

Place, Operations and Sustainability

Strategic Director: James Carpenter

Sent by email to:

hmwp.consult@hants.gov.uk

My Ref: HCC Minerals & Waste Consultation
Your Ref:

Date: 28 March 2024

Dear Minerals and Waste Planning Team

**NEW FOREST DISTRICT COUNCIL RESPONSE TO THE HAMPSHIRE COUNTY COUNCIL
MINERALS AND WASTE PLAN: PARTIAL UPDATE – REGULATION 19 PROPOSED
SUBMISSION PLAN CONSULTATION**

Thank you for the opportunity to respond to the Hampshire Minerals and Waste Plan (HMWP) Partial Update consultation.

New Forest District Council (NFDC) is grateful for the agreed extension of time to submit its formal representations. This extension was required to accommodate particular scrutiny of the Council's proposed position which was published in its original form¹ on 22 February 2024. This position was called in for debate at a meeting of the Council's Place and Sustainability Overview and Scrutiny Panel² held on 7 March 2024 and a subsequent special Full Council meeting³ on 26 March 2024.

In preparing this representation, NFDC has become increasingly aware of public concern of the continued reliance on the Avon Valley for extraction, and the impacts that this may cause locally. These were perhaps most clearly set out in the debate at full Council on 26 March 2024 which is available to view at: <https://www.youtube.com/live/P-MamTBzD4A?si=mM4xVSLU4gkDBi5F>. There are strong and heartfelt concerns and objections, and this Council asks that Hampshire County Council and the Secretary of State take the concerns raised by the local community into account and carefully consider them during the examination of the submitted Plan.

It is acknowledged that minerals extraction is an essential resource that helps to meet local and wider needs. 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 often considered for its role in meeting wider sub-regional needs.

NFDC welcomes the changes to the Plan made since the Regulation 18 version to address many of the previous concerns expressed by NFDC. The comments below on individual sites are designed to help HCC and the Examiner ensure that any adverse impacts of proposals are capable of being appropriately addressed through the planning application process. NFDC makes its response with a submission that is intended to further improve the HMWP. NFDC

¹ <https://democracy.newforest.gov.uk/ieDecisionDetails.aspx?id=1159&LLL=0>

² <https://democracy.newforest.gov.uk/ieListDocuments.aspx?MId=7875&x=1>

³ <https://democracy.newforest.gov.uk/ieListDocuments.aspx?CId=193&MId=8051>

expect that the development considerations set out in the adopted Plan to be fully reflected in subsequent developments, with appropriate planning conditions used to ensure that they are adhered to and enforceable so that future site operators are held to account for implementing those conditions.

Proposed Mineral and Waste Sites (Policy 20 and Appendix A)

Ashley Manor Farm, New Milton

Soundness: NFDC continues to hold concerns about this site allocation. The most substantial issues remain to be the impact on residents from dust/emissions and the adverse landscape impacts. There are also potential noise effects from gravel extraction works which may disturb the peace and tranquillity of the adjacent Milford Road Cemetery.

The development considerations set out in Appendix A for this site remains insufficient on the impacts of development on the landscape and residential amenity therefore fails the test of soundness under the 'justified' criterion. Further clarity would be helpful regarding the management of traffic associated with the development and the relationship of the site to the adjoining listed buildings.

There is also an unresolved 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.

Modifications proposed: NFDC would suggest that the development considerations set out in Appendix A include a requirement for clearly defined landscape buffers between the cemetery and residential properties around the periphery of the proposed site. This should include defined natural landscaping, planting regimes and a clear monitoring regime to monitor impacts. 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 Plan and that any site allocation must provide opportunities for an enhanced / alternative route that matches the vision for the Green Loop as set out in the adopted New Milton Neighbourhood Plan.

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, but this remains a significant area of concern for local residents. NFDC fully expect that the conditions in the plan relating to traffic management will be adhered to, and that future site operators are held to account for implementing those conditions.

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

This is a large area within the north-west corner in close proximity to the neighbouring settlement of Alderholt. It is recognised that a large number of representations have previously been made from nearby residents raising concerns about the principle of development of this site and Hampshire County Council and the Secretary of State are asked to consider carefully the points raised by such residents. NFDC notes the inclusion of additional development considerations in this Regulation 19 version of the Plan requiring a buffer to the north-west corner and western edge, plus buffers to adjacent residential properties, which have the potential to ensure that the direct impacts on the amenity of nearby residential properties are minimised.

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.

Historically, NFDC residents have experienced direct impacts from other extraction sites in the vicinity of Midgham Farm relating to dust, noise and highway safety. This includes the impacts from HGV vehicles travelling along Hillbury Road with related risks to drivers, pedestrians and cyclists. The enforcement of conditions on the management and operation of sites that come forward for extraction must be robust and enforceable. NFDC would not wish to see such adverse impacts repeated here or any future allocated sites.

Specific reassurance is also sought in the Plan that the closure of the existing extraction site at Bleak Hill will occur prior to any subsequent extraction at Midgham Farm. NFDC has particular concerns relating to the cumulative increases in vehicle movements should the two extraction sites be operating at the same time.

Purple Haze, Verwood (Policies 20 & 32)

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 policies

Modifications proposed:

Policy 20 (Appendix A) - once gravel has been extracted, many of the sites could be identified for providing nutrient mitigation, alternative 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 Policy 20 (Appendix A).

Concluding comments

This Council remains concerned about the continued reliance on the Avon Valley for extraction, and the impacts that this may cause locally. NFDC has particular concerns about the Ashley Manor Farm site and recommends amendments to the development considerations set out in Appendix A to address these. More generally NFDC asks that any development considerations

set out in the Plan are suitably drafted to ensure that suitable controls are in place to manage development and ongoing operations.

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 may continue to have a role in meeting wider sub-regional needs.

Yours faithfully

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cc
Councillor Derek Tipp
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