

PLANNING AND ECONOMY PORTFOLIO HOLDER DECISION - 22 FEBRUARY 2024

HAMPSHIRE MINERALS AND WASTE PLAN (PARTIAL UPDATE) CONSULTATION RESPONSE

1. RECOMMENDATION

- 1.1. To agree the proposed response to the Hampshire County Council's Mineral and Waste Plan: Partial Update as set out in section 4 of this report.

2. INTRODUCTION

- 2.1. The purpose of this report is to agree the Council's response to Hampshire County Council's (HCC) Minerals and Waste Plan: Partial Update, closing on 5 March 2024.
- 2.2. HCC is working to produce a partial update to the Hampshire Minerals and Waste Plan (HMWP) which will guide minerals and waste decision making in the Plan Area up until 2040. The HWMP forms part of the Development Plan for New Forest District. The partial update to the Plan aims to build on the currently adopted Hampshire Minerals and Waste Plan (2013), eventually providing new and updated policies based on up-to-date evidence of the current levels of provision for minerals and waste facilities in the Plan Area.

3. BACKGROUND

- 3.1. In July 2021 New Forest District Council (NFDC) responded to a previous consultation by HCC on the preparatory stages of plan making, when HCC consulted on the Sustainability Appraisal (SA) Scoping Report and SA Baseline Report. NFDC provided an officer response on the evidence base, including a comment on the balance required between meeting identified housing need in a timely manner on the one hand and the objective for prior extraction (where viable) on the other.
- 3.2. In January 2023 NFDC responded to the Regulation 18 consultation by HCC on a draft plan consultation. NFDC provided comments on the proposed policies and site allocations.
- 3.3. In particular NFDC responded on the following:
 - Development Management policies – NFDC concurred on the need for partial updates to reflect National Policy changes, and the requirement to update the evidence base. Particular support was given to policy update which addressed biodiversity and wider air quality issues.
 - Minerals policies – the criteria relating to prior extraction; questioned how the potential cumulative supply vastly exceeded the need identified in the Draft Plan; and that economic forecasts were based on 2020 report (i.e. demand has changed since then).
 - Waste policies - supportive of proposed updates relating to energy recovery, but suggested stronger controls on the location of anaerobic digesters near to water courses.
 - Other policies – deletion of Policy 14 (Community Benefits) regrettable.

- The new proposed depot at Totton rail sidings (Policy 19) – the absence of information on traffic generation – NFDC raised concerns that it could generate significant vehicle movements with adverse impacts on residents and businesses.
- Concerns that the potential cumulative supply vastly exceeds the need identified in the Draft Plan.
- Concerns 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. See Table 1 below for updated NFDC position.
- Detailed points relating to new proposed mineral and waste sites:
 - Yeatton Farm – Objection, potential adverse impacts inc loss of hedgerows, significant landscape impacts, and potential to encroach on the character of the adjoining settlements. NFDC also drew HCC to the allocated housing site (Policy SS8 – Land at Hordle Lane) immediately to the north of the proposed Yeatton Farm site. See Table 1 below for updated NFDC position.
 - Ashley Manor Farm (Policy 20) - concerns about in relation to landscape impact, the proposed Green Loop in the Neighbourhood Plan, and the proximity to residents with associated noise and dust. See Paragraphs 4.5 – 4.12 below for the updated NFDC position and proposed response.
 - Cobley Wood - Holding objection in relation to cumulative impacts from other proposed sites in the area arising from vehicle movements, and impacts on biodiversity. See Table 1 below for updated NFDC position
 - Hamer Warren Quarry (Waste – Policy 29) – agreed that proposed use for waste considered is compatible with the site, but as with Cobley Wood concerns were raised in relation to traffic movements and cumulative impacts. See Table 1 below for updated NFDC position.
 - Midgham Farm – Holding objection, with significant concerns regarding impacts on biodiversity, landscape screening, and cumulative effects with other proposed mineral and waste sites in the area. See Paragraphs 4.13 – 4.18 below for the updated NFDC position and proposed response.
 - Purple Haze – concerns about adverse impacts on the recreational use and enjoyment of the wider Moors Valley woodlands, potentially bringing more visitors to both the New Forest designated sites and the Dorset sites. Presence of Ebblake Bog SSSI adjacent to the site is a potentially significant constraint due to hydrological sensitivities of the peat mire (no transport concerns were submitted). See Paragraphs 4.19 – 4.26 below for the updated NFDC position and proposed response.

4. POLICY CHANGES TO THE HMWP AND PROPOSED NFDC RESPONSE

- 4.1. It is acknowledged that mineral resources can only be won where they exist, and the geography/geology of New Forest District means that the Plan Area is likely to have a role in meeting wider sub-regional needs. This is particularly so given that the majority of minerals extracted within Hampshire are used within the Hampshire area.
- 4.2. The Regulation 19 representation period is the last stage of public engagement before HCC submits the draft HWMP to the Secretary of State for independent examination by the Planning Inspectorate. This is a formal process that requires comments on the soundness and legal compliance of the plan¹ – comments must therefore be targeted to specific policies or paragraphs in the draft HWMP. NFDC also has the opportunity to set out the modifications that it considers necessary to make the pre-submission Local Plan legally compliant and/or sound including any revised wording.

Previously proposed mineral and waste site allocations

- 4.3. A number of the sites proposed in the Regulation 18 have been withdrawn in the Regulation 19 Proposed Submission Plan. These are set out in Table 1 below, together with the NFDC comments submitted in January 2023.

Table 1 - Sites that have been removed and the reasons given by HCC

Site:	NFDC response to previous (Regulation 18) consultation	Reason for deletion from Regulation 19 consultation	NFDC latest position
Totton Rail Sidings	the absence of information on traffic generation – NFDC raised concerns that it could generate significant vehicle movements with adverse impacts on residents and businesses.	There is insufficient evidence that this site will be delivered during the Plan period. Therefore, the site is now listed under Policy 34 as a potential site for the future should circumstances change. However, any future proposal would need to address issues regarding access to the site, impact on ecology, amenity and regeneration ambitions for the area.	This resolves concerns NFDC had on the absence of information on traffic generation. No further representations need to be made.
Yeatton Farm	Objection, potential adverse impacts including loss of hedgerows, significant landscape impacts, and potential to encroach on the character of the adjoining settlements. NFDC also drew HCC attention to the allocated housing site (Policy SS8 – Land at Hordle Lane) immediately to the north of the proposed Yeatton Farm site.	This site was withdrawn from allocation in the Plan by the landowner.	This removes the issues that NFDC had regarding the site at Yeatton Farm. No further representations need to be made.

¹ NPPF paragraph 35 sets out that Plans are ‘sound’ if they are: (a) Positively prepared (b) Justified (c) Effective (d) Consistent with national policy.

Cobley Wood	Holding objection in relation to cumulative impacts from other proposed sites in the area arising from vehicle movements, and impacts on biodiversity.	This site has been removed as a proposed allocation as the need for sand and gravel can be met from alternatives sites and could not be worked in addition to adjacent sites due to cumulative impacts. The site is small with a number of issues in relation to (but not limited to) ecology, landscape and heritage which would require mitigation such as buffers which impacts on the viability of the site to be deliverable.	The removal of this site from the plan means no further representations need to be made.
Hamer Warren	Agreed that proposed use for waste considered is compatible with the site, but as with Cobley Wood concerns were raised in relation to traffic movements and cumulative impacts	This site has been removed as a proposed allocation due to the objection from the Environment Agency and the potential for significant groundwater impacts which cannot be suitably mitigated.	The removal of this site from the plan means no further representations need to be made.

New Proposed Mineral and Waste Sites

4.4. The mineral and waste sites proposed to be allocated are summarised in Policy 20 with further site-specific details provided in 'Appendix A' of the HWMP. Each proposed minerals and waste allocation includes a number of 'development considerations' for each site e.g. effects on traffic and environmental impacts. The Minerals Plan does not specify exactly how the development considerations may be addressed, as these will be assessed through specific planning applications.

Ashley Manor Farm, New Milton (likely delivery 2024/25) - Policy 20

4.5. Land at Ashley Manor Farm (currently open agricultural land) is proposed for excavation of sharp sand and gravel. After excavation there would be restoration to agriculture with species rich meadow, ditches/ponds and extra hedgerows, utilising approximately 1.5 million tonnes of inert material. Nineteen considerations are listed for Ashley Manor Farm, for example the ecological and hydrological assessment of all watercourses, ditches and aquatic habitats will be required including an understanding of the hydrological regime.

4.6. A number of years ago the site was subject to a mineral planning inquiry and the appeal was dismissed. The site is subject to a current planning application to be determined by HCC as the Minerals and Waste Planning Authority (application number HCC/2022/0338). NFDC objected to the application in September 2022 on the basis that the site was not listed in the HMWP as a sand and gravel extraction site, and that there was inadequate assessment with regard to nearby listed buildings. The latest development considerations (page 170 of the HMWP) do make reference to restoration works and the respecting of listed features but no mention of the impact from extraction works on listed buildings.

4.7. Regarding biodiversity the site is relatively constraint free, though hydrological linkage to watercourses will need to be managed, as well as dust/emissions impacts on biodiversity, woodland and water courses to the south-east. The proposed development considerations require that hedgerows bounding the site should be

retained and enhanced wherever possible and any replacements required to be planted at an early stage of development.

- 4.8. In relation to transport impacts, the HCC Strategic Transport Assessment for the Minerals & Waste Plan states that in the current planning application it would operate under the cap of 150 HGV movements per day approved for Downton Manor Farm quarry, so the principal transport effect will be to relocate extraction activity 2.8km closer to the Caird Avenue processing facility. 150 trips are already permitted on the highway for Downton Manor Farm. Based on this information and with Ashley Manor Farm replacing the existing operations at Downton Manor Farm, HCC conclude that there is not expected to be any increase in trips over what is already permitted on the local highway. It would be helpful if the Development considerations (page 171) could clarify how the shift of HGV traffic from Downton Manor Farm to Ashley Manor Farm will be managed.
- 4.9. The development considerations now specify that a dust, noise and lighting management plan and monitoring is required. Any scheme must also appraise the impact on local business and amenity and well-being of residential properties and mitigate any adverse effects identified.
- 4.10. The condition of the landscape is good, and typical of the character area with a flat open landscape and linear woodlands encroaching on the boundaries. This open area of landscape forms an important part of the green belt keeping the rural landscape intact between the heavily populated communities along Hampshire's south coast. Crooked Lane running through the site forms an important landscape feature with double hedgerows along part of the route.
- 4.11. In addition, the Ashley Manor Farm site forms part of the proposed New Milton Green Loop (as adopted in its Neighbourhood Plan)².
- 4.12. **Proposed response to Ashley Manor Farm:**

Soundness: NFDC continues to hold concerns about this site allocation. The most substantial issues remain to be the impact on biodiversity from dust/emissions and the adverse landscape impacts. There are also potential noise effects from gravel extraction works adjacent to Milford Road Cemetery which could disturb the peace and tranquillity of the site. There have been previous sites in the New Forest District where prolonged issues with dust have adversely impacted nearby residents, but NFDC will work with HCC to lessen those impacts through the application process. Policy 20 (Appendix A) remains insufficient on the impacts on landscape and therefore fails the test of soundness under the 'justified' criterion.

There is also a question regarding the proposed Green Loop as adopted in the New Milton Neighbourhood Plan. It remains unclear whether an alternative green loop route has been offered by the site developer. The Regulation 19 updates do not address this element adequately and therefore Policy 20 (Appendix A) is considered unsound under the 'effective' criterion.

² https://www.newforest.gov.uk/media/2301/New-Milton-Neighbourhood-Plan-Made-Version/pdf/New_Milton_Neighbourhood_Plan_Made_Version_July_2021.pdf?m=63761338890670000

Modifications proposed:

NFDC would suggest that the Appendix A Development considerations include a requirement for clearly defined landscape buffers between the cemetery and residential properties around the periphery of the proposed site. This should include appropriate natural landscaping and planting regimes. This would provide satisfactory separation between the extraction works and local residents and cemetery visitors.

The development considerations in Appendix A with regard to Rights of Way should make reference to the Green Loop contained in Policy NM12 (and Appendix G) of the New Milton Neighbourhood Plan³ and that any site allocation must provide opportunities for an enhanced / alternative route that matches the vision for the Green Loop.

It would be helpful if the Transport Assessment referenced in Development considerations (page 171) clarified how the shift of HGV traffic from Downton Manor Farm to Ashley Manor Farm will be managed, including peak periods of rainfall when impacts from local flooding on traffic are most acute. A detailed Construction Traffic Management Plan that addresses these issues would be a suitable resolution.

Lastly, the Development considerations should also be clear about the need to appraise the impact of extraction work on listed buildings (not just the impact of restoration works on the listed status of buildings).

Midgham Farm, Hillbury Road, Alderholt (likely delivery 2024/25) – Policy 20

- 4.13. Currently open agricultural land, the proposed development would be for the extraction of sharp sand and gravel. The site could be viewed as an extension to the existing extraction site on land to the south, but the extent of the proposed site is much larger. Restoration would take the form of agricultural land at the existing levels (using imported inert materials) including nature conservation and increased permissive access.
- 4.14. The Minerals & Waste Plan states that a Transport Assessment must consider cumulative traffic impacts that take into account that the site is a continuation of the Bleak Hill site, which would cease prior to commencement at this site. The Strategic Transport Assessment supporting the Plan states that the expected number of additional HGV movements on any route on any one day would be relatively low, at 110 per day. As this would only represent an increase of 2.3% of HGV traffic or 0.2% of total vehicles on the corridor, this impact is considered by HCC to be negligible. In addition the planning considerations now require the provision of a new priority junction off Hillbury Road.

³ [New Milton Neighbourhood Plan - New Forest District Council](#)

- 4.15. Taking this into account, and the removal of previously proposed sites at Hamer Warren and Cobley Wood, previous NFDC concerns relating to unmanaged cumulative highway impacts in the wider area are now significantly lessened. Previous NFDC representations recommending that no HGV traffic is routed through Fordingbridge via the B3078 are also allayed now that more information has been set out in the Strategic Transport Assessment and development considerations. This includes the requirement for routing to be agreed which will take HGV traffic to the south of the site and thus away from Fordingbridge.
- 4.16. There is ecological interest due to the proximity of this site to the River Avon floodplain with complex habitats to the east and Ringwood Forest to the west. The site may provide supporting habitat to the SPA if birds are using it for high tide/roosting etc. In its previous response to the Regulation 18 draft Plan NFDC recommended that further studies were undertaken to consider this potential loss of habitat, backed up by adequate data, to inform future decisions about the appropriateness of this proposed allocation. This issue was also flagged in the NFDC Local Plan Habitats Regulations Assessment⁴. The southern margin needs to be protected and enhanced to maintain a strong connection between the two important areas of ecological interest. The Regulation 19 HMWP (Appendix A) now provides additional Development consideration (page 176) about the biodiversity impacts relating to qualifying bird species that need further appraisal regarding the associated SPA/Ramsar sites nearby.
- 4.17. NFDC concurs with the assessment that most of this site is of medium/good landscape quality. It is a farmed valley landscape, mainly pastoral, with a traditional field pattern surrounded by hedgerows with trees.

4.18. **Proposed Response to Midgham Farm site:**

This is a large area with the north-west corner in close proximity to the neighbouring settlement of Alderholt but the additional Development consideration requiring a buffer to the north-west corner and western edge addresses this point. The additional requirement for buffers with adjacent residential properties also provides reassurance on this issue.

Biodiversity impacts could be significant but the latest Development considerations are now clear that offsite roosting, foraging and breeding areas of the qualifying bird species of nearby SPAs/Ramsars will have to be appraised. In addition the requirement to enhance ecological networks as part of the restoration scheme is now clearer.

[Purple Haze, Verwood \(likely delivery 2024/25+\) – Policies 20 & 32](#)

- 4.19. The Purple Haze site is situated across the road from a previous sand and gravel site called Blue Haze which is now operating as a landfill site. Therefore the site could be viewed as an extension to the previous extraction site on adjoining land to the north even though it is split by the Verwood Road (the B3081). The site is subject to a

planning application for the extraction of sand and gravel, submitted in March 2021. NFDC has raised no objection to the proposal subject to conditions relating to HGV movement restrictions, washing of HGVs, and noise limits relating to both excavation and restoration of the site.

- 4.20. It is currently a coniferous plantation, but the proposed use is for extraction of soft sand, sharp sand and gravel. Restoration measures would be inert fill to agreed levels. The site would eventually be used for a combination of deciduous woodland planting, heathland, nature conservation areas, enhanced recreational areas and public open space, linked to the Moors Valley Country Park.
- 4.21. It has been estimated that during the extraction operations there would be approximately 45 HGVs per day. Routing of the HGVs to the A31 would be along the B3081, which is deemed by HCC to be a suitable route for HGV traffic. The Strategic Transport Assessment concludes that the sensitivity of receptors along the preferred route will be negligible given that traffic will travel along routes of low sensitivity to traffic flows. NFDC does not disagree with that assessment and is satisfied that with the necessary junction improvements identified in the Strategic Transport Plan the overall impacts can be mitigated.
- 4.22. The updated development considerations (page 179) now specify a requirement for hydrological/ hydrogeological assessment in relation Ebblake Bog SSSI which addresses the previous response from NFDC on this issue at Regulation 18 stage. Likewise the plan is now clear that recreational displacement must also be carefully managed.
- 4.23. In relation to biodiversity, the ecological interest at the site is deemed significant, despite the relatively poor condition of the lowland heathland. The varied microclimates and proximity to much better habitat significantly increases its value. The viability of the site is dependent on the resolution of significant ecological issues which can only be achieved with suitable mitigation and compensation packages. The plan references the need to put in place management arrangements to secure short and long term objectives for amenity and biodiversity including heathland, woodland, acid grassland and protected species.
- 4.24. In terms of landscape the site is predominantly coniferous forest which is well maintained, but the landscape is judged to lack diversity and visual interest. The landscape condition is deemed moderate by HCC, and therefore adverse effects on this issue are deemed neutral.
- 4.25. The only outstanding concern is in relation to the potential adverse impact on the recreational use and enjoyment of the adjoining Moors Valley Country Park 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. Mineral development in the vicinity of Moors Valley 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. The updated Development considerations (page 179) now provide clear reference to the issue of recreational displacement as part of the protection of the Dorset and New Forest sites.

4.26. Proposed response to Purple Haze site:

NFDC is satisfied that the updated development considerations have addressed the majority of concerns previously held for this site allocation. 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. Development considerations now specify a requirement for hydrological/ hydrogeological assessment in relation Ebblake Bog SSSI and NFDC is satisfied that this addresses the issue.

Other proposed responses

Once gravel has been extracted, many of the sites could be identified for nitrate mitigation, recreational mitigation or land for Biodiversity Net Gain, depending on current land use. This could be included, where appropriate, in the development considerations for each extraction site.

In its previous representations on the Regulation 18 NFDC suggested stronger controls on the location of anaerobic digesters near to water courses. The HWMP remains silent on this point. NFDC suggests that the HMWP could benefit from a stronger policy approach with regard to this issue, given the potential for spillages into sensitive water courses and the significant adverse effects this can have on ecological systems. As a minimum, paragraph 6.194 should be strengthened to reflect this point.

Concluding comments:

New Forest District Council does not raise any objections to the sites as set out in the Regulation 19 submission plan but has concerns about the Ashley Manor Farm site. A number of previous holding objections to Regulation 18 draft policies have been addressed relating to the in-combination transport impacts from proposed sites in the Harbridge / Midgham area through additional development considerations / updated strategic transport plan, together with the removal of some sites from the plan (namely Cobley Wood and Hamer Warren).

Previous concerns at Regulation 18 draft stage relating to the potential cumulative supply vastly exceeding the need identified in the HMWP have also been addressed. The removal of a number of proposed sites across the Hampshire area (including those of Yeatton Farm and Hamer Warren) means that demand can now be met from a smaller number of sites.

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

5. FINANCIAL IMPLICATIONS

5.1. None arising from this report.

6. CRIME & DISORDER, ENVIRONMENTAL AND EQUALITY & DIVERSITY IMPLICATIONS

6.1. None arising from this decision.

7. PORTFOLIO HOLDER ENDORSEMENT

I have agreed to the recommendation of this report.

Sign: Cllr Derek Tipp

Date: 22 February 2024

<p>For further information contact:</p> <p>Andrew Herring Planning Policy Officer 023 8028 5424 andrew.herring@nfdc.gov.uk</p>	<p>Background Papers</p> <p>Appendix 1 - 2021 NFDC Officer Response to Sustainability Appraisal</p> <p>Appendix 2 – 2023 NFDC Response to Regulation 18 HMWP consultation</p>
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Date on which notice given of this Decision – 22 February 2024

Last date for call in – 29 February 2024

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,

Andrew Herring
Planning Policy Officer
New Forest District Council
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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.

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

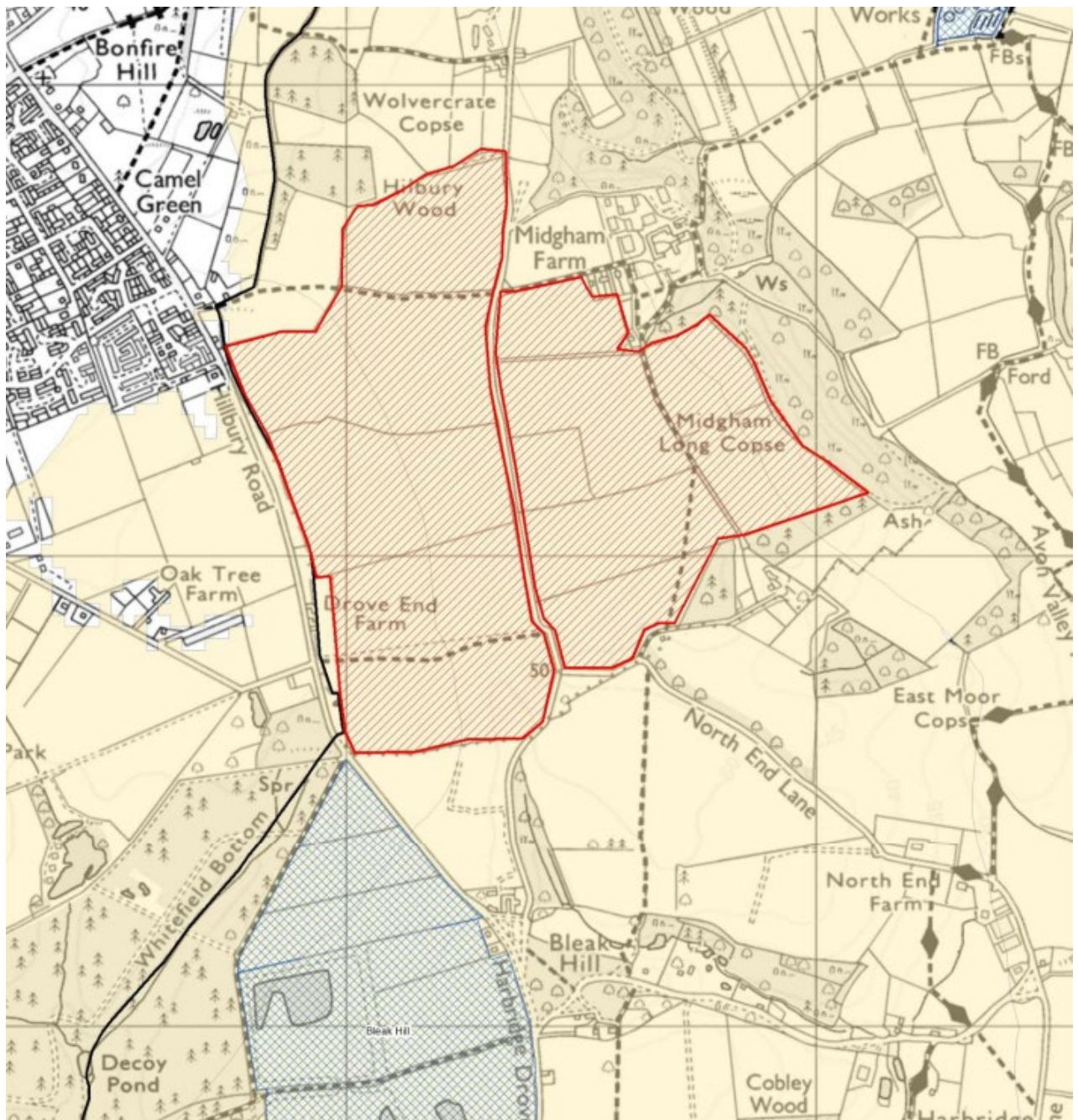
Executive Head for Planning, Regeneration and Economy

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Midgham Farm Site proposed allocation (edged red)

Existing Bleak Hill site in blue hatching



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From Appendix A of the HMWP Regulation 19 document -
<https://documents.hants.gov.uk/mineralsandwaste/HMWP-PartialUpdate-ProposedSubmissionPlanConsultationVersion-December2023.pdf>