

From: Ecology Team

Sent: 28 February 2022 15:42

To: Bond, Peter

Subject: CS/22/92277 - Hamble Airfield - Proposed extraction of sand and gravel, with restoration to grazing land and recreation using imported inert restoration materials, the erection of associated plant and infrastructure and the creation of a new footpath

Dear Peter,

CS/22/92277 - Hamble Airfield - Proposed extraction of sand and gravel, with restoration to grazing land and recreation using imported inert restoration materials, the erection of associated plant and infrastructure and the creation of a new footpath and access onto Hamble Lane

Thank you for consulting me on this planning application. In summary, I have a number of concerns and request that further information is submitted. My comments are detailed below:

Designated Sites

Having reviewed the submitted documents, I understand that update wintering bird surveys are currently ongoing and will be completed at the end of March 2022. Consequently, it has only been possible to assess impacts based on the survey results gathered up to the end of October 2021; nevertheless, it has been concluded that the wintering bird surveys to date do not identify the site as being used by SPA/Ramsar species and therefore the land is not functionally linked to the SPA/Ramsar. The full results of the 2021 - 2022 wintering bird surveys, together with a revised impact assessment and mitigation measures (if necessary), will be required to be able to confidently confirm that the proposals will not have an adverse impact on the qualifying features of the Solent and Southampton Water SPA and Ramsar by affecting a potential functionally linked SPA habitat.

The closest International designated sites include the Solent and Southampton Water SPA and Ramsar and the Solent Maritime Special Area of Conservation (SAC), located approximately 340m to the east of the site. The River Hamble, which lies approximately 410m to the east of the site, also forms part of the Solent and Dorset Coast SPA. 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), both of which lie 340m to the east, and Lincegrove and Hackett's Marshes SSSI which lies 350m to the north-east. The submitted Habitat Regulations Assessment report states that the hydrological consultant has confirmed that there are no surface water links from the site to the River Hamble and therefore any contamination of surface water has been considered unlikely. Overall, I have major concerns in relation to hydrological impacts as a result of this application and request that more detailed assessment is carried out. It is understood that the proposed lagoons have been designed to deal with surface water runoff from the site, in addition to infiltration through the active quarry void during each phase. As there is insufficient information to demonstrate that adequate infiltration could be achieved and due to the geology of the site resulting in a variable water table across the site and as currently any run-off from

the site runs towards the River Hamble and Southampton Water, I am not satisfied that the proposals will not result in any deterioration of water quality of the internationally, nationally and locally designated sites through surface water runoff or ground water contamination. The applicant's ecologist is required to refer to the published Hampshire Minerals & Waste Plan Assessment Under the Habitats Regulations (July 2013) which highlights that the site overlies a secondary aquifer in common with the SPA and the site is therefore expected to be worked 'dry' i.e. above the water table. Therefore this point would need to be demonstrated in the submitted Shadow HRA report.

The adopted Hampshire Minerals and Waste Plan (October 2013) states that the development considerations of this allocated land are '*Protection of the Solent and Southampton Water Special Protection Area (SPA) and Ramsar and Solent Maritime SAC*', '*Protection of the Lee on Solent to Itchen Valley Estuary Site of Special Scientific Interest*' and '*Protection of the water quality and recharge of the groundwater and surface water*'. In the absence of the above mentioned information, it can be concluded that these considerations have not been met.

Protected species

Invertebrates

The invertebrate surveys on site had recorded a total of 472 invertebrate taxa, of which 22 had conservation statuses, including one nationally rare species, three UKBAP species, 11 nationally scarce species, and seven notable species. The INVERTEBRATE SURVEY (appendix 4.6) and relevant sections of the Ecology chapter lack a meaningful impact assessment as a result of the operational and restoration phase of the development. Reference has only been made to mitigation in the form of habitat availability; i.e. habitats available in the form of the buffer zones along the boundaries (between the bunds and the outer edge of the fields) during the operational phase and the habitats restored during the post-operation phase. It is however unknown if the habitats that the rare species recorded rely on will be available within the buffers and the restored habitats. For instance, if the majority of these rare species rely on scrub, there will be a significant reduction of scrub availability within the buffers and within the restored habitats. Would this change affect the recorded populations of the invertebrates? A more detailed assessment and mitigation is therefore required.

Reptiles

The off-sett areas between the bunds and the outer edge of the site do not appear to be a minimum of 30m in some locations such as the southern boundary, north-eastern and north-western and northern boundary. Further information and a plan showing the width of these off-sett zones is required. Would the 5m tall bunds have any shading impacts and therefore reduce the suitability of these buffer zones? The plans provided are somewhat confusing; for instance, why is it that permanent fencing or some sections of it are not removed during each restoration phase to allow the recolonisation of these habitats by reptiles (refer to the drawings in the reptile mitigation strategy). At what stage would the bunds be removed as it is assumed that restoration of each phase is dependent on the removal of the bunds but this is not clear in the provided drawings. Further information in relation to the

proposed 'tunnels' (i.e. specification) is required. Is one tunnel sufficient in each area to allow reptiles to discover the restored zones?

Birds

Based on the results of the wintering bird surveys and breeding bird surveys, I am not satisfied that a detailed impact assessment of the proposals has been carried out on wintering and breeding bird species utilising the site. The mitigation offered is a mere reference to the reptile mitigation strategy which includes the provision of stand-off zones between the new bunds and the retained field edges. Due to the limited width of these buffers (maximum of 30m wide) and presence of a temporary public right of way resulting in disturbance, further clarification is required as to how these stand-off zones will provide suitable habitat for the birds recorded on site. For instance, the site was identified to be of value for flocks of the nationally declining farmland bird species skylark and linnet. Considering the size of these areas, phasing of the site and noise disturbance, would the stand-off zones provide any temporary suitable habitat for such species?

Habitats

Lighting impacts

It has been stated that the works will be carried out during the daylight hours and therefore there is no requirement for new lighting on site. Having reviewed the lighting layout plans, a large number of equipment mounted LED is proposed. There is also 9 pole mounted LED lights along the haul route car park and weighbridge. Further information is therefore required in relation to the proposed lighting on site.

Restoration Plan

The proposals will result in the loss of 25 hectares of scrub, with only 3.4 hectares of mixed scrub creation during restoration. Whilst I acknowledge that the restoration plan will result in the creation of acid grassland and water features which are of higher ecological value, the impact of such a significant loss of this habitat has not been assessed. For instance, what is the impact of such large-scale scrub reduction on notable invertebrates and birds? Therefore, further justification is required. In addition to the extent of scrub creation post-operation, I have concerns that the restoration plan has limited any retained scrub and new scrub creation to the site boundaries. The restoration plan has therefore failed to take into account the baseline open grassland/scrub mosaic on site and the importance of such habitat interface for protected species. For instance, as Dartford warbler had previously been recorded on site, would areas of open grassland with scattered scrub not be more suitable to encourage such species? Therefore, I request that the concept restoration plan is revised to address this point.

Further information, along with a plan, is required to clarify in detail the habitats that will be restored through the phased restoration, in line with the Working Phased Plan. This information is required to ascertain the extent and type of habitats which will be 'available' at any given phase.

Only a 5 year aftercare scheme has been submitted for the restoration of the site. It is deemed proportionate that a long-term management plan (for at least 30 years) should be submitted to ensure certainty of delivery of the enhancements.

Biodiversity Net Gain (BNG)

The results of the biodiversity metric calculation have been provided in a table within the Ecology Chapter of the ES. To check the accuracy of this document, I request that the spreadsheet of the calculations, along with all the pre and post operational habitat condition assessment sheets are submitted.

Could the location of the fen/mire area on the restoration plan be shown.

Based on the above, further information is required to ensure no adverse impacts on designated sites, habitats and protected species.

Please do not hesitate to contact me if you require any additional information.

Kind regards,

Senior Ecologist

Ecology Team

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