

From: Andrew Herring <andrew.herring@NFDC.gov.uk>
Sent on: Tuesday, July 13, 2021 6:02:50 PM
To: hmwp.consult@hants.gov.uk
CC: [REDACTED]
Subject: HMWP Partial Update - SA Scoping Report and SA Baseline Report
Urgent: High

Attachments: HMWP Partial Update SA Baseline Report June 2021.pdf (12.21 MB)

Dear HCC Colleagues

Thank you for consulting with New Forest District Council (NFDC) on the SA documentation.

The SA Baseline Report and Scoping Report provide a sound overview of the Hampshire context and issues at play.

During the preparation of the now adopted NFDC Local Plan Part One (2020) there was discussion at the examination relating to prior extraction on strategic sites. The SA documentation could usefully provide some commentary on the **balance required between identified housing need on the one hand and the objective for prior extraction (where viable) on the other**. This would aid Local Authorities in preparing future Local Plans and the need to deliver sustainable development that is also in line with the HMWP.

In addition, there are a few omissions that NFDC would like to draw to your attention in the HMWP SA Baseline Report:-

- Page 55 – With reference to the list of NFDC **strategic sites** – we note that SS2 & SS15 are omitted, and assume that this is because they either already have existing mineral extraction permissions that are due to be fully realised in the next few years or have been worked previously? (and therefore is not directly relevant to future HMWP strategies). With regard to SS11 & SS14 the omission is presumably based on there being no underlying minerals? The table on page 55 could benefit from explaining this to the reader for the sake of completeness.
- Page 81 – A **Strategic Flood Risk Assessment** was carried out for NFDC in 2018 but it is not listed in the table. The SFRA can be found on the council's evidence base for the Local Plan ([see website](#)).
- Page 87 – The New Forest **Landscape Character Assessment** (2000) is omitted from the table - this also can be found on the council's website ([Report](#) / [Map](#)).

Best Regards,

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**Planning Regeneration & Economy**

Executive Head: Claire Upton-Brown

Sent by email to:

hmwp.consult@hants.gov.uk

My Ref: HCC Minerals & Waste Consultation

Your Ref:

Date: 30 January 2023

Dear Minerals and Waste Planning Team

NEW FOREST DISTRICT COUNCIL RESPONSE TO THE HAMPSHIRE COUNTY COUNCIL MINERALS AND WASTE PLAN: PARTIAL UPDATE – REGULATION 18 DRAFT PLAN CONSULTATION

Thank you for the opportunity to respond to the Minerals and Waste Plan Partial Update consultation.

Please find below the response of New Forest District Council (NFDC).

In July 2021 NFDC responded to a previous consultation by Hampshire County Council (HCC) on the preparatory stages of plan making, when HCC consulted on the Sustainability Appraisal (SA) Scoping Report and SA Baseline Report.

It is acknowledged that resources can only be won where they exist, and the geography/geology of New Forest District means that the New Forest Plan Area is likely to have a role in meeting wider sub-regional needs.

Development Management Policies

NFDC concur with the need for partial updates to reflect changes to the National Planning Policy Framework, National Planning Policy for Waste and in response to the previous consultation.

This Council is supportive of the need for an up-to-date evidence base in relation to the current levels of provision for minerals and waste facilities and has previously provided factual comments on the Sustainability Appraisal which sits alongside the draft Plan.

NFDC is particularly supportive of more detailed reference to Biodiversity Net Gain and the citing of air quality issues. The requirement for all applications to be accompanied by a Climate Change Assessment is especially welcomed following the NFDC declaration of a Climate Change and Nature Emergency in October 2021.

newforest.gov.uk

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Mineral Policies

This Council is pleased to see reference in the supporting text to Policies 15 and 16 relating to the 2016 Safeguarding Supplementary Planning Document (SPD). Given that the Government is proposing that current SPDs will automatically cease to have effect at the point at which authorities are required to have a new-style plan in place, HCC should consider providing criteria on securing prior extraction of minerals (before the development of the site for other uses) in this HWMP update. There may be other elements in the SPD that would benefit from being inserted in this HMWP update. This approach would enable the HMWP itself to continue to inform Local Plan making as part of the overall Development Plan.

NFDC questions the basis for the aggregate requirement set out in the partial review. Paragraph 2.33 of the Minerals background paper (August 2022) sets out a shortfall of 2.17Mt (million tonnes) of aggregate. However, the plan goes on to propose a number of sites that in total are projected to provide nearly 12Mt of sharp sand and gravel. This appears to be significantly above the projected shortfall, and NFDC believes that this represents an excessive potential allocation of sites. Site specific comments on land within the New Forest District Plan Area are set out on subsequent pages.

In addition, economic forecasts set out in the evidence base (whilst they appear broadly sound and take into account the impact of the COVID-19 pandemic) are based on 2020 reports and the Local Aggregate Assessments (LAA), which both predicted growth in construction output in 2021 and 2022 and beyond. However, inflation and other factors have had an effect since 2020, and the quantum of demand for aggregates for 2023 and beyond is therefore questioned.

Waste policies

With regard to updated waste policies (Policies 25-33) this Council makes a general comment that the HWMP appears to reflect the latest levels of waste arising and plans positively to ensure forecasts for future waste capacity are maintained.

NFDC supports the stronger policy approach in relation to energy recovery and the requirement that energy recovery proposals provide combined heat and power as a minimum (Policy 28). NFDC would also advocate strong controls on the location of anaerobic digesters in relation to water courses, especially where slurry is stored. This is due to the well known nutrient pollution that can occur through accidental spills of slurry into watercourses. The HMWP should stipulate that all slurry pits and digester plants be enclosed with bunds to contain spills, and be sited well away from water courses.

Delivering the policies set out in the updated HMWP will compliment and add value to the delivery of New Forest District Council's new Waste Strategy ([Waste and recycling strategy - New Forest District Council](#)) which was adopted in the summer of 2022.

Other policies

It is regrettable that the Partial Review proposes to delete the previous Policy 14 (Community benefits). This took a positive approach to the potential implementation of mitigation measures which can bring benefits to the local community and it is not evident that suitable provisions have been proposed elsewhere in the Partial Review to ensure that lawful community benefits can be secured in future development. NFDC notes that the Partial Review sees mineral and waste

operations (sites) as temporary, but the Plan should retain the policy framework to negotiate positive outcomes where they present themselves.

Proposed Rail Depot allocation

Totton Sidings (Totton Station) – Policy 19

It appears that HGV movements will be required to facilitate the proposed use of the site as an aggregate depot - however no assessment of traffic generation from existing uses or future scenarios has been made available for scrutiny. In the absence of this information the District Council wish to note that this use could have significant impact on the highway network, nearby residential properties and on air quality and the general character of this part of the town centre.

In the absence of such information, there are concerns that the proposal could generate significant vehicle movements with associated impacts on this part of the town centre and the residents and businesses that occupy this area.

Proposed Mineral and Waste Sites

Yeatton Farm, Hordle – Policy 20

NFDC objects to the potential allocation of this site. There are a number of potential adverse impacts including loss of hedgerows, significant landscape impacts, and potential to encroach on the character of the adjoining settlement. In addition, the draft plan does not specify an access point; a number of the local lanes are very narrow.

NFDC draws to the attention of HCC that there is an allocated housing site (Policy SS8 – Land at Hordle Lane in the [New Forest Local Plan Part 1, adopted 2020](#)) for up to 160 homes immediately to the north of the proposed Yeatton Farm site. Proximity to present and future residential properties raises significant in-combination concerns. Given the excess of proposed mineral allocations relative to forecasted shortfall, NFDC question what purpose is served by allocating an environmentally challenged site that is not expected to deliver until the very end of the M&W Plan period.

Ashley Manor Farm, New Milton – Policy 20

NFDC has concerns about this site. The most substantial issue is landscape impact - this area was assessed in the most recent Local Plan as part of a Landscape Sensitivity Study and was judged to have high landscape sensitivity ¹. The proposed extraction of minerals from this site, both from the works themselves and the associated development needed to enable this, is likely to have a significant detrimental impact on this landscape. In addition HCC must ensure that any potential noise from gravel extraction works adjacent to Milford Road Cemetery would not disturb the peace and tranquillity of the cemetery. The development is also likely to have an adverse impact on the occupiers of nearby residential properties, by reason of noise and dust, which will need to be carefully considered.

There is also a significant question regarding the proposed Green Loop as adopted in the New Milton Neighbourhood Plan. It is not clear whether an alternative green loop route has been offered by the site developer, noting the existing public right of way at Crooked Lane.

It is noted that the potential biodiversity is low at the site.

¹ (newforest.gov.uk) New Milton Area 3: pages 129-133

Cobley Wood, Harbridge – Policy 20

Holding objection - this is a remote location but there are potentially significant cumulative impacts from other proposed mineral and waste sites in the area (Hamer Warren and Midgham Farm). In addition developers are currently promoting a major residential site on the Dorset side of the boundary which, if brought forward, could result in substantial in-combination effects relating to HGV and traffic movement. Impacts on biodiversity are identified in adjacent areas which could be mitigated, and detailed assessment for SPA impacts would be required.

Hamer Warren Quarry, Harbridge – Policy 29

This proposed use is compatible with the site and restoration measures have already been agreed in the current planning permission. However it is unclear whether this proposed allocation would have the effect of delaying the restoration of the site. If so, it would be regrettable for residents to experience an extended period of works and the likely impacts from an extended period of traffic movement.

This is a remote location but there are potentially significant cumulative impacts from other proposed mineral and waste sites in the area (Cobley Wood and Midgham Farm). In addition, developers are currently promoting a major residential site on the Dorset side of the boundary which, if brought forward, could result in substantial in combination effects relating to HGV and traffic movement.

Midgham Farm, Hillbury Road, Alderholt – Policy 20

Holding objection – this is a large site with the north-west corner in close proximity to a residential area. Biodiversity impacts could be significant; in particular grassland habitats that are likely to provide supporting habitat to the SPA for off-site foraging for protected bird species. Should this potential allocation be progressed, a landscape assessment should be undertaken to establish the most appropriate screening and/or long-term mitigation. It should also be ensured that no HGV traffic is routed through Fordingbridge via the B3038 as this road is sub-standard in width (single lane) through the town centre.

This is a remote location but there are potentially significant cumulative impacts from other proposed mineral and waste sites in the area (Cobley Wood and Hamer Warren). In addition developers are currently promoting a major residential site on the Dorset side of the boundary which, if brought forward, could result in substantial in combination effects relating to HGV and traffic movement.

Purple Haze, Verwood – Policies 20 & 32

NFDC has concerns about this site. There is a reasonable buffer from the nearest residential area. Ecological interest at the site is deemed significant, but there is also significant scope for restoration to provide woodland, heathland, nature conservation areas, enhanced recreational areas and links to the Moors Valley Country Park.

NFDC would flag up the potential adverse impact on the recreational use and enjoyment of the wider Moors Valley woodlands. A number of potential visitors to New Forest and Dorset sites are attracted to Moors Valley Country Park – this successfully diverts them from sensitive international nature conservation sites in the New Forest and Dorset heathlands. Minerals development in these part of the Moors Valley vicinity could reduce the attractiveness of the Country Park for recreation. This would potentially bring more visitors to both the New Forest designated sites and the Dorset sites. As such, the potential to mitigate this potential harm should be explored further.

The presence of Ebblake Bog SSSI adjacent to the site is a potentially significant constraint given the hydrological gradient that has brought about this peat mire . Such habitat is now internationally scarce and the relatively few remaining undamaged mires thus assume special nature conservation importance.

Concluding comments

New Forest District Council is concerned that the potential cumulative supply vastly exceeds the need identified in the Draft Plan. There are also questions relating to the in-combination transport impacts from proposed sites in the Harbridge / Midgham area, together with specific site concerns about impacts on residents in Hordle and New Milton.

Notwithstanding these concerns, NFDC would welcome the opportunity to discuss these representations further with the County Council and would also encourage greater collaboration and dialogue as the Plan develops.

Yours faithfully

Claire Upton-Brown

Claire Upton-Brown

Executive Head for Planning, Regeneration and Economy

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