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BY EMAIL ONLY

Dear Lisa

Planning consultation: 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

Location: Hamble Lane at Hamble Airfield

Thank you for your consultation on the above dated 05 December 2022 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED

As submitted, the application could have potential significant effects on the provision of Best and Most Versatile (BMV) agricultural land in the Solent region.

Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

The following information is required:

- A calculated Agricultural Land Classification (ALC) Grade for the Site and subsequent assessment of impacts of the Development on BMV land.

Please re-consult Natural England once this information has been obtained.

Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

Habitats Regulations Assessment (HRA)

A shadow Habitats Regulations Assessment (sHRA) has been produced in support of this planning application (LC Ecological Services, October 2022).

Natural England notes that this sHRA has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the HRA and be accountable for its conclusions. We provide the advice enclosed on the assumption that your authority intends to adopt this HRA to fulfil your duty as competent authority.

The HRA should consider impacts from the proposals in-combinations with other plans/projects in the area, and with Local Plans.

Soils, Land Quality and Reclamation

Following the advice provided by Natural England in 2021 (November), the Applicant has undertaken an Agricultural Land Classification (ALC) survey and prepared chapter 14 'Soils and ALC'.

Based on the information provided in support of the planning application, we note that the proposed development would extend to approximately 60 ha. However, the applicant describes the land as being non-agricultural due to its former airfield history and does not provide an assessment of potential impact on BMV agricultural land.

Reconnaissance ALC data (Post 1988) was undertaken in 1994/5 (see [Agricultural Land Classification detailed Post 1988 ALC survey, Hamble - ALCR24494 \(naturalengland.org.uk\)](#)), which shows the application area as mainly BMV with a substantial area likely to be of Grade 1 quality; in which much of the area was permanent grass and being grazed by horses or cattle. Therefore, the land should be considered to have been last used for agriculture, and therefore subject to an ALC assessment.

The ALC grades agricultural land according to the degree to which its physical characteristics impose long-term limitations on agricultural use. A combination of climate, topography and soil characteristics and their unique interaction determines the limitation and grade of the land. The ALC Grade is therefore not based on the current land use or cropping of the land, but the potential of the land. Further detail can be found in the [Guide to assessing development proposals on agricultural land - GOV.UK \(www.gov.uk\)](#).

In accordance with Schedule 5, Part 1, Paragraph 4 (1) of the Town & Country Planning Act 1990 (as amended), Natural England confirms that it would be appropriate to specify agriculture (grassland managed by grazing and mowing (ie a low intensity agricultural use)) as an afteruse, and for the land to be reclaimed in accordance with Paragraph 3 (1) of the 1990 Act; namely that the physical characteristics of the land and soil resource to be restored, so far as practicable, to what they were when last used for agriculture.

It is not clear in the text of Chapter 14 how the soil sensitivity criteria (excellent quality; very good quality, etc) has been determined. Has the soils sensitivity been determined from the ALC grade? We advise that Chapter 14 should include the calculated ALC Grade for the Site and subsequent assessment of impacts of the Development on BMV land.

Landscaping, Restoration and Outline 5 Year Aftercare Scheme

The Landscape, restoration and outline five-year aftercare scheme (Revision A) has been updated in September 2022. With appropriate phasing and progressive re-instatement, the proposals will lead to the temporary loss of <20 ha of soil resources that can be returned to use within 5 years.

The restoration design provides for the re-instatement of 58.17 ha of land, which represents approximately 97% of the site area. Approximately 1.87 ha of soil will be permanently removed to accommodate wetlands and ponds in the east of the site. The report concludes that the residual magnitude of likely significant effects on the soil resource is low.

Five years' of aftercare is proposed at this site. While this management is welcomed, to re-iterate our previous advice, we would highlight that certain features such as wetland areas can take time to

establish, and may require ongoing management actions including vegetation clearing and de-silting. We recommend that the management period is extended to address the longer-term management and maintenance of this site, including management of the perimeter pathway and fenceline.

Soils will be handled as set out in Sheets A-D inclusive of the Institute of Quarrying (2021) Good Practice Guide for Handling Soil in Mineral Working. No soil handling will take place between the months of October to March, unless conditions are suitable and unless agreed with the Mineral Planning Authority. No fertiliser or soil ameliorant applications within the acid grassland and wetland areas unless required by results of soil analyses. The use of pesticides on site will only be considered as a last resort and with the advice of a BASIS qualified adviser.

It is noted that the need for secondary treatments such as subsoiling will be kept under review during the aftercare period. We advise that drainage of the site is monitored, with drainage measures undertaken as necessary in order to maintain the habitats on site. We would recommend that this is discussed as during the annual aftercare meetings.

Hydrological Impacts

A letter from Stantec (24th May 2022) has been provided to address consultee queries, including that from Natural England in our advice dated 3rd March 2022 (reference 381357). This states that the relatively small flow of groundwater towards the northeast would enter the Badnam Creek and flow into the Hamble. This would prevent any impacts occurring at the Lincegrove and Hackett's Marshes SSSI which lies beyond the creek.

The letter states that hydrological impacts from hydrocarbon contamination is very unlikely to pose any significant risk to groundwater away from their source area, as the types of contaminant noted (in very low concentrations) are not mobile in groundwater. We advise that monitoring of contaminants within groundwater is undertaken during the works to identify any increases in groundwater contaminants and if required, suitable remedial measures are undertaken.

Solent Wader and Brent Goose Strategy (SWBGS)

The [Solent Wader and Brent Goose Strategy](#) identifies a network of non-designated terrestrial wader and brent goose sites that support the Solent and Southampton Water SPA, Portsmouth Harbour SPA, and Chichester and Langstone Harbours SPA (commonly referred to as the 'Solent SPAs') and aims to protect it from land take and recreational pressure associated with new development. These sites can be referred to as 'SPA functionally linked land' or 'SPA supporting habitat'.

The current site is not part of the mapped network of SWBGS sites across the Solent. However, following these works a large area will be reinstated as a grassland area. This maintained grassland area could have the potential to enhance the SWBGS network in future by providing an open undisturbed grassland area. Further measures to enhance this area for overwintering birds would therefore be welcome, which may be something your authority wishes to consider.

Post development this site would provide a greenspace of approximately 60ha. We recognise that this could have significant strategic value within the local context and would therefore recommend that yourselves as competent authority explore ways to maximise this site's potential, for example through the emerging policies and guidance relating to the Local Nature Recovery Strategies and Biodiversity Net Gain. This site may have potential to form a Suitable Alternative Natural Greenspace (SANG) to help divert visits away from sensitive ecological areas in the region. Natural England would be happy to advise further via our Discretionary Advice Service.

Further general advice on consideration of protected species and other natural environment issues is provided at Annex A.

Should the developer wish to discuss the detail of measures to mitigate the effects described above with Natural England, we recommend that they seek advice through our [Discretionary Advice Service](#).

If you have any queries relating to the advice in this letter please email consultations@naturalengland.org.uk marked for my attention.

Should the proposal change, please consult us again.

Yours sincerely

Mary Andrew
Sustainable Development Senior Adviser
Thames Solent Team, Natural England

Annex A – Additional advice

Natural England offers the following additional advice:

Landscape

Paragraph 174 of the [National Planning Policy Framework](#) (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 174 and 175). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling separate guidance on soil protection for site restoration and aftercare is available on [Gov.uk](#) website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying [Good Practice Guide for Handling Soils in Mineral Workings](#).

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced [standing advice](#)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found on [Gov.uk](#). Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

Natural England's [Biodiversity Metric 3.1](#) may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Biodiversity Metric 3.1](#) and is designed for use where certain criteria are met. It is available as a beta test version.

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Biodiversity Metric 3.1](#) and is available as a beta test version.

Green Infrastructure

Natural England's [Green Infrastructure Framework](#) provides evidence-based advice and tools on how to design, deliver and manage green infrastructure (GI). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the [15 Green Infrastructure Principles](#). The Green Infrastructure Standards can be used to inform the quality, quantity and type of green infrastructure to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

GI mapping resources are available [here](#) and [here](#). These can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to

the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 100 and 174 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Biodiversity duty

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).