

From: Angie Lush
Sent: 03 March 2022 14:09
To: Strategic Planning
Subject: Planning application - HCC/2021/0787 EA112

Good afternoon

Planning ref: HCC/2021/0787 EA112 - Hamble Airfield, Hamble Lane, Hamble

Members discussed this application at Monday night's Full Council meeting and voted **not to support this application. Please see extract from minutes of the meeting on 28 February 2022.** Cllr Hawes had some comments to make on this application.

Ecology

- Lowland acid grassland - Central Government Countryside Stewardship Priorities in South Hampshire (May 2021) identified habitats to be maintained and restored which included lowland dry acid grassland.
- Hamble Airfield was identified as a Priority Biodiversity Link within EBC's Biodiversity Action Plan 2012, was noted to be an ecological Network Opportunity area, and is within the designated area for countryside stewardship measures for Curlew, Lapwing, Redshank.
- 5 species of birds which use the site for breeding purposes or other reasons are Birds of Conservation Concern (British Trust for Ornithology 2020) - Skylark, Linnet, Song Thrush, Dunnock, Common Whitethroat. The protected species Dartford Warbler was noted to be present on Hamble Airfield in 2017. 2 species using the site for breeding are on the Red List for Birds of Conservation Concern - Skylark and Song Thrush. The Skylark is a ground nesting bird which needs protection from dogs and disturbance from grazing animals. This would be unlikely to survive the current plans for restoration as only a small area is proposed to be turned over to the public and their dogs, and the rest of the area turned over to livestock grazing and/or biannual hay cutting. The Song Thrush is a tree and scrub nester, and if the majority of the scrub is removed as proposed in the current plan, then it is unlikely they will have enough habitat to make the site a viable site for these birds in the future following the restoration. Meadow Pipet, Stock Dove and Kestrel have been recorded on the site, and are on the Amber List for Birds of Conservation Concern. The Meadow Pipet is a ground nesting bird which would require a similar habitat to the Skylark and again would be unlikely to return following the restoration of the site for the same reasons as the Skylark. Hedgehogs, which is a species deemed to be vulnerable to extinction, are known to use the site.
- Large Velvet Ant (*Mutilla Europaea*) which is classed as a Nationally Notable Nb species, now only found in less than 10% of the country, seems to exist on the site, and will be lost on this site with the proposed mining of the site.
- Schedule 14 Part 1 Section 2 Environment Act 2021 states a net gain in biodiversity should be 10% or above. The current application states there will be a net increase in biodiversity across the entire 60 Ha site of 10.22% at the end of the restoration of the site. This should prevent any further development of any part of the 60 Ha site in the future, as any future development would reduce the level of biodiversity improvement that has been offered up as part of the working of the site and resulting destruction of current habitats. Therefore, in the future, none of the entire 60 Ha site would be able to be used for future development. Moreover, the grazing lands are not going to be suitable habitats for the red-listed overwintering birds and ground nesting birds which are currently being displaced and are unlikely to be able to utilise the small area currently being proposed as being available to the public and their dogs following restoration.

- Due to both these points, if the proposed gravel extraction is allowed to go ahead, Cllr Hawes would ask that, following the extraction of the gravel, the entire site be restored to a wildlife sanctuary similar to sites that have been restored by Cemex elsewhere in conjunction with RSPB and wildlife trusts and turned over to the local population as part of any limitations placed on the current planning application. This is likely to be much more palatable to the local population who would at least have something beneficial to look forward to at the end of the extraction process, and would be significantly more beneficial to the flora and fauna which currently inhabit the site than the current restoration plan.

Traffic

- Hamble Lane is a single carriageway B road which forms the main route in and out of the peninsula. It passes through residential areas which have pedestrian access across it for residents to access schools and amenities. It is classed as a minor road, and therefore not built to withstand the significant amount of traffic and weight of heavy goods vehicles proposed in the CEMEX plan. The proposed significant increase in heavy goods vehicles is likely to result in damage and erosion to road surface and therefore cause significantly more disruption to road users and cost to residents when road surface requires fixing. It is currently already over-subscribed with load of traffic on and off the peninsula, especially in peak hours, without any additional increase in traffic.
- The number of heavy goods vehicle movements is estimated in the application documents to be up to 144 heavy goods vehicle movements per day when both extraction and importation of restoration materials is ongoing, equating to a heavy goods vehicle movement every 3.75 minutes per day.
- The peak hours of traffic along Hamble Lane are stated in the planning application as being 08.00 until 09.00 and 18.00 until 19.00. This is not the case in actuality, as from experience the peak hours often go from 07.00 until 09.00 and 16.00 until 19.00 during normal non global pandemic times.
- Before and after school hours, there are large numbers of children commuting along Hamble Lane by car, bicycle, scooter and on foot as the catchment area for the Hamble Sports college/secondary school is across the entire peninsula. The children commuting to the school by foot or by bicycle/scooters will be in very close proximity to even more heavy goods vehicles than is currently the case. If parents deem that walking and cycling/scootering to and from Hamble School is too unsafe due to the significant increase in heavy goods vehicle movements along Hamble Lane, they are likely to drive their children to the school, which will result in a secondary increase in traffic and worsening air pollution along Hamble Lane.

Air pollution

- Eastleigh ranked 250 out of 317 local authorities for background concentrations of PM2.5 in 2018 and 2019 with background levels of $10.6\mu\text{g}/\text{m}^3$. These existing background levels are already deemed to be dangerous and in breach of WHO limits of average annual limit of $5\mu\text{g}/\text{m}^3$ (Taskforce for Lung Health). The current application by CEMEX has an objective of an annual mean PM2.5 of $25\mu\text{g}/\text{m}^3$, which is significantly higher than the WHO recommended limits.
- There is likely to be a very high risk to local residents' health from airborne dust containing crystalline silica, which is known to lead to an increased risk of silicosis and lung cancer. Silicosis is deemed to usually develop after being exposed to silica for 10-20 years, although it can sometimes develop after 5-10 years of exposure. Occasionally, it can occur after only a few months of very heavy exposure. The main symptoms of silicosis are: a persistent cough, shortness of breath, weakness and tiredness, and can ultimately be fatal. Silicosis can increase the risk of developing other health conditions such as chest infections, heart failure, arthritis, kidney disease, Chronic Obstructive Pulmonary Disease (COPD) and lung cancer.

- There are regulations and limits set for workplace exposure to dust containing crystalline silica. These limits are taken over an 8hr period. The “All Party Parliamentary Group for Respiratory Health - Silica - The next asbestos” noted that the “regulation is currently ineffective” regarding exposure limits and recommended halving the limits to exposure. But the majority of quarries which exist in the UK are not directly next to schools where the school children will potentially be exposed to these harmful contaminants on a daily basis with no Personal Protective Equipment over a 6 hour period, and residential properties where the residents will be exposed over the entire 24 hour period with no Personal Protective Equipment. She is extremely concerned about the long-term effect of having a gravel extraction plant immediately next door to the school and residential properties, which will put these people in particular but also the whole population on the entire peninsula at an unacceptably high risk to their health as small particulates are known to be blown and travel long distances.
- The current plan from CEMEX proposes that they use water suppression only on prolonged dry weather and/or high winds, or if visible dust is generated. However, silica dust particles are invisible to the naked eye in normal light, so high concentrations can be inhaled without the worker being aware of it. Thus, if the proposed mitigations against air pollution from silica dust rely on workers being able to see the dust generated before using water suppression, they will be entirely ineffective in preventing and transmission of silica dust particles.
- Relying on rainy weather will not help - It is known that there is an average of between 8 and 12 rainy days per month in Hamble, leaving between 221 and 269 dry days in the year when the local population will be at risk of inhaling crystalline silica dust, and so at long term risk of silicosis and lung cancer.
- The “All Party Parliamentary Group for Respiratory Health - Silica - The next asbestos” noted that the “regulation is currently ineffective” regarding exposure limits. Respirable Crystalline Silica is noted in this document to be most toxic when it is freshly fractured, ie: when it has been freshly mined. It was noted that exposure to Respirable Crystalline Silica occurs beyond the task of drilling or cutting, and can remain airborne after the task, to be released later when disturbed from clothes or in leaks or spillages. The “All Party Parliamentary Group for Respiratory Health - Silica - The next asbestos” has recommended methods of designing out exposure to Respirable Crystalline Silica should be used to reduce risk - the best and most appropriate way of designing out exposure in this situation is to not have the gravel extraction plant directly next to schools and residential properties.

In conclusion, Cllr Hawes proposed that HPC object to the proposal of having a gravel extraction plant in the current planned location, due to concerns regarding the ecological destruction and inappropriate and insufficient restoration of the site, significant concerns regarding effect on air quality and ineffective control of Respirable Crystalline Silica dust particles, and effect on traffic due to a significant increase in number of Heavy Goods Vehicles on an already congested residential road. A proposal was received, seconded with six Members voting in favour and one Member abstaining.

RESOLVED: That HPC would not support this application.

Kind regards

Angie Lush

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