

R-A-G-E

Residents Against Gravel Extraction

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To:

CC:

DRAFT Hampshire Minerals Plan - Regulation 26 Consultation

Response submitted by Susie Tomson PhD, Planning and Environmental Advisor on behalf of a concerned group of Hamble residents and local businesses – Residents Against Gravel Extraction.

December 7, 2007

As a group of Hamble based residents and businesses we are objecting to the identification of the Hamble Airfield and Pickwell Farm as 'preferred areas' for sand and gravel extraction. This document explains the reasoning.

1. General comments:

This consultation is the first true public consultation held on the Hampshire Minerals Plan. Previous consultation at the Issues and Options stage has been through invited respondees only and will not truly capture the concerns of the local population. The outcome of this consultation does not appear available to the public. This is therefore the first opportunity for residents and employees functioning in these areas to consider and respond to the proposals put forward.

With this in mind it is essential that the County Council only use the Draft Plan as a 'work in progress' as stated in the Plan's introduction and use this phase of the consultation to identify major issues that appear to have been totally disregarded in the Plan.

It would appear that both the Draft Minerals Plan and the accompanying Integrated Sustainability Appraisal appear to be severely lacking in sufficient background analysis of the impact of the 'proposed sites' on the local community. It is of note that the County Council was advised to undertake a full economic, social and traffic analysis prior to publishing the Draft Minerals Plan (Minutes of meeting 27th September) although it did not apparently see the merits in this. We strongly urge the County Council to pursue these types of studies into the sites and feel confident that the identification of sites on the Hamble Peninsular will not appear as 'preferred locations' once the local situation is fully understood.

As a group of residents concerned with the future of a historic village we invite the County Council to work with us to identify the issues that are missing from both the Minerals Plan and the Integrated Sustainability Appraisal and request that we are fully involved at all future stages of the development of the proposals in the Plan including the Public Examination.

Our overriding concern is that of the existing overcapacity of the Hamble Lane and the problems that the additional traffic particularly in terms of heavy lorries would bring to the area. This would be affected by both the Pickwell Farm and the Hamble Airfield Sites.

R-A-G-E

Residents Against Gravel Extraction

We are also concerned with the proximity of the Hamble Airfield site to the two local schools, the newly constructed Blackthorn Health Centre, recreational and residential areas. The combination of the impacts would seem to contravene the Government's drive towards sustainable communities.

The following sections detail our concerns and objections

2. Traffic

The Hamble Lane is already running at overcapacity. The County's own Local Transport Plan clearly identifies this and has earmarked £30 million investment over the period 2011-2026 to tackle the Hamble Lane congestion. The area at the top of the Hamble Lane at the Portsmouth Road junction is an air quality management area and the Transport Plan identifies it as likely to fail the annual levels of nitrogen dioxide due to existing traffic congestion.

It is therefore hard to imagine that the County Council is proposing to increase the heavy commercial traffic along this already overstretched road.

The Integrated Sustainability Appraisal for the Minerals Plan appears to disregard the traffic issue for the Hamble sites which as already stated is contrary to the County's own findings. Whether or not the minerals can be removed by rail from the airfield site, the heavy commercial traffic will increase and should be thoroughly examined before either site is identified as a 'preferred area'.

It is on these grounds alone that the County should strongly consider rejecting both Pickwell Farm and Hamble Airfield sites.

3. Proximity to local schools

The Government's policy on sustainable development clearly supports the need for sustainable communities which is reflected in the many layers of planning. Both the Hamble Primary School and the Hamble Secondary School are close to the proposed Hamble Airfield site. The Secondary School, the Community College lies adjacent to the Airfield Site. Access to the school would be along the same route as the heavy lorries for the gravel extraction and the subsequent land filling. Many children arrive at the school on foot and any increase in traffic will have a major implication in terms of health and safety of these children.

In addition there would be noise and air pollution associated with the movement of heavy lorries, the extraction of the sand and gravel and subsequent land filling which would all impact on the functioning of the school.

4. Proximity to recreational grounds

The Hamble Airfield site lies adjacent to the Hamble playing fields and Rory Underdown Pavillion where in the last few months new tennis/ basketball courts have been constructed. This is an important resource for the village and provides an important amenity area for young kids to enjoy outdoor exercise.

In addition within 50m of the airfield is the village playground where the swings are regularly used by toddlers and young children.

Again these local facilities would be affected by noise and air pollution from the mineral working and transportation and would potentially render them unusable.

5. Proximity to Health Centre

Similar issues to those affecting the school of access, noise and air pollution will also affect the functioning of the newly constructed Blackthorn Health Centre which lies adjacent to the school and the provides a valuable service to the residents of both

R-A-G-E

Residents Against Gravel Extraction

Hamble, Netley and Bursledon. Access to and from such a facility is critical for both patients as well as for the medical and support staff particularly in emergencies.

6. Proximity to residential areas

Both the Pickwell Farm and the Hamble Airfield site lies adjacent to residential areas. The noise associated with the extraction and on-site processing of the sand and gravel will create a nuisance to many local residents. There are clear guidelines for granting planning permission for housing adjacent to mineral workings based on concerns that they later complain of nuisance and want the operating times to be limited to reduce this nuisance. It can therefore only mean that the reverse is true and that mineral workings and later land filling so close to residential properties due to the noise and air pollution factors should be discouraged.

There is also concern from residents living along the Satchell Lane due to flooding. The road is constantly flooding and the area appears to be sensitive to changes in surface run off properties of the airfield. When the airfield was ploughed around 6 years ago, some of the properties suffered flooding and were given compensation from Persimmon Homes who took responsibility for the impact. It is extremely possible that extracting the natural filter of the sand and gravel will only exacerbate the problem in addition to the mineral workings which would fill with water and have an increased risk of flooding to local properties. These issues need careful evaluation and studies to be undertaken, particularly in the light of climatic changes and more intensive storm conditions that the UK appears to be experiencing.

With all these issues to be taken into account - flooding, noise, air pollution, increased traffic, loss of local businesses and services, it is likely that properties will start to devalue leaving people at potential financial risk. It is possible that these plans alone have already started to have an effect on people's ability to sell properties already on the market.

7. Impact on local business

The issue of transport and access is paramount to local businesses in Hamble. Part of the vibrancy of the Hamble village is the business side that relies on the marine industry and the visitor market. Increasing the pressure on the already overburdened Hamble Lane will have a detrimental effect on the existing businesses and the ability of the village to attract new ones. Businesses have already left as a result of the current traffic congestion.

8. Impact on Hamble River

As the Harbour Authority for the River Hamble, Hampshire County Council should be more than aware of the importance of the Village of Hamble to the sustainability of the River. The County has recently been challenged as the appropriate organisation to be the Harbour Authority and has stated that it is clearly its intention to manage the River for the benefit of the people of Hampshire. Hamble Village is the main settlement along the river not only important for visitors to the area as well as boat users but also for the marine businesses that make the Hamble an internationally important centre for yachting and boating activity. Any proposals that could impact on this facility whether it is through availability of services within the village (See impact on local business) or through limiting access adding to the ever increasing traffic situation should be carefully examined.

9. Impact on nature conservation

Like many of the sites proposed around Hampshire the Hamble sites are in close proximity to important Nature Conservation areas. It is possible that changes to the

R-A-G-E

Residents Against Gravel Extraction

drainage of the airfield will have a detrimental effect on the water quality of the Hamble River and its habitats and this should be carefully explored.

10. Comparison between potential sites

The Minerals Plan makes little effort to compare the relative merits of the sites and it is unclear as to why the Hamble sites have been selected as preferred sites as opposed to the more rural Brownwich and Chilling sites. Whilst we recognised the proximity of the Brownwich and Chilling site to nature conservation sites, this is also the case of the Hamble sites which have the additional impact on the local community, residents, schools, businesses that is clearly not the case with the alternative areas. A clear explanation of the selection process should be outlined in the Minerals Plan. As it stands there appears to be little thought having gone into the selection of the Hamble sites. Purely stating that

‘Consideration will need to be given to impact on Old Netley and traffic congestion particularly linked to the nearby school.’

This comment is given in relation to both Pickwell Farm and Hamble Airfield sites, omitting the fact that both sites will also have a major traffic impact on the Village of Hamble and the Hamble River.

11. Future proposals for development

Much of the discussion regarding extraction of mineral at the Hamble Airfield site relates to the subsequent infilling and construction of around 700 homes. This proposal for housing is currently contrary to Local Plan Policy and is surprising that it should be considered as an option at all at this stage. For all the reasons of capacity in terms of road links but also services – the schools have already exceeded by the capacity increased from recent development in the village – this remains an area of ‘countryside’ within the village (see below).

12. Contrary to Regional and Local Plan policies

It is our belief that the proposals for the Hamble sites and the impact that they will have on the Villages of both Hamble and Netley are contrary to several Regional and Local Plans, including Plans prepared by Hampshire County Council. We have outlined the relevant policies below:

Hampshire County Council Minerals Plan - Core Strategy

The Vision of the Core Strategy states:

- Minerals and waste activities will be scaled and located sensitively, such that they reduce the impact of road transport and meet the present and future needs of communities, businesses and the environment

The Objectives of the Core Strategy states:

- ensure that infrastructure for the management of waste and the extraction of minerals is developed with due regard for the principles of sustainable development
- protect local communities and areas of environmental interest from the adverse impact of mineral, waste and resources development

Hampshire County Council Local Transport Plan:

Overall Policy

- Develop land use policies to create more sustainable communities, including local employment and other services.

R-A-G-E

Residents Against Gravel Extraction

South East Regional Assembly: The South East Plan

SECTION 20.2: Regional minerals policies are guided by sustainable development as a key principle. This means that while delivering the minerals that the region and the nation needs, extraction and processing should:

1. Safeguard the region's naturally occurring minerals and encourage the use of suitable alternative construction materials where appropriate
2. Protect the environment and local amenity
3. Minimise the adverse impacts of the transport of minerals and construction materials.

SECTION 20.7: Mineral working and processing can have an adverse impact on the environment and local amenity and, as a consequence, extensive mineral resources will remain unavailable for working. Local Development Frameworks (LDFs) should include policies to manage specific impacts such as noise and dust and encourage good site management and effective restoration.

Eastleigh Borough Council: Eastleigh Local Plan 2001-2011

Pickwell Farm and Hamble Airfield are both designated as 'countryside'; Pickwell Farm and part of the Hamble Airfield are designated 'local gap' and Pickwell Farm is designated as 'strategic gap';

Both sites are close to nature conservation designations; the boundary of the Hamble Airfield is designated as 'proposed for landscape improvements'; the Hamble Secondary School, adjacent to the airfield is designated as 'a special policy area'.

13. Answers to specific questions relevant to Hamble and Netley in the consultation

Question 5

To what extent should the prior extraction opportunity at Daedalus Airfield (pAPA3) be reflected in the Hampshire Minerals Plan, in particular should it be identified as a Preferred Area for land-won sand and gravel extraction contributing towards meeting South Hampshire's local apportionment, either as an alternative to Pickwell Farm (pPA5), Hamble Airfield (pPA6) or Forest Lodge Farm (pPA7), or in addition to them?

This option should definitely be explored. If planning permission for development of housing has already been granted it is likely that the area's transport system could also cope with traffic associated with mineral extraction.

Question 6

Should Hampshire County Council's land at Brownwich and Chilling Farms (pAPA6) be identified as a preferred area for land-won sand and gravel extraction and contribute towards meeting South Hampshire's local apportionment, either as an alternative to Pickwell Farm (pPA5), Hamble Airfield (pPA6) or Forest Lodge Farm (pPA7), or in addition to them?

R-A-G-E

Residents Against Gravel Extraction

This site should definitely be examined as an alternative to the Pickwell Farm and the Hamble Airfield sites as the impact on the local community is far less. In addition, the resource is far greater than the Hamble sites and a selected portion of the site could be developed to meet the required targets for gravel extraction minimising any nature conservation impact. Only 25% of the site would be required which could be sensitively selected. It is also possible the site could be restored to wetland area and provide an increasingly valuable habitat. The benefits of this site should be thoroughly explored and be seen as a viable alternative to the Hamble sites.

Yours sincerely,

Susie Tomson PhD

For and on behalf of R-A-G-E

Residents Against Gravel Extraction