

Is this your own personal response, or are you responding on behalf of an organisation?	This response is on behalf of an organisation or group
The full name of your organisation or group	Hamble Primary School
The full address of your organisation or group	Hamble Ln, Hamble-le-Rice, Southampton SO31 4ND
Your full name	[REDACTED]
Your position in the organisation or group	Vice Chair of Governors
Contact email address	[REDACTED]
Main Modification 2 comments	<p>These comments relate to paragraph 2.26 on page 3. The pre-amble describes the desire to maintain community quality of life, yet it doesn't set out any considerations relating to the proximity of the proposed sites to centres of the community, for example schools. In Hamble there are two schools within very close proximity and the HMWP has no requirement for the wellbeing of young people to be accounted for. The second bullet point states "Secure proposals and their restoration schemes that improve health and well-being". As a school community we have concerns that this improvement to health and wellbeing is not quantified. How will the HMWP authority know if these criteria are met? How will they be measured? There is no indication of criteria or how the restored state will be benchmarked against the pre-proposal baseline. It is also not clear as to which groups or what percentage of the communities will benefit from the improved health and wellbeing. If the developer demonstrates a 1% improvement, is this acceptable to the HMWP Authority? The third bullet point states "Achieve a net gain in biodiversity above the pre-worked baseline, having regard to strategic ecological networks". As a school community that teaches our children about the importance of our environment, we are concerned that there is no quantifiable measure set and that it does not appear to specifically apply to all sites, rather as an aggregated net gain. This is wrong as this means that the site within our community may be excluded from delivering a BNG, which would have a detrimental impact to the local amenity for our children and go against bullet point 2 (mentioned earlier) that requires restoration schemes to improve health and wellbeing. Without a requirement for a specified BNG target that applies to all sites, how will the second bullet statement be met? The vision must,</p>

	<p>in our view include measurable BNG targets that have to be delivered, otherwise there is no way that either the HMWP Authority or the developer can be held to account by the local community.</p>
<p>Main Modification 4 comments</p>	<p>Our community has several sensitive receptors within very close proximity to the Hamble Airfield site proposed in the HMWP (early years, primary and secondary school). It is our understanding from the inspector's inquiry, that the inspector specifically requested additional information to be included in the plan that covers any contextual development considerations. We understood this request to mean that the inspector requires the plan to address the number and scale of the local developments as well as the number of sensitive receptors in the vicinity of the sites that would be impacted by the site. We are disappointed to see that this request from the inspector has not been addressed in the document. Not only has the HMWP Authority failed to satisfy the inspector's request, we also believe that they have failed to meet the intent of para. 198 and 200 of the NPPF.</p>
<p>Main Modification 13 comments</p>	<p>It is not clear to us how policy 10 (p35 - 1f), (p36 - bullet 2 starting 'Measures to achieve...'), (p39 - 4.116) - it is unclear to us as a school community how these policy requirements will be enforced, and which authority will be responsible for holding the landowner to account and enforce these. In Hamble, we have a particular concern as the minerals extractor is unlikely to abide by their commitments to restore the site, especially given that at the closing of the planning inspector's appeal into the Hamble airfield application, the landowner submitted at the last minute a unilateral undertaking. This means that if the landowner applies for planning permission at any time in the future, then the requirements to complete the restoration as laid out in the original scheme is negated. How will the HMWP Authority ensure that the obligations for restoration and BNG are met?</p>
<p>Main Modification 14 comments</p>	<p>Para. 5.14, p 41 states that "Environmental assessments will identify where adverse impacts may occur and how these should be minimised". In order for adverse impacts to be minimised, there needs to be mitigations in place. We feel that without specifically requiring mitigations, i.e. including the word "mitigation" in the paragraph, the strength of this statement is diluted and will provide a route for the land owner to avoid their obligations.</p>

<p>Main Modification 15 comments</p>	<p>Policy 12, 1c, part ii on page 43 refers to the lifetime of the development. What is meant by the lifetime of the development, is it just for the lifetime in the initial planning application, the lifetime if extended, or through the aftercare and restoration period? We believe that this ambiguity will provide opportunities for the landowner to ultimately avoid their obligations. According to Hampshire County Council's own statements, the impacts of climate change are already being experienced in Hampshire, such as flooding, heatwaves and extreme weather. These developments are 15 year + developments and as such we are concerned that there is no requirement to revisit / revise the assessments set out in the policy. 1c v on page 43 also requires whole life management and maintenance arrangements but fails to clarify who will be responsible or what whole life really means. By only referring to the development, the policy fails to take into account any spillover impact from the site to land adjacent. This is of concern to us given the proximity of our school to the site and the risk of flooding and is something that Hampshire County Council's own local flood authority have raised in relation to the Hamble site, where they stated on 30th January 2023 that "We have concerns that if groundwater flow paths are restricted it could trigger spring flows elsewhere."</p>
<p>Main Modification 18 comments</p>	<p>No comment, page would not allow progress unless one item selected</p>
<p>Main Modification 39 comments</p>	<p>P96, Development considerations -1. This states "Ensure no significant adverse impact on the integrity", yet it does not define what is meant by no significant adverse impact. Is there a standard that this can be measured against as otherwise it is very subjective and open to interpretation. The developer's definition may be completely different to that of other stakeholders. This needs clarification as to exactly what this means. The same applies for 3 and 4. 21 - Given that there is a major petrochemical pipeline crossing the site, this should be specifically identified as this should not be considered a standard utility, given the risk to the local community and environment should it be damaged.</p>