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<i>Date</i>	4 April 2022	<i>Email</i>	planning@hants.gov.uk

Dear Ms Pearman,

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 at Hamble Airfield(Application No. CS/22/92277

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017: Regulation 25 – Further Information and evidence respecting Environmental Statements

I have reviewed the consultation responses received following the submission of the above planning application and require further information to be provided under Regulation 25 of the above regulations.

In order to allow Hampshire County Council, as the Minerals and Waste Planning Authority, to assess the application in the light of a full and robust Environmental Statement, it is considered that the following matters need to be addressed.

Ecology

Natural England (NE) considers that, as submitted, the application could have potential significant effects on designated sites in the Solent including the Solent and Southampton Water Special Protection Area (SPA) and Ramsar site, the Solent Maritime Special Area of Conservation (SAC) and the Solent and Dorset Coast SPA. In addition, the following Sites of Special Scientific Interest (SSSIs) could be impacted:

- Lincegrove and Hacketts Marshes SSSI;
- Hythe to Calshot Marshes SSSI;
- Lee-on-the-Solent to Itchen Estuary SSSI; and
- Upper Hamble Estuary and Woods SSSI.

*Director of Economy, Transport and
Environment*

In order to determine the significance of these impacts and the scope for mitigation, the following information is required:

- A detailed Agricultural Land Classification (ALC) and soil resources survey including the following:
 - Baseline information about agricultural land quality and the amount of best and most versatile (BMV) agricultural land present;
 - Baseline information on soil types and volumes present available for restoration including the identification of any shortfalls, using a 'soil balance'; and
 - Restoration proposals based on the above information for returning the land back to its original quality with the aim of no net loss of BMV agricultural land and the protection and sustainable use of all soils present.
- Updates to, and clarification of, parts of the Landscaping, Restoration and Outline 5 year Aftercare Scheme document to include, as a minimum,
 - An agreed and costed long-term plan that sets out how the management of the site, post-restoration, will be implemented and delivered;
 - Details of which management body(ies) will take long term responsibility for the site, should this be extended beyond five years; and
 - Details of ongoing monitoring of delivery of the agreed management.

With regard to the Habitats Regulation Assessment (HRA), it would be very helpful if the shadow HRA could be amended to consider impacts from the proposal in-combination with other plans/projects in the area, and with Local Plans. Hampshire County Council will consider adopting the shadow HRA once the requested amendments are made.

NE also raises a potential issue of Lincegrove and Hackett's marshes SSSI, which shows a natural transition from unimproved pasture through to saltmarsh, and therefore could potentially be impacted by changes to groundwater flows. While NE tentatively agrees with the Environmental Statement's conclusion in that changes in hydrology are unlikely to impact nearby designated sites, it is considered necessary that further consideration of this SSSI is undertaken.

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 proposal 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.

Your attention is drawn to the County Ecologist's request for further information regarding potential contamination risks from the proposed development on the nearby international and nationally sites of ecological

interest through both surface and groundwater pathways – see pages 1 and 2 of this response. This information is necessary in order to provide a satisfactory shadow HRA.

Protected Species – further assessment is required with regard to the specific availability of habitats during the life of the development for invertebrates. Further information/clarification is also requested regarding the proposed off-set areas and buffer zones for reptiles and also in regard to the nature and number of proposed tunnels to assist reptilian movement. The mitigation strategy proposed for wintering birds is considered inadequate and your attention is drawn to the comments of the County Ecologist in this regard.

Habitats – Lighting - while it is noted that the majority of site operations will take place during daylight hours, it is also evident that there are 9 no. pole-mounted LED lights proposed for the site. Further information in relation to the light spread etc from such lighting is requested and the potential impacts that the lighting may have on the several species of bat identified during the surveys.

Restoration - The proposals will result in the loss of 25 hectares of scrub, with only 3.4 hectares of mixed scrub creation during restoration. Whilst 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 and what is the justification behind this? 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, it is requested that the concept restoration plan is revised to address these points.

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. The location of the fen/mire area should also be indicated on a revised restoration plan.

It is also noted that a 5-year aftercare scheme has been submitted for the restoration of the site. It is deemed proportionate that a longer-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.

It is understood that Defra's Biodiversity metric 3.0 has been used to calculate a biodiversity net gain of just over 10%. This is welcomed, however, it is understood that these calculations do not meet the trading rules for the metric, and therefore it is requested that these calculations are updated, if possible, in line with the trading rules.

Highway Matters

It is noted that the proposal is for the extraction of ~1.7million tonnes of sand gravel with restoration using imported 'inert' waste material, with a significant overlap of these two processes between years 3 and 7. The Highway Authority has requested more detailed information in regard to the following issues:

Access Junction

- While the junction location and junction form is briefly mentioned in the Transport Assessment (TA), there is no evidence that an optioneering exercise was undertaken fully and this should be provided to enable to rationale of the presented access to be understood.
- The pre-application advice was clear that both County Arboriculturist and Ecologist had genuine concerns regarding the proposed tree loss and set out requirements for the Designer to demonstrate that their loss could not be avoided, and to fully mitigate if their loss was found to be essential. One key element relates to CAVAT (Capital Asset Value for Amenity Trees), the value of these trees is likely to be substantial but this information is missing and needs to be submitted in order to try and address these points. Further information can be found within Hampshire County Council's TG15 Trees, landscape and Ecology and the 2019 Highways Trees Policy <https://documents.hants.gov.uk/transport/TG15-Trees-Landscape-and-Ecology.pdf>
<https://documents.hants.gov.uk/transport/HighwaysTreePolicy.pdf>

Additional information is also required as follows:

- Speed data is provided in a summary table only with no raw data. It is unclear where the measurements were taken, or when. The designer needs to confirm that the speeds are current (within two years) and taken in appropriate locations.
- Visibility to the south (left) can actually be shown to the centreline as there is a physical feature (refuge) which prevents overtaking here.

- Visibility to/from the tactile paving on the southern side of the proposed junction (in particular) may be limited. The designer should demonstrate that ped/cyclist visibility is achieved at all crossing points.
- The RSA requires updating to reflect the changes made since the pre-application design review.
- There is no mention of LTN 1/20. Designs will need to prove compliance. Where possible, the cycleway should be widened to 3.0m and a suitable verge/margin provided for safety – given recorded speeds. The designer also needs to account for ‘shyness’ from the proposed barriers. One section is shown 2.28m wide with barrier adjacent. The effective width becomes minimal here. The crossing refuge in the bellmouth should also be a minimum of 3.0m ‘deep’ to cater for cyclists and the designer needs to check that the barriers do not become a problem for cyclists here too.
- A Walking, cycling and horse-riding assessment and review (WCHAR) has not been provided and is required.
- With regard to vehicle tracking, lock-to-lock times of 6s would be more appropriate than the 3s currently proposed for HGVs.
- Tracking – Speeds are not shown. These should be provided (it should be noted that anything lower than 10mph is not appropriate/realistic).
- All internal tracking uses a 14m HGV, whereas the junction is tracked with the correct 16.5m HGV, please can you clarify why this is inconsistent.
- Also, it is noted that the traffic count data included within the Transport Assessment includes ATC data from 2016/2017 plus growth. A sensitivity test to compare this approach with more recent data (potentially held by Hampshire County Council surveys team) should be undertaken to confirm accuracy.

Your attention is also drawn to the detailed objection from Hamble Parish Council (PC) which raises several concerns regarding the proposal. It is considered appropriate that a detailed response to the highway concerns raised by Hamble PC be submitted by the Applicant – either within the main response to this Reg 25 request or as a separate standalone document.

Hydrology & Hydrogeology

Surface water is proposed to be managed through infiltration, however, there is no information which demonstrates that infiltration is feasible at the application site and an infiltration rate of 1.0 m/hr has been assumed for the calculations, an approach not supported by the LLFA without site specific testing.

Therefore, at this stage Hampshire County Council requests infiltration testing be undertaken in accordance with the BRE365 (2016 publication) methodology at a depth and location commensurate with the proposed infiltration features. Considering the site characteristics and proposals in question, the infiltration testing should be carried out within several trial pits at the proposed lagoons' locations and depth(s), and for each phase location and depth.

It is also requested that an assessment be produced of the likely impacts the infilling operations will have on local flood risk. The introduction of possibly less permeable material to replace the extracted sand and gravel has the potential to affect how groundwater travels through the site post-restoration and a demonstration that this will not generate unacceptable impacts on and off-site is requested.

Noise

The Environmental Health Officer (EHO) notes that background noise monitoring was undertaken in 2018, some four years ago and which may not be reflective of the current position. It is requested that a revised background noise monitoring exercise be undertaken to better reflect current noise levels within an updated NIA.

Dust and Air Quality

It is noted that sand and gravel is largely wet when extracted and dust issues from such operations are rare, although temporary soil moving operations can generate dust emissions that leave a site's boundary depending on local weather conditions and working methods. The EHO has assessed the proposal and notes that the quantity of dust and particulate matter that will be received by residents and dwellings has not been quantitatively predicted/modelled. The EHO requests that quantitative dust and particulate modelling is undertaken to better inform decision making and any scheme of mitigation and future monitoring that may be necessary to ensure that there are no significant impacts on the local community and environment. Your attention is drawn to the specific consultation response of the EHO.

Rights of Way

The County RoW Officer raises an objection based on the current proposal. Please can you review this consultation response and consider the proposed improvements to the local rights of way network requested by the RoW officer? It is also requested that a detailed drawing on the proposed permissive path should be provided to ensure it is safe and accessible to all.

Archaeology

While the County Archaeologist endorses the general approach offered in relation to the archaeological potential of the site, it is requested that the

applicant provides additional details with regard to the military structures at the site and to the site's Palaeolithic archaeological potential. Please see the full response of the officer for further details on this matter.

Landscape & Arboriculture

The County Landscape Architect raises no objection in principle but does make comments on the submitted details. In the light of these comments, it is requested that a revised phasing scheme be prepared that ensures complete phase restoration and bund removal in a sequential manner rather than this being left until the end of the infill operations. Clarification is also sought on the suggested use of lime when the end goal includes an acid grassland, the retention in situ of dead trees and the proposed planting of Aspen instead of willow.

The County Arboriculturist notes that the proposal would result in a relatively low number of trees being removed. However, it is also noted that no positions for utilities, lighting, drainage, soakaways, attenuation tanks, CCTV lines, visibility splays etc have been identified and until this is done, it is impossible to fully determine the potential impact on trees. The AIA must be revised and resubmitted once these routes and services are known and must also take onboard the other concerns raised in the attached officer's response including the need to protect RPAs from compaction, ownership of the trees potentially within the highway boundary along Hamble Lane and a detailed mitigation 'offer'.

Restoration & Aftercare

The key issues regarding restoration and aftercare have been covered above and in the detailed technical consultee responses. There is no objection in principle to the submitted schemes, but clarity and minor amendments to the restoration scheme and its phasing are requested, along with more information relating to groundwater flows post-restoration, improved rights of way and habitat creation. With regard to aftercare, it is requested that as a minimum, an indicative 30-year management plan be prepared. In the event that planning permission is granted it is expected that such a long-term plan will be the subject of a S106 obligation.

Public Representations

The number of public representations received currently exceeds 1,000 and you may wish to prepare a document addressing the concerns and objections raised in these documents. A summary of the main concerns raised includes:

- Impact of HGVs on already busy roads and overcrowded junctions to the north of the site access;
- Loss of trees to facilitate the new access;
- Amenity impacts from noise, dust and on air quality;

- Loss of important habitats and impacts on protected species on the site;
- Potential impacts on designated sites in the wider locality;
- Impacts on rights of way; and
- Duration of the proposals.

Availability of Consultee Responses

Copies of all consultee and public responses can be accessed from the attached link <https://planning.hants.gov.uk/Planning/Display/HCC/2021/0787>

Should you wish to discuss any of the matters raised above then please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Peter Bond', with a stylized flourish at the end.

Peter Bond
Principal Development Management Officer