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Date	24 August 2023	Email	<a href="mailto:planning@hants.gov.uk">planning@hants.gov.uk</a>

Dear Emma,

**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)**

**Town and Country Planning (Environmental Impact Assessment) Regulations 2017 - Regulation 25 request for further information and evidence in respect of an Environmental Statement**

I refer to the above referenced planning application (CS/22/92277) and accompanying Environmental Statements (ES) in connection with the above proposed development.

### **Regulation 25 request**

In accordance with Regulation 25 of the [Town & Country Planning \(Environmental Impact Assessment\) Regulations 2017](#) and following further public consultation of the application and the Environmental Statement (ES) as well as the issuing of Biodiversity Net Gain (BNG) guidance, we are writing to request further information, set out by relevant ES chapter, considered by the County Council to be necessary to enable the full and proper consideration of the likely environmental effects of the proposed development.

In all instances, we refer you back to the main responses from the consultees for more detailed information on the requests being made. This response summarises the information required to assess the potential impacts of the proposal, by theme due to the overlap in some areas between responses. The further information required is **highlighted**.

Director of Universal Services  
**Patrick Blogg**

It is important to note that this Regulation 25 request is only based on the consultation responses received by the Minerals and Waste Planning Authority (MWPA) to date.

It is clear that, following recent clarification discussions on a number of matters, the nature of the some of the areas of clarification were straying into Regulation 25 matters. The Minerals and Waste Planning Authority is therefore taking the opportunity to address these issues and seek further comment through public consultation, prior to taking the planning application forward to a decision. A formal Regulation 25 request is therefore issued to ensure due process is followed.

### **a) Ecology**

*Relevant documents:*

*Environmental statement Chapters 1-6 Preliminary Chapters (Vol 2), Environmental statement Chapter 10 Ecology / Ecology Vol 2 Chapter 10 RevA (Reg 25 28 November 2022) , Environmental statement Appendix 4.1 Ecological Appraisal & Desk Study, Environmental statement Appendix 4.2 Habitats Regulations Assessment, Environmental statement Appendix 4.3 Bat Surveys, Environmental statement Appendix 4.4 Breeding & Wintering Bird Surveys , Environmental statement Appendix 4.5 Hazel Dormouse Surveys, Environmental statement Appendix 4.6 Invertebrate Survey, Environmental statement Appendix 4.7 Reptile Surveys and Mitigation Strategy Vol 2 chapter 1 - 6 RevA (Reg 25 2 December 2022), Ecology Vol 2 Appendix 4.4 Breeding & Wintering Bird Surveys RevA (Reg 25 28 November 2022), Ecology Vol 2 Appendix 4.7 Reptile Surveys & Mitigation Strategy Rev A (Reg 25 28 November 2022), Ecology Vol 2 Appendix 4.8 (NEW) BNG Calculations (Reg 25 28 November 2022), Ecology Vol 2 Appendix 4.8 (NEW) BNG Calculations (Reg 25 28 November 2022) , Ecology Vol 2 Appendix 4.2 Shadow Habitat Regs Assessment RevA (Reg 25 28 November 2022)*

As you know, there has been a fair amount of clarification discussions on this matter following the publication of the previous response from the County Ecologist. The Government's recent publication of guidance on the implementation of Biodiversity Net Gain is also of relevance to the proposal.

The County Ecologist has noted in recent discussions that she agrees with the baseline habitat being 'other acid grassland' but it is likely that only an uplift from 'other acid grassland' in 'poor' condition to 'other acid grassland' in 'moderate' or 'good' condition could be considered, rather than a change in habitat category, unless sufficient justification and evidence is submitted.

The County Ecologists response to the last Regulation 25 also noted the concerns in relation to breeding birds and the proposed changes to the . mosaic of scrub and grassland. This is considered in more detail in the restoration section of this request.

On the basis of the responses received from consultees and the clarification discussions, the following additional information / updates to the ES is formally requested by the MWPA:

**1. Amendments to Chapter 10 to included:**

- **Updated BNG calculations in accordance with Metric 4.0 to remove any errors and a reconsideration of the time delays in habitat creation/enhancement tabs to ensure they are correct;**
- **Clarification on the size of trees to be used on site;**
- **Condition assessment sheets pre and post development;**
- **More information to support how a medium distinctiveness habitat (i.e. other acid grassland) can be enhanced to a very high distinctiveness habitat (i.e. lowland dry acid grassland) and how wider habitat creation on site will be enhanced. This should include clarification on the delivery of acid grassland alongside the proposed fill material.**
- **Review of the shadow HRA to ensure it includes in combination impacts with other plans / projects (including local plans) in the area.**

It should be noted that the County Ecologist comments in relation to lighting in the previous response have now been resolved following clarification discussions on the lighting specification for the proposed development and the timings proposed for use.

There will be a need for a Section 106 long term Landscape and Ecological Management Plan for this site, in the event that planning permission is granted. On the advice of the County Ecologist, this will need to be for 30 years following successful completion of the aftercare period. A long term management plan is standard for all major mineral developments in Hampshire with 30 years considered to be the minimum.

**b) Restoration and aftercare**

*Relevant documents:*

*Environmental statement Appendix 3.2 Landscaping Restoration and outline Five year Aftercare Scheme, Vol 1 Appendix 2 Proposed Site Plan RevA (Reg 25 28 November 2022), Vol 1 Appendix 2 Proposed Plant Site Layout Plan RevA (Reg 25 28 November 2022), Vol 1 Appendix 2 Method of Working Scheme RevA Part 1 (Reg 25 28 November 2022) , Vol 1 Appendix 2 Method of Working Scheme RevA Part 2 (Reg 25 28 November 2022), Vol 1 Appendix 2 Proposed Plant Site Layout Plan RevA (Reg 25 28 November 2022), Vol 1 Appendix 2 Proposed Site Plan RevA (Reg 25 28 November 2022), Landscape & Restoration Vol 1 Appendix 2 Restoration Plan Rev A (Reg 25 28 November 2022), Landscape & Restoration Vol 1 Appendix 2 (New) Aftercare & Management Areas (Reg 25 28 November 2022), Landscape & Restoration Vol 1 Appendix 2 Landscape Layout Operational Phase RevA (Reg 25 28 November 2022) , Landscape & Restoration Vol 1 Appendix 2*

*(New) Phased Restoration Plan Part 1 (Reg 25 28 November 2022), Landscape & Restoration Vol 1 Appendix 2 (New) Phased Restoration Plan Part 2 (Reg 25 28 November 2022), Landscape & Restoration Vol 2 Appendix 3.3 (New) Estimate for Planting & Restoration Costs (Reg 25 28 November 2022), Landscape & Restoration Vol 2 Appendix 3.2 Outline Landscape Restoration & Aftercare Scheme RevA (Reg 25 28 November 2022), Appendix 9.12 Phasing Plan (Reg 25 28 November 2022) Appendix 9.4 Restoration Plan (Reg 25 28 November 2022)*

As you know, the main response from the County Ecologist following the first Regulation 25 included concerns on restoration. It was noted that the restoration plan *'failed to take into account the major loss of scrub on site and the baseline open grassland/scrub mosaic and therefore impact on birds such as Dartford warbler and invertebrates'*. It was noted that *'as stated before, the baseline is a mosaic of grassland and scrub which is of benefit to bird species and notable invertebrates along with a wide range of other notable and protected species (e.g. the submitted reptile report and relevant section in the ES specifically raises the importance of a 'mosaic of scrub and grassland' for reptiles.)*. *Inclusion of small areas of scrub to an area in the north which is subject to recreational pressure and limiting any scrub creation/retention to only the site boundaries is not considered to be acceptable'*. This also links to the requirement for further information relating to the reptile habitat suitability post operational phase.

Furthermore, it was considered that there has been a lack of detailed impact assessment in relation to breeding birds. Whilst it was acknowledged that breeding bird surveys have been completed, Section 10.6.25 of Chapter 10 of the ES acknowledges the substantial short-term loss of suitable breeding habitat but fails to acknowledge that the scrub/woodland as part of the restoration plan will be mainly concentrated along the site boundaries which will be subject to public disturbance. Whilst it was appreciated that scrub and woodland will be present along the boundaries and open grassland in the main body of the site, there will be major changes in the current baseline which is a mosaic of scrub and grassland and therefore to ensure the suitability of the site is maintained for a wider range of species recorded on site, more scrub planting scattered in the southern part of the site will be required. This will be particularly beneficial to species such as Dartford warbler and stonechat which rely on open heathland/scrub mosaic. Therefore, it is not clear why the inclusion of scattered scrub such as gorse within the southern part of the site has not been taken into account. In summary, replacement of a mosaic of scrub / open grassland with continuous scrub along the site boundaries is not supported and further amendments to the restoration plan is therefore required.

As you know, we have had subsequent clarification discussions on these matters which need to be taken into account in the ES. In relation to the matters outlined above, and in response to the issues raised by consultees

and recent clarification discussions, the MWPA request the following amendments / review of the ES:

**2. Amendments to Restoration Plan to reflect any changes proposed to the ecological scheme, scrub planting distribution and reptile management measures.**

**c) Hydrology and flood risk**

*Relevant documents:*  
*Environmental statement Chapter 8 Water Environment & Flood Risk, Environmental statement Appendix 2.1 Borehole Logs, Environmental statement Appendix 2.2 Flood Risk Assessment , Environmental statement Appendix 2.3 Estimation of Hydraulic Conductivity , Environmental statement Appendix 2.4 Saturated Thickness Chart , Environmental statement Appendix 2.5 Ground Condition Assessment Part 1 , Environmental statement Appendix 2.5 Ground Condition Assessment Part 2, Environmental statement Chapters 1-6 Preliminary Chapters (Vol 2), Appendix 9.8 Flood Risk Map (Reg 25 28 November 2022), Hydro Reg Response to NE, Ecology and LLFA (Reg 25 28 November 2022), Hydro Reg 25 Response to Network Rail and EA (Reg 25 28 November 2022), Hydro Vol 2 Appendix 2.7 Infiltration Testing Report (Exc Appendix B) (Reg 25 28 November 2022), Hydro Vol 2 Appendix 2.7 (New) Infiltration Testing Report Appendix B Parts 1 - 7(Reg 25 28 November 2022) , Hydro Vol 2 Appendix 2.6 (New) Borehole Logs (Reg 25 28 November 2022) , Hydro Reg 25 Response - Drainage and Infiltration Testing*

I draw your attention to the comments from the Lead Local Flood Authority's response to the first Regulation 25. This raised a number of concerns relating to hydrological aspects. This included the need for information to be provided on the specification of fill material, any revisions required to the drainage strategy to ensure conformity with the approved documentation) and confirmation on how the risk to groundwater movements will be mitigated.

In relation to the matters outlined above, and in response to the issues raised by consultees and recent clarification discussions, the MWPA request the following amendments / review of the ES:

**3. Update to the ES to include:**

- ***an Updated Drainage Design to include revised detailed drainage calculations to demonstrate existing runoff rates are not exceeded and there is sufficient attenuation for storm events up to and including 1:100 + climate change and to include type, layout and dimensions of drainage features including references to link to the drainage calculations***
- ***more information on the groundwater flow and exceedance plans (Exceedance plans demonstrating the flow paths and areas of ponding in the event of blockages or storms exceeding design criteria)***
- ***A response on the specifications of fill material.***

I also draw your attention to the response received from Network Rail. Ground water flow aspects are also of relevance to the issues raised by Network Rail. It is clear from recent discussions that you have prepared a response to these consultation comments. It is therefore requested that this information is formally submitted under Regulation 25. Therefore, the following is requested:

**4. Amendments to the ES to include a response to the concerns raised by Network Rail in relation to Ground Movement Assessment for Network Rail Assets**

**d) Air Quality**

*Relevant documents:*

*Environmental statement Appendix 6.1 & 6.2 Air Quality, Environmental statement Chapters 1-6 Preliminary Chapters (Vol 2), Environmental statement Chapter 14-18 Final Chapters, Vol 2 chapter 1 - 6 RevA (Reg 25 2 December 2022), Environmental statement Chapter 12 Air Quality, Air Quality (Reg 25 28 November 2022)*

I draw your attention in particular to the comments made by the Parish Council consultees, Eastleigh Borough Council and UK Health Security Agency.

Hamble Peninsular Residents Group have provided comments on air quality ([Hamble Peninsular Residents Group Further](#) : dated 9 July 2023 (published 1 August 2023 on the planning pages) which states that the ES Chapter 12 fails to undertake the necessary tests and approaches to prevent negative health impacts.

UK Health Security Agency note that the site is close to sensitive receptors on all boundaries including housing, schools and nurseries, and that mineral dust emissions can vary substantially from day to day, depending on the level of activity, the specific operations being undertaken, and the weather conditions. Given the proximity of sensitive residential and educational receptors within 100 – 200m of the site, and the ability for PM10 to travel several hundred metres, it is concerned that the proposal has the potential to result in an increase in the exposure of the local population.

The UKHSA recognised that whilst the currently predicted low levels of PM10 exposure appear to provide significant headroom before the 40µg/m<sup>3</sup> annual threshold is breached, it does not endorse an assessment approach that argues that an increase was not of relevance unless the 24 hour or annual thresholds for PM10 or PM2.5 were predicted to be exceeded.

In its response, the UKHSA states that short-term exposure (over hours or days) to elevated levels of air pollution can cause a range of health impacts, including effects on lung function, exacerbation of asthma, increases in respiratory and cardiovascular hospital admissions and mortality. In response to this, it recommends that any assessment of PM10 levels should consider

worst case and mean hourly exposure patterns from the site over a 24-hour period, including an assessment of the impact of seasonal weather conditions on the release and transport of particulates. It considers that this additional analysis would demonstrate that the proposed dust management measures will minimise the impact on local populations, particularly those with pre-existing respiratory or cardiovascular conditions.

In further comments, the UKHSA states that the baseline data for quarry emissions appears to be solely from the background mapping data for local authority's website and that no evidence has been provided of a dust monitoring programme in the vicinity of the proposed quarry. It notes that in response to Eastleigh Borough Council's request for more detailed modelling of emissions the IAQM position on lack of accurate UK emissions data is being used to justify a solely qualitative and subjective approach to the potential for dust emissions from the site.

As the site has sensitive receptors within 200m of the site boundary and therefore has significant potential for exposure of the local population, it recommends that to increase confidence in the qualitative assessment, evidence from comparable existing sites should be provided.

In terms of meteorological assessment, several consultees have made comments. In particular, Eastleigh Borough Council and UKHSA have considered the wind data for the same period but has also considered how wind direction is affected by seasonality. It is suggested that for significant periods of time the wind blows from sectors other than the from the south west. Consequently, UKHSA is of the opinion that there is a potential pathway for wind-blown dust exposure at sensitive receptors surrounding the site. Given this variation it recommends that further consideration be given to the effects of varying wind direction, relative humidity, and rainfall – supported ideally by data from similar sites. Please also refer to the comments from the Hamble Peninsular Residents Group (letter dated 9<sup>th</sup> July 2023) regarding the assessment of prevailing weather conditions on site.

To avoid uncertainty over the impact of the quarry operations, UKHSA recommends that measurements be taken to confirm the current level of Total suspended particulates (TSP), PM10 and PM2.5 exposure in the vicinity of the site. This would validate the DEFRA predictions and allow existing sources of particulates in the vicinity be identified. This information could then be used in conjunction with data obtained from similar quarries and used to model or estimate the likely impacts on different receptors as a result of the operation of the proposed site.

Eastleigh Borough Council in its subsequent response to the original Regulation 25 information, maintains significant concern regarding impact to human health from dust and particularly for those with underlying health conditions. They therefore request a Health Impact Assessment and Dust



Management Plan are provided – the latter I understand has already been prepared.

In light of the above, it is requested that this information is formally submitted under Regulation 25. Therefore, the following is requested:

- 5. Update the ES to include additional information on the proposed mitigation and their impacts on the AQMA, more information on the consideration of changes from the Environment Act (2021) in relation to PM 2.5;***
- 6. Provide details/evidence from comparable existing sites where possible to include:***
  - complaints histories;***
  - measurements of TPM, PM10 and PM2.5 at various distances and directions from site boundaries;***
  - the effects of variation in relative humidity and wind speed on dust migration and secondary dust emissions;***
  - Modelling techniques, such as polar plots could use this data to help demonstrate source attribution, effects of wind speed and direction etc;***
  - Conclusions drawn could be used to support the assumptions made during the qualitative assessment of the proposed site;***
- 7. Provide modelled dust emission exposure patterns on local receptors, including an assessment of the annual average, 24-hour average, hourly averages and the impact of seasonal weather conditions on the release and transport of particulates;***
- 8. Provide a response to the UKHSA who have requested details of current level of total suspended particulates (TSP), PM10 and PM2.5. Identify existing local sources of PM10 and TSPs in the local area;***
- 9. Provide a standalone Dust Management Plan;***
- 10. Provide additional on-site Meteorological data to demonstrate the potential pathway for wind-blown dust exposure at sensitive receptors surrounding the site, taking account of the varying wind direction, relative humidity, and rainfall. These assessments should ideally be supported by data from similar sites.***

Your attention is drawn to the comments made by the UKHSA which states that it does not endorse the reliance on UK air quality objectives (AQO) as a threshold for the assessment of health impacts relating to PM10 and PM 2.5. The UKHSA advises that the 40 µg/m<sup>3</sup> and 20 µg/m<sup>3</sup> for PM10 and PM2.5 respectively should be considered as a worst-case scenario rather than being protective of health.

Whilst noting that it is unlikely that the AQO's would be breached as part of the operation of this quarry, it does not accept the premise that not exceeding current UK thresholds demonstrates that there is no risk to health. A response on this should be worked into the amendments to the ES.



It should be noted that the Minerals and Waste Planning Authority is seeking some external consultancy advice on air quality matters. This includes an assessment of the work submitted to date but also of the responses received on air quality matters from UKHSA, the Borough Council and other interested parties. The outcomes of this work should be with the Planning Authority shortly. Should this assessment work show any additional areas which require further work or clarification, we will seek this in a separate Regulation 25 / clarification letter.

#### **e) Landscape and visual impact**

*Relevant documents:*

*Environmental statement Chapter 9 Landscape and Visual Impact Assessment, appendices 1a-1d, 2a-2c, Environmental statement Appendix 3.2 Landscaping Restoration and outline Five-year Aftercare Scheme, Environmental statement Chapters 1-6 Preliminary Chapters (Vol 2), Environmental statement Appendix 3.1 Visual Elements, Vol 2 chapter 1 - 6 RevA (Reg 25 2 December 2022), Landscape & Visual Reg 25 Addendum (Reg 25 28 November 2022)*

I draw your attention to the comments made by the County Council's landscape team. This section of the ES also relates specifically to the ecological and restoration elements.

In relation to these matters, and in response to the issues raised by consultees, the MWPA request the following amendments / review of the ES:

#### ***11. Revised planting plan (if required) to take into account any changes to the ecological and restoration plans.***

In relation to arboricultural matters, the following is of relevance:

*Relevant documents:*

*Access Plan For S106 (Reg 25 2 December 2022), Vol 1 Appendix 2 Proposed Site Plan RevA (Reg 25 28 November 2022), Vol 1 Appendix 2 Proposed Plant Site Layout Plan RevA (Reg 25 28 November 2022), Trees CEMEX Response to Tree Officer (Reg 25 28 November 2022), Trees Vol 1 Appendix 3 AIA & AMS Rev B (Reg 25 28 November 2022), Trees Vol 1 Appendix 3 Tree Survey Constraints & Protection Plan RevB (Reg 25 28 November 2022), Trees Vol 1 Appendix (New) Areas of Trees Marked as Group (Reg 25 28 November 2022), Trees Vol 1 Appendix 3 (New) CAVAT Valuation Rev A (Reg 25 28 November 2022)*

I draw your attention to the comments made by the County Arboriculturist following the last Regulation 25 request. These related to concerns about T8, root protection measures and the potential for a shift in the access.

As you are aware, we have had some clarification discussions on arboricultural issues. This has included the potential to slightly amend the proposed access to reduce the impact on trees.

In relation to these matters, and in response to the issues raised by consultees, the MWPA request the following amendments / review of the ES:

***12. Amendment to the ES to include more information what mitigation measures could be employed to protect impacted trees and whether the scheme access could be amended to protect some of the impacted trees (e.g. T8).***

It should be noted that some aspects related to trees are also covered above under other parts of this request. The amendments to the proposed access are covered under highways.

#### **f) Soils**

*Relevant documents:*

*Chapter 14 – Soil resource assessment, Appendix 9.5 Individual Soil Auger Boreholes (Reg 25 28 November 2022), Appendix 9.6 Soil Auger Boreholes descriptions (Reg 25 28 November 2022), Appendix 9.7 Soil Analysis (Reg 25 28 November 2022), Soils Vol 2 Chapter 14 (New) - Soils and ALC (Reg 25 28 November 2022), Soils Appendices 9.1 (Reg 25 28 November 2022), Soils Appendices 9.2 (New) (Reg 25 28 November 2022), Appendix 9.3 Photo Inventory (Reg 25 28 November 2022)*

I draw your attention to the response received from Natural England in relation to soils and best and most versatile land.

It is clear from recent discussions that you have prepared a response to this consultation response. It is therefore requested that this information is formally submitted under Regulation 25 so it can be considered. Therefore, the following is requested:

***13. Amendments to the ES to include a response to the issues raised by Natural England and include an Agricultural Viability Report. This should include a calculated Agricultural Land Classification (ALC) grade for the site and subsequent assessment of the impacts of the development on the land.***

***14. Amendments to the ES appendices to include a calculated agricultural land classification.***

## **Areas of clarification**

### **Non-technical summary**

It is recommended that the Non-Technical Summary is updated to include the outcomes of the above requests for further information and to reflect any of the other clarification matters (as required).

### **Ecology:**

I draw the applicant's attention to the response from Natural England in relation to the Solent Wader Brent Goose Strategy. 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'. Natural England note that 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.

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.

**A response from the applicant is requested on the matters raised by Natural England in relation to SANG.**

I draw the applicant's attention to the response from Eastleigh Borough Council's Ecologist in relation to ammonia within the HRA.

**A response from the applicant is requested on the matters raised by Eastleigh Borough Council's Ecologist in relation to ammonia.**

### **Human Health/Air Quality**

I draw your attention to the response received from UK Health Security Agency (UKHSA) . It is clear from recent discussions that you have prepared a response to this consultation response.

**A clarification response on the matters raised by Eastleigh Borough Council, UKHSA and Hamble Peninsular Residents Group letter (dated**

9th July 2023) is requested in relation to air quality and human health. This should include but not be limited to:

- reference to World Health Organisation (WHO) stance relating to non-threshold effects and the significance of respirable particulates on health.
- clarification based on the modelled data for source apportionment for activities including quarrying, stockpiling, vehicle movements, mineral processing, and the processing of imported infill materials;
- clarification provision of a 'dust monitoring programme' in the vicinity of the proposed quarry has been used in the baseline data for quarry emissions;
- provision of a Health Impact Assessment;

A clarification response on the matters raised by Hamble Peninsular Residents Group letter dated 9<sup>th</sup> July 2023 is requested in relation to human health.

It is acknowledged that some of these areas may be covered by air quality matters requested under Regulation 25.

### **Right of way**

I draw your attention to the response received from the Council's countryside team in relation to rights of way.

I also draw your attention to some of the mitigation areas set out by the Parish Council in relation to rights of way provision mitigation (dated 21/03/2023)

**A clarification response on the matters raised in the Countryside response in relation to rights of way is requested. This should include a response on whether a formal dedication of the permissive footpath is achievable.**

**A clarification response is also requested to the mitigation measures proposed by the Parish Council.**

### **Public representations**

For clarification, where matters are not covered by the requests noted above, it would be useful for the applicant to prepare a separate response to the issues raised by interested parties such as Hamble Parish Council and the Hamble Peninsular Residents Association (post Regulation 25 part 1) and how these will/ have been addressed. There are a number of responses relating to highways for example. You will note the following responses on the planning application pages:

(<https://planning.hants.gov.uk/Planning/Display/HCC/2021/0787#undefined>)  
under the consultee and public representation sections.

## Next Steps

As has been previously set out on a number of occasions, the Minerals and Waste Planning Authority highly recommends that the applicant engages with the Parish Council and local community on this proposal, particularly as we enter the second Regulation 25 stage. As you are aware, there is significant public interest in this planning application and significant criticisms of how the public engagement has taken place since submission.

In order to ensure the planning process keeps moving, all requested information must be submitted no later than mid-September 2023. It will then be subject to full public consultation. I have placed the application on the forward plan for Regulatory Committee decision for by the end of 2023 based on the need to undertake this round of Regulation 25 consultation.

It will be exceptionally important that any new information submitted is packaged appropriately to ensure the ES is still a usable and a public facing / easy to understand document. I would recommend that replacement ES and shadow HRA documents are prepared, where these are needed, to aid the assessment of the new information alongside the wider application information by consultees and interested parties. This will help to avoid confusion.

If you have any queries on the matters addressed in this letter, please do not hesitate to contact us on the details provided.

Yours sincerely,



Lisa Kirby-Hawkes  
Development Planning Manager