <p>Sensitive Receptors: due to the immediate proximity of sensitive land uses as identified the effect of these impacts should be considered high. Whilst mitigation may reduce these impacts, the scale of the site and its intended use will introduce difficulties in comprehensively mitigating noise and vibration effects for all sensitive receptors. This issue places doubt over the appropriateness of seeking to achieve mineral extraction at this location.</p>
Secondary impacts	<ul style="list-style-type: none"> ▪ Transport associated with the use of this site for mineral extraction will introduce additional lorry movements that will take access to the lorry routes by passing through Old Netley, in conflict with existing road users. Although the distance of this conflict is relatively short it involves passing through a residential area.
Influence upon allocation	<ul style="list-style-type: none"> ▪ Site is suitable in part, where necessary separation can be achieved from Butlocks Heath and Old Netley, which may be possible given the size of the site. However, site also in use for market gardening and grazing which may reduce useable area. ▪ Site should be considered in reserve subject to other sites being sought in either (a) south Hampshire or (b) wider Hampshire before revisiting reserve sites such as Hound as part of a possible additional stage of revisiting reserve sites in the absence of more suitable alternatives. ▪ Further to HCC's recent traffic assessment, the quantitative impacts identified suggest that this site should be deleted on transport and traffic grounds. Given the presence of such recommendations and conclusions, this is supported and agreed with.

Site	Land North of Old Portsmouth Road, Old Netley All 6 sites appraised as one unit								
HCC Minerals Plan Allocation Map	 <table border="1" data-bbox="1050 1317 1329 1429"> <tr> <td>Site Code</td><td>BLH 012 /B-F/</td></tr> <tr> <td>Site Name</td><td>Land at Portsmouth Rd (Selected Features Only)</td></tr> <tr> <td>District</td><td>Eastleigh</td></tr> <tr> <td>Scale</td><td>1:10,000</td></tr> </table>	Site Code	BLH 012 /B-F/	Site Name	Land at Portsmouth Rd (Selected Features Only)	District	Eastleigh	Scale	1:10,000
Site Code	BLH 012 /B-F/								
Site Name	Land at Portsmouth Rd (Selected Features Only)								
District	Eastleigh								
Scale	1:10,000								
Key Impacts identified by AH using HCC methodology (see also Figure 1 for key impacts)	<ul style="list-style-type: none"> ▪ Landscape: as the site is located in a belt of open gently sloping (slope of ~ 20 metres AoD from N – S over a distance of 1100 metres) / flat farmland the potential for adverse landscape and visual impacts is high, although this view is not shared by HCC. Whilst screening with bunding and planting would offset inward impacts the presence of such features are likely to be incongruous in the flat agricultural landscape. ▪ Air quality: site lies adjacent (within 100 metres) of the Pleasant View estate of East Southampton and also of Old Netley, however no consideration has been given to AQ impacts as the site and area is not an AQMA. Nonetheless, close proximity to concentrations of population such as this will give rise to AQ issues. ▪ Sensitive Receptors: site lies adjacent (within 100 metres) of the Pleasant View estate of East Southampton and also of Old Netley, would encompass Old Grange Farm, be immediately adjacent to Old Netley Farm and its market garden business, surrounds a sports ground and lies within 150 metres of a school. Impacts such as noise, vibration, visual intrusion in a flat landscape from extraction, stockpiles and plant, dust, vehicle movements and (if restoration is by non-hazardous landfill) litter / 								

	<p>odour / vermin / nuisance impacts will all be significant in such a location.</p> <ul style="list-style-type: none"> ▪ Transport: access could be taken through plot F onto the roundabout with the Old Netley Tesco superstore, should this have capacity or be upgraded. From here journeys can access the A27 and M27. If this cannot be achieved then the routes will need to either pass through Old Netley or through East Southampton on the A3025. Whilst the A3025 is part of HCC's M&W Lorry Route, this brings HGV movements from the site into direct conflict with other sensitive residential and urban road users.
Primary Impacts	<p>Landscape: due to the significant change in the appearance of the land that will be required by mineral extraction there is little opportunity to screen the impacts of this development from immediately adjacent land uses such is their proximity to the site and potential for overlooking views.</p> <p>Sensitive Receptors: due to the immediate proximity of sensitive land uses as identified the effect of these impacts should be considered high. Whilst mitigation may reduce these impacts, the scale of the site and its intended use will introduce difficulties in comprehensively mitigating noise and vibration effects for all sensitive receptors. This issue places doubt over the appropriateness of seeking to achieve mineral extraction at this location.</p>
Secondary impacts	None
Influence upon allocation	<ul style="list-style-type: none"> ▪ Site allocation requires further thought – many of the plots abut residential areas or other sensitive land uses. There is scope to route journeys direct to the A27 via a short stretch of the A3025. If suitably distanced areas of workings and access can be achieved this site should not be contested further. ▪ If, however, separation from sensitive land uses cannot be achieved and suitable routing designed, the degree of conflict as outlined above would need to be considered against lack of alternative sites elsewhere in South Hampshire or the wider County to provide this quantity of sand. ▪ Further to HCC's recent traffic assessment, the quantitative impacts identified suggest that this site should be deleted on transport and traffic grounds. Given the presence of such recommendations and conclusions, this is supported and agreed with.

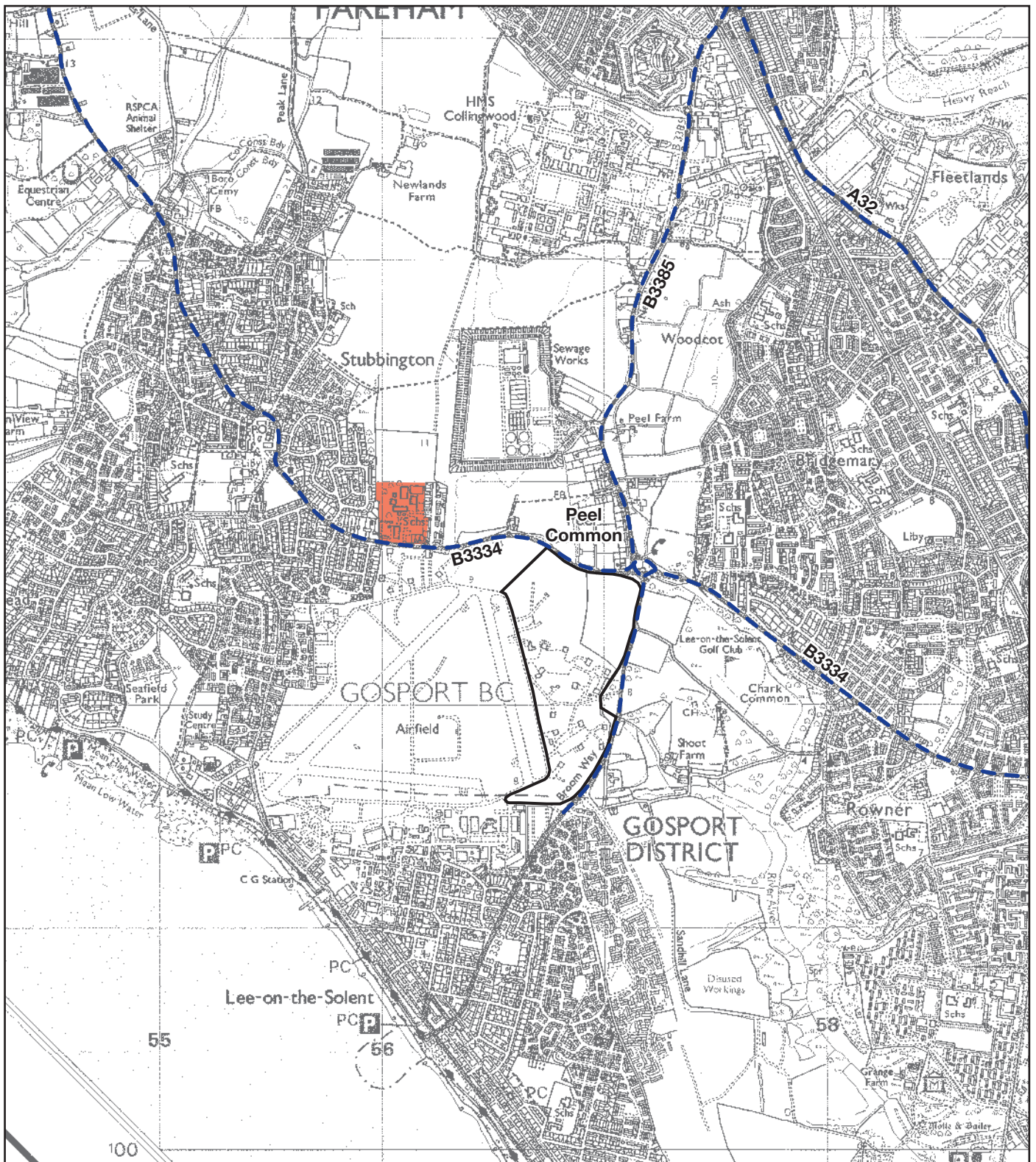
Site	Brownwich and Chilling Farms, Warsash (pPA4)								
HCC Minerals Plan Allocation Map	 <p>The map shows the site boundary in red, located in the FAREHAM DISTRICT. It includes various geographical features, roads, and conservation areas. The site is adjacent to the sea and includes several farms and buildings. The map also shows the EA 2006 Flood Zone 2 and 3, and various historic buildings and RAMSAR sites.</p> <p>Legend</p> <ul style="list-style-type: none"> Boundary Sites of Importance for Nature Conservation Sites of Special Scientific Interest Special Protection Areas EA 2006 Flood Zone 3 EA 2006 Flood Zone 2 Historic Buildings <ul style="list-style-type: none"> Grade I Grade II Grade II* Grade III No Grade RAMSAR Sites <p>Reference</p> <table border="1"> <thead> <tr> <th>Reference</th> <th>pAPA4</th> </tr> </thead> <tbody> <tr> <td>Name</td> <td>Brownwich and Chilling Farms, Warsash</td> </tr> <tr> <td>Geographic Area</td> <td>South Hampshire</td> </tr> <tr> <td>Scale</td> <td>1:20,000</td> </tr> </tbody> </table> <p>This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. HCC 100619180 2007</p>	Reference	pAPA4	Name	Brownwich and Chilling Farms, Warsash	Geographic Area	South Hampshire	Scale	1:20,000
Reference	pAPA4								
Name	Brownwich and Chilling Farms, Warsash								
Geographic Area	South Hampshire								
Scale	1:20,000								
Key Impacts identified by AH using HCC methodology (see also Figure 2)	<ul style="list-style-type: none"> ▪ Landscape: as identified visual and landscape impacts of mineral working in this location will be significant. ▪ Ecology: the significance of potential ecological impacts is noted by HCC – grade should be A due to the near direct impacts upon the SAC/SPA/RAMSAR, SSSI, loss of the SIN, which may well be inextricably linked to the above and the lack of an Appropriate Assessment. ▪ Archaeology: high potential for impacts. ▪ Groundwater / Hydrogeology: issue linked to ecology as well as general water environment impacts – significant impact is possible. ▪ Air quality: clear potential for impacts upon ecology, tourism, properties within the site boundary. ▪ Sensitive Receptors: Direct impacts on sensitive receptors is probably lower than HCC have graded, given their leniency on this issue elsewhere in the appraisal process for sites located closer to residential properties and other sensitive receptors. C&B adjacent to holiday park and includes a number of properties within the boundary. 								

	<ul style="list-style-type: none"> ▪ Transport: HCC grade this site as orange/B: >2km from the M&W Lorry Route. This does not reflect the true picture. Posbrook Lane is not wide enough to accommodate existing light traffic and regular HGV movements. The final 1.2km to the A27 is through the built up area of Bellfield after having completed 2km on Posbrook Lane.
Primary Impacts	<ul style="list-style-type: none"> ▪ Landscape ▪ Ecology ▪ Archaeology ▪ Groundwater / hydrogeology ▪ Air quality ▪ Sensitive Receptors ▪ Transport
Secondary impacts	None
Influence upon allocation	<ul style="list-style-type: none"> ▪ It is unclear how that this particular allocation can be sustainably worked. The key constraints are those of ecology and transport, followed by landscape. Amenity and air quality, followed by archaeology are secondary to some degree but at this site, and within the discipline covered by each objective, the impacts are individually high. ▪ As an area of search further work should be done to identify specific parcels that are less constrained, particularly those in the north east of the allocation. ▪ Prior to this, however, it would be necessary to undertake an Appropriate Assessment as part of the HRA. ▪ Further to HCC's recent traffic assessment, the quantitative impacts identified suggest that this site should be deleted on transport and traffic grounds. Given the presence of such recommendations and conclusions, this is supported and agreed with.

Site	Daedalus Airfield, Lee-on-Solent (pAPA3)								
HCC Minerals Plan Allocation Map	 <p>The map shows the Daedalus Airfield site outlined in red. It is situated between Peel Common to the north and the Lee-on-Solent area to the south. To the east is the Gosport District, which includes the Gosport Golf Club and Chalk Common. The map also shows various flood zones (EA 2006 Flood Zone 2 and 3) and historic buildings (Grade I, II, II*, III, and No Grade). A legend, north arrow, and reference table are included.</p> <table border="1" data-bbox="1058 1294 1345 1433"> <tr> <td>Reference</td><td>pAPA3</td></tr> <tr> <td>Name</td><td>Daedalus Airfield, Lee-on-Solent</td></tr> <tr> <td>Geographic Area</td><td>South Hampshire</td></tr> <tr> <td>Scale</td><td>1:15,000</td></tr> </table> <p><small>This map is reproduced from Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationary Office © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. HDC 100019180 2007</small></p>	Reference	pAPA3	Name	Daedalus Airfield, Lee-on-Solent	Geographic Area	South Hampshire	Scale	1:15,000
Reference	pAPA3								
Name	Daedalus Airfield, Lee-on-Solent								
Geographic Area	South Hampshire								
Scale	1:15,000								
<p>Key Impacts identified by AH using HCC methodology</p> <p>(see also Figure 3)</p>	<ul style="list-style-type: none"> ▪ Landscape: Site is relatively flat, adjacent to an airfield, visible from housing in three directions and has been graded as having some form of landscape character impact. ▪ Ecology: HCC state that the site is within 100 metres of SPA – if so, it is unclear why an AA has not been undertaken unless the potential for disturbance and noise impacts upon an SPA from the extraction of mineral at this site is considered to be insignificant. The AA profiles for the screening process suggest that this information was not available and no conclusion was reached, although the grading suggests that such impacts could be significant or unknown, triggering a need for further assessment. ▪ Archaeology: potentially of regional and national importance ▪ Groundwater / hydrogeology: depends upon the impact upon the SPA...although site overlies minor aquifer so potential is high. ▪ Air Quality: housing immediately to the south; within 50 metres to east; within 200 metres to north east and within 500 metres to north west. Golf course located within 								

	<p>200 metres to east. Airfield immediately west used for pleasure flights. Area of common land immediately to the north.</p> <ul style="list-style-type: none"> ▪ Sensitive Receptors: housing immediately to the south; within 50 metres to east; within 200 metres to north east and within 500 metres to north west. Golf course located within 200 metres to east. Airfield immediately west used for pleasure flights. Area of common land immediately to the north. ▪ Transport: site is bound to north and east by lorry route. Access may be possible onto existing traffic lighted junction
Primary Impacts	<ul style="list-style-type: none"> ▪ Landscape ▪ Ecology ▪ Archaeology ▪ Groundwater / hydrogeology ▪ Air quality / sensitive receptors
Secondary impacts	<ul style="list-style-type: none"> ▪ Transport
Influence upon allocation	<ul style="list-style-type: none"> ▪ Apart from the relatively good transport links, which still require a journey into the built up area of Fareham to access the main strategic highway routes of the A27 and M27, the site does not lend itself readily to mineral development. ▪ Further to HCC's recent traffic assessment, the quantitative impacts identified suggest that this site should be deleted on transport and traffic grounds. Given the presence of such recommendations and conclusions, this is supported and agreed with.

Appendix 2: Figures



KEY

- Site Boundaries
- School
- HCC Minerals and Waste Lorry Routes

RAGE/813

FIGURE 3 : Daedalus

Scale. 1:25 000

Date: 080609

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Appendix 3: References

- *Planning And Compulsory Purchase Act 2004*
- *Town and Country Planning (Local development) (England) Regulations 2004 (SI 2004 / 2204)*
- *Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 (SI 2008 / 1371)*
- *Planning and compulsory Purchase Act 2004, A Guide To The New law, Tromans et al, The Law Society (2005)*
- *Minerals Policy Statement 2: Controlling and mitigating the Environmental Effects of Minerals Extraction in England; Annex 1: Dust*
- *Hampshire, Portsmouth, Southampton and New Forest National Park Minerals and Waste Core Strategy (adopted June/July 2007)*
- *Hampshire Minerals and Waste Development Framework: Key Diagram*
- *Hampshire HGV Advisory Route Network Draft Version (supplied by HCC June 2008)*
- *Hampshire Minerals Plan and Hampshire Waste Management Plan Issues and Options – Sites Discussion Paper September 2006*
- *Hampshire Minerals and Waste Development Framework: Hampshire Minerals Plan Revised Scoping Report September 2006*
- *Hampshire Minerals Plan Regulation 26 Consultation October 2007*
- *Hampshire Minerals and Waste Development Framework: Hampshire Minerals Plan Regulation 26 Consultation Document Sustainability Appraisal Report October 2007 (Land Use Consultants)*
- *Hampshire Minerals Plan Regulation 26 Consultation Document Habitats Regulations Assessment 'Final Report' October 2007 (Land Use Consultants)*
- *Proposed Submission Hampshire Minerals Plan Integrated Sustainability Appraisal Draft Report, June 2008 (Land Use Consultants)*
- *Proposed Submission Hampshire Minerals Plan Habitats Regulations Assessment Draft Report, June 2008 (Land Use Consultants)*
- *Hampshire Minerals Plan Traffic Assessment Study Report May 2008 (MOTT Gifford)*
- *Residents Against Gravel Extraction response to the Draft Hampshire Minerals Plan – Regulation 26 Consultation (7th December 2007)*