

BHH – Bursledon, Hamble-le-Rice and Hound Local Area Committee

Thursday 3 March 2022

NOTE: This report relates to a consultation request on an application that has been submitted to, and will be determined by, Hampshire County Council. The purpose of this report is to set out Eastleigh Borough Council's response to the consultation.

Reference Number: CS/22/92277 (HCC application ref. HCC/2021/0787)
Case Officer: Rebecca Altman
Received Date: 18 January 2022
Site Address: Hamble Airfield, Hamble
Applicant: Cemex UK Operations Ltd
Proposal: Proposed extraction of sand and gravel, with restoration to grazing land and recreation using important inert restoration materials, the erection of associated plant and infrastructure and the creation of a new footpath and access onto Hamble Lane.

Recommendation:

It is recommended that:

- 1. The Council responds to Hampshire County Council's consultation with an objection to the Cemex application and asks Hampshire County Council's Regulatory Committee to refuse permission.**
- 2. The content of this report is agreed as supporting evidence for the Council's objection.**
- 3. The Council reserves the right to give further formal and material views on the matter in response to any further information from the developer (Cemex) and / or Hampshire County Council.**
- 4. In the event of Hampshire County Council's Regulatory Committee granting permission, recommend the mitigations detailed in this report to be included as conditions to any permission.**

Summary and purpose of the report

- 1. The Council received notification on 18th January 2022 of an application by Cemex to remove minerals from the former Hamble Airfield site, which is allocated in Hampshire County Council's (HCC's) Minerals and Waste Plan 2013 as a potential future site for sharp sand and gravel extraction.**

2. The Council objects to this application for the reasons set out in this report.
3. Eastleigh Borough Council is not the planning authority for the application. The application has been submitted to Hampshire County Council as the Minerals and Waste Authority and all relevant publication and notifications have been dealt with by HCC. All public representations will be submitted directly to HCC.
4. The purpose of this report is to set out Eastleigh Borough Council's response to the consultation, to include supporting information to justify the Council's objection.
5. This report covers the planning matters for objection. Further matters will be covered in a separate report to Cabinet on 24th March 2022, with a subsequent response covering the further agreed matters to be sent to Hampshire County Council.

Site Characteristics and Character of the Locality

6. The former Hamble Airfield covers an area of approximately 62ha. It ceased its use as an airfield in the 1960s and currently comprises an area of scrub vegetation and rough grazing. The site is privately owned but is widely used for public recreation, predominantly dog walking. There is a public footpath (No.1) on the east side of the site, which connects Satchell Lane with the residential development north of Hamble Lane. The northern side of the site lies within the Local Gap as defined within the adopted Eastleigh Borough Local Plan.
7. The surrounding area is characterised by a mix of residential, rural, leisure and commercial uses. The nearest residential properties are located in Hamble Lane, Satchell Lane and those to the south of the site on Tudor Close, Astral Gardens and Spitfire Way. There are also two schools close to the site, which are The Hamble School to the north and Hamble Primary School to the south-west. The railway line borders the north side of the site, with Hamble Station to the north-west.
8. There are a number of environmental and heritage designations near to the site including the following:
 - Within 300m of the Solent and Southampton Water Ramsar and Solent Maritime Special Area of Conservation (SAC);
 - Approximately 400m from the River Hamble, which forms part of the Solent and Dorset Coast SPA;
 - Lee-on-Solent to Itchen Estuary Site of Special Scientific Interest (SSSI) and Mercury Marshes Local Nature Reserve (LNR) (approximately 340m east);
 - Lincegrove and Hackett's Marshes SSSI (approximately 350m to north-east);

- Badnum Copse Site of Importance for Nature Conservation (SINC) adjacent to the north east corner of the site.
 - Grade II listed Royal Victoria Country Park (approximately 250m to west);
 - A number of listed buildings to the west, south-west and south-east (over 500m from the site boundary);
 - Two Conservation Areas (Old Bursledon Conservation Area and Hamble-le-Rice Conservation Area).
9. Whilst the site itself is not currently subject to any ecological designation, it is identified as a potential ecological network opportunity in the Hampshire Biodiversity Information Centre (HBIC) mapping and is a priority link for biodiversity in the Council's Biodiversity Action Plan (BAP).
10. There is a declared Air Quality Management Area (AQMA) covering the area from Windhover Roundabout south on Hamble Lane to the junction with Portsmouth Road (A3025) and east along Providence Hill (A27).

Description of Application (as submitted to Hampshire County Council)

11. The application is for the extraction of sand and gravel from the Hamble Airfield site and subsequent restoration to parkland and grazing land. The key elements of the extraction and restoration proposals are summarised below.
12. Extraction:
- Extraction of approximately 1.7million tonnes of sand and gravel at approximately 250,000 tonnes per annum, for a period of up to 7 years. The depth of extraction would be up to 7m (average 4.5m).
 - Works to be carried out in 7 phases, starting on the northern side of the site.
 - New access to be created from Hamble Lane, approximately 260m south of the railway line.
 - Plant to be provided on site including aggregate processing plant, stocking conveyor, water treatment plant, double weighbridge, site offices / welfare units, wheelwash, car parking and cycle parking.
 - Hours of operation from 07:00 to 17:00 Monday to Friday and 07:00 to 12:00 Saturdays. Soil stripping and sand extraction to not commence until 08:00. Maintenance of plant and vehicles proposed until 19:00 Monday to Friday and 18:00 on Saturdays.
 - Permissive footpath to be put in place from the start of the development, from south east corner to north west corner.
13. The extraction would take place using an excavator, shovel loader and dump truck with a central conveyor carrying the material to the screening plant located at the north of the site. Material would be screened, and the graded aggregates stored in stockpiles to be loaded into lorries for delivery off site.

14. Restoration:
 - Restoration estimated to take place over a period of 6 years following extraction, with a further 1 year required to finalise planting.
 - Site to be restored to a mix of lowland acid grassland, lowland mixed deciduous woodland, mixed scrub and drainage ponds.
 - Over 1km of additional native hedgerows and over 20,000 trees and shrubs to be planted.
 - North eastern corner of site to be restored to an area for permissive community access.

15. There would be three main phases of works. Phase 1 (years 1 to 2) would involve extraction only. Phase 2 (years 3 to 7) would involve extraction and infill. Phase 3 (years 8 to 12) would comprise infill only.

16. It is estimated that the extraction phase of the works (years 1 and 2) would result in an average of 45 loads of aggregate entering and leaving the site daily (90 vehicle movements). During phase 2, this would increase to approximately 144 vehicle movements per day, reducing back down to 90 vehicle movements during phase 3.

17. During morning peak times (08:00 to 09:00), the number of HGV movements is estimated to be approximately 11 during phase 1 and 3, and 17 during phase 2.

18. The proposal is classed as a Schedule 2 development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (Schedule 2, 2 – extractive industry), and requires an Environmental Impact Assessment which forms part of the submission. In addition, the following reports are included in the submission documents:
 - Transport Assessment
 - Air Quality Assessment
 - Ecology Surveys and Assessments (bats, breeding and wintering birds, hazel dormouse, invertebrates, and reptiles)
 - Habitats Regulations Assessment
 - Noise Assessment
 - Tree survey, constraints plan and impact assessment
 - Landscape and Visual Impact Assessment and landscaping details
 - Geological report
 - Flood risk assessment
 - Contamination assessment
 - Archaeology Assessment

Relevant Site History

19. The Borough Council objected to the allocation of the site for mineral extraction in 2012. Grounds for objection related to the significant ecological, economic, amenity, transport, road safety and air quality issues.
20. The site was subsequently allocated in the Hampshire Minerals and Waste Plan (2013) as a potential future extraction site under Policy 20.
21. In 2016, the Council objected to a pre-application enquiry consultation for proposed sand and gravel extraction at the site (ref. Q/16/78595). The objection emphasised the Council's strong view that the site was unsuitable for mineral extraction, and noted that insufficient consideration had been given to a variety of environmental matters including nature conservation, water quality and flow rates, highway matters, air quality impact, amenity impact, economic impact and heritage impact.
22. There are no planning applications relating to the site.

Policy Context and Designations Applicable to the Site

23. National Planning Policy Framework (2021)
24. Section 2 of the National Planning Policy Framework (NPPF) states that the purpose of the planning system is to contribute to the achievement of sustainable development, which can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.
25. Achieving sustainable development means that the planning system has three overarching objectives: economic; social; and environmental. These objectives are interdependent and need to be pursued in mutually supportive ways, and should be delivered through the preparation and implementation of plans and the application of the policies in the Framework.
26. Part 17 of the NPPF sets out the requirement to secure a sufficient supply of minerals to provide infrastructure, buildings, energy and goods for the country. However, the NPPF makes it clear in paragraph 210(f) that it is necessary to ensure that permitted and proposed operations do not have '*unacceptable adverse impacts on the natural and historic environment or human health*'. Paragraph 211 of the NPPF further notes that when determining applications for mineral extraction, great weight should be given to the benefits of extraction including the economy, but point (e) reiterates that it is also necessary to ensure no adverse impacts on the natural and historic environment, human health or aviation safety, and take account of the cumulative effect of multiple impacts from sites in the locality. Point

(f) of paragraph 211 also requires restoration and aftercare to be provided at the earliest opportunity and carried out to a high standard.

27. Hampshire Minerals and Waste Plan (2013)
28. The Hampshire Minerals and Waste Plan (HMWP) was adopted in 2013 and covers the period up to 2030. It aims to deliver sustainable minerals and waste development in Hampshire, to supply sufficient minerals to support the economy, whilst protecting the environment and community from the impacts of such development.
29. Policy 15 of the HMWP requires sand and gravel resources to be safeguarded against sterilisation by non-minerals development, unless prior extraction takes place.
30. Policy 16 aims to safeguard minerals infrastructure from development which would unnecessarily sterilise that infrastructure. This is seeking to ensure that development does not encroach /impact on the operation of minerals sites.
31. Policy 17 sets the overall target of land won extraction at 1.56 mtpa.
32. The HMWP also includes policies aimed at protecting the countryside, ensuring the highest standards of design, operation and restoration, and protecting Hampshire's communities, including public safety and amenity. Policy 12 relates specifically to the requirement to manage traffic impacts.
33. The safeguarded sand and gravel sites are set out within Policy 20 of the Plan. This includes 13 current and permitted sites, 2 existing site extensions and 5 new sand and gravel extraction sites, including Hamble Airfield. Appendix A provides further details on the specific constraints and considerations relating to Hamble Airfield, including:
 - Location close to Solent and Southampton Water Special Protection Area (SPA) and Ramsar Solent Maritime Special Area of Conservation (SAC);
 - Potential impact on roosting and foraging areas used by bird species of the nearby SPA and Ramsar;
 - Need to protect Lee on Solent to Itchen Valley Estuary Site of Special Scientific Interest (SSSI);
 - Safeguarding of adjacent public rights of way (Footpath 1);
 - Maintenance of existing informal recreational use;
 - Protection of local businesses and amenity of local residents;
 - Protection of water quality and recharge of groundwater and surface water;
 - Ensuring safe and satisfactory access and managing impact on peak flows;
 - Consideration of traffic issues including school traffic, and traffic congestion.

34. It is stated that the site would be restored to a combination of grazing, nature conservation, open space, public access and woodland.
35. The HMWP notes in paragraph 2.34 that: '*The spatial strategy for the future supply of aggregates will centre on using local land-won sand and gravel resources that can be worked without significant impacts to the environment, communities or economy*'. However, it also highlights some of the issues with mineral extraction in parts of Hampshire, noting that: '*The south of Hampshire is a densely populated and a heavily developed area but has significant underlying sand and gravel resources which are close to the markets they serve. However, mineral workings in these areas can present problems for local communities, particularly lorry traffic associated with extraction in locations such as Hamble and Hythe*'.

Eastleigh Borough Local Plan Review (2001-2011) Saved Policies:

36. Within the Eastleigh Borough Local Plan Review, the Hamble Airfield site is located within the countryside, with the northern part forming part of the designated Local Gap under Policy 3.CO. The boundary vegetation surrounding the site is also identified under Policy 20.CO for landscape improvements.

Submitted Eastleigh Borough Local Plan 2016-2036

37. The Eastleigh Borough Local Plan 2016-2036 was submitted by the Council to the Planning Inspectorate on 31st October 2018 with hearings in public having commenced in November 2019 and concluded in early 2020. The Council subsequently received the Inspector's feedback and recommended action points on the plan in April and May 2020. On 25 June 2020, the Council's Cabinet resolved to progress the examination on the basis of the main modifications outlined in the Inspector's letter and action points and/or any other main modifications which may be necessary.
38. The Council's Planning Policy Team subsequently prepared further evidence and drafted the main modifications in response to each of the Inspector's letters and points and the Inspector has also held an additional hearing in January 2021 in relation to Mercury Marina. Following on from this, the Inspector has now finalised the main modifications for public consultation and the Council has also prepared modifications to the policies map and proposed additional modifications. A report of the Planning Policy Senior Specialist was considered at Cabinet and Full Council on 27 May 2021 which recommended approval of the modifications proposed for public consultation.
39. Consultation on the Main Modifications took place between 9th June and 21st July 2021, and adoption of the Plan is anticipated in mid 2022.

40. Policy HA3 of the emerging Plan relates specifically to Hamble Airfield and states that if permission is granted for the extraction of sand and gravel and takes place, the site shall be restored in accordance with the Hampshire Minerals and Waste Plan to be retained as an area of accessible countryside and open space. The restored land shall comprise grazing, public access and outdoor recreation facilities.
41. Other relevant policies include the following:
- S1 (Sustainable Development)
 - S7 (Development in the Countryside) – development should avoid adverse impacts, including on biodiversity and landscape (and recognising the need not to sterilise mineral resources)
 - S8 (Settlement Gaps) – development should not diminish the physical extent and / or visual separation of settlements, and not have an urbanizing effect detrimental to the character of the countryside or separate identify of adjoining settlements.
 - S12 and DM13 (Highways) – the Council will work with the Highway Authority and developers to minimise congestion; development should not have a significant detrimental impact on the highway and will be required to implement mitigation measures.
 - DM1 (General Development) – development should not have an unacceptable impact on residential amenity and should be compatible with surrounding uses.
 - DM11 (Nature Conservation) – development to protect, conserve and enhance all biodiversity designations and networks (commensurate with the status of the designation) and seek a net gain in biodiversity.
42. The Hamble Parish chapter of the emerging Local Plan identifies that Hamble Lane is one of the most congested in the Borough and that the most pressing issues include the future of Hamble Airfield and traffic.

Representations

43. Public representations for the application are being submitted directly to Hampshire County Council as the planning authority for the application.
44. Two representations from members of the public have been received to Eastleigh Borough Council, raising concerns about impact on traffic, public safety, noise, pollution and contamination, flood risk and impact on wildlife. The respondents have been advised to submit their comments directly to Hampshire County Council.

Eastleigh Borough Council Consultation Responses

Ecologist

45. Objection. Insufficient evidence to assess the likely effectiveness of the mitigation to conclude that the project would not have a significant impact on the Solent National Site Network, contrary to the Habitat Regulations 2019. The following specific areas of concern are noted:
- It is considered that the ecological status of the site has been underestimated;
 - Concern about the certainty of proposed mitigation and restoration plans for reptiles and bird populations;
 - Lack of a detailed assessment of potential recreational impact on the nearby SPA through displacement of current recreational users of the site to the coast.
46. The detailed response from the Ecologist can be viewed [here](#) and is summarised below.
47. The site lies within close proximity to a number of statutory designated sites (refer to list in paragraph 8). The site also lies around 1km from Hamble Common, which is a matrix of coastal heathland, acid grassland, woodland, creeks and shoreline and is subject to a considerable amount of visitor pressure.
48. The baseline ecological survey work submitted to HCC have all been undertaken in line with accepted industry standard guidelines. It is noted that updated winter bird surveys are still ongoing, but it is unlikely that the results would materially change the assessment of the impacts of the scheme.
49. The majority of the site comprises grassland and scrub and there are two significant species rich native hedgerows along a portion of the northern and eastern site boundaries. Other habitats include small areas of regenerating broad-leaved woodland along the western boundary in places and scattered trees across the site.
50. The habitats on site are of importance for breeding birds and reptiles:
- Birds - the ecological surveys assess the site as being of local importance for birds. There was no evidence of waders (other than a single bird) using the site and no evidence that the site is functionally linked to the coastal SPA sites.
 - Reptiles - there are common lizard and slow worm present on the site, the populations of which could potentially be exceptional.
 - Bats - a minimum of seven species of bats were recorded during site surveys and the site is considered to be of County importance for bats.
 - Invertebrates – the site is assessed to be locally important for invertebrates.
51. It is considered that the site would qualify as a Site Importance for Nature Conservation under HBIC's recently updated 'criteria for the

section of Sites of Importance for Nature Conservation (SINCs) in Hampshire, October 2021', due to the presence of a rich mosaic of habitats and species. The impacts of the development should therefore be considered in the context of Policy DM11 of the emerging EBC Local Plan.

52. Direct impacts from the proposal would include:

- Phased loss of c.60ha of grassland/scrub matrix of SINC quality;
- Phased loss of habitat supporting potentially 'exceptional' reptile population;
- Phased loss of breeding habitat for SINC quality bird assemblage;
- Phased loss of habitat supporting at least three BAP invertebrate species.

53. Indirect impacts on the Solent and Hamble Estuary sites:

- Direct land take;
- Increased recreational disturbance of wintering birds (via displacement from the site);
- Increased recreational disturbance of breeding birds;
- Disturbance of wintering birds from quarrying activities;
- Hydrological changes e.g., contamination of surface water, foul water, flood risk and water abstraction;
- Air quality impacts;
- Dust generation.

54. The submitted information does not appear to include any formal assessment of the current nature and levels of recreational use of the site, including where visitors have come from. However, it is understood that the site is subject to significant use for recreation, albeit that it is privately owned. It therefore currently absorbs recreational uses that would otherwise be occurring elsewhere, such as the coastal areas. Whilst the proposal includes retention of a 30m wide buffer zone for walkers, this will not offer the same recreational potential as the 60ha currently available.

55. The Concept Recreation Plan proposes a much smaller proportion of the site will be available for recreation post-operation. Whilst this is supportable in terms of the benefits it would bring to the on-site biodiversity; the concern is that it will have the long-term impact of diverting recreational use to the coast.

Other matters – air quality, dust, noise and hydrology:

56. The submitted information determines no significant effects on Solent Sites as a result of air quality, dust, noise or hydrological changes. These matters may need to be revisited depending on responses from other consultees.

Mitigation and enhancement:

57. Broadly supportive in ecological terms alone with the ambitions and type of habitats to be created, restored and enhanced. However, more work and consideration is needed around the provision for particular species groups including reptiles and birds. For reptiles, it will be crucial to maintain populations while work is ongoing and ensure that restored habitat is available and suitable when required. For birds, the post-excavation site should be aiming to secure an overall gain for breeding bird species given its current importance.
58. Securing on-going management plans, responsible authorities and land ownership post extraction are issues that need resolution.

Biodiversity net gain:

59. The biodiversity net gain (BNG) calculation does not meet the Defra Metric rules. A revised BNG calculations may be necessary.

Sustainable Transport Planner

60. Holding objection – insufficient information.
61. Hamble Lane has long been acknowledged as suffering from severe congestion in both morning and evening peak periods and therefore additional vehicle movements are likely to have a disproportionate impact on journey time delay and queue length.
62. The Transport Assessment considered impacts of the development on traffic volumes at the site access and Hound Road and Satchell Lane junctions but does not include any consideration of the impact on junctions further north, including Portsmouth Road and the Windhover Roundabout.
63. Traffic count surveys were undertaken in 2016 and 2017.
64. The Transport Assessment has focused on AM and PM peak hour, but this falls outside of the development peak.
65. No details of site surveys used to estimate trip generation have been provided. Without further details of the traffic surveys it is not possible to determine if vehicle movements generated by the site have been adequately assessed.
66. The additional traffic from the development would have a detrimental impact on air quality in the Air Quality Management Area (AQMA) and the Transport Assessment does not identify measures to minimise or mitigate the impact.

67. The TA states that the development will increase the annual average daily HGV traffic between 10% and 30% between 2030 and 2034. In addition to increased pollution, HGV's pose a greater risk to vulnerable road users such as pedestrians and cyclists, result in less attractive walking/ cycling environments and greater concerns regarding road safety.

Recommendations:

- Full traffic survey data and further detail on the methodology used to determine trip rates for the site is required to ensure that the site impact on the surrounding highway network can be assessed appropriately.

Environmental Health Officer

68. Objection. The Pollution Team is unable to ascertain from the information provided that potential significant adverse impacts from air pollution and noise will be avoided, and that adverse impacts will otherwise be minimised to acceptable levels.
69. The detailed response from the Pollution Team can be viewed [here](#) and is summarised below.

Summary:

70. The Transport Assessment predictions regarding vehicle movements are a vital input to air pollution modelling and noise assessment, and its importance should not be underestimated. It is recommended that an agreed traffic assessment is used for the purposes of air pollution modelling and noise impact assessment.
71. Residential dwellings are located around the site to the west, south and east. Most vehicle movements are understood to pass through the Hamble Lane AQMA at the top of Hamble Lane, which was declared due to exceedances of UK national target levels of nitrogen dioxide due to emissions from road traffic.
72. Given the nature of the activities proposed and proximity of sensitive receptors and the increased traffic / HGV flows, there is a clear potential for noise and air pollution impacts including particulate matter and nitrogen dioxide. The duration of several years or more will feel permanent and occupy a significant chunk of life.
73. With regard to contamination, whilst there is some important information missing, the information does indicate that historic land contamination is present on site. However, as the development is of low sensitivity in land contamination terms, no objection is raised on this matter, provided that appropriate site assessments and mitigations are secured by condition should permission be granted.

74. The Pollution Team disagrees with the robustness of the technical assessments undertaken. Key concerns relate to loss of amenity and harm from:
- Air pollution from heavy lorry emissions in the AQMA;
 - Noise pollution from powered mechanical equipment;
 - Noise pollution from heavy lorries delivering on site;
 - Noise pollution from heavy lorries using local roads;
 - Air pollution from windblown sand and waste fines (dust).
75. There are many uncertainties behind the noise and air quality information in the Environmental Impact Assessment. Specific queries relate to:
- The background or baseline condition of the environment (noise surveys carried out in 2018 and therefore not reflective of the situation in 2022);
 - Time of the day and day of the week of noise impact;
 - Fluctuation in sand production, stock keeping or piling and quantity of waste received in time;
 - Seasonal and weather conditions and effects of more extreme weather events;
 - The quantity of dust and particulate matter that will be received by residents and dwellings. The EIA does not quantitatively predict dust emissions and impact to dwellings and there has been no localised site monitoring of wind;
 - How agile and transparent the monitoring and audit will be;
 - The health risk to occupants and those with underlying health conditions.

Recommendations:

76. The Pollution Team has put forward a number of recommendations for further work and / or mitigation, to include:
- Updated sound measurements should be taken to get a more accurate understanding of background sound levels.
 - Extended public consultation should take place to better understand the impact on residents.
 - Monitoring and audit and community engagement should take place throughout the life of the development.
 - Request quantitative dust and particulate modelling to inform decision making, implementation of mitigation, monitoring and audit.
 - Recommend conditions requiring an appropriate contaminated land site assessment and agreement of mitigation.

Landscape Officer

77. The proposals are not intrinsically in conflict with the countryside and gap policies because the site is acknowledged in the Council's Local

Plans as being allocated for mineral extraction. Although the proposals would have a medium-term impact on the designations, in the long term the land would retain its function as open and free from development. Subject to appropriate design and mitigation of impacts during the operational phase, the temporary proposals could, in principle, be accommodated in accordance with the countryside policies.

78. The Landscape and Visual Impact Assessment (LVIA) methodology, assessment and conclusions are thorough, well considered and reasonable, but some points are raised for further consideration:
- The LVIA has underestimated the landscape character impacts during the works and this should be re-examined, to include assessment of the life impacts on residents close to the site.
 - Concern about the proposed design of the landscape buffer bunds, which would look highly unnatural and engineered. A more sensitive approach to mitigation is advised, with a softer, more convex bund design.
 - There is some confusion on the Restoration Section drawings and whether the bunds are proposed to be removed once works are completed, which would be the preferred solution.
 - Section plans of the active works should be provided.
79. Other recommendations:
- A detailed drawing on the proposed permissive path should be provided to ensure it is safe and accessible to all;
 - Should the application be approved, it would be imperative to set out a timetable for restoration that is clear and enforceable, including a maintenance plan for the duration and following completion.

Built Heritage Consultant

80. No objection. The proposal is temporary, albeit for some years, and will not affect the setting of any listed buildings or conservation areas. The nearest heritage asset is the northernmost part of the Hamble Conservation Area, known as Crowsport, which is some distance away. As Crowsport is on sloping ground facing east (i.e., away from the site), and given the distance and intervening built estate and vegetation, there is not likely to be any adverse visual effect.

Tree Consultant

81. Objection to loss of trees at access point.
82. The site is largely tree free, with significant trees only on the site boundaries. Save for the trees at the access point and G4, all other trees on the site appear to be retained and protected. For the most part, trees are given good buffers to the proposed bund.

83. Trees to be removed - There is confusion over the species of trees to be removed (T5, T6, T7 and G4). No objection would be raised to the removal of G4. The group is not significant and individual tree loss within the group would not be significant from an amenity perspective, subject to compensatory planting. However, objection would be raised to loss of trees T5, T6 and T7 for the proposed access. It is appreciated that there are many aspects that feed into the access location, but from an arboricultural and amenity perspective, the chosen site is relatively impactful. The nature of Hamble Lane would be significantly altered with the removal of these three trees. The applicant has not suitably demonstrated that they have explored other access options. The tree report is also a little vague, e.g., it does not provide details regarding tree pruning around the entrance.
84. Footpath and other works – most of the proposed footpath on the east and northern parts of the site is beyond the root protection areas (RPAs) of the trees and thus not impactful. The only area of potential conflict appears to be on the northern boundary where the path appears to go through G7. However, there would appear to be no significant trees in this area.
85. Summary:
- Whilst the report is a little vague it does demonstrate that the vast majority of trees can be retained and protected.
 - No arboricultural objection to the general proposal.
 - Objection to removal of three trees to create access.

Policy Officer

86. Eastleigh Borough Council was and is strongly opposed to the allocation of the Hamble Airfield site for sand and gravel extraction in the Hampshire Minerals and Waste Plan. It is acknowledged that this Plan has now been adopted and forms part of the development plan, and so the principle of the allocation has been established by the Hampshire authorities.
87. The adopted Minerals and Waste Plan, supported by the emerging Eastleigh Borough Local Plan, does not simply allocate the site for sand and gravel extraction, it requires careful design, layout, operation, management and restoration of the site. The appropriate planning mechanisms should be in place to ensure this is achieved in accordance with the adopted development plan and emerging Local Plan, otherwise the planning application should be refused.
88. Key issues will include minimisation and management of traffic in a congested area, the careful protection of the amenity of Hamble-le-Rice and nearby communities along Hamble Lane, and the careful restoration of the site. With regards to the latter, whilst not a requirement for this proposal, consideration should be given to how in meeting the requirements for restoration as set out in the Plan, the

site could serve as suitable alternative natural greenspace (SANG), to achieve multiple benefits from the open space created.

89. In relation to traffic, in finding the Minerals and Waste Plan sound (including this site allocation), the Inspector was provided evidence that there could be up to 60 two-way HGV movements per day, judging this to be an insignificant increase in the number and frequency of HGV movements on Hamble Lane. It is noted that the applicants Transport Assessment indicates that during peak years of operation there would be 72 two-way movements, which is 20% greater than the upper limit on which the Inspector based his decision in 2013. The baseline traffic levels will also have increased since 2013. At the least this emphasises the importance of minimising trips where possible.
90. Hampshire County Council's report as Transport Authority regarding improvements on Hamble Lane (2019), identifies that Hamble Lane is heavily congested with the potential to improve the situation being limited. It notes that there is a clear need for improvements to address existing problems and background growth, that additional development would compound the problems and that until at least the improvements to the northern section of Hamble Lane are implemented, further development along Hamble Lane would be inappropriate from a traffic perspective. Whilst the Hamble Lane site is an existing rather than further allocation, the effect of the report is to emphasise the importance of minimising / managing traffic from the proposal. In addition to minimising overall trips where possible, the operation should avoid or minimise as far as possible trips and peak / sensitive times, noting that peak / sensitive times on Hamble Lane reflect standard peak times and also school starting and finishing times and factory shift patterns. Minimise as far as possible should not simply be based on operational considerations, but a reasonable balance between mineral operational and transport / safety / amenity concerns.
91. New minerals infrastructure has the potential to impact significantly on existing residential areas. The Minerals and Waste Safeguarding in Hampshire SPD (2016) sets a 'Minerals and Waste Consultation Area' with a 250m buffer around minerals infrastructure in rural areas. This is a consultation area and so does not mean there should automatically be a buffer as wide as 250m between mineral workings and adjacent residential areas. However, it does indicate that if buffers are less than this, then even further care is needed in the design / operation of the minerals site to ensure the appropriate level of mitigation.

Economic Development Officer

92. Cemex cites five principle economic benefits in its proposal: supplying the local construction industry with material; creating local jobs;

creating indirect spend in the local area through these new employees; paying business rates; and paying a national aggregate levy. Of these, the locally sourced supply of construction material and business rates revenues are the most compelling. The employment creation is low and the likely local spend correspondingly low whilst the national aggregate levy does not necessarily return to the local area. Increased travel movements on a single access road that already suffers from congestion is likely to lower the productivity of local commuters. On balance, the economic disadvantages appear to outweigh the benefits.

SUMMARY OF MAIN AREAS OF CONCERN

93. The following summary relates to matters that are within the remit of Eastleigh Borough Council to comment on. There will be a variety of other matters relevant to the application that will be considered by statutory consultees such as the Environment Agency, Natural England and Southern Water, with their comments being provided directly to Hampshire County Council.

Policy principle

94. Eastleigh Borough Council acknowledges that the site is allocated as a potential future minerals extraction site within Policy 20 of the Hampshire Minerals and Waste Plan. However, the Policy makes it clear that any proposals for extraction at the site need to take account of a variety of environmental and technical matters, with appropriate mitigation secured where impacts cannot be overcome. It is also noted that the proposal is for the extraction of more minerals than envisaged in the Policy allocation, and is therefore likely to generate impacts beyond those originally considered when the allocation was agreed.
95. It is also noted that the Hamble Airfield site is one of 5 potential new extraction sites included in Policy 20. Having reviewed the background information set out within the submitted details (EIA non-technical summary and Planning Statement), EBC is not satisfied that a proper assessment of alternative sites has been undertaken in terms of considering less environmentally sensitive options. EBC is not convinced that the locational benefits of securing minerals close to markets in south east Hampshire would outweigh the significant environmental issues of extraction at the site.

Local economy impacts

96. Whilst the applicant has referred to a number of potential economic benefits of the development, EBC would counter that the job creation and local spend would be limited and the national aggregate levy would not necessarily return to the local area. Increased traffic

congestion would also negatively impact local businesses. EBC considers that the economic disadvantages outweigh the benefits.

Highway implications

97. The increased level of traffic, particularly HGV's, generated by the proposed works is a significant concern of EBC, both in relation to highway capacity and safety, and pollution / air quality. There are two schools in close proximity to the site and any increase in traffic and congestion could have serious implications for pedestrian safety. There are also concerns that increased traffic congestion would impact on emergency vehicle access to the local area, and on the ability of local businesses to operate effectively. A number of local businesses rely on Hamble Lane for the efficient operation of their services, and some have shift and delivery patterns that would not necessarily correspond to normal peak traffic times, which needs to be taken into account.
98. As detailed in the comments of the Sustainable Transport Officer, there are specific concerns about the lack of analysis of the impact of additional traffic on surrounding road junctions, and queries about the methods used to determine trip rates. Without clarification on these points, it cannot be determined that the impact of traffic from the development has been properly assessed. Related issues of increased pollution and impact on air quality are covered separately in this report.
99. EBC would also like to refer Hampshire County Council to a recent appeal decision relating to proposed residential development at the GE Aviation Site, Kings Avenue, Hamble-le-Rice (appeal ref. 325559, decision dated 15th January 2021). In dismissing the appeal, one of the key matters considered by the Inspector was that of highway impacts on Hamble Lane and nearby junctions. The Inspector notes within his assessment that *'Hamble Lane is subject to significant congestion at peak times, with a number of junctions experiencing capacity problems, particularly nearer to the M27 from Portsmouth Road northwards'*. The inspector concluded that the development would result in increased queuing times at the Tesco Roundabout and Portsmouth Road junctions, which would be considered a 'severe' impact when compared to the baseline situation. Although consideration was given to the potential to mitigate impacts through contributions towards HCC's Hamble Lane improvement works, the Inspector raised concerns about the availability of funding and timing of the improvements. This appeal decision therefore emphasises the importance of fully and properly assessing transport impacts and mitigation measures, and EBC does not consider that these matters have been satisfactorily addressed in relation to the Hamble Airfield proposals.

100. In addition to the comments received from the Council's Sustainable Transport Officer, EBC has commissioned Systra Ltd Transport Consultants to carry out an independent review of the Transport information submitted with the application. Some specific matters that EBC is seeking further clarification on include:
- The County Council's position on development in Hamble Lane in terms of whether additional development can be accommodated without capacity improvements;
 - The timing and accuracy of the traffic count data;
 - The lack of assessment of junction capacity and impacts;
 - Potential impact of changes to the highway code;
 - Impact on other users of the highway (e.g., pedestrians, horses)
101. An update on the outcomes of the Systra Assessment will be provided as an update at the Planning Committee and will also be included in the subsequent report to Cabinet on 24th March 2022.

Pollution – air quality and noise

102. From the submitted information, EBC is unable to determine that significant adverse impacts from air pollution and noise will be avoided, or that adverse impacts would otherwise be satisfactorily mitigated.
103. As detailed in the response from the Council's Environmental Health Officer, EBC has a number of questions relating to the information used to assess air quality and noise impacts. Most significantly, there is concern about whether the Transport Assessment provides an accurate representation of traffic impact, and therefore whether the related air quality impacts have been properly assessed. There is also no quantitative assessment of dust emissions and the resulting impact on dwellings. This would be fundamental to assessing the amenity impact on local residents.
104. In relation to noise, there is concern that the surveys used to determine the baseline environment are out of date and do not accurately reflect the current position, and that the assessments do not adequately consider impacts throughout the day.

Amenity impact and public health

105. Having regard to the concerns outlined within this report, EBC is of the opinion that the impact of the proposed works on local residents and businesses has been inadequately assessed and underestimated. Impacts would be wide ranging and would last for at least a 13-year period, which is a significant period of time in the lifetime of residents. The fundamental concerns relate to impacts of increased air pollution from additional traffic and from works at the site (i.e., dust / particles), noise impacts, visual impacts and loss of recreational space. Increased pollution can have significant impacts

on the long-term health and wellbeing of local residents, particularly those with underlying health conditions, and this is a significant concern. Based on the information submitted to HCC, EBC considers that the development would be harmful to local amenity and should not be permitted.

Ecology and nature conservation including impact on SPAs

106. Eastleigh Borough Council is concerned that a fundamental issue relating to the potential for increased recreational pressure on nearby coastal sites has not been properly assessed within the application submission. Given the extent of public use of the land (predominantly by dog walkers), the potential diversion of recreational pressure onto more environmentally sensitive coastal areas is a significant concern and one which requires detailed assessment in order to comply with the Habitat Regulations.
107. In relation to protected species, whilst EBC raises no objection to the methodologies used in the submitted surveys, it is considered that the ecological value of the site has been underestimated, particularly in relation to birds and reptiles.

Tree impact

108. EBC objects to the proposed removal of three trees to create the site access. In relation to arboricultural impact, the loss of these trees would be impactful, altering the visual nature of Hamble Lane. EBC does not consider that sufficient information has been provided to demonstrate that other access locations have been fully explored from an arboricultural perspective.

Landscape impact

109. Whilst the principle of mineral extraction followed by restoration could meet the general objectives of EBC's landscape policies if carried out sensitively, based on the information submitted there are concerns about the content of the LVIA and the design of the proposed screening bunds. The bunds as proposed would appear overly engineered and unnatural and would need to be redesigned to provide a more natural appearance in order to prevent harm to the landscape character of the area during the operational phase of development. The concern regarding the LVIA is that the overall landscape impacts have been underestimated and limited consideration has been given to the impacts on local residents.

Drainage and flood risk

110. Matters relating to drainage and flood risk (including impacts on the water table and pollution from water run-off), will be considered by Hampshire County Council's Flood and Water Management Team,

the Environment Agency and Southern Water, who will be responding directly to HCC. At the time of writing this report, only the Flood and Water Management Team's response was available to view and it is noted that they have requested further information in order to assess the acceptability of the drainage strategy. EBC would request that full consideration is given to all comments and recommendations raised by these consultees.

Contaminated land

111. EBC notes that there is further information required to assess land contamination, but this could potentially be addressed via condition should planning permission be given.

Heritage

112. EBC has no significant concerns with respect to the impact of the development on nearby listed buildings and Conservation Areas. EBC would support the recommendations of the County's Archaeologist (response to HCC dated 8th February 2022), in requiring further information to fully assess the potential archaeological impact.

Climate change

113. In July 2019, the Council declared a Climate Change and Environmental Emergency. In doing so it agreed, among other things, to: (a) put in place measures to ensure the Council's own operations and functions achieve carbon neutrality by 2025; (b) work with partners to aim for all projects and services delivered in the Borough to achieve carbon neutrality by 2030; (c) ensure that the Council's procurement policy recognises carbon neutrality as one of its primary considerations; and (d) recognise the urgency of action to mitigate and adapt to climate change in every decision taken by the Council. This is underpinned by the Climate and Environment Emergency Strategy 2020–2030 and the supporting Climate and Environmental Emergency Action Plan – Update June 2020.
114. The declaration of the Climate Change and Environmental Emergency demonstrates a strong commitment from the Council to achieve net zero. It is not part of development plan or emerging plan policy, but it is a material consideration to be considered alongside all other material considerations. The need to support the economy is part of the Strategic Environmental Assessment for the Emerging Local Plan, as is an assessment of climate impacts.
115. The NPPF, Saved Policies 34.ES and 37.ES of the local plan, Policies S1, DM2 and DM3 of the Emerging local plan and energy and water elements of the adopted Environmentally Sustainable Development SPD require development to be sustainable in terms of resource use,

climate change and energy use. When considering the impact of climate change, the proposed development is not expected to be directly impacted by the potential effects of climate change and is expected to have a negligible impact on the climate as a result of the development or its use.

Equalities implications

116. Section 149 of the Equalities Act 2020 created the public sector equality duty. Section 149 states:
- A public authority must in the exercise of its functions, have due regard to the need to:
 - a. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
117. When making policy decisions, the Council must take account of the equality duty and in particular any potential impact on protected groups. It is considered that this consultation response does not raise any equality implications.

CONCLUSION

118. Eastleigh Borough Council objects to the proposal for mineral extraction at Hamble Airfield for the reasons detailed in this report, summarised as follows:
- Insufficient justification for mineral extraction at Hamble Airfield given the significant environmental impacts;
 - Inadequate assessment of highway impacts, notably in terms of predicted traffic generation, increased traffic congestion and junction capacity, and resulting implications for highway and pedestrian safety and the local economy;
 - Insufficient information to assess pollution, noise and air quality impacts and effects on the health and wellbeing of local residents and businesses;
 - Lack of assessment of the impact of displaced recreational activity on protected coastal areas, and concern that the ecological value of the site has been underestimated;
 - Objection to loss of trees to create access;
 - Poor design of landscape buffer bunds and associated visual impacts.
119. From the information submitted, EBC is not satisfied that the proposed extraction of minerals at the site can be undertaken without

significant impacts on the local environment in relation to ecology, pollution, traffic impact and local amenity.

120. It is requested that should new information be received by HCC in relation to any of the matters outlined within this response, EBC should be formally reconsulted to allow further review and comment.

FURTHER RECOMMENDATIONS

121. Should this application progress, EBC would recommend that the following additional information is requested from the applicants to allow for more detailed assessment of the proposals:
- Further assessment of options for alternative extraction sites.
 - Review and response to detailed queries raised by EBC's Pollution Team.
 - Updated Noise Assessment to include updated sound measurements for a more accurate understanding of background noise levels.
 - Quantitative dust and particle modelling.
 - Extended public consultation, to include a forum, to better understand the impact of the development on local residents.
 - Updated Landscape and Visual Impact Assessment to include further consideration of the landscape impacts in relation to local residents.
 - Re-design of the screening landscape bunds, to achieve a softer more convex and natural design.
 - Section plans of the active works phase of development to better assess the landscape impacts.
 - Detailed drawings of the proposed permissive path to ensure it is safe and accessible to all.
 - Further information to justify the position of the proposed access from an arboricultural perspective.
 - Clarification on the species of all trees to be removed and pruning proposals around access.
 - Provision of full traffic survey data and further details of the methodology used to determine trip rates. Surveys of the traffic levels at similar minerals and waste sites would be recommended to determine accurate trip rates.
 - Clarification of the methodology used for calculating biodiversity net gain.
 - Detailed assessment of the potential impacts of increased recreational pressure on nearby coastal sites from diversion of activities from the application site, during the operational phases of development and after completion of restoration.

- Provision of updated wintering bird survey data.

122. Notwithstanding the objections raised by EBC, in the event that Hampshire County Council were to recommend permission for the proposed works, Eastleigh Borough Council would wish to ensure that the following matters are addressed through appropriately worded conditions or obligations:

- Provision and monitoring of all measures required to mitigate adverse impacts of the development.
- Restoration of the site in line with policy requirements and provision of long-term management and maintenance.
- On-going monitoring and public engagement in relation to pollution control mitigation throughout the operational phase of development (including restoration phases).
- Detailed timetable for the restoration works, to include maintenance plans for the duration of the works and following completion.
- Provision of contaminated land site assessment and agreement of any necessary mitigation measures.
- Provision of a net gain in biodiversity including habitat for breeding birds.
- Detailed timetable for habitat restoration works to ensure existing species populations are maintained and new habitat provided at appropriate times.