



UNION 4 PLANNING

IGas Energy PLC

Holybourne Rail Terminal Site, A31 Farnham Road,
Alton, GU34 4JD

Demolition of existing plant and structures, redevelopment and partial change of use of rail terminal site to consolidate oil operations and provide an aggregates depot, comprising erection of new plant and site buildings, security fencing and access road, together with landscaping

PLANNING, DESIGN AND ACCESS STATEMENT

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Author(s): Jonathan Rowlatt

Checked By: Alan Hannify

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1-2 Paris Garden | London | SE1 8ND
0207 122 0094
planning@union4.co.uk
www.union4.co.uk

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1.0 Introduction

- 1.1 This Planning, Design and Access Statement has been prepared by Union4 Planning Ltd on behalf of IGas Energy PLC ('the Applicant') in support of proposals for the consolidation of oil operations at the Holybourne Rail Terminal site and introduction of a new aggregates handling facility across the remainder of the site, utilising the rail terminal for the importation of goods, prior to their ongoing transportation by road.
- 1.2 It should be noted that the proposals are not linked to the neighbouring site and a recent unsuccessful application submitted by Veolia for an Energy from Waste (EFW) facility.
- 1.3 The redevelopment will revitalise this underused and predominantly vacant site, bringing a key transport terminal back into viable operation in accordance with Local and National planning policy promoting sustainable development and retaining the minerals use of this site, whilst reducing emissions and road miles associated with HGV movements incurred through the transportation of vital construction materials.
- 1.4 This submission follows positive feedback received at the pre application stage and the scheme has evolved since this initial approach, following discussions with potential operators and a clearer understanding of market demand, as well as a more detailed solution for the IGas retained element.
- 1.5 Following a screening request by the applicant, Hampshire CC have confirmed that the development does not constitute EIA development and therefore an Environmental Statement is not required to support the proposals.
- 1.6 The aggregates use hereby proposed would benefit from the existing rail infrastructure, which Hampshire CC and Network Rail are keen to retain and upgrade. To this end, discussions are ongoing with Network Rail regarding their ambitions for improvements to the sidings running into the terminal, albeit the extent and form of these improvements are not yet finalised and therefore are not included as part of this application.
- 1.7 Whilst historically Holybourne has been an active and extensively used site for the applicant, its utilisation today is heavily reduced, to an extent that much of the site lays vacant. Tanker movements in and out of the site are minimal, as is the volume of oil stored on site and transport of oil by railway ceased to occur a number of years ago. As such, much of the plant, equipment and site area is surplus to requirement and the oil operations can be consolidated into a much smaller portion of the site, freeing up large areas of land for more economically beneficial uses.
- 1.8 The proposed use of the railhead, by an aggregates operator, has the potential to significantly reduce the distance of HGV movements by reducing road borne freight to just the final few miles

between the depot and the customer, rather than the current requirement for aggregates to be transported by road for the entirety of their journey, from the point of their extraction, to the customer. This will significantly reduce emissions from long distance HGV transportation.

- 1.9 The submission follows a number of formal and informal pre application discussions with officers at Hampshire County Council, as well as discussions and meetings with Councillor Joy (member for Alton and Holybourne) and Councillor Kemp-Gee (member for Alton Rural), undertaken both on and off site.
- 1.10 Consultation with local stakeholders and interested parties will continue through the application process, guided by Councillors Joy and Kemp-Gee.
- 1.11 The application comprises a full set of plans and elevations, with additional plans submitted to amplify the IGas retained area in more detail, namely HOLY-1001 and HOLY-1002.

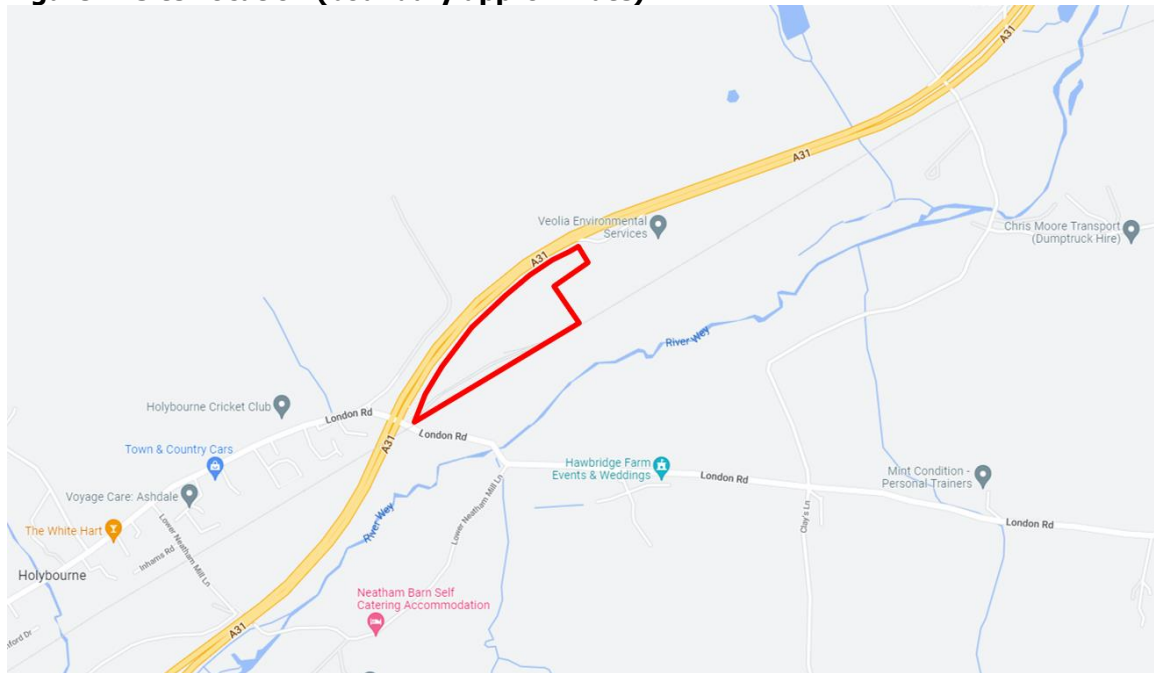
Structure of this Planning Statement

- 1.12 This Planning Statement is structured as follows:
- Section 2 provides an overview of the site's location and description including any relevant planning history;
 - Section 3 describes the proposed development;
 - Section 4 sets out the policy context pertaining to the site;
 - Section 5 outlines the key planning considerations;
 - Section 6 provides a summary and conclusions.

2.0 Site Location and Description

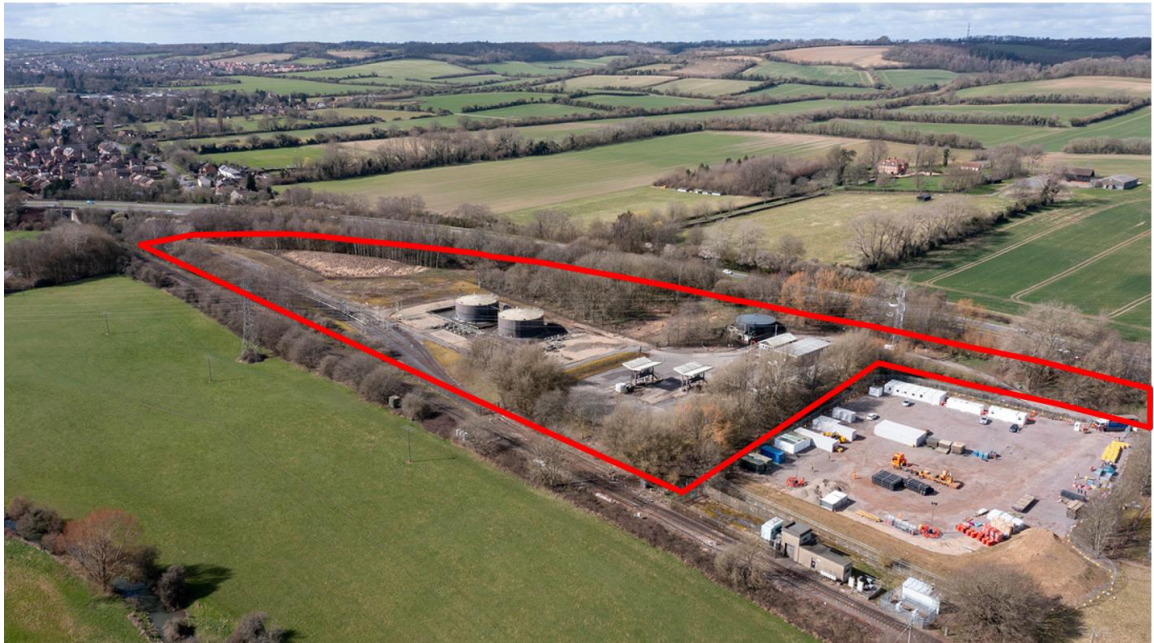
- 2.1 The site is known as Holybourne Rail Terminal and is located on the south/east side of the A31. It is situated approximately 2.5km northeast of Alton, 1km north of Neatham and 1km northeast of Holybourne.
- 2.2 The River Wey runs through open countryside to the south, on an east-west trajectory, as indicated on the following extract.

Figure 1: Site Location (boundary approximate)



Source: Google Maps

- 2.3 The site is situated within a parcel of land which is bound by the A31 to the north and west, by the railway line to the south and by the Veolia Waste Management Depot and Alton Pump Station, operated by Esso, to the east. The railway line and rail siding run along the entirety of the southern boundary, with the latter being located within the site.
- 2.4 The site shares an access/slip road with the Veolia Waste Management Depot and Esso pumping facility, which runs off the A31 between the two sites and splits to serve each of the sites respectively.
- 2.5 The portion of the Esso site immediately to the east has recently been excavated and levelled and covered with hard standing as part of ongoing pipeline works. A bund has been formed from the excavated topsoil, along the southern boundary. This is indicated on the following image.



- 2.6 The site consists mainly of two areas; one at the eastern side which houses the control office, welfare facilities, fire water tank and tanker unloading area and the other comprising the oil storage tanks, associated plant and pipework and rail sidings. The northern, eastern and western boundaries are screened by mature deciduous planting and similar is true of the southern boundary, where views are screened by a tree belt which runs between the mainline railway and the sidings within the application site, and also to the south of the railway line.
- 2.7 The current site arrangement of oil storage tanks, tanker loading bays, firewater tank and site offices and welfare is shown on the following image:



- 2.8 Both the tanker loading bays and central oil tanks rise to an estimated 9/10m in height, thus are significant structures at the eastern and central parts of the site respectively, as indicated in the following images:



- 2.9 There are no planning or environmental designations which cover the site itself, however there are a number of heritage assets noted within fairly close proximity. The Grade II Listed Bonham's Milestone lies roughly 50m northwest on the opposite side of the A31, whilst the Grade II* Listed Bonham's Farmhouse is approximately 285m northwest. There is also a Scheduled Monument known as Cuckoo's Corner Roman Site, Neatham which is located approximately 130m to the west. These areas of heritage interest all lie on the opposite side of the A31, from the application site, however, therefore there is limited or no relationship between the application site and these heritage assets, in terms of intervisibility or potential for impact on setting.
- 2.10 The boundary of the South Downs National Park lies to the southeast of the application site, approximately 1.4km away at its closest point. A number of SSSI designations also cover areas of woodland to the southeast, but these are approximately 3km from the application site at their nearest point.

Planning History

- 2.11 The site is part of the wider Humbly Grove oilfield development, which extends across the Basingstoke and Deane, Hart and East Hampshire authority areas.
- 2.12 The original planning permission for the Holybourne Rail Terminal site itself was granted in February 1984 under planning reference F26326/2 for:

"Construction of an access road and export terminal and the installation of equipment, buildings, plant and facilities to enable crude oil to be stored and loaded for transport either by road or rail and the installation of oilfield pipelines."

- 2.13 The terminal originally handled oil from the Horndean oilfield only and to this end, Condition 2 of the planning permission required the development to be carried out in accordance with the approved details.
- 2.14 Subsequently this condition was varied in October 1989, allowing for 20 more vehicles per day to import to the site from well sites other than those associated with the Horndean oil field.
- 2.15 Consent was granted in April 2000 under the first Periodic Review of Minerals Permission (ROMP) regime, through application references F26326/9/CMA, 00/00024/CMA and BDB46946. These consents set out a comprehensive list of conditions for all sites within the Humbly Grove Oilfield including Holybourne, Humbly Grove A, B, C and X well sites, Herriard A and X well sites and the Weston Common Gathering Centre.
- 2.16 The consent also set out a number of conditions relating specifically to Holybourne Rail Terminal, albeit these bear minimal relevance to the current proposals hereby submitted for consideration.
- 2.17 Condition 12 required cessation and restoration of the site by 30th September 2014.
- 2.18 Applications F.26326/010/CMA, 03/00817/ADJ and BDB55930 sought the 'Variation of condition 12 of First Periodic Review of Minerals Permission BDB46946 to allow the continued production of oil and gas'.
- 2.19 The applications were approved in October 2003 and extended the life of the terminal site to 30th September 2025. All other conditions remained in force and as attached to the ROMP consent.
- 2.20 Planning permission was granted in May 2012 under reference 26326/11 to provide a new demountable office and ancillary works. This consent was subsequently varied under application reference 26326/12 to amend the approved office unit. Consent was later granted in September 2014 for an office extension and additional car parking, under application reference 55680. All extant permissions are due to expire on 30 September 2025 or upon cessation of use of the site as an oil terminal.
- 2.21 More recently, consents 26236/013, 14/00863/CMA and 14/01027/CMA varied condition 5 of the ROMP consent (which restricted road tanker movements to Herriard site only) and allowed the export of oil from Weston Common to Holybourne, by road tanker, for a temporary period of 3 years.
- 2.22 Most recently, pre application advice was sought from Hampshire County Council for the consolidation of oil related activities and redevelopment of the site for a range of uses (aggregates

depot and light industrial/commercial units), similar to the scheme now submitted for full planning consent.

2.23 The pre app feedback received was extremely supportive of the proposals, setting out the following comments and considerations:

- The principle of diversifying a site in this manner is sound and generally considered sustainable
- Significant weight should be placed on the need to support economic growth and productivity
- The principle of the retained oil use and aggregates use are supported in principle
- The site is well screened by vegetation and bunding
- The site is safeguarded for mineral activity associated with the current temporary oil consent and also as a rail depot for the transport of minerals and waste
- Capacity at such depot's should be maximised
- Any non-aggregates/mineral uses should ensure they do not jeopardise the sites mineral activities, considering that the mineral/aggregate use may look to grow in the future
- Addressing climate resilience and mitigation will be key for any scheme
- Whilst minerals and waste development in the open countryside would generally be resisted, in this instance, where the site is a protected railway siding and previously developed land (albeit subject to a restoration condition) redevelopment is considered appropriate
- Proposals will need to consider visual impact, particularly from the SDNP to the south, although it is considered that the proposal will quite likely not cause unacceptable visual or landscape impacts
- The railway depot nature of the site should achieve a net reduction in HGV movements to and from the site
- Proposals are unlikely to have any significant below or above ground heritage impact

2.24 The planning history and particularly the recent pre application advice sets out the context for the proposed development hereby submitting, confirming the considerations and policy context against which any redevelopment scheme will be assessed.

3.0 Proposed Development

- 3.1 The application hereby submitted seeks the retention and consolidation of IGas operations towards the main site entrance from the A31 and the clearing and redevelopment of the remainder of the site to provide an aggregates handling facility with access to the rail sidings to the south, together with a new internal access road, parking and associated landscaping.

Plant/Structures to be Removed

- 3.2 As indicated above, the site, whilst sparsely populated, accommodates a significant amount of bulky plant and built structures at the centre and towards the eastern side. These include the two large oil storage tanks at the centre of the site, set within their own bunded area and associated pipework and hardstanding, as shown on the following image:



- 3.3 In addition to this, two double-sided tanker loading bays are found at the south-eastern corner of the site, surrounded by hardstanding and HGV manoeuvring area, as well as a significant planted and bunded area to the east and south and a lower grassed bund to the west, as shown on the following image:



- 3.4 Both the oil storage tanks and the tanker loading/unloading infrastructure are now unused and are surplus to the applicants requirements. As such, they will be dismantled and cleared from the site, along with any associated pipework and oil infrastructure in these areas.
- 3.5 Where possible, the materials will be recycled and there is potential for the re-use of the oil storage tanks on other sites controlled by the applicant, subject to the relevant permissions.
- 3.6 Welfare and storage units along the eastern boundary, as shown on the following image, will also be removed from the site:



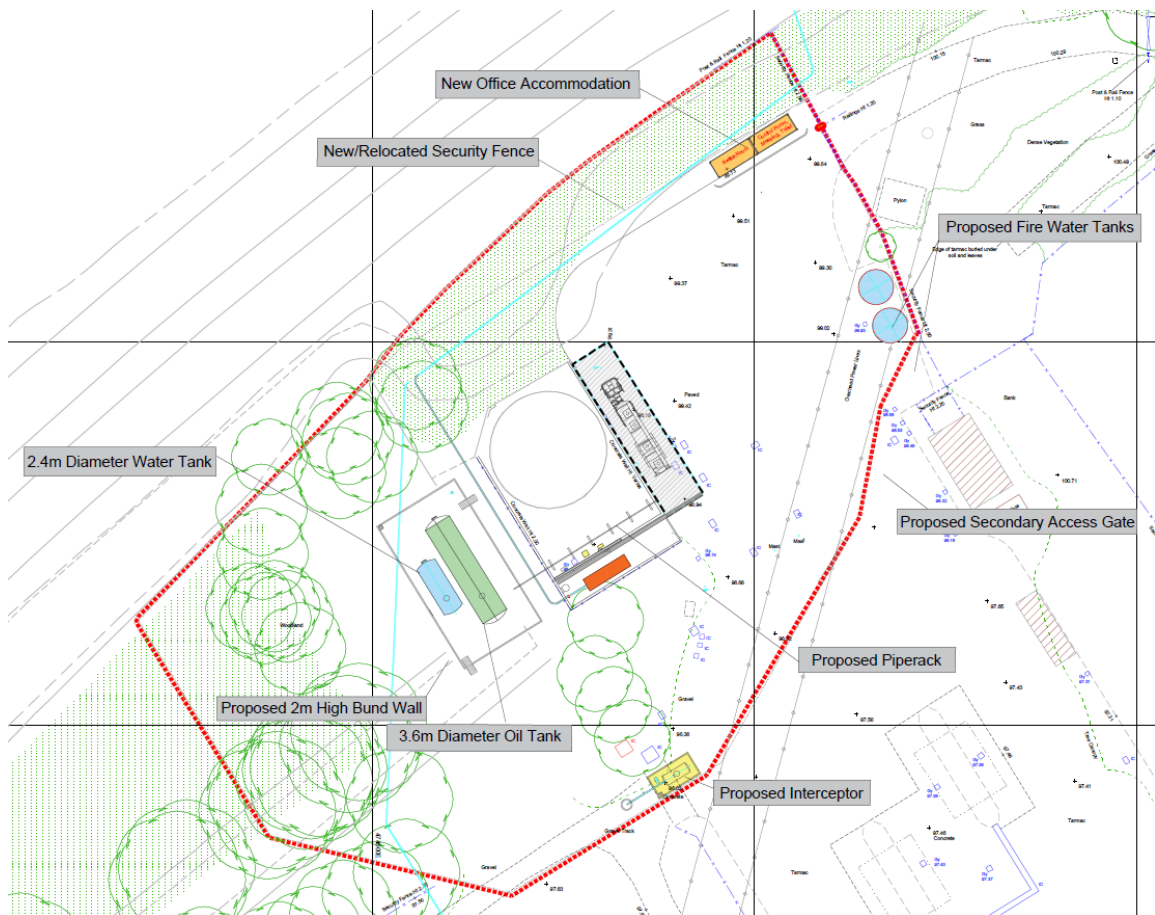
- 3.7 Following removal of these elements, where necessary the hardstanding will be removed and central parts of the site levelled, whilst retaining bunding around the perimeter.

Retained IGas Area

- 3.8 As part of the proposals, the applicant needs to retain a facility at the site to handle the small volumes of oil passing through via pipeline from Humbly Grove to the northwest, albeit much reduced in scale when compared to the existing facility. This separate compound will be located towards the northeast corner of the site, in the location of the existing oil tank, site office and control room, which are shown on the following image, from left to right.



- 3.9 The oil tank and surrounding bunding will be retained during construction works, serving the consolidated IGas portion of the site until the new tanks are installed and operational. The control room and site office will be removed. A new 1000 barrel oil storage tank and 280 barrel produced water tank will be located southwest of the existing oil storage tank and will be contained within a purpose built bund measuring 23 x 15m.
- 3.10 A tanker loading bay will be located just east of the existing oil storage tank, on existing hardstanding.
- 3.11 The fence line will be amended to enclose the entire facility, plus a significant buffer, as indicated by the red line on the following extract. It will incorporate the main access gates at the northwest corner and a secondary escape gate along the southern perimeter, for emergency use only:



- 3.12 As part of the IGas facility, the existing subterranean pipeline running from Humbly Grove will be diverted so that it terminates within the IGas fence line (it currently runs further west into the centre of the wider site) and a pigging area will be installed just to the west of the proposed oil and produced water tanks, to service this pipeline.
- 3.13 The diverted subterranean pipeline will feed into the new oil storage tank, where the oil will separate into crude oil and produced water, the latter of which will pass into the produced water tank. As each tank becomes full, they will be emptied by road tanker prior to the oil and produced water being transported off site for processing and disposal. Given the small volumes of oil and water involved, this will account for up to 6 tankers per week (but likely to be more in the region of 3) servicing the oil requirement and up to 2 tankers per month to remove produced water and rainwater.
- 3.14 A new (and much smaller) switchroom and control room will be located near the access gates at the northeast corner of the facility and two firewater tanks will be installed just inside the secure perimeter fence, just south of the main entrance. A new interceptor will also be installed at the southern boundary, just inside the fence line, towards which the site levels will fall. This will ensure

that any surface water run off from the hardstanding area is collected and processed, removing potential for ground or groundwater pollution.

- 3.15 The existing area of hardstanding within this portion of the site will be retained and will be used for tanker manoeuvring and car parking as necessary.
- 3.16 Electricity lines cross above the site and a pylon is located just south of the main access gate. This will be retained outside of the secure perimeter and protected as necessary during construction and site clearance. The vegetation to the east of this, sandwiched between the IGas facility access road and the proposed main site access road, will be retained and enhanced, as will the other areas within and around the site not covered with hardstanding.

Rail Sidings

- 3.17 Whilst the ambition of Network Rail is to extend the rail sidings in order to accommodate new longer freight trains, these discussions are ongoing and as such, the scheme hereby submitted reflects the current situation. The current layout is sufficient to accommodate freight trains of suitable size to transport aggregates, as it has done historically in relation to the oil operations.
- 3.18 Any future changes to the rail sidings will be subject to a separate planning application, or will benefit from network rail's permitted development rights and are not for consideration as part of this application.

Aggregates Depot

- 3.19 It is proposed that the remainder of the site will be developed as an aggregates handling and storage depot, with the use comprising the importation, exportation and storage of aggregates.
- 3.20 The aggregates operations will have direct access along the entire length of the railway sidings, for the unloading of material brought in via freight train.
- 3.21 Built development on the site will be relatively minimal, given the nature of the use proposed and the significant areas of external and semi-covered storage, and will comprise open aggregate storage bays, facing the rail siding, a semi covered storage area along the northwest elevation, a site office and control building, weighbridge and a warehouse/storage building at the south-eastern corner of the site, within the existing bunded area. Staff and visitor car parking will be provided towards the site access point.
- 3.22 The route of the former A31 road, which previously ran through the site, is visible as a strip of hardstanding running through the centre. The section of this road running from the junction with the IGas facility access road, to the new aggregates facility, will be reinstated, following the line of

the previous road, before curving south into the site. Staff and visitors will then be able to pull off this access road and park in a dedicated parking area close to the site entrance, whilst HGVs will continue on to the weighbridge and site office before continuing on to collect their loads from the aggregate bays located towards the western end of the site.

- 3.23 It is envisaged that the site will be predominantly used for the import of aggregates from outside the county, which will be delivered to the depot by train, unloaded by bucket grab and deposited into the relevant storage bays towards the southern side of the site, adjacent the rail sidings, similar to that being undertaken in the following image:



Source: railfreight.com

- 3.24 The aggregates will remain in stockpiles until collected by HGV to service the local demand. At that time, aggregates will then be transferred from the stockpiles, onto HGVs, again using a bucket grab.
- 3.25 Once full, the HGVs will exit the site, via the weighbridge, back onto the A31 and then west. The aggregates will then be transported to local building sites and other construction/infrastructure related activities, for use in the construction process.

Landscaping and Drainage

- 3.26 The proposals include the comprehensive landscaping of the site, improving the existing quality of landscaping, as well as biodiversity and site drainage whilst seeking to optimise the usable area of the site for the proposed aggregates use.

- 3.27 Perimeter trees will be retained, ensuring screening of the site, and understory planting will be added to enhance these areas. Towards the northern boundary with the A31, native hazel, goat willow and honeysuckle will be planted within the woodland to provide dormouse habitat and connectivity. Elsewhere, shade tolerant wildflower planting will occur between and around the retained trees.
- 3.28 Bat boxes will be installed on the southern facing trunks of suitable mature trees along the northern boundary with the A31, whilst bird boxes will be installed on the south facing trunks of suitable mature trees along the eastern and southern boundaries.
- 3.29 The existing closely cropped grass bund areas will be enhanced through grass and wildflower mix planting, providing greater diversity and habitat potential.
- 3.30 Log, brash and compost piles will be incorporated beneath the understory in both shady and sunny locations, suitable for fungi, invertebrates, reptiles and small mammals. At the southwest corner of the site, a wildlife pond is proposed within an area of existing grassland.
- 3.31 The car parking area towards the entrance to the aggregates depot will be permeably paved, with a soakaway tank beneath. Around the parking area, raingarden is proposed, which will drain into the main drainage system. This area will be planted with native species to maximise wildlife habitat.
- 3.32 Along the northern extent of the hardstanding servicing the aggregates depot, an infiltration swale will be installed, providing drainage for the aggregates depot. Each of the proposed buildings will also drain into the main drainage network.

Fencing

- 3.33 As a result of the consolidation of operations and the physical dividing of the site into 2 distinct areas, new fencing will need to be erected to supplement and/or replace existing fencing.
- 3.34 On the whole, the existing perimeter fencing will be retained and simply replaced/repaired where necessary. An internal fencing surplus to requirement, where appropriate, will be removed, creating 2 distinct site areas.
- 3.35 The proposed additional areas of fencing will likely comprise just the perimeter of the IGas compound and new fencing and a gateway at the northeast corner of the aggregates depot, providing secure access. Given the removal of existing surplus fencing, particularly around the IGas compound, will mean the overall amount of fencing present at the site is unlikely to change significantly.

- 3.36 New and replacement fencing will match the existing 2.5m high fencing which currently surrounds and crosses through the site. For completeness, it is considered that a condition can be attached to any consent, requiring confirmation of the exact location of removed, replaced and additional fencing, together with details of the colour and appearance.

4.0 Planning Policy Context

- 4.1 This section considers the most relevant planning policies and legislative framework, which together provide the context against which this planning application will be considered. It identifies those national, regional and local policies which are contained within statements of Government policy or the development plan for the area, or which otherwise may be material to the consideration of the proposed development.
- 4.2 Planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) and Ministerial Statements are material considerations which the Courts have held are material considerations that should be taken into account in reaching such decisions.

National Policy

National Planning Policy Framework (July 2021)

- 4.3 The NPPF sets out the overarching purpose of the planning system which is to contribute to the achievement of sustainable development. This can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs and includes securing economic growth, social progress and environmental protection and enhancement.
- 4.4 The NPPF sets out the need for the planning system to plan positively for development and growth and sets out a presumption in favour of development in paragraph 11.
- 4.5 Paragraph 20 of the NPPF, in relation to plan making, states that plans should make sufficient provision for development, including the provision of minerals and energy resources.
- 4.6 Paragraph 38 advises planning authorities to approach decision making in a positive and creative way, approving applications for sustainable development wherever possible. Paragraph 40 encourages pre-application discussions in achieving development that can be supported. Paragraphs 47-50 set out the approach to decision making that should be adopted.
- 4.7 Paragraph 81 advises that the planning system should help create the conditions in which businesses can invest, expand and adapt and that significant weight should be placed on the need to support economic growth and productivity.
- 4.8 A consideration of ground conditions and pollution is also required and the site must be suitable for its proposed use.

- 4.9 Section 17 promotes the sustainable use of minerals and key to this is paragraph 209 which seeks to ensure that there is a sufficient supply of such minerals. The NPPF states that “*it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs*”.

National Planning Practice Guidance

- 4.10 The NPPG includes a number of paragraphs which are relevant to the application proposals, including the safeguarding of transport sites and the environmental considerations associated with mineral workings (noise, dust etc).

Energy Security Strategy (April 2022)

- 4.11 The new Strategy was published on 7th April, setting out the Governments ambitions for a more secure, home grown energy network, reducing reliance on imported resources, reducing costs and ultimately achieving carbon neutrality.
- 4.12 A key to the Strategy is reducing our dependence on imported oil and gas and given a continued reliance on both these energy sources, the best and most secure way to meet this demand is by sourcing domestically. As made clear in the introduction to the Strategy: ‘*Net zero is a smooth transition, not an immediate extinction, for oil and gas*’.
- 4.13 In relation to oil and gas, the Strategy confirms the importance of the North Sea reserves in securing security of domestic supply. The same is also true of domestic onshore oil and gas facilities, playing a key role in energy security and domestic supply.

The Development Plan

- 4.14 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, all planning decisions must be made with reference to the statutory Development Plan first, and all decisions must accord with the provisions of the plan, unless other material considerations indicate otherwise.
- 4.15 The relevant local planning policy framework is made up of Saved policies contained within the Hampshire Minerals & Waste Plan (2013) and the East Hampshire Joint Core Strategy (2014).
- 4.16 Whilst not lying within the boundaries of the National Park, there are a number of policies of relevance included within the South Downs National Park Local Plan (2019) relating to the developments potential impact on the National Park (which sits 1.5km away) and its setting. The 2020 ‘Monitoring Report for Minerals and Waste in Hampshire’ and 2021 ‘Local Aggregates Assessment’, both produced by HCC, are also of relevance.

4.17 Whilst dating back to 2013, a review by Hampshire in 2018 found their Minerals and Waste Plan to be robust and therefore not requiring update.

4.18 The HCC Council Report of the Executive Member for Environment and Transport, dated 29th November 2018, confirmed that:

'The review of the Plan concluded that the 34 policies enable the development Hampshire requires, supported by a suite of management development policies that protect Hampshire's residents and environment...'

4.19 The 2018 Review of the Hampshire Minerals and Waste Plan found that policy 1 (Sustainable Minerals and Waste Development) could be identified as 'Green' on the RAG (Red, Amber, Green) scale, confirming that monitoring of this policy and its outcomes showed no issues.

4.20 A further review was however undertaken in 2020, again finding that the Plan had been performing well, but that there were certain areas where compliance with the NPPF was not at its fullest and therefore a partial update is required.

4.21 To support this partial update, an assessment of minerals and waste site options is required to confirm that suitable sites for minerals and waste development are included in the Plan. To this end, a call for sites exercise was undertaken in April, May and June 2021, encouraging landowners to submit their sites for consideration for a variety of mineral and waste related uses.

4.22 As part of this process, the proposal site was submitted to HCC, for consideration of its appropriateness for a range of economic uses, following consolidation of the IGas use. The site is currently safeguarded for oil and gas uses, however the extant oil and gas consents at the site are due to expire in 2025, therefore this safeguarded status would lapse.

4.23 As such, whilst the 2013 HWMP is undergoing partial review, the early stage of this review means that the 2013 version still remains a key constituent of the Development Plan for the site.

4.24 East Hampshire are also in the process of replacing their Joint Core Strategy document, having held 2 consultation events on their emerging new Local Plan, however as with the HMWP, whilst the emerging plan will carry increasing weight, the 2014 Core Strategy is still the key policy document of relevance at the local level.

East Hampshire Joint Core Strategy (2014).

4.25 The East Hampshire Joint Core Strategy (EHJCS) does not include policies relating to mineral extraction, however sets out a presumption in favour of sustainable development at policy CP1.

- 4.26 Policy CP2 sets out the spatial strategy for development within the district, directing development to the most sustainable and accessible locations, supporting both residential and economic growth, supported by necessary infrastructure. The policy goes on to state that new development will make the best use of previously developed land and buildings within existing built-up areas.
- 4.27 Chapter 5 covers Sustainable Economic Development and sets out the key role economic development has to play in sustainability. At paragraph 5.6 it sets out that one of the key aims of sustainable economic development is to:

'create a local framework for business success and investment, to include: employment land provision, premises, electronic communications infrastructure, efficient transport and skills'.

- 4.28 Policy CP3 concerns new employment provision and seeks 21.5ha of additional employment land to 2028. Policy CP5 supports development which provide employment and improve workforce skills.
- 4.29 Policy CP19 concerns development in the Countryside, seeking restraint, but confirming that development of genuine and proven need in a countryside setting, will be permitted.
- 4.30 Policy CP20 concerns the landscape and seeks to protect the special characteristics of the districts natural environment. This includes the conservation and enhancement of natural beauty, protection of local distinctiveness, incorporation of new planting where necessary and protection of green networks.
- 4.31 Policy CP27 concerns pollution and states that development must not result in pollution which prejudices the health and safety of communities and their environments.
- 4.32 Policy CP31 concerns transport and seeks to ensure that transport arising from development does not negatively impact on the safe and efficient operation of the strategic and local road network.

East Hampshire Draft Local Plan

- 4.33 Whilst at a fairly early stage in its production, consultation has occurred on the new draft and it will carry increasing weight in decision making, going forward.
- 4.34 Policy S1 directs employment development to the main settlements and locally significant employment sites and seeks the provision of an additional 50ha of employment land between 2017 and 2036.
- 4.35 Policy S13 concerns 'Planning for Economic Development', seeking 'sustainable employment development patterns, business competitiveness, and flexibility to cater for the changing needs of the economy'.

- 4.36 The policy context is supportive of focusing development on brownfield land, with good accessibility, particularly those areas within or linked to urban areas.

Hampshire Minerals & Waste Plan (2013)

- 4.37 The Hampshire Minerals & Waste Plan (HMWP) adopted in October 2013, sets out the County Council's vision, objectives and strategy for mineral and waste land-use planning in Hampshire, and provides the extant policy framework for determining mineral planning applications.
- 4.38 As detailed above, the site is allocated as a Safeguarded Site (Ref: EH133) for oil and gas operations in accordance with the online policies map. This is indicated on the following extract:



Source: Hants.gov.uk (2021)

- 4.39 Policy 1 (Sustainable minerals and waste development) of the adopted plan sets out a presumption in favour of sustainable development and indicates that minerals development that accords with policies in the HMWP will be approved without delay, unless material considerations indicate otherwise. It is noted that the principle of oil and gas development has already been established via previous planning consents.
- 4.40 Policy 3 seeks to protect habitats and species and minerals and waste development, where possible, should enhance, restore or create designated or important habitats and species.
- 4.41 Policy 9 (Restoration of Minerals and Waste Developments) requires that mineral developments are restored to beneficial after uses in keeping with the character and setting of the local area and in line with the requirements of the development plan.

- 4.42 Policy 10 (Protection of Public Health, Safety and Amenity) requires that minerals and waste development does not cause adverse public health and safety impacts and should not result in any increase in noise, ecological impact, visual impact or vehicle movements as a product of the development.
- 4.43 Policy 12 concerns traffic management and requires that development sites have suitable access to the highways network.
- 4.44 Policy 13 requires that minerals and waste developments are of a high quality in terms of their design and contribution towards sustainable development.
- 4.45 Policy 16 refers to safeguarding minerals infrastructure and seeks to protect minerals sites with temporary permissions for minerals supply activities for the life of the permission.
- 4.46 Policy 17 refers to aggregate supply and states that an adequate and steady supply of aggregates until 2030 will be provided for Hampshire and surrounding areas from local sand and gravel sites at a rate of 1.56mtpa, of which 0.28mtpa will be soft sand. Policy 18 encourages secondary and recycled aggregates development.
- 4.47 Policy 19 protects and encourages the maximisation of existing aggregates wharfs and rail depots, including their extension where appropriate. The key requirement for such sites is that they have connections to both the road and rail (or water) networks.
- 4.48 Policy 24 concerns oil and gas development, supporting such proposals, subject to environmental and amenity considerations.
- 4.49 Policy 34 identifies potential mineral and waste rail depot infrastructure. Whilst the application site is not safeguarded as a rail depot as such, policy 34 does safeguard *'existing and former railway siding and other land that could be rail linked'*.

South Downs National Park Local Plan (2019)

- 4.50 Whilst lying outside of the South Downs National Park, the pre application response identified a number of policies within the SDNP Local Plan which were considered relevant.
- 4.51 Policy SD4 concerns Landscape Character, requiring that proposals conserve and are informed by landscape character. In this case, the setting of the National Park.
- 4.52 Policy SD6 relates to SD4 and concerns Safeguarding Views. It requires that development conserves and enhances key views to preserve the visual integrity of the National Park. This also requires a consideration of cumulative impacts.

- 4.53 Policy SD7 relates to Relative Tranquillity, requiring an assessment of the tranquillity of the area and any impacts that the development has the potential to make on both visual and aural tranquillity.
- 4.54 Policy SD8 concerns Dark Night Skies, requiring development to reduce light pollution, either through avoiding light installation altogether, or ensuring that such lighting is designed to avoid light spill.

Local Aggregate Assessment (2021)

- 4.55 Whilst the LLA predominantly assesses reserves of aggregates and performance against the 7 year landbank target, it does make reference to the 3 aggregate rail depots within the county, namely Botley, Eastleigh and Fareham. Whilst levels of aggregates handed through these facilities have remained fairly steady in recent years, the report does state that: *'...Should future demand increase, the issue lies with the capacity of the rail depots to manage a higher level of imports...'*
- 4.56 Section 7 of the report then goes on to detail the significant growth in housing earmarked for the area, as well as a significant number of infrastructure projects and thus the subsequent likely increase in demand for aggregates.
- 4.57 It is suggested that demand for aggregates will move from land won aggregates, to marine won aggregates, going on to state that *'...it will be vital to ensure that the capacity of wharves and rail depots in Hampshire is able to keep pace with sales...'*

Minerals and Waste in Hampshire Monitoring Report 2020 (2022)

- 4.58 The monitoring report is divided into 3 sections:
- Progress with the Minerals and Waste Development Scheme (MWDS) - the timetable;
 - Monitoring policy performance (monitoring the policies from the HMWP); and
 - Monitoring outcomes and identifying relevant actions (the issues identified and the actions to be taken).
- 4.59 The document identifies, in its review against policy 19, that rail depot capacity has reduced by more than 130,000 tonnes per annum.

5.0 Planning Considerations

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that, if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan, unless material considerations indicate otherwise.

5.2 This section of the statement assesses the key issues relevant to the proposals as submitted and the extent to which the scheme complies with planning policy and legislative requirements. It is split into the following headings:

- Principle of Development
- Amenity and Design
- Air Quality and Climate Change
- Flood Risk and Drainage
- Landscape and Visual Impact
- Noise
- Ecology and Trees
- Lighting
- Contamination
- Highways
- Heritage

Principle of Development

5.3 The site is currently safeguarded for oil and gas development and as such, the sites use for oil and gas storage and handling has already been well established, is supported by policy and therefore the proposed retained IGas portion of the site is considered acceptable.

5.4 The key matter to consider is therefore the physical layout of the IGas retained area, including the acceptability of new structures and plant, and the provision of the additional aggregates handling and storage use at the site. It is important to note that the safeguarded nature of the site lapses in September 2025 when the current temporary consent expires, opening up opportunities for

alternative uses which can best make use of the accessible location on the major road network and served by a dedicated rail siding.

- 5.5 The rail terminal nature of the site is a key consideration and there is a significant need to safeguard it for appropriate development which can benefit from the direct and sustainable transportation offered by this facility. This desire is echoed by Hampshire, who, through their policy context and recent call for sites exercise, seek to retain and maximise capacity at rail terminals and other such sites. As detailed above, this is also supported by Network Rail, who are keen to retain, upgrade and extend the existing sidings at the site. It is clearly accepted and encouraged that use of the site should continue and be optimised. Restoration back to agricultural land/woodland, as required by the current temporary consent, would be a missed opportunity and would sterilise one of the counties few railheads.
- 5.6 IGas no longer require the full extent of the site to carry out their oil and gas operations, which at present amount to storage of small volumes of oil and partial occupation of the office facility, thus the majority of the site is underutilised and is operating inefficiently. It is therefore proposed to incorporate additional uses to allow for more efficient and productive use of this previously developed and highly accessible brownfield site and allow for additional employment opportunities provided through the aggregates operations. Given the above, it is considered that the principle of this is accepted.
- 5.7 This strategy is supported by the NPPF, with paragraph 85 stating that the use of previously developed land should be encouraged where suitable opportunities exist. Similarly, Policy 5 of the HMWP and Policy CP2 of the EHJCS confirm support for development which provides a suitable reuse of previously developed land. As per consideration of the neighbouring Veolia scheme, the site should not be considered as within the open countryside, given its previously developed form.
- 5.8 Given the importance of its accessibility, it is envisaged that the site will continue to be safeguarded as a rail depot, retaining the oil infrastructure needed to sustain a viable operation, but also opening up to the alternative use hereby proposed, which would benefit from the rail import/export terminal, especially given the potential future proposal to extend the sidings to increase freight capacity.
- 5.9 Policy 17 of the HMWP emphasises the need to provide an adequate and steady supply of aggregates for Hampshire and the surrounding areas, including local sand and gravel as well as alternative sources of aggregates, including 1 mtpa of limestone delivered by rail. It therefore follows that sites to receive, store and transport such material are also required. This is further demonstrated through the council's recent call for sites exercise.

- 5.10 Policy 20 sets out the scenarios where new aggregates sites outside of areas listed within the policy would be supported. This includes situations whereby the development is part of a proposal for another beneficial use. In the case of the application site, we consider this point to apply given that the site would contain both oil facilities and aggregates uses.
- 5.11 The aforementioned call for sites exercise sought nominations for sites which could host a variety of activities including aggregate recycling and secondary aggregate processing facilities. The Holybourne Rail Terminal site was subsequently put forward, highlighting the fact that whilst it is safeguarded for oil and gas development, the current consents are temporary and will lapse in September 2025, also meaning the safeguarded nature of the site will lapse. Whilst this application does not specifically include for aggregates recycling and processing, it could be that such operations will be the subject of future applications once an operator is in place.
- 5.12 Whilst the HMWP does not contain any policies which relate specifically to employment provision, paragraph 4.38 of the supporting text highlights the importance of managing minerals and waste development to support employment and provision of services in rural areas. The surplus nature of much of the existing site means that employment associated with the current activities is minimal. The proposed aggregates use will provide significant new employment to the site, both direct and indirect.
- 5.13 The January 2014 'Aggregate wharves and rail depots in Hampshire' document sets out the importance of such facilities, stating that rail depots:
- '...allow aggregates that cannot usually be sourced from within Hampshire to be imported from other locations where they naturally occur. This infrastructure also allows for the more sustainable delivery of minerals that would otherwise be transported on the highways'.*
- 5.14 The document also identified that the existing rail depots are all located towards the south of the county, at Fareham, Botley and Eastleigh and therefore that there was opportunity to develop depots elsewhere.
- 5.15 In addition to the identified 'rail depots' as set out above, Policy 34 of the HMWLP also confirms that existing and former railway sidings are safeguarded.
- 5.16 To conclude, it is suggested that there is strong policy support for the retention of sites which form part of a rail terminal, there is support for employment generating development in accessible locations and there is demand and support for aggregates related sites, especially with access to sustainable means of transport.

- 5.17 This, combined with the fact that the current oil and gas safeguarding at the site is due to lapse, indicates that the proposed range of uses now tabled are acceptable and in line with the relevant policy context.

Amenity and Design

- 5.18 Policy 10 of the HMWP seeks to protect the health and safety and amenity of existing, surrounding occupiers. The site is located a substantial distance from surrounding residential areas, the closest being approximately 130m to the west and located on the other side of the A31. There are also a significant number of mature trees screening the site and residential areas from the A31, creating a substantial buffer between the site and any sensitive uses.
- 5.19 Built development on site will be fairly minimal, comprising single storey office units and oil/water tanks to serve the retained IGas land, and metal clad industrial buildings serving the aggregates use. These will be below the height of the 2 central oil storage tanks and only slightly taller than the tanker loading bays at the SE corner and by virtue of this, well below the tree line.
- 5.20 In addition to the tree belt as mentioned above, there is a significant embankment running along the northern boundary of the site, up to the A31, which means that the ground level of the site is well below the level of the road and surrounding settlements, as clearly demonstrated in the submitted sectional drawings. This will further eliminate any views of structures or activities on the proposal site from the surrounding land or residential areas.
- 5.21 The existing and proposed sections also demonstrate the height of existing structures against the height of those now proposed. It is clear from these that at the centre of the site, where the existing oil tanks are located, built development will be significantly reduced. This is key, given that this is the only realistically visible part of the site when viewed from the south.
- 5.22 The sections also show that the 2 larger buildings on the aggregates site are located up against areas of bunding and/or significant tree screening and that the existing bunds are retained, with retained trees extending well above the proposed roof heights. The sections also demonstrate that the roof line of the 2 larger proposed new buildings will only be marginally above the level of the A31.
- 5.23 The buildings themselves will be of simple industrial appearance, serving their industrial/storage purpose. Notwithstanding the natural screening to be retained, the simple design and materiality of these buildings will enable them to blend into their surroundings. The buildings can also be finished in a range of colours, as necessary.

- 5.24 The principle of the broader industrial use of the site is already established through current consents for oil handling and storage and vehicle movements associated with these operations. Environmental reports demonstrate that the environmental impact of the proposals would be no worse than those already consented and historically in operation at the site and in many cases, environmental impacts will be reduced.

Air Quality and Climate Change

- 5.25 Air Pollution Services have provided an Air Quality Assessment/Dust Report and a Greenhouse Gas Assessment to accompany the application. In terms of air quality, the main concerns relate to the dust soiling and human health effects arising from aggregates handling and the associated potential for dust emissions.
- 5.26 An air quality screening exercise was undertaken as part of the process which screened out various impacts, given the size, location and nature of the proposed facility, including impacts of road traffic on human health and ecological sites and impact of dust on ecological sites.
- 5.27 Given the existing nature of the oil facility and fact that there will be no emissions from this part of the site, the impacts of this element are not considered. The report confirms that the site is not within an Air Quality Management Area.
- 5.28 The Air Quality Baseline was established by considering and reviewing information on existing air quality as collected by the Local Authority and other networks, nearby industrial and waste management operations, background concentrations of PM10 and PM2.5 from national pollution maps and predicted roadside concentrations of PM10 and PM2.5.
- 5.29 The impact assessment considered the source-pathway-receptor model to assess whether adverse impacts were likely to occur at nearby residential or employment properties. Meteorological conditions were also taken into account, utilising the last 5 years of records to establish prevailing wind speeds and direction. The closest receptor to the proposals site was identified as being 115m away, to the west, on the other side of the A31.
- 5.30 12 separate receptors were identified around the site and in all cases, the 'Pathway Effectiveness' was considered to be ineffective.
- 5.31 In terms of dust impact, the assessment concluded that the impact on the local area would be 'not significant' and that:
- The Proposed Facility will result in Negligible Effects for both dust soiling and human health effects, following the IAQM's mineral dust guidance.

- The process contributions of PM10 from the Proposed Facility will result in Negligible impacts, following the EPUK/IAQM guidance.
- 5.32 Notwithstanding the minimal impacts, a Dust Management Plan is provided for the facility, as best practice.
- 5.33 In terms of Green House Gas (GHG), the supporting report sets out the 5 IEMA steps to achieve direct GHG mitigation. The key points associated with the proposed development, in line with these steps, are use of the railway to reduce HGV travel distances, the use of existing brownfield land, retention of vegetation, use of simple structures/construction materials and an overall efficient site design.
- 5.34 The Assessment identifies the potential for each stage of the development to release GHG's, comprising demolition and construction, operation and decommissioning. During these phases, there is the potential for the release of carbon dioxide and nitrogen oxide and these are the primary GHG's of concern.
- 5.35 The report assesses the baseline conditions, informed by the UK 5 year carbon budget periods, as well as the extant and historic operations ongoing at the site, including locomotive and HGV transport. The proposed facility is assessed as contributing less than 0.01% of the local, regional and national carbon budget. As such, the contribution from the facility to GHG is considered to be de minimis and the magnitude of impact will be negligible.

Flood Risk and Drainage

- 5.36 The application is supported by a Flood Risk Assessment and SUDs report, produced by Lyons O'Neill, which identifies that the site lies within flood zone 1 and therefore has a low probability of flooding, with site levels lying between approximately 97 and 101m AOD.
- 5.37 In terms of their vulnerability classification, the industrial type uses proposes and associated buildings fall within the 'Less Vulnerable' category and as such, that the site is appropriate for the type of development proposed.
- 5.38 Given the low flood risk rating, there is no need to satisfy the sequential test, which is passed by default.
- 5.39 The surface water drainage strategy has been developed taking into account climate change allowances, in this case accounting for an increase of 25% and a 40% climate change assessment considered to provide a buffer.

5.40 The EHDC confirms that there is no recorded flooding from river, coastal, tidal, drainage or unknown sources, at the site. The nearest river is the River Wey, approximately 150m to the south of the site at its nearest point, however the flood risk map and correspondence with the EA confirms that the risk of flooding from the river is 'very low'. There is also no risk of tidal flooding from the sea.

5.41 The EHDC SFRA and the EA both confirm that the risk from surface water flooding is low. Whilst parts of the Authority area are at risk from groundwater flooding, given the permeable nature of its geology, flood maps demonstrate that these areas of risk do not impact on the application site.

5.42 The risk of flooding from sewers and 'artificial sources' such as reservoirs, is also confirmed to be low.

5.43 The report goes on to investigate existing drainage systems at the site, informed by a June 2022 utility and drainage survey. This confirms that:

'The site is currently discharging via an existing surface water systems into a concrete sump which has 3no. compartments. The final compartment contains the water and discharges to the River Wey via pumps'.

5.44 The document confirms that as the sites proposed surface water discharge strategy is via infiltration, greenfield runoff rates are not applicable. Infiltration into the ground is identified as being top of the drainage hierarchy for surface run off. A BGS report confirmed that the site is likely to be free draining with a high permeability range, therefore infiltration is likely to be feasible.

5.45 Various SUDs options have been investigated, including rainwater harvesting, green roofs, soakaways, attenuation ponds, swales and permeable paving. Of these options, the most feasible for this site are rainwater harvesting, soakaways, swales and filter drains and permeable paving. For parts of the site, groundwater is estimated to be between 3 and 5 metres below the surface.

5.46 The proposed surface water drainage strategy is confirmed as follows:

The retained IGas operation site (approx. 0.63ha) will reuse existing pipe runs to discharge surface water and foul water runoff. The existing concrete sump will be replaced with a new rainwater capturing system which will discharge into River Wey via the existing pump outlet.

It is proposed that the remainder of the site will be developed as an aggregate 'open' bay storage area and storage buildings. The storage buildings will have a series of new rainwater downpipes to collect surface water runoff. The runoff will be discharged via a new below ground drainage pipe system.

Above ground natural based SuDS features including infiltration swale, and raingarden are proposed to improve the overall sustainability of the scheme. Further detailed SuDS features design will be carried out during the detail design stage.

An infiltration rate of $1 \times 10^{-5} \text{m/s}$ is used in developing the surface water drainage strategy. Further site investigation and BRE infiltration tests need to be carried out to confirm site ground conditions.

- 5.47 In order to provide mitigation against pollution, on a site identified as having the potential for a high pollution hazard level, the swale and raingarden will ensure proprietary treatment to ensure that the SUDs component mitigation is greater than the pollution hazard.

Landscape and Visual Impact

- 5.48 The application is supported by a detailed landscaping masterplan, the details of which are set out above in section 3, and also a Landscape and Visual Appraisal (LVA), both produced by Lizard Landscape Design and Ecology.
- 5.49 The Appraisal confirms that the character of the commercial area of the site bears no relationship with the character and historic core of Holybourne to the west, or rural nature of the landscape surrounding the River Wey. It goes on to reference the benefits afforded to the site from the dense boundary tree screening and changes in levels, confirming that at present, only the top of the oil storage tanks is currently visible from the south. no views are afforded from the north, either from the A31, or from public rights of way running to the north of the A31.
- 5.50 Replacement of these 12m high tanks with 5m open storage bays at the centre of the site is considered to be an improvement in views from the south.
- 5.51 The location of the proposed depot building, at the SE corner of the site, means it would be barely perceptible behind existing (and strengthened) vegetation screening and a retained bund area, resulting in an overall positive impact on the landscape of the river corridor to the south.
- 5.52 The report features a selection of key viewpoints in and around the site, confirming the characteristics of the landscape and significant areas of tree cover from all angles.
- 5.53 The report goes on to identify the various landscape character areas which cover the site and surrounding area, at the national, county-wide and district level. in accordance with the 2012 HCC study, the entire Study Area is located within the Landscape Character Area 3F: Wey Valley.

- 5.54 The various landscape constraints are identified, followed by the proposed mitigation and enhancement measures, including new native tree planting, wildlife pond, 'gapping up', wildflower areas and SUDs features.
- 5.55 The report concludes, in terms of the landscape character appraisal, that the development scheme would have a 'moderate beneficial' effect upon the surrounding river corridor to the south of the site area in the southern rural arable landscape.
- 5.56 In terms of the visual appraisal, the report confirms that there is no visibility into the site from the north and is limited to very glimpsed views of the top of the existing oil tanks within the southern central section of the site area viewed from Binsted Road and Mill Court Lane and the public right of way running between the two to the south within the southern rural riparian landscape.
- 5.57 It also states that the height of the structures shall be reduced and the perception of the commercial equipment and operation within the site shall be reduced and predominantly eliminated in perception from the surrounding landscape. The visual appraisal therefore also considers the development to have a 'moderate beneficial' effect.

Noise

- 5.58 A supporting Noise Impact Assessment has been undertaken by MZA Acoustics and is submitted as part of this application.
- 5.59 The Assessment identifies 4 sensitive receptors in the vicinity of the site, upon which the assessment has been based. These comprise Holybourne Village (275m to the west), Hill Farm and Hawbridge Farm (350m to the south), Bonhams Farm (345m to the north) and properties at Mill Court (940m to the east). In all cases, these sensitive receptors lie on the opposite side of the A31 or railway line, from the application site.
- 5.60 Noise monitoring was undertaken over a 2 day period in various locations in proximity to the sensitive receptors, in order to establish the background noise levels. weather conditions were dry with minimal wind, therefore conducive to accurately measuring background noise levels. The following extract indicates the measurement positions and replicates those agreed as part of the neighbouring application at the Veolia site.



- 5.61 As to be expected, the dominant noise in all locations was vehicle noise from the A31. Bird song and noise from trains and the Veolia operations was also audible. At Mill Court, the river contributed significantly to audible night time noise.
- 5.62 A 3D noise model was created using the background noise recording and inputting noise source data from other similar operations to that now proposed, including HGV movements and activity.
- 5.63 The noise assessment is undertaken on a worst case scenario, assuming arrival and unloading of trains during the night time, when the rail line is quieter. It also assumes that train engines will be left idling whilst unloading. Given the flexibility of the operations, as a worst case scenario, peak plant activity is considered to happen at any time of the day and night, although of course in reality, will not occur 24/7.
- 5.64 The Assessment sets out the background sound levels for each sensitive receptor, during both day and night times. It then goes on to detail the predicted operating noise levels at each receptor, generally in the region of 19/20dB at 3 of the receptors and at just 10dB at Mill Court. A 3dB intermittency value is added to account for potentially audible HGV movements. In all cases, the predicted operational noise level is considerably lower than the background noise levels at the various sensitive receptors, as follows:
- Bonhams Farmhouse: -29dB (day) and -7dB (night)
 - Mill Court: -26dB (day) and -19dB (night)
 - Hill Farm and Hawbridge Farm: -16dB (day) and -10dB (night)

- Holybourne Village: -18dB (day) and -3dB (night)
- 5.65 As above, these figures assume the worst case, with all activities operating simultaneously and at full intensity during the day and night. As such, during both the daytime and night time, operations from the proposal site are likely to be inaudible and will have a low impact. No further mitigation is deemed necessary.
- 5.66 In terms of train idling, again this is considered on a worst case basis, with a diesel train idling on the sidings throughout the entire 8 hour night time period. In order to meet internal noise levels at the sensitive receptors, noise from locomotives should not exceed 45dB. The estimated sound from locomotives, at the sensitive receptors, is estimated to be between 32dB and 43dB, this all meeting the target external noise level and criteria for night time sleeping. As such, no mitigation is required.
- 5.67 In terms of mitigation, the report states that the level of noise predicted at all receptors is sufficiently low enough to achieve a predicted low impact according to BS 4142. Additional mitigation is therefore not required.
- 5.68 It does however then go on to set out general good practice and management policies which will be employed by the operator, including:
- Limiting idling of vehicles within the yard;
 - Limiting unnecessary manoeuvring of vehicles, especially overnight;
 - The use of broadband reversing alarms, not tonal alarms on all mobile plant;
 - Utilise turning circles to avoid need for reverse warning alarms;
 - Avoidance of activities during the quietest night-time periods where logistically possible.

Ecology and Trees

- 5.69 Lizard Landscape Design and Ecology have undertaken an Ecological Impact Assessment to support the application, informed by a site visit undertaken in April 2022 and a Preliminary Ecological Appraisal (PEA) undertaken in February 2022. A bat emergence survey was also undertaken, but no suitable habitat was found and no further surveys are needed.
- 5.70 The bat assessment included an internal and external assessment of all buildings and trees within the site. A badger walkover survey was also undertaken, covering the site and immediate surroundings. These therefore lie within the 'zone of influence' of the site.

- 5.71 Protected sites, comprising Local Nature Reserve, National Nature Reserve and SSSI were identified within 2km of the site, whilst SAC, SPA and Ramsar sites were identified within 10km of the site.
- 5.72 It was however noted that, considering the sites location within the Impact Risk Zone of Wealden Heaths Phase II SPA, and East Hampshire Hangers SAC sites, the development proposals do not meet the criteria which would require consultation with Natural England.
- 5.73 In terms of designated sites, it was concluded that the site is neither located within nor adjacent to any Non-Statutory Designated Site. The intervening distance and discrepancy between habitats suggest that the development proposals would not have an adverse effect upon any of the above sites.
- 5.74 On-site habitat was identified as comprising neutral grassland, recently felled woodland, broadleaf woodland, modified grassland and a line of trees along the southern bund. The neutral grassland had a low sward length, is considered to be in 'low' condition and is of site value only.
- 5.75 The recently felled woodland comprised a number of trees previously planted to screen the A31 and again were considered to be a habitat of site value only. The retained woodland along the A31 is considered to be of local value.
- 5.76 Modified grassland growing on the bund at the eastern and southern boundary was kept very short and was considered to be of site value only. Likewise the trees growing from the same bund were considered to be of site value only.
- 5.77 In terms of protected species, the assessment found that the site was of negligible value to GCN, given the lack of ponds and the physical barrier of the A31. Reptile habitat is considered to be of site value and the only potentially suitable areas are to be retained.
- 5.78 The buildings on site were all considered to have negligible potential to support roosting bats, whilst 2 trees were considered to have moderate potential. The retained broadleaf woodland is considered to support foraging bats and it considered to be of local importance to the bat community. This area of woodland is being retained.
- 5.79 Whilst records of dormouse had historically been found, the site was considered to have a low habitat suitability, considered to be of site value only. No evidence of badgers was noted on site, which is considered to be of site value for foraging and commuting badgers only. The site is of negligible value to water vole.
- 5.80 The woodland around the site is considered to be of site value to breeding and nesting birds and will be retained as such. Similarly, the site is likely to support a range of invertebrates.

5.81 The Assessment of Effects section scopes out protected species for which the site offers negligible suitability. Where neutral grassland and bare ground habitat is lost, this loss is considered to be negligible. To mitigate against this, construction and demolition works will be undertaken in accordance with best practise. The Assessment concludes that provided mitigation and protection measures are followed, no priority or other important habitats or plant species will be affected by this development, the impact of which is not significant.

5.82 Whilst impact on habitats and protected species is concluded as being negligible in most cases, the following mitigation will be incorporation:

- Capping of trenches/foundations or provision of ramps, to ensure no entry by reptiles or badgers
- Checking of trenches on a daily basis
- Lighting designed to avoid light spill onto ecologically sensitive areas
- Enhancement of retained woodland to provide suitable dormouse habitat

5.83 The Assessment goes on to set out a list of ecological enhancements, to mitigate against potential habitat loss and provide a net gain in terms of biodiversity, as follows:

- The planting of native hazel, goat willow and honeysuckle within the remaining broadleaved woodland to enhance the habitat and its connectivity for dormice;
- The seeding of the bund to the south and east of the site with a neutral grassland wildflower and shade tolerant wildflower mixes;
- The seeding of retained neutral grassland with an appropriate native wildflower mix;
- The creation of raingarden areas to be planted with native species;
- Soft landscaping to use native flowering shrubs;
- Seeding of the tree understorey along the woodland boundary with a suitable shade-tolerant wildflower mix;
- Installation of bat boxes to the southern aspect of surrounding mature trees;
- Installation of bird boxes to the north-eastern aspect of surrounding mature trees
- The use of pale and night-scented species to increase bat foraging potential.

- 5.84 The Assessment concludes that every effort has been made within the proposals to include the maximum area of ecological enhancements possible within the scope of the project. These areas are also to be populated with species which provide the greatest support for native wildlife. Any overall loss of biodiversity from the proposed development is to be compensated for through an appropriate off-site compensation scheme.
- 5.85 Once avoidance, mitigation and compensation measures have been taken into account, it is established that the impacts of the planned development upon biodiversity are likely to be negligible and non-significant.
- 5.86 With regard to trees, the application is supported by a Tree Constraints Plan, a Tree Retention Plan, an Arboricultural Impact Assessment and an Existing Tree Schedule.
- 5.87 The AIA identifies the woodland along the northern boundary of the site as most likely the result of screen planting from the construction of the A31. It also confirms that the primary focus of the report was on those high value trees closest to the construction area, along the northern boundary and at the southeast corner.
- 5.88 The report identifies risk to trees through removal, harm to root protection areas and pressure to prune or remove post-development. It goes on to confirm however that all trees on site are to be retained and that these trees shall be protected using tree protection barriers during construction. Construction works, as set out in the application plans, are all proposed outside of the root protection zones.
- 5.89 Where development is close to the RPA or trees, this is only in locations where there is existing development and hardstanding, such as the proposed new oil tank within the retained IGas facility. The tank will sit within its own bunded area, within an existing area of hardstanding, therefore poses no risk to the health of this tree or its RPA.
- 5.90 It is also concluded that the proposals would not significantly alter the need for future surgery works, which would focus on removal of any hazardous trees/limbs, maintaining access to the site and potentially thinning for the benefit of the woodland.
- 5.91 Through site management and optimisation of operations at the site, a number of landscaping trees were removed and their removal will be mitigated through the enhancement of the remaining woodland and understory planting of hazel, honeysuckle and goat willow.
- 5.92 The Arboricultural Method Statement contained within the AIA requires the contractor to exercise due care when working in the vicinity of trees, including the installation of tree protection barriers in the form of 2m high Heras fencing.

- 5.93 Any contractor compounds, stockpiles, vehicle movements, chemicals, fires or excavation shall occur entirely outside the RPA and fenced off areas.

Lighting

- 5.94 Designs for Lighting (DFL) have provided a lighting plan and supporting Technical Report, setting out the location, type and justification for lighting installations at the site.
- 5.95 The layout proposes lighting around the open fronted aggregates storage building, the central open storage bays, the warehouse entrance, the site office and the car parking area. 3 different types of luminaire are proposed around the site, with differing lux levels depending on the area of activity they are illuminating.
- 5.96 The strategy sets out a minimally obtrusive, whilst standard-compliant, approach to lighting. Whilst lighting is necessary for safety, security and amenity, the proposals ensure a sensitive relationship with the local environment and human receptors.
- 5.97 The site is identified as within an E1 'Environmental Zone' and suffering from relatively low levels of 'night blight' from artificial lighting. The report identifies that the site: *'falls within the designation of 'Intrinsically Dark Brightness' and 'Relatively uninhabited rural areas, National Parks, Areas of Outstanding Natural Beauty etc'.*
- 5.98 Three potentially sensitive receptors are identified from an ecological perspective (the SDNP, the River Wey and a sensitive boundary area) whilst two are identified from a human safety perspective (the railway line and the A31).
- 5.99 The assessment of lighting sets out the worst case scenario, by not accounting for topographical or screening features in the landscape and also assuming that all lighting will be turned on simultaneously. Therefore in reality, light spill will be significantly reduced from the worst case position, given the presence of significant boundary screening.
- 5.100 The lighting proposed across the site ensures that light is only directed to where it is needed and utilises the minimal lighting levels necessary and that minimal lighting leaves the site. The report concludes that:
- 'It is unlikely that the Proposed Development will negatively impact the identified sensitive receptors, as the luminaire selection and position prevent any significant spill light from leaving the Proposed Development'.*
- 5.101 As such, it is considered that the proposals comply with all relevant policies with regard to light pollution, including SD8 of the SDNP Local Plan, dealing with Dark Night Skies.

Contamination

- 5.102 A Phase 1 Environmental Report has been undertaken by GO Contaminated Land Solutions, identifying potential contamination sources at the site being from its use as an oil terminal, use of the neighbouring site by an Esso pipeline, imported hardcore below ground and naturally occurring contaminants.
- 5.103 In terms of hydrology, the River Wey to the south is considered to be too distant to be significantly impacted by the site and an assessment of ground stability has confirmed that no unusual or exceptional area of artificial ground have been identified either in the site, or within the vicinity. There is therefore considered to be no risk to the proposed building in terms of stability.
- 5.104 The document confirms that the site is not within an area of coal mining, is not at risk from radon gas and whilst the site lies within a nitrate vulnerable zone, this is not considered to be significantly affected by the site.
- 5.105 The report goes on to assess all nearby sources of potential contamination, including the Esso terminal and the Veolia MRF, both neighbouring to the east. It discounts a number of potentially contaminating uses as being too distant from the application site to have any significant impact.
- 5.106 Whilst no contamination was apparent at the time of the site visit, on site contamination potential was attributed to use of the site as a rail terminal, use as an oil terminal, the presence of oil storage tanks and made ground.
- 5.107 The report goes on to recommend mitigation ahead of any redevelopment of the site, including preliminary investigation measures comprising soil sampling and vapour monitoring. A watching brief is also suggested during site preparation works. A list of Site Development Considerations is set out in the report, identifying key matters to be aware of or review as part of the redevelopment of the land.
- 5.108 Overall, it is concluded that there is a moderate risk of potentially significant contamination, but that remediation measures will be of a typical nature for such a project. Such measures will be secured by planning condition.

Highways

- 5.109 In terms of transportation, the site is highly accessible with a dedicated access road off the A31 and has been subject to high levels of historic HGV movements for a number of decades. Whilst conditions applied to the extant consent limited tanker movements to the site from 'other sites' to no more than 20 per day, there was no such limitation imposed on movements from the Horndean

oilfield. As such, it was clearly considered that there was no traffic related impact from HGV movements to and from the site and it is not considered that this position has changed.

- 5.110 No highways related issues have been reported at the site and it is notable that the recently refused Veolia scheme was considered acceptable from a highways perspective, despite the significant increase in HGV movements of up to 90 trips (180 movements) per day and additional car movements at the AM and PM peak.
- 5.111 The application is supported by a Transport Statement produced by RGP, which confirms that the extant consent allows for an unrestricted number of HGV movements and that the consolidation of the existing use would result in a decrease in HGV movement when compared with what could occur under the terms of the extant consent.
- 5.112 A review of road accidents in the vicinity has revealed that no accidents have been reported over the latest 5-year period along the westbound carriageway on the A31 in close proximity to the site. As such, the site access poses no highways safety risks.
- 5.113 The report identifies the significant reduction in oil tanker movements to and from the site, with export of oil by road tanker only required when the oil tank, fed by the existing pipeline, becomes full. A likely maximum of 6 tankers per week will service the oil facility, plus approximately 2 water tankers per month, however in reality, these numbers will likely be much smaller. Such movements would occur outside of the morning and evening peak hours.
- 5.114 In terms of the aggregates use, the TRICS database has been interrogated, using data from comparable operations. The results estimate likely HGV movements in the region of 15 per day, plus a similar level of LGV and car movements.
- 5.115 In terms of the impact of these movements, automatic DfT traffic counts have been analysed from 2019 (prior to COVID-19) which reveal that the proposed vehicles trips from the development will account for 0.26% of all vehicular movements on that stretch of the A31 and 4.62% of HGV movements.
- 5.116 It is concluded that this volume of movements will not result in significant impacts on the westbound carriageway. This also of course does not account for the reduction in HGV movements associated with the reduction in scale of the IGas operations. When considering traffic growth over the next 10 years, the movements associated with the application site will comprise an even smaller percentage of total and HGV movements.
- 5.117 A review of the access junction has confirmed that this complies with relevant standards and it is considered not necessary to undertake any further detailed junction capacity assessment work.

- 5.118 It is confirmed that car and cycle parking provision is adequate and swept path analysis has confirmed sufficient manoeuvring space to enable vehicles to enter and exit in a forward gear, without complex turning procedures. All internal roads are designed to allow 2 HGV's to pass.
- 5.119 In conclusion, the reports confirms that that the proposed development would not have a demonstrable impact on the local highway network and so there are no impediments on transport and highway grounds that should prevent the granting of planning permission.

Heritage

- 5.120 There are no designated heritage assets within the site, but there are a number of assets which lie within 300m of the site. Given the nature of the proposed development, including a reduction in the scale and quantum of built development, it is considered that the proposals would only have potential to impact on those heritage assets within close proximity and therefore a search area of 300m is considered acceptable in this case.
- 5.121 The Grade II Listed Bonham's Milestone lies roughly 50m northwest on the opposite side of the A31, whilst the Grade II* Listed Bonham's Farmhouse is approximately 285m northwest. There is also a Scheduled Monument known as Cuckoo's Corner Roman Site, Neatham which is located approximately 130m to the west.
- 5.122 All three of these heritage assets lie on the opposite side of the A31 from the application, and are therefore separated by a dual carriageway, central reservation and dense mature planting and woodland along each side of the road. Further dense planting around the assets themselves ensures that there is no intervisibility between the application site and the heritage assets, but also that there is no noise impact from the application site, as the noise environment is dominated by the A31 and noise emissions arising from the application site will not be audible from the other side of the road.
- 5.123 Whilst the pre application feedback did not require an assessment of heritage impact, for completeness this has been included and concludes that there will be no harm to the heritage assets, or their setting.

6.0 Summary and Conclusion

- 6.1 This Planning, Design and Access Statement has been prepared by Union4 Planning on behalf of IGas in respect of proposals for the consolidation of oil operations at the Holybourne Rail Terminal site and introduction of new aggregates uses at the rail terminal site.
- 6.2 The site is an existing developed brownfield site, including rail sidings and as such, is promoted and protected for beneficial development, by HCC, who encourage the use of rail transport as a sustainable means of freight movement.
- 6.3 Consolidation of oil operations at the site will retain a long term consented use at the site, whilst enabling the optimisation of the use of the wider site, bringing in a secondary operator who can benefit from the sustainable location and transport interchange nature of the site.
- 6.4 The import of aggregates by rail will significantly reduce HGV miles, reducing emissions and the number of HGVs on parts of the network within Hampshire and surrounding areas.
- 6.5 Removal of the majority of the oil infrastructure from the wider site, particularly the larger items of plant (the two oil storage tanks the two tanker loading bays) will reduce the visual impact when viewed from the south. New buildings proposed will be located towards the edges of the site, behind areas of bunding and dense vegetation screening, therefore are unlikely to be perceptible from surrounding areas. It has been established that there are no views into the site from the north, east or west and that views in from the south are only glimpsed. The proposed development will only serve to enhance views from the south.
- 6.6 In terms of other environmental considerations, supporting environmental assessments have confirmed that the proposed development will have no negative impacts on noise emissions, transport, light, flood risk or air quality.
- 6.7 Various enhancements are proposed to the retained natural areas of the site, including additional screen and understory planting, further reducing views into the site and improving habitat. A wildlife pond and areas of grassland will further enhance the ecological credentials of the site.
- 6.8 Overall, it is considered that the proposed development is suitable for this highly accessible, sustainable site, fully according with the relevant planning policy context and bringing the existing rail terminal back into beneficial use.