Altman, Rebecca

From: Harwood, Alice
Sent: 07 February 2022 23:42
To: Altman, Rebecca
Cc: Parker, Nicholas
Subject: RE: Planning App Consultation Request Internal CS/22/92277

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red Category, Consultation responses

Rebecca;

Landscape Officer comments 07.02.2022

The application site is allocated for mineral extraction. The land is outside the settlement edge of Hamble-le-Rice identified as Countryside in both the EBC adopted and examination Local Plans and the northern section of the site is identified as Settlement Gap in the examination Local Plan, which remains consistent with the adopted EBC Local Plan.

It is noted that the proposed function is temporary, with extraction works being active for 7 years; with a further 6 to 7 year period for full landscape and ecological restoration and enhancement works following the completion of extraction.

Countryside and Settlement Gap Policy
The proposals are not intrinsically in conflict with the Countryside and Gap policies because a) the site is acknowledged in EBC Local Plans as allocated for mineral extraction; and b) although the function will have a medium term impact upon those designations, in the long term the land will retain its function as open and free from development. It can be acknowledged that the proposals are bound to this specific site due to the geological resources identified in this location. In addition the nature of these works are in a range typical of land-use beyond a settlement edge. Subject to appropriate design and mitigation of impacts during the operational phase, the temporary function could, in principle, be accommodated on land subject to these policies, from a landscape perspective. In order for these specific proposals to be acceptable to approve, the works will still be bound to comply with the spirit of these policies and be designed and managed in such a way that they do not compromise the integrity of the settlements edges and avoid the diminishing or urbanisation of the Gap or Countryside.

LVIA
Overall, the LVIA methodology, assessment and conclusions are thorough, well considered and reasonable.

I raise the following points for consideration:

1. I consider that there is a slight overstatement of the temporary nature of the works and a slight understatement on the effect on the local Landscape Character, views and the effectiveness of the Settlement Gap for the duration of the works. At a local level, 7 years of extraction works followed by 6 years of restoration works is significant to the local community and especially nearby residents. This time period will comprise a substantial part of their life and therefore their experience of living close to these works.

   It would be useful if the LVIA could re-examine this and respond to this nuance because it will help to inform a more sensitive approach to mitigation during the Operational Phase. At present I feel this is not adequately addressed given the specific context of the Local Plan Policy designations and the quality of life impacts that the works may have on residents close to the site.

2. I note that the key mitigation feature comprises bunds made from the stripped topsoil, which is to be stored onsite and seeded to stabilise it; prior to reinstatement as part of the later restoration works. Section 9.7.5 in the LVIA describes the bund formation, with an inner gradient of 1:1.5 and outer faces to be between 1:2 and 1:3. My concern about this specification is that this will be likely to result in a highly unnatural and engineered bund, which in itself could be considered a visual intrusion with an industrial characteristic at odds with the current semi-rural appearance of this open landscape.

   Given the acknowledged sensitivity of a number of the Viewpoints, I find that the mitigation effect of the bunds according to the specification above will not be likely to provide as positive a solution as the LVIA concludes. However I do think this can be addressed through a more nuanced approach to the bund design – and for this to be approached not only as a convenient way to store soil stockpiles and provide a functional landscape screen, but also for the quality of that screen to be considered. This would be achieved through a softer, more convex/rounded profile and relaxed and varied gradient to the outer faces. I would also like to see sacrificial scrub planting proposed to some of the slopes to further soften them where views are particularly sensitive or where some additional height would be of benefit.

3. The information shown on drawing LVIA and Restoration Sections raises some queries. Are the sections intended to show the restoration landscape or the working landscape? The section location plan and some of the labels refer to the restored landscape – however in this case why are the bunds still shown and why would screening be desirable? My understanding, given the explanation elsewhere in the document, is that the bunds will be removed once the works are completed and this would be the preferred solution, given these are not natural or naturalistic landforms.

4. Sections showing the active works would however be very useful. These sections should include the areas where plant will be located so that the effectiveness of the bunds to screen the works can be tested.

Other considerations

a. It would be useful to see detailed drawings for the proposed permissive path described in the Planning Statement paragraph 5.9. It is stated that this would connect houses on Satchell Lane to Hamble Station and the Hamble School and sports complex. It is noted that the intention is for the path to remain for the long term, so it is important to ensure it will be safe, accessible to all and to provide a good facility for the local community. I would like to see the proposal upgraded to a footway and cycleway, a well maintained self-binding gravel surface would be sufficient and should also be able to accommodate buggies etc. Signage should also be considered.
b. Ref. Vol 2 – Environmental Statement Chapter 2, para 2.18 – This states that 'Restoration will be progressive/ will depend on the amount of inert restoration materials that can be brought to site'; going on to state that the six years restoration period is an estimate. I raise this as I consider this problematic in relation to the Landscape and Visual Impacts. Should this application be approved it is my opinion that it will be imperative to set out a timetable for restoration that is clear and enforceable, including a maintenance plan for the duration and following completion to ensure the proposed restoration scheme is achieved as planned. Without this certainty, there is a risk that the site could have the appearance of semi-derelict wasteland for an extended period of time, which would be unacceptable in terms of local landscape character and amenity as well as with regard to the impacts upon local residents and community.
c. Proposals for the landscape restoration: I will defer to the EBC ecologist with regard to the detail of the proposed restoration scheme. Given this is to largely remain as private land, from a landscape perspective it will be sufficient to have the assurance that the land will be returned to an enhanced open and natural landscape that supports the Local Plan policy designation of Countryside and Settlement Gap as appropriate. Details that are of specific interest to the EBC Landscape Officer will be detailed design and maintenance of permissive paths; details of the appearance and construction of boundary fences and any other infrastructure pertaining to the public realm.

Conclusion

As set out above, there are a number of further considerations I would advise the applicant should address prior to a conclusion being drawn on the acceptability of this scheme. My key concern is the effectiveness of the bunds as mitigation of potential landscape and visual impacts. Simply screening the works from view may not be sufficient to avoid a fundamental change in landscape character and an erosion of visual amenity at the local level, therefore I

would like to see further work on the mitigation proposals to address these concerns. Whilst the works are temporary, the operational time is fairly substantial in terms of lived experience at the local level, and therefore a more sensitive approach to mitigation is advised.

Thank you,

Alice

Alice Harwood

Principal Landscape Officer

Service Delivery - Specialist Services - Housing and Development

Ext.: 8353

From: Planning (Eastleigh Borough Council) <planning@eastleigh.gov.uk>
Sent: 24 January 2022 09:52
To: Pollution.CMO <Pollution.CMO@eastleigh.gov.uk>; ecology <ecology@eastleigh.gov.uk>; Trees @ Eastleigh Borough Council <trees@eastleigh.gov.uk>; Stringer, Chris <Chris.Stringer@eastleigh.gov.uk>; Culver, Mike <Mike.Culver@eastleigh.gov.uk>; Harwood, Alice <Alice.Harwood@eastleigh.gov.uk>; Ellison, Mark <Mark.Ellison@eastleigh.gov.uk>; Kodis, Aliis <Aliis.Kodis@eastleigh.gov.uk>
Subject: Planning App Consultation Request Internal CS/22/92277

Application No: CS/22/92277
Address: Hamble Airfield, Hamble
Description: HCC Consultation Request: Proposed extraction of sand and gravel, with restoration using imported inert restoration materials, the erection of associated plant and infrastructure and the creation of a new footpath and access onto Hamble Lane at Hamble Airfield

Would you please let me have your observations on the above application.

You can access the plans and documents through Salesforce. At the top of the screen type the planning application number into the search box and either select the application from the list displayed or press the enter key and select it from the list of results.

In order to meet the Government's challenging targets for our speed of determining applications, we require any comments you wish to make within 14 days from the date of this memo. Failure to meet this time period will usually result in an application being determined without your comments being considered.

Please reply to the planning officer on the below email address.

Planning Specialist Contact Details
Email: rebecca.altman@eastleigh.gov.uk
Phone/Ext: 023 8068 8266

Kind regards

Altman, Rebecca

From:	Tuck, Graham
Sent:	04 February 2022 12:29
To:	Altman, Rebecca
Subject:	FW: Hamble Minerals
Attachments:	Appendix 2 HCC Hamble Lane Improvements (Full Report).pdf; FINAL Report Hampshire.doc
Follow Up Flag:	Follow up
Flag Status:	Flagged
Categories:	Consultation responses, Red Category

Hi Rebecca – thanks for sight of your emerging committee report on the mineral extraction proposals at Hamble Airfield. My policy comments are below:

Eastleigh Local Plan

The plan is at an advanced stage (submission plan and proposed modifications post examination hearings).

The site is outside the urban edge and designated countryside (with the northern part of the site also designated as settlement gap). The site is also identified under policy HA3.

A wide range of policies will be applicable to consideration of the details of the scheme. Key policies (incorporating the proposed modifications) include:

S1 – sustainable development

S7 – development in the countryside – should avoid adverse impacts, including on biodiversity and landscapes (and recognising the need not to sterilise mineral resources)

S8 – settlement gaps - development should not diminish the physical extent and/or visual separation of settlements; and not have an urbanising effect detrimental to the character of the countryside or the separate identity of the adjoining settlements.

S12 and DM13 – the Council will work with the highway authority and developer to minimise congestion; development should not have a significant detrimental impact on the highway and will be required to implement mitigation measures

DM1 – no unacceptable impact on residential amenity, and compatibility with surrounding uses

DM11 – protect, conserve and enhance all biodiversity designations and networks (commensurate with the status of the designation) and seek a net gain in biodiversity

Hamble Parish chapter – identifies that Hamble Lane is one of the most congested in the Borough and that the most pressing issues include the future of Hamble Airfield and traffic; policy HA3 states that if planning permission were granted for minerals extraction, the site shall be restored in accordance with the Minerals and Waste Plan and to the satisfaction of the Borough Council

Hampshire Minerals and Waste Plan

Eastleigh Borough Council was and is strongly opposed to the allocation of the Hamble Airfield site for sand and gravel extraction in the Hampshire Minerals and Waste Plan. It is acknowledged that this plan has now been adopted and forms part of the development plan, and so the principle of the allocation has been established by the Hampshire authorities.

The Minerals and Waste Plan includes policies to:
- meet the sand and gravel targets, including policy 17 which sets the overall target of land won extraction at 1.56 mtpa and policy 20 which allocated Hamble Airfield (see also Appendix A)
-protect the environment, including policies 5 and 9 which protect the countryside and sets the expectation of the highest standards of design, operation and restoration
-maintain Hampshire's communities, including policy 10 which protects public health, safety and amenity (with no unacceptable impact from noise, dust or lighting for example); policy 12 which manages traffic impacts (where possible minimising and then mitigating any significant impacts) and policy 13 which requires a high quality design (with no unacceptable visual impact).

Appendix A sets out the development considerations for Hamble Airfield, including:
-restoration to a combination of grazing, nature conservation, open space, public access and woodland
-biodiversity, rights of way / informal recreation
-phasing to protect businesses / residential amenity
-management of traffic / congestion

In finding the Minerals and Waste Plan 'sound' (including this allocation), the independent Inspector was provided evidence that there could be up to 60 two way HGV movements per day, judging this to be an insignificant increase in the number and frequency of HGVs on Hamble Lane. It is noted that the applicant's transport assessment indicates that during the peak years of operation there would be 72 movements (with 45 movements in the shoulder years) (TA, Table 5.3). This means that HGV movements are up to 20% greater than the upper limit on which the Inspector based his decision in 2013, since which baseline traffic levels will have increased. At the least this emphasises the importance of minimising trips where possible (e.g. using reverse logistics). (Inspector's report 2nd attachment paras 94 – 97)

Since the adoption of the Minerals and Waste Plan, Hampshire County Council's report as transport authority regarding improvements on Hamble Lane (1st attachment) identifies that Hamble Lane is heavily congested with the potential to improve the situation being limited; that there is a clear need for improvements to address existing problems and background growth; that additional development would compound these problems; and that therefore until at least the improvements to the northern section of Hamble Lane are implemented, further development along Hamble Lane would be inappropriate from a traffic perspective (paras. 3.1 and 3.2). Whilst in this context the Hamble site is an existing rather than further allocation, the effect of the report is to emphasise the importance of minimising / managing traffic from this proposal. In addition to minimising overall trips where possible, the operation should avoid or minimise as far as possible trips at peak / sensitive times, noting peak / sensitive times on Hamble Lane reflect the standard peak times and also school starting / finishing times and factory shift patterns. (Minimise as far as possible should not simply be based on operational considerations, but a reasonable balance between mineral operational and transport / safety / amenity concerns).

Policy 16 of the Minerals and Waste Plan aims to safeguard the minerals infrastructure listed in Appendix B (including Hamble Airfield) from development which would unnecessarily sterilise that infrastructure. This is seeking to ensure that residential and other development does not encroach / impact on the operation of minerals sites. However it is also a useful guide as to where impacts may occur in reverse (e.g. new minerals infrastructure in relation to existing residential areas). The associated safeguarding SPD (link below) sets a 'Minerals and Waste

Consultation Area' (MWCA) with a 250 metre buffer around minerals infrastructure in rural areas. This is a consultation area and so does not mean there should automatically be a buffer as wide as 250 metre buffer between the mineral workings and adjacent residential areas (page 20). It does indicate that if the buffers are less than this even further care is needed in the design / operation of the minerals site to ensure the appropriate level of mitigation (for example, the last set of consideration in the box on page 26).

https://documents.hants.gov.uk/planning-strategic/HMWPMineralsandWasteSafeguardinginHampshireSPDFinalFeb2016.pdf

Conclusion

The adopted minerals and waste plan, supported by the local plan (at an advanced stage), does not simply allocate the site for sand and gravel extraction, it requires careful design, layout, operation, management and restoration of the site. The appropriate planning mechanisms should be in place to ensure this is achieved in accordance with the adopted development plan (including all aspects of the minerals and waste plan) and the advanced local plan, otherwise the planning application should be refused. Key issues will include the minimisation and management of traffic in a congested area, the careful protection of the amenity of Hamble-le-Rice and nearby communities along Hamble Lane, and the careful restoration of the site. With regards to the latter, whilst not a requirement for this proposal (which is not residential development), consideration should be given to how in meeting the requirements for restoration as set out in the plan, the site could serve as suitable alternative natural greenspace, to achieve multiple benefits from the open space created.

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CS/22/92277 Hamble Airfield, Hamble

HCC Consultation Request: Proposed extraction of sand and gravel, with restoration using imported inert restoration materials, the erection of associated plant and infrastructure and the creation of a new footpath and access onto Hamble Lane at Hamble Airfield

Thank you for consulting Ecology, my observations are as follows:

Documents Consulted:

Vol 1 Planning Statement (Cemex, December 2021)

Vol 2 Environmental Statement (Cemex, December 2021)

Ecological Appraisal and Desk Study (LC Ecological Services, November 2021)

Habitats Regulations Assessment (LC Ecological Services, November 2021)

Bat Surveys (LC Ecological Services, November 2021)

Breeding and Wintering Bird Surveys (LC Ecological Services, November 2021)

Hazel Dormouse surveys (LC Ecological Services, November 2021)

Invertebrate Surveys (Dodd and Denton, October 2021)

Reptile Surveys and Mitigation Strategy (November 2021)

Landscape Detail Sections (Operational Phase), Cemex November 2021

Landscape Layout Plan (Operational Phase) Cemex December 2021

Concept Restoration Plan, Cemex December 2021

Hampshire Minerals and Waste Plan (2013)

Hampshire Minerals & Waste Plan Assessment Under the Habitats Regulations (2013)

1. Designated sites

1.1 Hamble airfield ("the site")

Hamble Airfield has no ecological designation at present but is identified as potential ecological network opportunity in HBIC's mapping and is also a priority link for biodiversity in the Council's BAP. The fact the site has no official designation can be down to factors other than its intrinsic ecological value. The site is privately owned but is widely accessed recreationally, with dog-walking probably being the dominant activity. There is currently no active management (conservation based or otherwise) on the site.

The proposed extraction is due to take place in 7 phases, with the work lasting a total period of around 14 years including the extraction itself, infilling and planting.

1.2 Other potential receptors

The site is located around 300 metres from three statutory designated terrestrial sites. These are: Solent and Southampton Water Special Protection Area (SPA), Solent and Southampton Water

Ramsar, and Solent Maritime Special Area of Conservation (SAC). The River Hamble, which lies approximately 410 metres to the east of the site, also forms part of the Solent and Dorset Coast SPA, a maritime SPA designated to protect the foraging habitat of breeding terns. There is the potential for all of these to be impacted by the proposals which has been assessed as part of the HRA process.

The closest national, statutory designated sites include the Lee-On-The Solent to Itchen Estuary Site of Special Scientific Interest (SSSI) and Mercury Marshes Local Nature Reserve (LNR), which both lie 340 metres to the east, and Lincegrove and Hackett's Marshes SSSI which lies 350 metres to the north-east. All of these national, statutory designated sites also form constituent parts of the above international designated sites.

Hamble Common is owned and managed by Eastleigh Borough Council and is located around 1km south of the site. It is comprised of part of the Lee-On-The Solent to Itchen Estuary Site of Special Scientific Interest (SSSI) and Hamble Common West Site of Importance for Nature Conservation (SINC). It is a matrix of coastal heathland, acid grassland, woodland, creeks and shoreline and is also subject to a considerable amount of visitor pressure on these habitats.

Badnum Copse SINC is an area of Ancient Woodland located adjacent to the northeast corner of the site across Satchell Lane. Located east of the site boundary is Mercury Marsh Marina and Mercury Marsh South SINCs which are contiguous with Lincegrove and Hackett's Marshes SSSI. To the west of the site is Royal Victoria Country Park West Wood SINC which is another area of ancient woodland.

2. Baseline Ecological Value of the site

The submitted baseline ecology survey work (Appraisal and desk study and associated phase 2 surveys for bats, birds, dormice, invertebrates and reptiles) have all been undertaken in line with accepted industry standard guidelines and we can therefore be confident in the findings when assessing the present ecological value of the site. It is noted that the updated winter bird surveys are still ongoing and results can be provided as an addendum but it is unlikely the results will make a material change to the overall assessment of impacts from the scheme.

2.1 Habitats

The vast majority of the site is a matrix of grassland and scrub, with most of the grassland being assessed as semi-improved and dominated by coarse grasses. Having visited the site on 6th January 2022 I concur with this assessment. There were some areas are more botanically interesting grassland (acidic in character), predominantly in the northern portion of the site. Scrub covers a large portion of the site (dominated by bramble) and is increasing in area (as evidenced by previous survey work and historical aerial imagery) due to a lack of management or grazing on the site.

There are two significant species-rich, native hedgerows running along a portion of the northern and eastern boundaries of the site. Both contain a good number of woody species and a diverse ground layer that includes native bluebell.

Other habitats include small areas of regenerating broad-leaved woodland along the western boundary in places and scattered trees across the site.

2.2 Species

The nature of the habitats (dense bramble scrub and grassland matrix) lends itself to being important for breeding birds and reptiles.

Birds - The ecological surveys confirm that a number of declining bird species are breeding in significant numbers on the site at present (e.g. Skylark, linnet, song thrush) along with good numbers of warbler species (whitethroat, blackcap, lesser whitethroat, chiffchaff, willow warbler, garden warbler). Dartford warbler was recorded breeding on the site in 2008 but subsequently none were found in 2015 and one individual was seen in 2017. However, none were recorded in the most recent breeding bird survey in 2020.

The wintering bird assemblage contains a number of notable species, with good numbers of meadow pipit, skylarks and linnets. Dartford warbler were recorded in the earlier surveys but not since 2017/18. It is fairly common for individual Dartford warblers to winter away from known breeding grounds, with the closest being at Hook-with Warsash. There is also the significant population of the New Forest located across Southampton Water.

It is important to note that no waders (other than a single snipe in 2015/16) were recorded using the site during any of the wintering bird surveys. There is currently no evidence to suggest the site is "functionally linked" to the coastal SPA sites.

In summary, the ecological work assesses the site as being of **local importance** for birds.

Reptiles – Common lizard and slow-worm are both present on the site in substantial numbers. Numbers of both had shown a decline between the 2015 and 2020 surveys. However, the surveys will underestimate the true number of individuals and it is noted in the report that; "based on LCES previous experience of working on similar development sites in the same local area where high numbers of these species have been encountered, it is therefore assumed that the populations of both slow-worm and common lizard on site could **potentially be exceptional**."

Bats – A minimum of seven species were recorded during the bat activity surveys with four species considered to be rare: serotine, Nauthusius' Pipistrelle, Nyctalus sp. and Myotis sp. although it should be noted that they are widespread in Hampshire. The remaining three species (common and soprano pipistrelle and brown long-eared bat) are common and widespread and these also made up the bulk of the records.

Overall the site was considered to be of **County importance** for bats.

Invertebrates – the site generally supports an assemblage that would be expected given the relatively floristically poor grassland. The key habitats on the site for invertebrates are scrub edge, scrub-heath and moorland and open, short sward which had good representation from expected species groups. Some notable species were nevertheless recorded with three national Biodiversity Action Plan (BAP) species present: cinnabar moth, small heath butterfly and Phoenix fly. The site is considered to be **locally important** for invertebrates.

It should be noted that summer 2021 was poor for invertebrates due to long periods of unsettled, cool weather. However, this is not likely to be significant in assessing the overall value of the site for invertebrates.

Other species/species groups are either infrequently using the site (e.g badger, hedgehog) or are likely absent altogether (great-crested newts and dormouse).

3. Hamble airfield current ecological status

We can compare the baseline ecology information gathered as part of this application to the recently updated criteria for the selection of Sites of Importance for Nature Conservation (SINCs) in Hampshire.

Criterion 9a (Brownfield Sites and Previously Developed Land: sites which possess a rich mosaic of habitats and/or have an outstanding assemblage of species) states that:

"Land under or formerly under urban or industrial use can often be of very high value to wildlife. Examples of such areas include airfields, quarries, former MOD land, railway sidings, former factories or deliberately created urban greenspace. These sites are concentrated but not exclusively located in urban areas and in the urban fringe. These areas can include relics of semi-National Site Networkl habitats such as grassland, heathland and woodland.

These can be a feature of more extensively-managed and rural sites, for instance airfields where much of the land would have been managed as unimproved grassland, or quarries where unquarried, rabbit-grazed grassland can persist around the margins.

.....Sites must have a history of human use and disturbance not related to agriculture, forestry or related rural activities. Sites should have a mosaic of two or more juxtaposed habitats such as scrub, tall-herb vegetation, early successional grassland and open ground. While open ground is normally a highly desirable feature of the earliest successional stages, later stages may often consist of closed vegetation communities."

Given the baseline survey information we have, it is my opinion that Hamble Airfield would qualify as a SINC under criterion 9a. It is also likely to qualify independently under criterion 6a for supporting breeding pairs of notable Hampshire bird species (e.g. linnet, skylark, lesser whitethroat) and reptiles (slow-worm and common lizard populations).

Therefore the site should be treated **as a SINC** in policy terms. Policy DM11 in the emerging Eastleigh Local Plan states:

"Development will not be permitted if it is likely to have a direct or indirect adverse effect on a Site of Importance for Nature Conservation (SINC) or Local Nature Reserve as shown on the policies map (or on a more recent plan provided by the Hampshire Biodiversity Information Centre), unless it can be demonstrated to the satisfaction of the Borough Council that:

i. the benefits of the development clearly outweigh the adverse effects on the nature conservation value of the site;

ii. the adverse impacts are unavoidable;

iii. measures are taken to mitigate or, if this is not possible, compensate for the adverse effects, such that the development will result in at least no net loss of biodiversity; and

iv. buffers free from development are provided to Locally designated sites within or adjacent to developments to alleviate recreational impact and impacts on edge habitats and to maintain dark skies."

4. Direct Impacts resulting from proposal

- Phased loss of c.60 hectares of grassland/scrub matrix of SINC quality
- Phased loss of habitat supporting potentially "exceptional" reptile population
- Phased loss of breeding habitat for SINC quality bird assemblage
- Phased loss of habitat supporting a bat assemblage of county importance
- Phased loss of habitat supporting at least three BAP invertebrate species

In addition to the direct ecological impacts the vast majority of the site will become inaccessible for the public during the operational phase (and in part post-restoration – see later comments).

5. Indirect Impacts resulting from the proposal and Habitats Regulations Assessment (HRA)

The HRA carried has identified several pathways through which the proposals could have a significant effect on the National Site Network (in this case the Solent and Hamble Estuary suite of sites):

- Direct land take
- Increased recreational disturbance of wintering birds (via displacement from site)
- Increased recreational disturbance of breeding birds (via displacement from site)
- Disturbance of wintering birds from quarrying activities
- Hydrological changes: contamination of surface water, foul water, flood risk, water abstraction
- Air quality
- Dust generation

Of these, the HRA concludes that there is **no likely significant effect (LSE) alone or in combination** with other plans from all pathways except increased recreational disturbance of wintering birds and Disturbance of wintering birds from quarrying activities. Both of these are assessed as requiring embedded mitigation meaning they have to proceed to appropriate assessment.

The noise assessments have concluded that the addition of bunds around the working area will limit noise levels on the SPA sites to well below the 50db threshold identified for Estuarine birds. The conclusion is therefore that noise will **not have an adverse effect** on the interest features of the SPA and Ramsar sites.

To mitigate the potential impacts from displacement of recreational activity from the site it is proposed to retain a 30m buffer strip around the perimeter of the site that will be fully accessible to residents (i.e. dog-walkers). It is concluded that this (in combination with the fact that direct walking links to the SPA/Ramsar are not present) will reduce the potential impacts significantly, to a point where it is concluded there **is no likely adverse impact.** Similarly, the same measures are used to conclude no likely impacts from direct trampling on the Solent Maritime SAC.

5.1 Current levels of recreational use - implications

From the information submitted, I can find no formal assessment of the current nature and levels of recreational use of the site from which any conclusions on the likely impacts are based. Likewise, we have no information about where the visitors have come from and how many are walking to the site *verses* driving to the site (parking is available in a number of locations).

There are anecdotal references to the levels of public access throughout the ecology documents, such as this from the bird survey report:

> *"This species was only present on a single survey visit and given the **extensive use** of the site by the public and dog walkers it is therefore not considered that the site is suitable for frequent use by this species"*

Having visited site in early January 2022 on a cold, grey day my perception would tend to support the view that the recreational pressure is extensive. Indeed the network of paths is clearly visible in aerial photography indicating significant use. I would also take the view that the vast majority of the use is dog walking (everybody I encountered was a dog-walker) which is already a major cause for concern along the Solent National Site Network. Although the current access is unauthorised (and technically trespassing) it hasn't been prevented and therefore the airfield is absorbing recreation that could otherwise be occurring elsewhere.

In effect, the Hamble Airfield site may well be acting as a notional "SANG" by diverting significant recreational pressure (in this case dog-walking) away from the sensitive coastal sites. Given that the site currently has 60 hectares freely available, reducing this to a 30m wide, fenced permitter buffer zone will be a completely different visitor experience for the users, not least as beyond the bunds will be an active quarry site. Depending on the levels of current use it is my view that it may not be viewed as suitable by some dog-walkers when compared to other sites nearby.

In order to conclude that there will be no likely significant effects on the Solent sites resulting from the proposals we need to have **certainty** that the proposed mitigation will work. The displacement of even one free-roaming dog to the coast on a daily basis could potentially be significant in disturbance terms for the component bird species present given existing levels of recreational use on those sites.

The Concept Restoration Plan proposes that a much smaller proportion of the site will be available for recreation post-operation. While I support this in terms of the benefits it would bring to the on-site biodiversity, I have a concern that the reduction in available space will have the long-term impact of not attracting back the number of visitors that currently use the site. Again, those visits could then be diverted to coastal sites.

My primary concern here is that the proposals (despite the proposed embedded mitigation) **will** displace a significant number of dog walkers to other receptors, with Hamble Common and the associated coastal environment one of the most likely sites to be impacted. This may be both during the quarrying phase and also post-restoration due to changes in the accessibility of the site.

5.2 Air quality and dust

As presented, the air quality assessment has concluded no significant effects on the Solent Sites as a result of the proposal. Ammonia (https://www.gov.uk/government/statistics/emissions-of-air-pollutants/emissions-of-air-pollutants-in-the-uk-ammonia-nh3#major-emission-sources-for-ammonia-in-the-uk) doesn't seem to have been specifically assessed, although the HRA suggests the distances are far enough that any increase will not be significant.

Depending on other areas of speciality (i.e. transport assessment), it may be that the air quality calculations need to be re-visited so it may be necessary to comment further if more information is requested by other consultees.

Similarly, dust is not seen as potentially significant on designated sites, including Badnum Copse ASNW located adjacent to the northeast corner of the site. Should further information be requested by other consultees, this information may also have to be revisited.

5.3. Noise

Noise impacts proceeded to Appropriate Assessment in the HRA due to the need for embedded mitigation (bunds). The noise modelling calculated site noise levels at receptors on Satchell's Lane during works would be between 45 and 47 dB Leq. These levels would be achieved with the perimeter

bunding in place. These levels are below the 50dB low response threshold identified for estuarine species.

These receptors are also significantly closer to the site than the SPA/Ramsar sites so one would expect the impact to be even less at these sites which builds in some degree of precaution. At the present time, and with information provided I do not think noise disturbance on ecological receptors will be significant as a result of the proposals. However, should further information be requested elsewhere this may also need to be verified to ensure the conclusions remain as presented.

5.4 Hydrology

An impact assessment has been undertaken of the proposed excavation and subsequent restoration with imported inert restoration materials of the former airfield. The impact assessment suggests that there will be no significant impacts on groundwater, surface water or the spring feature. A number of additional mitigation, compensation and enhancement measures are proposed to ensure that impacts from the Site are not significant.

The survey work included that informs the ES chapter and HRA seems detailed and thorough and at present I am satisfied that it is unlikely there will be any significant affects om designated sites of Nature Conservation value as a result of hydrological changes resulting from the development. However, should further information be requested by other consultees this would need to be considered in the HRA.

6. Proposed mitigation and enhancements (concept restoration plan) for species and habitats

6.1 General comments

Looking at the Concept Restoration Plan, I am broadly supportive in **ecological terms alone** with the ambitions and type of habitats to be created, restored and enhanced. However, there are some specifics which will need more work and consideration around provision for particular species groups for which the site is already important.

Securing ongoing management plans, responsible authorities and land ownership post extraction are all issues that would need resolution preferably prior to any decision being made.

6.2 Reptiles

The site is highly likely to support a reptile population of county-level importance. The mitigation strategy seeks to retain the populations on site which is always the most preferable approach to take. However, there are a number of complexities with this approach related to the proposed phasing of the scheme and ensuring the viability of the population.

The mitigation strategy as presented is focussed on retaining the reptiles in temporary on-site receptor areas, with connectivity maintained to surrounding habitat. As areas of worked quarry are restored the habitat will be created and allowed to develop to a point at which reptiles can be allowed to recolonise. Habitat within the on-site receptor areas will be improved through appropriate management to mitigate for the loss of overall reptile habitat. The crucial elements are maintaining the populations while work is ongoing and ensuring that the restored habitat is available and suitable for reptiles when it is required within the phased working.

The approach proposed seems to be the most appropriate available but at this stage I have some concerns about the timescales involved. It would be useful to see how the phased reptile stages relate to the timetable of works over the 14-year period of work (e.g. how many years after Stage 1 will the

area be required to be suitable for reptiles and how does that relate to likely timescales for the development of the proposed habitats outlined in the restoration plan?).

Monitoring of reptile numbers will be important throughout the span of the works.

6.3 Birds

The Hampshire SINC criteria states that *"Any site that supports the breeding of any Hampshire Notable Species summarised at the time of writing in Table 8, will be eligible for SINC designation under Criterion 6A."* Hamble airfield supports a number of Hampshire notable species at the thresholds required and therefore the site should be considered to be of more significant value than simply of local value as assessed in the ES Ecology Chapter and Bird Surveys report.

The ES Ecology chapter accepts that the works will have a major impact on birds over the life-span of the proposed project and this is unavoidable if the works go ahead. The scrub and open grassland habitat mosaic is lacking in floral diversity but nonetheless is highly favoured for many species for breeding, particularly the impenetrable blocks of bramble. I accept that at present, with no positive management on the site, it is likely to decline in value for breeding birds over time.

Should the proposals proceed and the concept restoration plan be put in place, there is an opportunity to secure positive conservation management on the site. However, as presented I think the concept plan has underplayed the significant role that the blocks of scrub are playing on the site. Naturally it is a balance between maintaining enough open habitat for species which favour this and creating enough breeding habitat, but at the moment I think a higher percentage of scrub cover should be factored in.

The post-extraction site should be aiming to secure an overall gain for breeding bird species given its current importance. While this is hard to quantify, I think the Concept Plan falls short at present but will likely need revision as a result of other concerns anyway.

6.4 Bats

The site has been assessed as being of County level importance for bats due to the presence of up to seven species. As presented, the phased approach to reptile mitigation, the lack of night working (and therefore illumination) and proposed restoration is estimated to ensure that there will be no significant impacts on bat populations as a result of the proposals. I tend to support this.

However - as with other aspects of the proposed mitigation – any significant reviews needed as a result of additional work required elsewhere could affect these conclusions.

6.5 Invertebrates

The concept restoration plan aims to create more diverse grassland which is likely to increase the invertebrate diversity and should also retain the present BAP species. It is important to note that scrub and scrub edge is also beneficial to invertebrates and indeed this habitat was found to be favourable on the site in the assessment. More scrub habitat for breeding birds (again the balance will be tricky and the devil is in the detail and ongoing management) would also be beneficial for invertebrates so a revised restoration plan should consider this. The addition of wet scrapes/pools will also likely increase invertebrate diversity.

In general, I think the restoration post-operations has the opportunity to be positive for invertebrate diversity on the site.

6.6 Biodiversity Net Gain Calculations

I note that the current BNG calculations do not meet the "trading rules" of the Defra Metric 3.0. However, notwithstanding all the potential issues and how these could impact the future layout detail, I do support the general concept and would be prepared to accept a deviation from the metric rules if necessary if all avenues have been thoroughly explored and exhausted.

With a review of the restoration plans in the light of the required further work, a revised BNG calculation will likely be needed and the full calculations should be submitted at this point (as opposed to just a summary table).

7. Conclusions and recommendations

It is my view that the current ecological status of the site, based on the survey work, has been underestimated. While I accept that the grassland is not particularly florally diverse and the scrub is mostly bramble, the overall scale of the habitat mosaic and the species it supports are of sufficient quality for the site to be considered as a SINC (i.e. of county-level importance for biodiversity).

Any restoration plan must seek to create a site of at least county-level importance with secured management (for a time-period longer than five years) to continue to enhance and protect the ecological value for the future and to ensure the project could deliver a net gain for biodiversity. I have particular concerns around the certainty of proposed mitigation and restoration plans for the security of reptile and current breeding bird populations in the longer term.

It should be noted here that a detailed assessment of the potential recreational impacts (re-iterated below) is likely to have major impacts on the mitigation requirements and this is also likely to have significant implications for what is proposed as the restoration plan. With more work needed there is likely to be a need to revisit most aspects of the proposal in terms of ecology.

As stated, my major concern surrounds the displacement of visitors (primarily dog-walkers) from the site. It is my view that at present there is insufficient information submitted with regards to the current levels and nature of recreational use or the potential impacts of recreational displacement (both during operation and post-operation). A precautionary approach must be taken with the decisions at each stage of the HRA process.

The Habitats Regulations Assessment (September 2013) highlighted the potential for impacts from recreational disturbance on the Solent Site Network from any proposals on Hamble Airfield. It concluded that mitigation outlined in Appendix A of the Hampshire Minerals and Waste Plan for each site in combination with adherence to Policy 3 ("Protection of habitats and species") would be sufficient to rule out any adverse impacts. The mitigation outlined in Appendix A for Hamble Airfield includes:

- *"Safeguarding of adjacent public rights of way (footpath no. 1).*
- *Maintain and manage existing informal recreational use of the site. Phasing programme and working to protect local businesses and the amenity of local residents."*

While the perimeter buffer zone proposed attempts to address the issue of maintaining access during operation and a reduced accessible area is included in the Restoration plan, I think it is insufficient to absorb the present levels of recreational activity. For example, when the HRA was conducted the dog population in the UK was around 7 million – it is now upwards of 12 million. What could have been considered a viable mitigation measure then is not necessarily relevant now.

In conclusion, I believe there is insufficient evidence submitted to assess the likely effectiveness of the mitigation to conclude that the project will not have a significant impact on the Solent National Site Network. This is contrary to the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (Habitat Regulations), The National Planning Policy Framework (2021) and Policy DM11 (Nature Conservation) in the Emerging Eastleigh Local Plan and **on this basis it is my opinion that the application should be refused until this and the other outstanding issues highlighted in this response can be satisfactorily resolved.**

Paul Howe MCIEEM

Ecologist

Date 08/02/2022

Altman, Rebecca

From: Stringer, Chris
Sent: 04 February 2022 12:54
To: Altman, Rebecca
Cc: Parker, Nicholas; Culver, Mike; Bright, Diccon
Subject: CS/22/92277 - Hamble Airfield, Hamble

Follow Up Flag: Follow up
Flag Status: Flagged

Categories: Red Category, Consultation responses

Dear Rebecca,

CS/22/92277 - Hamble Airfield, Hamble

The site is largely tree-free, with significant trees only on the site's boundaries. Therefore, our comments will be relatively brief when compared to other disciplines, such as ecology.

Trees to be retained and protection measures.
Save for the access point and G4 (see below), all other trees appear to be retained and protected under the proposals. For the most part trees are given good buffers to the proposed bund and we raise no arboricultural objection to the majority of the proposals.

Trees to be removed.
Firstly, there is come confusion over the species of the proposed removals, namely T5, T6, T7 and G4. In the tree survey and in the schedule within the AIA (Table 1) the trees are listed as being sycamore, oak, sycamore and crab apple/willow/field maple/oak mix, respectively. However, within the AIA in Table 2, it lists them as oak, oak, oak and ash.

Ultimately, we would not raise an objection to the removal of G4 from within the site. This group is not significant and the individual tree loss from within this group would not be significant from an amenity perspective. We would, obviously, like to see compensatory planting for any tree lost, though.

We would, however, raise an objection to the loss of the three trees (T5, T6 and T7) for the proposed access. Whilst we appreciate that there are many other aspects that feed into access location, from an arboricultural perspective and, thus, an amenity one, the chosen site is relatively impactful. The nature of Hamble Lane will be significantly altered with the removal of the three trees. The applicant has not suitably demonstrated that they have explored other options.

Footpath and other work.
For the most part, the proposed footpath on the east and northern parts of the site is beyond the RPAs and, thus, not impactful. The only area of potential conflict, identified using the plans, appears to be on the northern boundary – the path appears to go through G7 – however, upon ground-truthing, there are no significant trees in this area and so we are not concerned.

Overall, the report is a little vague. For example, it doesn't provide detail regarding tree pruning around the entrance. However, the tree protection plans are satisfactory for the majority of the site.

Summary

- The report is a little vague in areas, but suitably demonstrates that the vast majority of trees can be retained and protected.
- Therefore, we raise no arboricultural objection to the general proposal.

- However, we would raise an objection to the removal of the three trees for the proposed access.

Kind regards,

Chris.

Chris Stringer
Tree Consultant
Countryside and Trees
Ext.: 8257

From: Planning (Eastleigh Borough Council) <planning@eastleigh.gov.uk>
Sent: 24 January 2022 09:52
To: Pollution.CMO <Pollution.CMO@eastleigh.gov.uk>; ecology <ecology@eastleigh.gov.uk>; Trees @ Eastleigh Borough Council <trees@eastleigh.gov.uk>; Stringer, Chris <Chris.Stringer@eastleigh.gov.uk>; Culver, Mike <Mike.Culver@eastleigh.gov.uk>; Harwood, Alice <Alice.Harwood@eastleigh.gov.uk>; Ellison, Mark <Mark.Ellison@eastleigh.gov.uk>; Kodis, Aliis <Aliis.Kodis@eastleigh.gov.uk>
Subject: Planning App Consultation Request Internal CS/22/92277

Application No: CS/22/92277
Address: Hamble Airfield, Hamble
Description: HCC Consultation Request: Proposed extraction of sand and gravel, with restoration using imported inert restoration materials, the erection of associated plant and infrastructure and the creation of a new footpath and access onto Hamble Lane at Hamble Airfield

Would you please let me have your observations on the above application.

You can access the plans and documents through Salesforce. At the top of the screen type the planning application number into the search box and either select the application from the list displayed or press the enter key and select it from the list of results.

In order to meet the Government's challenging targets for our speed of determining applications, we require any comments you wish to make within 14 days from the date of this memo. Failure to meet this time period will usually result in an application being determined without your comments being considered.

Please reply to the planning officer on the below email address.

Planning Specialist Contact Details
Email: rebecca.altman@eastleigh.gov.uk
Phone/Ext: 023 8068 8266

Kind regards

Application No: CS/22/92277

Address: Hamble Airfield, Hamble

Description: HCC Consultation Request: Proposed extraction of sand and gravel, with restoration using imported inert restoration materials, the erection of associated plant and infrastructure and the creation of a new footpath and access onto Hamble Lane at Hamble Airfield

Thank you for consulting us on the above application.

Summary of Recommendations:

At this time the Pollution Team are unable to ascertain from the information provided that potential significant adverse impacts from air pollution and noise will be avoided, and that adverse impacts will be otherwise minimised to acceptable levels. On this basis we are unable to support the application at this time. We would recommend that the applicant review and update their submission to address our comments (also see below regarding the traffic assessment).

We understand that colleagues have raised questions about the robustness of the transport assessment and some of its underlying assumptions, the transport assessment predictions regarding vehicle movements are an important input to air pollution modelling and noise assessment, the importance of this in understand the likely air pollution impacts in the Hamble Lane, Air Quality Management Area, AQMA, and noise impacts form activity on site, should not be underestimated. We recommend that an agreed traffic assessment is used for the purposes of air pollution modelling, and noise impact assessment, as well as taking into account our points in the previous paragraph.

With regard to land contamination the information provided whilst missing important details, indicates that historic land contamination is present on site. However, as the development is of allow sensitivity in land contamination terms we do not object, we do recommend that further site investigation information be submitted for approval prior to the commencement of any works on site.

Introduction:

The application proposes that 1.7Mt of aggregates, including sand are to be extracted, with 1.8Mt of inert fill to restore the site, with landscaping after that. Extraction and infilling will proceed in phases anti clockwise around the site starting from the top NW corner, adjacent to the railway line.

It is proposed to take 7 years or so for the sand extraction, with a similar length of time for infilling to occur, with infilling due to commence 2 or so years after extraction commences. The applicant states that infilling will continue for 6 years after extraction ends, giving a total of around 13 years of activity. Due to extraction and infilling 'overlapping' in the middle years activity on site and vehicle movements associated with the site will be higher in this period than at the beginning or end.

To provide screening for noise and dust to local residents and other receptors, a buffer around the site and bunds at the edge of the workings are proposed.

The extraction of aggregates in each phase, is proposed to take place utilising an excavator, shovel loader, and dump truck, with a central conveyor carrying the material to the screening plant located at the north of the site. Material will be screened and the graded aggregates stored in stockpiles adjacent to this facility, to be loaded into lorries for delivery off site. Wheel washes are to be located before lorries exit the site onto the highway.

The traffic assessment predicts a maximum of 144 HGV movements per day in the middle phase, with 90 HGV moments per day before and after this.

Residential dwellings are located around the site on the west, south and east, with the railway line to the north and a school beyond that. The majority of vehicle movements are understood to pass through the Hamble Lane Air Quality Management Area, AQMA, at the top of Hamble Lane. This AQMA has been declared due to exceedances of UK national target level of nitrogen dioxide due to emissions from road traffic.

Given the nature of the activities proposed and the proximity of sensitive receptors, and the increased traffic / HGV flows through the AQMA, there is a clear potential for the development to give rise to noise and air pollution impacts, including particulate matter as well at nitrogen dioxide.

The land was formerly used as an airfield and for aircraft manufacture, service and other associated activities, linked to the historic aircraft manufacturing of the locality. The land is also understood to have had defensive gun emplacements located on it, and been used during WWII.

Given the former use of the land there is a clear potential for land contamination to have occurred previously, and to be present on site.

Noise and air comments

We refer to:

- EIA Chapter 7 Noise, dated December 2021
- EIA Chapter 12 Air Quality, dated December 2021
- Planning and Economic Impact Statement, dated December 2021

Part A Introduction and Summary Comment

A(i) Introduction

The applicant has engaged the public and stakeholders and among the comments received, noise and air pollution impact are key concerns. Pollution Control reviewed the Environmental Impact Assessment (EIA) report and disagreed with the Planning Statement on the robustness of the technical assessments in allaying the key concerns of the public and stakeholder. Pollution Control found there is a lack of detail and nuance in support of the applicant's conclusions and more work needs to be done to justify the application.

Key concerns are loss of amenity and harm resulting from:

- Air pollution from heavy lorry emissions (nitrogen dioxide and particulates) in the Hamble Lane Air Quality Management Area
- Noise pollution from the use of powered mechanical equipment (plant) when stripping overburden, excavating sand, moving sand around the site, processing, storing and loading road going heavy lorries.
- Noise pollution from heavy lorries delivering and tipping waste into voids on the site and plant handling this in the void and to make up the finished level in restoration.
- Noise pollution from heavy lorries using the local roads.
- Air pollution from windblown sand and waste fines (dust) from the above activities, bare ground and open voids, and stored or stockpiled sand.
-

A(ii) Summary Comment on Noise and Air Pollution

Pollution Control has many questions about the technical assessments, and as such at this time are unable therefore to be satisfied that the development would not avoid significant adverse impact, nor that it is been demonstrated how adverse impact would be minimised. Therefore, Pollution Control currently objects to the planning application.

Part B Background and Summary of Technical Comments

B(i) Background

Pollution Control asks for the opportunity to explore the proposals in the local context for residents of dwellings the works would locate close to and the means to control, monitoring and audit noise and dust impacts.

It is recognised sand mineral resources are of strategic importance to development and national guidance is available to gauge the approximate impact of construction, operations and restoration works. But the local context is important to understand also as dwelling holders are asked to endure many years of elevated noise and dust exposure which pose harm to health and enjoyment of amenity.

Sometimes mineral workings are likened to engineering or infrastructure construction, but construction works more often bring about improvement in the local context and the timeframe is less and more certain. For example, a road improvement reduces congestion making life easier for residents and safer for drivers, pedestrians, cyclists etc. Whereas demand for minerals is elsewhere, outside of the locality and seemingly intangible to a resident living by a new quarry.

Demand for sand waxes and wanes according to demand which is difficult to predict other than on long period average thinking ahead for regional development and general market economics. This

means there are times when quarries are at low or high or maximum production and times when sand is stockpiled in reserve or as buffer on site in anticipation of market demand.

When the afterlife also depends on demand such as if the void is used for commercial infilling, the duration of the works again variable due to uncertainty on demand for waste disposal. It is easy to think of an idealised demand and supply of quarry products and waste reception, but also to appreciate this is not a circular economy as the two opportunities are independent.

At all times during the life of the works, there will be impact to dwellings. The adversity will fluctuate according to use of the works for sand supply and the site void for infilling. For many, while the planning statement says these works are temporary, the duration of several years or more will feel permanent and occupy a significant chunk of life; half a childhood or retirement for example and time sufficient for many may find 'as long as one can remember', meaning the experience lives with them permanently without the possible end of quarry life being sufficient reward or something to look forward to.

Such themes as striking a balance between regional or national needs and local impacts need careful examination to ensure the best is done to minimise pollution and the local context is recognised in pollution limits to be complied with. This should included monitoring and audit and community engagement throughout the life of the development for compliance and being a good neighbour.

B(ii) Summary of Technical Comments

On first review of the Environmental Impact Assessment, Pollution Control has questions which strongly relate to the local context and asks for clarity on EIA predictions of impact and the adversity residual impacts will bring to dwellings after the mitigation proposed by the applicant is implemented.

There is a lot of concern on the robustness of EIA predictions which unfortunately have underpinned the planning statement saying residents' concerns overestimate impact or under appreciate the effectiveness of the mitigation measures.

This is because there are many uncertainties behind what has been said in the EIA, including: the background or baseline condition of the environment; time of the day and day of the week of noise impact; fluctuation in sand production, stock keeping or piling, the quantity of waste received in time; seasonal and local weather conditions; the effect of more frequent extreme weather events we experience now and continue to anticipate more as climate changes; what quantity of dust and particulate matter will actually be received by residents and dwellings; how agile and transparent will the monitoring and audit programme be to trigger action and for remedial measures; and besides 'national limits' on pollution, what is the health risk to dwelling occupants and those with underlying health problems ?

As many find, an EIA document is mostly technical information and uses technical language. It is difficult to understand and appreciate what the real effects will be. People ask what does small or negligible mean to me, or does it simply tell me not to be concerned ?

Unfortunately, the application comes forward just as the effects of Covid are lessening and there is now opportunity to hold consultation meetings and forums in person. Public and stakeholder

consultation was carried out a few months ago when public gatherings were allowed. But, given the magnitude and duration of the works for over a decade into the future, the opportunity to hear and answer questions in a forum can help to answer some of the concerns residents and stakeholder have. Rather than seeking to decide on the planning application immediately, a time extension would help to answer questions and importantly help make the best plans for the development.

Included in Pollution Control's comments are questions Eastleigh residents and planning committee frequently ask. They reflect the need for certainty where the EIA is less than robust. And help to explain why considering 'uncertainty' is important in helping the EIA to be robust.

We ask for information in forms that can help the non-specialist, or ordinary resident with other skills and experiences understand what it will be like when the quarry opens near them and will work for more than decade.

In Part C Technical Comments below, items C(i) Noise Pollution C(ii) Air Pollution and C(iii) Planning and Economic Impact include our initial technical comments on the planning application for sand quarry, infilling with inert waste and restoration and the Impact Assessment reported on this.

Part C Technical Comments

C(i) Noise Pollution

Para 7.1.2 and 7.1.3 Background Sound Levels

It is recognised that Covid affected everyday life in 2020 and 2021. Measurements of background sound levels were carried out in 2018 and used as baseline to compare with works noise. We ask:

- What are the observations on life in 2018 and 2022 that lead to the EIA concluding year 2018 is representative of background sound levels ?
- Is it premature to submit the EIA for approval when opportunity now exists for background sound levels to be measured?
- Given the importance of the information the whole noise impact assessment depends upon to design the mitigation measures for the works, will it be premature to rely on this?
- What mechanism is there to recompute EIA predictions and make new plans for mitigation now and during the development?
- Have the background sound levels been measured over sufficient duration to conclude on short and long-term sound level variation?

Para 7.3.5, 7.4.9 and 7.4.10 Background Sound Levels

Attended sample measurements of one hour total duration were carried in around the middle of the day at six noise sensitive receiver locations on Monday 12 February 2018, Tuesday 24 April 2018 and Tuesday 15 May 2018. We ask:

- Are these few remeasurements representative of long-term background sound levels and why were long term measurements not undertaken as well ?

- What is the variance in background sound level and character throughout an ordinary day at on a Saturday morning?
- What is the 'uncertainty' of suggesting noise limits for several years of works based upon these limited data?
- How can it be concluded that from 0700 in the morning residents will be going to work as the EIA says they will less likely impacted by the works?
- Does background traffic flow data support this for the road between the works and dwellings?

Para 7.6.2 Noise Bund Mitigation

Heavy reliance placed on the noise bund to reduce noise and comply with the limits the EIA uses. We ask:

- What are the benefits of different bund heights?
- Can residual noise impact be ameliorated ?
- Can uncertainty in the EIA prediction be accommodated with ease ?
- What if say noise barriers were erected on top of the maximum possible earth bund height ?

Para 7.6.2 Distance Buffer to Properties

Noise reduces over distance and 'buffers' between works and dwellings allow for 'drop out' or deposition of dust. We ask:

- What are the benefits of different buffer distances between works and dwellings ?
- Can residual noise impact be ameliorated ?
- Can uncertainty in the EIA prediction be reduced by increasing the buffer ?

Para 7.1.5 and 7.3.3 Noise Limits

The EIA derives noise limits from the national publication "Planning Practice Guidance for Minerals". This was first published in 2014. The EIA says acceptable noise levels when they are not more than ten decibels above background sound levels at dwellings between 0700 and 1900. And notes the intention of the limits includes for "*not imposing unreasonable burdens on the mineral operator*" and "*Care should be taken, however, to avoid any of these suggested values being implemented as fixed thresholds as specific circumstances may justify some variation being allowed*". This provides a benchmark, but it is somewhat simplistic.

This is because a pollution impact is more nuanced in the way it is perceived. Human exposure to elevated magnitudes of noise for a short time tend to be tolerated and can be less harmful than a lower magnitude over a longer term. This is recognised for example by tolerance to construction noise as it is temporary and a positive outcome from this is tangible, such as a road improvement.

The Noise Policy Statement for England (2010) and National Planning Policy Framework (2021) encourage developers to "*Mitigate and minimise adverse impacts on health and quality of life...*" and "*...where possible, alternative options which reduce or eliminate such impacts should be pursued*".

We therefore ask:

- Can the applicant explore options of mitigation measures to minimise or eliminate noise (and dust) impacts?

The use of plant and equipment on an open site is akin to construction works, such as building a road or preparing a large site for development. Ordinarily, construction works start at 0800 and end at 1800 weekdays and 0800 to 1300 Saturdays only. We ask:

- Why would the sand extraction, processing, loading of lorries and lorry movements and reception of lorries with waste and dumping into voids and plant and equipment handling this in situ be less of a disturbance and of lesser impact to dwelling holders than say construction works of a lesser duration ?

Para 7.6.5 Calculation Methods

Calculations assumed 100% operation of plant in each hour of operation and co-tipping into the extract void at 20%. We ask:

- What if hourly tipping activity peaks at 100% ?

The EIA uses Sound Power Levels for plant and equipment from "manufacturers data and typical measurements of such plant items on other sites". We ask:

- What if plant used is noisier than has been assumed for the EIA predication?
- How will emissions from the plant items themselves be verified ?
- How will maintenance be carried out to alleviate noise emission increase from wear and tear ?
- How much can the operator influence the noise from machines ?
- What if demand leads to more lorries onsite and using the road?
- What is the contingency for peak periods ? Is sand delivery to customers even and consistent throughout the day?
- What if the customers need more sand in the early part of the day ?
- Are there other sand quarries to refer to on the typical operating pattern?

Table 7.8 Calculated Site Noise Level (Routine Operations)

Hourly average noise levels are predicted and compared to a suggested hourly noise limit. The limit is ten decibels higher than the background sound levels measured around lunchtime. The EIA predicts compliance by one decibel. We ask:

- What if all the uncertainties described above are taken into consideration ?
- What is the hourly experience of dwelling holders and compliances or non-compliances throughout the working day and on a Saturday morning ?
- Would complex modelling of site emissions, phases and monthly time intervals help to describe the longer-term noise levels experienced by dwelling holders. For example, to use

computer aided software commonly used by planning applicants for commercial and industrial premises.

- Can such modelling help to test 'what ifs' for reducing uncertainty and improving mitigation measures for robustness of the EIA prediction of compliance with noise limits ?
- Besides average noise what instantaneous higher-level noise will be heard by dwelling holders and how will this be controlled ? Common instantaneous noise problems occur from dropping or tipping plant buckets, shaking plant tools or disengaging load, dropping materials and waste etc.
- What is the character of the noise? What will it sound like ? Will the character be disturbing or annoying compared to background sounds such as conversation and natural sounds ?
- Can use of audible movement bleepers be broad band ? Tonal bleepers cause annoyance even at a low sound pressure level. Broadband sounds are easier for site staff to distinguish the location and direction of travel of mobile plant and lorries.
- Would an audio demonstration help to communicate the EIA predication and everyday experience of dwelling holders to site noise ?

C(ii) Air Pollution

Like noise, air pollution harms and impacts upon amenity. Nitrogen dioxide emissions from road traffic are a key consideration given their known impacts on health. Inhaling fine particulate matter such as invisible small fines from sand and silt extracted and waste materials has morbid and mortal consequences. Larger particles such as visible dust are a nuisance and common from sand tailings. They are easily mobilised by wind in plumes and deposit can fall out over a large area. Windblown dust accumulates on surfaces such as windows sills, outdoor furniture, on cars and all visible surfaces. Sand dust has colour and is easily identifiable compared to say light grey colour dust commonly seen.

The EIA predicts the quantity of nitrogen dioxide and particulate matter from tailpipe emissions from lorries using the works and reference is made to Air Quality Objectives for these as well as ambient air quality, exceedances of which for nitrogen dioxide have led to the declaration of an Air Quality Management Area on Hamble Lane and the A27 Bridge Road. This occurs on Hamble Lane, a route that would be used by works lorries. . Development which increases road traffic through this area is undesirable for the reason of increasing levels of air pollution.

But saying whether the limits of the Air Quality Objectives are exceeded or not does not fully represent if there will be health impact or not. Disease and fatalities occur below the limits and sometimes there are underlying health conditions exacerbated air pollutants. It is important to understand risk increases with pollution concentration.

Closer to the application site, background air pollution is less than in the Air Quality Management Area because there is less traffic on the roads. But the EIA does not quantitatively predict what the burden of the works will be. Instead, the EIA embeds dust mitigation measures from the outset and say these will be sufficient because generally if background air quality is not bad, the addition of dust from works probably won't exceed the Air Quality Objectives. This leaves questions about whether

mitigation minimises impact and what the residual concentration of nitrogen dioxide, dust and fine particulates will be at dwellings.

The mitigation includes bunds on the perimeter site, use of conveyor to transport sand across the site, wet screening of sand, keeping stockpiles more 100m away from dwellings, avoiding undertaking dust generating activities within 100m of dwellings on dry or windy days (said when operationally possible and perhaps supply to demand is more important), restricting vehicles speeds on site to 10 mph and water suppression as necessary. The EIA suggests agreeing a Dust Management Plan with the Local Planning Authority for implementation and this is welcomed, but without quantification, the extent and effectiveness of dust control measures cannot be concluded upon. It is important to know what the residual dust levels are with various effectiveness control measures.

Unfortunately, the EIA has not predicted dust emissions and impact to dwellings. There is discussion on weather and a regional wind rose, but not localised site monitoring of wind. This is important because it is the local topography, buildings and 'roughness' of terrain that also influence the magnitude and duration of dust impact.

The EIA also talks about average wind speed, which while important consider 'puff' or short-term effects that happen in gusts of wind. These occur even when average wind speed is low, or not apparent due convection when the ground is heated and alternately when cool air descends onto the ground again. These are just a few examples of real time effects.

The EIA qualitatively predicts that because background (without project) air quality is not bad, the imposition of the works would be "*insignificant*" because the limits of the Air Quality Objectives might not be exceeded. As a macro or strategic kind of environmental assessment tool, generalisation overlooks location, site specific conditions and an overriding need to minimise residual impacts. EIA ought to be a useful tool to plan and design the development and protect the sensitive. By doing so, residual impacts can be minimised.

- **We ask for quantitative dust and particulate prediction modelling to be provided in the EIA report to inform decision making and the implementation of controls or mitigation measures, environmental monitoring and audit.**

Para 12.7.1 Assessment Summary and Likely Significant Residual Effects

The areas of uncertainty identified in the underlying assumptions used by the EIA are as we identify for noise and describe further below on planning and economic impact. These are relevant concerns on the EIA's narrative of there being only small impact from air pollution coming from the site and routes of travel.

But without demonstration of emissions and propagation of dust and fine particulates, the conclusion that "*the proposed development would not be significant and a residual impact assessment is not required*" is uncertain. We ask:

-
- Regarding the impact of vehicular emissions, can the EIA check the transport model is valid with the Local Planning Authority?

- Given the significant increase in HGV movements in the vicinity and through the Hamble Lane AQMA, modelling or air pollution needs to consider the impact of increased traffic flows in as much detail as possible, demonstrating that short term and long term impacts caused by HGVs. Where mitigations are required these should be modelled to confirm their effectiveness.
- For works lasting up to and beyond a decade in proximity to dwellings, can the applicant undertake quantifiable dust modelling to aid description of the impact to EIA readers and dwelling holders?
- Can the applicant examine the assumptions for noise modelling to conclude on effective mitigation measures to minimise residual impact?
- Using a quantitative model of the site and its activities, can the applicant also refine the EIA prediction using locally measured meteorological conditions which include wind speed and direction?
- Can the EIA quantitatively predict dust levels for different stages or seasons going into the future ten years or so?
- Can the EIA quantitively predict and assess 'what if' scenarios on supply and demand for sand and waste to infill ?
- Can the EIA use worst case assumptions on modelling accuracy?
- Can the EIA explain what the impact of dust and particulate matter is using a health risk-based assessment technique?
- Can the EIA explain what threshold of impact or conditions that influence dust will trigger action to prevent increases in dust and particulates? For example, seasonal variation in weather, heat waves, windstorms, lower moisture content in sand at the excavation face, moisture content and particulate size of waste material being infilled, availability of surface water or lagoon for dust suppression during drought, seasonal variability in water table etc ?
- Will the EIA embed all best practicable means of preventing fugitive dust including using enclosed conveyor system and hoppers? Can stockpiles for example be kept in a three-side enclosure with optional sheeting for when needed ?
- Can the EIA explain the site EMS and environmental monitoring and audit for dust and particulates? Can this include weekly measurement and reporting ? Can this set out clearly what remedial actions are needed if trigger limits to be agreed with the Local Planning Authority are exceeded?
- What will be the complaint response action time, for construction works where 24 hours is normal?
- Can the EIA demonstrate whether dwelling holders will experience dust on windowsills, indoors when windows are open, on cars and in the garden environs? For example, what would dust deposition look like on a surface at a dwelling near the works ?

C(iii) Planning and Economic Impact

Overarching "*Sustainability*" approach is set out as the applicant strengthening local communities and partnership with key stakeholders and managing footprint for environmental excellence.

Para 2.3 Engage Stakeholders

Covid has unfortunately limited the means of public and stakeholder consultation. A few more months would be useful now Covid imposed restrictions on gatherings has been lifted. We ask:

- Can the applicant re-engage local dwelling holders and stakeholders while technical questions on the EIA are answered, and an amended submission is made ?
- Can the applicant demonstrate in simple terms what the impact of the works will be ?
- Can the applicant use other forms of demonstration such as audio so that residents can listen to what the works will sound like amongst the existing normal everyday sounds?
- Would technology solutions like immersive studio audio help ?
- Can the applicant provide images of what its works elsewhere look like ?
- Can the applicant provide examples of community engagement and what the community said or say about its other works elsewhere ?
- What lessons have been learned in the applicant's experience operating quarries and waste disposal works and sites ? Can the applicant explain these to ease understanding ?

Para 2.4 Environmental Management System (EMS)

The applicant is certified according to ISO 14001, and this is appropriate at head office as well as on site. The basic ethos of EMS is a 'Plan Do Check Act' cycle. Each works EMS must therefore be a living system and key to management of all activity. At site level, this must include monitoring and audit. Both EIA and community engagement should inform an EMS as a starting point for new sites, and therefore they have an important role in implementing a project.

Paragraphs in this section give nice examples of restoration. But, for the many years before restoration, the experience of residents nearby will be very different. We ask:

- Can the applicant explain what the site EMS and environmental monitoring and audit will include for the site operating day to day and how will it be consulted on and informed by useful information including environmental impact ?
- Will residents' views and suggestion help to inform and improve the living EMS ?
- How often will residents be consulted and how agile is the site EMS in responding to and preventing pollution problems ?

Para 3.3 EIA Consultation Informing Council, Consultees and General Public on Likely Environmental Effects of the Proposals

There is uncertainty on whether the EIA has identified all the adverse environmental impacts because of the range and number of questions that have been asked. It is also doubtful the EIA effectively communicates the environmental outcomes to consultees including the public. We ask:

- Can the applicant supplement the EIA with detail in the technical assessments of noise and air pollution impacts including for uncertainty and the local context ?

- As EIA reports are technical in nature and quote values or numbers of impact magnitudes and use some qualitative words on significance, they are hard to understand and appreciate just what the residents will experience for the working life of the quarry and waste infilling will. Can the applicant demonstrate impacts by other means to Council and public forums ?

Para 5.7 Working Hours

Referring to the EIA prediction of noise impact, this has been demonstrated for the middle of the day around or over lunchtime. We ask:

- Can the applicant assessment and predict the noise impact at the proposed operating hours from 0700 hours ?

Para 5.9 Throughput

Induced road traffic mainly lorries is described for an average throughput. We ask:

- Can the applicant explain what the variation in lorry movements will be as demand for sand and waste disposals waxes and wanes over the life of the works?
- What will be daily pattern of lorry movements be ?

5.11 Bund Planting and Buffer Distance

Options on the design of the bund and buffer distance between works and dwellings seem not to have been explored. We ask:

- Can the distance between the works and dwelling be increased and can options be tested using quantitative dust modelling ?
- In addition to grassland, would fast growing shrubs and trees help to entrap wind-blown dust ?
- Would such higher growth attainment help make a more favourable subject impression of the works all year round ?

5.13 Phased Extraction, Waste Disposal and Restoration

The magnitude, character, timing and duration of pollution impact depends on assumptions use or taken by the EIA. These are positively demand led in strategic terms and yet fluctuation in time seems beyond the control of the applicant. We ask:

- If demand for sand is higher than for waste disposal, what is the contingency to keep up with the restoration plans ?
- How has demand for waste disposal been forecasted and what factors influence the timing and quantity of waste to infill the works after sand has been extracted?
- Is there a risk the lifetime of the works could be longer ?
- Is there a risk of more open site area or bare ground while waiting for incoming waste to be disposed in the voids ?
- Would an alternative restoration method be more environmental beneficial, say without leaving areas of the works bare and eventually infilling which is noisy and dusty ?

Para 7.13 Community Consultation and 'Robustness' of EIA Predictions

Review of Chapters 7 (Noise) and 8 (Air Pollution) had identified where assumptions on the works and background environmental surveys lead to uncertainty. But applicant asserts the EIA predictions are robust and adequate to address residents' concerns. We ask:

- Can the applicant discuss and address uncertainty in the Planning Statement as well as revise Chapters on noise and air pollution impacts ?
- Unfortunately, Covid has affected how the residents have been engaged and consulted in late 2021. But as the works are for long term and residents expressed concern about noise and air pollution and the EIA report is difficult to understand, can the applicant arrange interactive means of understanding what the pollution will be like ?

Section 8 Benefits of the Proposal

The demand for sand for Hampshire is explained and demonstrated in this section. On the other hand, demand for waste disposal for infilling is not explained and has not been demonstrated. Waste disposal increases the magnitude and duration of noise and air pollution impacts. Thinking from the resident's perspective, a quarry extraction life of several years could be more tolerable than say a lifetime extended years of waste infilling. We ask:

- Can the applicant explain and demonstrate the demand for waste disposal at this site?

<u>Land contamination</u>

The proposed development would entail excavation across large parts of the site, potentially exposing these pollutants to atmosphere, or to those working on site. Altering surface cover on site can lead to mobilisation of in ground contaminants.

The application is supported by a report entitled GROUND CONDITION DESK TOP STUDY by Ground Condition Consultants limited, dated April 2018 reference: J18-010-R01 version 1.0. (Appendix 2.5 parts 1 and 2, and at Appendix 2.1 borehole logs from previous site study work unrelated to this report). A UXO report by Safelane Global is also provided, entitled 'Detailed Unexploded Ordnance Risk Assessment', dated Dec 2021 Ref RA9091.

This report reviews electronic / on line information sources regarding the land, references the local historical society website (relating to use as an airfield and associated activities) which confirms the dates and types of operations on site in connection with its use as an airfield, and refers to the results of a UXO survey into unexploded ordnance from WWII.

The report also references information obtained by previous investigations on site, understood to relate to the mineral potential of the land, and which it reports have uncovered evidence of hydrocarbon contamination (presumed fuel oil) in the central area of the site, and which is attributed to the historic airfield use.

However, as there is no information regarding the scope or purpose of these studies, for example whether land contamination was contamination potential was considered, or chemical analysis of the suspected contamination carried out, his limits the usefulness of this information. The report also identifies: Asbestos; metals; and both organic and inorganic contaminants as potentially being present on site, as by products of the aero industry use. There is no indication that any of these previous studies considered these contaminants as a part of their investigation. The UXO report identifies the potential for unexploded ordnance to be present, confirming historical removals of such items from the land, and ordnance from defensive features located on or close to the site.

The report concludes that, '*The risk of impact to identified receptors from the identified potential sources, in relation to the proposed use, is considered to be very low to low. As such, an intrusive investigation is not recommended for the proposed development to further assess the risks associated with potential contamination in the soil and groundwater.*

Given the proposed use of the site for mineral extraction, it is considered more appropriate to maintain a discovery strategy for the duration of the extraction works, such that evidence of contamination encountered during the development is reported to and assessed by a qualified geo-environmental consultant and significant impacts reported to the Local Authority and remediated appropriately.

Whilst the proposed quarry end use is not a particularly sensitive end use, we are concerned that an area of contamination has been encountered and no discernible follow up has occurred. Whilst borehole logs are included from these earlier investigations the extent and nature of contaminants encountered is vague. We are concerned that the potential hazards identified from the confirmed historical land use, the risks from encountering the likely contaminants, or of these being processed in the aggregate screening process have not been have not been not considered sufficiently. We do not consider a watching brief sufficient to address these concerns.

In conclusion, we do not object to the principle of the development on land contamination terms, however we would recommend that should permission be granted that the permission is conditioned to require an appropriate site assessment to be submitted, and where mitigation is deemed appropriate that such mitigation measures are agreed with the Council, and implemented as recommended, prior to the commencement of mineral extraction (including preparatory works to form noise bunds etc). With respect to the UXO risks identified, we recommend that the recommendations for site surveys and investigation contained in the report are implemented.

Summary

We are concerned that the information provided in support of the application is not adequate to demonstrate that significant impacts from noise and air pollution will be avoided, or that they will be minimised. On this basis therefore, at this time we are unable to support the application.

We recommend that the applicant review and address colleagues concerns on the transport assessment, and update the air pollution and noise assessments in the light of this and the comments above.

With respect to impacts arising from land contamination we recommend that additional information will be required prior to any works commencing on site.

Regards

Neil Scott

Senior Pollution Control Officer