

CEMEX Response to concerns raised by Parish Councils and residents

Hamble Parish Council

Background Point – Policy Position

1. The site is allocated in the Hampshire Minerals and Waste Plan. Hamble PC have stated that the Inspector relied upon a report stating that there would be 60 HGV movements per day and this is 2.5 times the current application for 144 HGV movements per day during times of greatest activity.
2. HGV movements would only have been one of a number of considerations for the Minerals Planning Authority and the Inspector when allocating the site, and the information put forward at allocation stage is not binding with regard to any future planning application, but is a best estimate at the time of submission of the likely impacts. The submission for the plan was based on a lower rate of output (100-200ktpa), and an estimate of the total mineral of 1.25mt. A lower rate of output would of course extend the life of the quarry in years instead and the minerals plan submission proposed 6 to 12 years of extraction, where as working it more quickly results in a higher number of HGVs but for a shorter duration, as is proposed now with a duration of extraction for 7 years.
3. In addition, the reserve has been reassessed and it is now estimated that there are 1.7mt of sand and gravel within the site, which has led also to a change in the figures. Estimating how much mineral is within a site can only ever be a best guess based on geological investigations and it is not possible to be exact. The figures also in the 2012 report were also just the extraction figures and did not include bringing restoration materials into the site for restoration purposes. This is clear in the 2012 report.
4. The pre-application submission in 2016 to the Council was based on the same extraction and total mineral figures as the planning application and the application submission has followed the advice of the County Highway Authority in their pre-application response. This application is accompanied by a further, detailed Transport Assessment at Appendix 7.1 of the ES, which has concluded that the impact on the local highway network of the development will be negligible. Further junction modelling has been undertaken as part of the Regulation 25 submission (Appendix 7.2 of Volume 2), which also shows that the development will not have a severe impact on the operation of the junctions to the north of the site, and has updated the background traffic flows to 2022 figures. The results are again negligible on all counts as set out in the conclusion of the updated Chapter 13.
5. Hampshire has a duty to provide for the amount of sand and gravel required in the County and minerals can only be worked where they are naturally found, and physically able to be extracted and exported from the site. In a County considerably constrained by landscape and other designations, particularly in south Hampshire where large parts of the County and surrounding counties are constrained by National Park and AONB designations, Hamble was considered by Hampshire County Council as one of the best options to provide sand and gravel, along with the other allocated sites. Hamble is in close proximity to the urban areas

where demand for aggregate is highest, which makes it significantly more sustainable environmentally than sites which would have to bring aggregate to the urban areas from much further afield, resulting in longer HGV journeys through other locations.

6. There are a significant number of infrastructure and building projects proposed in south Hampshire (see the 2021 LAA) including the Southampton Airport project, upgrades to roads, and large housebuilding and school improvement projects, and it is noted that a bypass at Chickenhall Lane in Eastleigh is also a potential project. All of these require significant amounts of aggregate, as do smaller projects such as house extensions, and it is imperative that the impact on climate change is minimised and HGVs are not forced to come from much further afield to supply these projects. Even if the site at Hamble does not directly supply these projects, the gap in the general local aggregates market that will be left by their demand upon other sites needs to be met locally to minimise environmental impacts, that would result from long HGV movements in bringing material from other places. The link has to be made between aspirations of economic growth and the need for aggregate to be supplied locally, otherwise the economic growth could come at significant environmental cost if HGVs are forced to come from much further afield.
7. Quarries are not “urban” developments – mineral can only be worked where it is naturally found in the ground and where it is viable to extract, without having significant effects on the environment and amenity. Most quarries are in the countryside as it is generally easier to be able to extract and transport the mineral, but only then if they are close enough to main traffic routes rather than single track roads, and close enough to major towns to be in a sustainable location without having to transport mineral long distances. Sites also have to be generally free of landscape and ecological or other designations on or adjoining the sites that would make them too sensitive to be worked from an environmental point of view, and there are many other considerations in terms of a site’s viability such as hydrological and flood considerations, soils and agricultural land, impacts on protected species, and proximity to residential properties, as well as a landowner who is willing to agree to the development and a site large enough to be financially viable to extract the mineral from, given the significant cost of setting up a new site. An “urban” site would of course be much closer to higher densities of housing than sites in the countryside. Sites that fit the above criteria are becoming much harder to find as they have already been worked out, and as such if Hamble was not worked for mineral it would not necessarily be easy to find a local replacement which would be required to meet Hampshire’s need.
8. All sand and gravel sites are temporary as mineral supplies are finite, and it is not possible to rely on other sites for the long term, as sites have to be regularly replaced as the mineral is worked out. Hamble is in a good location to support large infrastructure projects such as Southampton Airport expansion and local building projects with locally sourced sand and gravel. The proposal at Hamble has been fully assessed by independent consultants as part of the Environmental Impact Assessment, and it has been demonstrated that the site can be worked without unacceptable environmental or amenity impacts.

Traffic Impacts

9. Detailed assessments of the traffic impact have been carried out which have shown the impact in all regards will be negligible. Further updated assessments and junction modelling undertaken as part of the Regulation 25 request have shown no significant impacts on junctions resulting from the development. The updated surveys have shown that the baseline traffic along Hamble Lane has reduced from when the original surveys were carried out in 2017, as the amount of traffic overall in 2017 was 5-10% higher, as shown in the Regulation 25 Transport Addendum (Vol 2 Appendix 7.2). This, of course, means CEMEX's vehicles as a percentage of the overall traffic is higher based on the 2022 data, however traffic numbers overall including CEMEX's vehicles would be lower if we were operational in 2022 than had we been operational in 2017.
10. The TA included a robust assumption that all 20 staff and visitors would arrive in the morning network peak, as set out in paragraph 13.5.22 of Chapter 13 (original version). The staff movements are also shown in the evening peak hours in Table 13.13 of Chapter 13. Since the data has been updated, the 2022 data shows that the evening peak is now much earlier (1615-1715 hours) than it was in 2017 (1800-1900 hours) and as such there would be a small number of HGVs in the earlier evening peak, but this would be only 3-5 HGV movements over the course of the hour, and a 1-2% increase on overall traffic in the immediate vicinity of the site.
11. It is acknowledged that Hamble Lane suffers from peak congestion issues but the additional vehicles from this site are not only small in number but are temporary. It is noted that the Hamble Lane Improvement Scheme is not being taken forward by County Highways at this time however CEMEX is willing to provide proportionate contributions to improvements to Hamble Lane or other transport improvements as identified by the County Highways Authority which will help to minimise any impacts. When permitting other sites since the adoption of the HMWP along Hamble Lane, the allocation of this site would/should have been taken into account by the County Highway Authority when deciding whether it is appropriate to allow additional housing. CEMEX are also willing to accept planning conditions that are required to make the development acceptable in the view of the County Highway Authority.
12. The TA submitted with the application does not demonstrate that the application will have a severe impact on the road network, as that has not been the results of the assessment. In fact, the assessment has shown the impact will be negligible. The methodology used in the TA is accepted methodology and concerns regarding the methodology have not been raised by the County Highway Authority. The additional information asked for by County Highways has been submitted as part of the Regulation 25 submission.

Site restoration

13. The restoration of the site will result in biodiversity net gain over and above the level of biodiversity currently on the site, so will be beneficial in terms of ecology compared to the current situation. Detailed mitigation to ensure no harm arises to protected species has

been set out in the Environmental Statement, and restoration of the site would be progressive and would follow mineral extraction in phases. CEMEX would be responsible for site restoration and aftercare secured through a legal agreement, as is standard with mineral sites. CEMEX are proposing between 5-20 years aftercare for different parts of the site, again as is standard with mineral sites around the country.

14. CEMEX have won awards for site restoration in other parts of the country, and have had a partnership with the RSPB for over 10 years, who are involved in the restoration of our sites to ensure that the biodiversity of the site is maximised wherever possible. For example, Attenborough Nature Reserve is a former CEMEX quarry now run by Nottinghamshire Wildlife Trust. Most of CEMEX's sand and gravel quarries also have a Biodiversity Action Plan which is part of CEMEX's commitment to maximising biodiversity gain at all our sites.

Displacement of recreational impacts

15. The site does have unauthorised recreational use which is acknowledged in the application. CEMEX understands from the site owners that fences have been regularly put up to stop unauthorised access but these have been torn down within a short time frame, and that the Parish Council are responsible for maintaining the fence along the southern boundary. In terms of impact on surrounding designated sites, a Habitat Regulations Assessment has been carried out and updated as part of the Regulation 25 request, which can be found at Appendix 4.2 of the accompanying Environmental Statement.
16. Whilst the extraction of minerals at the site may result in recreational use being displaced to other surrounding sites, it is not reasonable to rely on a private site to absorb recreational uses that would otherwise impact surrounding designated sites. The impact of recreational use on designated sites would have been considered by Eastleigh Borough Council when applications for housing within close proximity to designated sites were being determined, and any reliance on Hamble Airfield to absorb recreational impacts is not appropriate given that it is a private site. Formal Suitable Alternative Natural Greenspace (SANG) areas could have been set up at the time of granting permission for housing, if the recreational impact of the housing upon the designated sites was not considered acceptable. This site could be fully fenced at any time without planning permission and as such the existing recreational use would be displaced in any case.
17. It is considered that, by allowing a permissive path around the edges of the site which will be wide, screened by bunds and have access points out of the site, that the proposals provide beneficial impacts compared to the current situation in terms of recreational impacts by allowing an authorised use. This is considered to help minimise any displacement of the unauthorised use to other areas by allowing walking on the site to continue, and access from the residential areas to the south of Hamble to Hamble School and railway station through the site.

Flood Risk

18. The site is within Flood Zone 1 so is at the least risk of flooding. The Flood Risk Assessment submitted with the application considers the flood risk from the proposed development to the surrounding area fully in Section 7, including during and post-development.
19. The surface water run-off rates are predicted to decline during the operational phase, given that there will be a large voids within the site. Therefore the risk of flooding will be lower than presently. Upon restoration, surface water run-off will be managed through a series of surface water features on the site including ditches and ponds as shown on the restoration plan, and the detailed drainage design is anticipated to be submitted by condition, where it would be approved by the Local Lead Flood Authority and the Mineral Planning Authority before development can commence.

Air Quality

20. The impact of the development on Air Quality has been fully taken into account in the Environmental Statement, including the impact on the AQMA. Additional information has been Regulation 25 stage which sets out a detailed response to Parish Council concerns.

Noise

21. Table 7.7 of the Noise Chapter shows that HGVs have been taken into account in the assessment. Further information has been provided at Regulation 25 stage as requested, and the background noise levels updated which have shown that the suggested noise limits at surrounding properties suggested in the original ES chapter are still appropriate.

Dust

22. The assessment is considered to be robust and is based on the recommended methodology in the Institute of Air Quality Management Guidance on the Assessment of Mineral Dust Impacts for Planning 2016. Whilst the EHO has asked for quantitative modelling, the guidance says:

“Detailed dispersion modelling of dust impacts from minerals sites in the UK is extremely rare and is not generally recommended by the IAQM given the lack of accurate UK emissions data for this sector.”

“The collective view of the IAQM Working Group is that it is currently inappropriate to use a quantitative modelling approach to predict the impact in most cases and a qualitative risk-based approach using the S-P-R concept should usually suffice. This is primarily due to a lack of UK derived emission factors for minerals sites that could be used for modelling.”

23. It is clear therefore that air quality professionals should not use dispersion modelling to predict impacts due to dust from mineral workings as the lack of useable emissions data would render the results meaningless. The IAQM recommend using a qualitative risk-based approach using the source-pathway-receptor (S-P-R) concept, as has been undertaken in the Air Quality ES Chapter, with details of the assessment methodology provided in the Air Quality Appendices.

Buffer Zones

24. The buffer zones in this case have been derived from noise, air quality and landscape studies that have formed part of the Environmental Statement. The appropriate buffer distance will vary for different sites depending on background noise, landscape features and the layout of the site. It has been demonstrated in the Environmental Statement that there will be no unacceptable adverse effects on surrounding residents as a result of noise, air quality or landscape and visual impacts.

Hound Parish Council

Ecology

25. The site will result in a biodiversity net gain overall, of over 10% in habitat units and 138% in hedgerow units. The site has been fully assessed in terms of protected bird populations in Appendix 4.4 of the Environmental Statement. Mitigation for birds is set out in Chapter 10 of the ES, and CEMEX have had a partnership with the RSPB for over 10 years who are involved in the restoration of our sites. Almost all trees on the site will be retained, other than those at the access and a few smaller trees that have seeded within the site itself. The buffer zones around the edges of the site will ensure that a suitable level of good quality mitigation habitat is retained on site at all times, and the site will be significantly enhanced for breeding birds in the long term, post-restoration. To avoid risks of disturbing or injuring birds, all site preparation work will be undertaken outside of the bird nesting season, or following a check by an ecologist.

Traffic

26. The peak hours stated in the application are fact, based on the time period that the data was collected in 2017. The traffic surveys have since been updated and the 2022 peak hours are slightly different, as set out in the response above to Hamble Parish Council. It is acknowledged that the road is also busy at other times but the peak refers to the single morning and evening hour with the most recorded vehicles at the time of the survey and therefore these are the correct peak hours at the time the data was collected. The access has been designed to ensure that there is good visibility for vehicles and other road users including pedestrians along Hamble Lane. The number of HGVs on the road would only make up 2-3% of total traffic along Hamble Lane in the peak hour and 1-2% in the evening (earlier) peak, based on the 2022 data. The amount of vehicles overall on Hamble Lane has reduced in 2022 compared to 2017, by 5-10%.

Air Quality

27. The Regulation 25 response has addressed the issue of silica. Silicosis is a lung disease caused by inhaling large amounts of crystalline silica dust due to occupational exposure. The Workplace Exposure Limit (WEL) for respirable silica dust is 0.1mg/m³ averaged over 8 hours, which would equate to 100µg/m³. This is significantly higher than the Air Quality Objectives for PM₁₀. Annual mean PM₁₀ concentrations across the study area range from 13.6-15.0µg/m³ significantly lower than the objective. The potential health impacts due to the PM₁₀ fraction of dust emissions, i.e., respirable dust, has been considered in the Dust Deposition Health Effects section of the Air Quality ES Chapter. The IAQM minerals guidance

takes the approach that there is little risk that a process contribution from a dust source would lead to an exceedance of the objectives where background ambient PM₁₀ concentrations are below 17µg/m³; therefore, the proposed development will have an insignificant effect on health due to fugitive emissions of PM₁₀.

28. CEMEX are very experienced in controlling dust emissions at quarries and have very few complaints nationally, with any issues addressed immediately by site managers. CEMEX anticipate that a Dust Management Plan would be required by condition.

Bursledon Parish Council

Vehicle movements and road infrastructure

29. See response above to Hamble Parish Council.

Air Quality

30. See response above. The Air Quality impacts have been fully addressed in the application including impact on the AQMA.

Additional homes since the allocation

31. When planning permission has been granted since 2013 for houses along Hamble Lane, the allocation of this site for mineral working was known and should have been taken into account when determining whether it was an acceptable location for additional housing.

Lowford Surgery

32. The traffic surveys have been updated to 2022 and as such will include all current movements in the baseline figure.