

HMWP Partial Update Regulation 18 Draft Plan Consultation Response

Document and section that you are responding to:

Minerals and Waste Plan October 2022 - Midgham Farm – pages 184 & 185

Site Proposal Study August 2022 - Midgham Farm - pages 61 to 6

Into which of the following categories does your representation fall?

- Support
- No view either way
- Objection

If your comment is in support of the above-named item, please explain your reasons for this:

N/A

An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions on the Tests of Soundness, please refer to Q11 & Q12 of the FAQs, which can be found at www.hants.gov.uk/minerals-waste-update.

Please tick all that apply

- Not complying with legal requirements / the duty to co-operate
- Not meeting the Test of Soundness

If you are objecting on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? Please tick all that apply

- The positively prepared test
- The justification test
- The effectiveness test
- The test of consistency with national policy

If you are objecting on the grounds that it does not meet the Test of Soundness, please include below your comments on how it does not meet the Test of Soundness:

What has changed since this site was considered as a Planning Application in June 1995 and recommended for refusal 92/NFDC/050721 application withdrawn), following it being an “omission site” in the Hampshire Minerals and Waste Local Plan of 1993? Subsequently this site was not included in the previous HCC Minerals and Waste Plan of 2013.

As in para 2.8 of the 1995 planning application, it should be noted that a greater number of dwellings now front directly onto or lie within a few meters of Harbridge Drove and Hillbury Road, notably at Drove End Farm, Braemoor, the Bungalow, Primrose Cottage, Hill Crest, new dwellings at Bleak Hill Farm, Christmas Rose Cottage and Daffodil Cottage. All of these properties lie within the first 1.2Km south of the proposed site access and will be adversely impacted by the daily HGV movements.

The same reasons for the removal of this site from the current HCC Minerals & Waste draft plan exist today although slightly less mineral extraction is envisaged: 4.2Mt as opposed to 5.9Mt.

This rural area on the extreme edge of the HCC authority area abuts the village of Alderholt and is very close to important biodiversity sites (as listed extensively on page 61 of the HCC M&W Proposal Study for the site and page 25 of the Ecological Statement).

These are: -

Loss of good quality agricultural land grades 3a and 3b within the site – “a significant quantity of best and most versatile agricultural land, a national resource for the future”: of particular importance due the Climate Change Emergency, and the need for food security.

Negative impact on Alderholt Dorset residents who are outside the accountable HCC area, with respect to excessive increased noise brought about by the extraction, processing and transportation, together with associated vibration, dust and air pollution. EDDC clearly objected to the 1995 application on the grounds of the “*likely detriment to amenity that will be caused to the adjacent residential neighbourhood and outlying individual dwellings*” at para 5.6 of the officer’s report on PA 050721.

Para 5.9 (i) to (iv) of the 050721 officer’s report quite clearly states the NFDC Environmental Health Officer’s objections regarding the detrimental impacts of increased noise levels due to machinery and plant on the site as well as the increased noise, vibrations and pollution resulting from the HGV traffic movements, as cited below: -

“The District Council has recorded levels as low as 31/32 dB(A) at Wolvercroft Spinney and Midgham Farm Bungalow and Cottages and comments as follows:

- (i) Primrose Cottage aside, the noise from the plant site and haul road will result in an increase in the background noise level well in excess of 10 dB(A), ie the level at which complaints are likely. For example, at Midgham Farm Cottages; Shallotte House and Holmwood, increases of 14. 15 and 16 dB(A) respectively are predicted.*
- (ii) Even if the more stringent standard of 45 dB(A) can be met then five out of the seven residential properties will be subjected to noise levels 10 dB(A) above the background level throughout the life of the site. At this level complaints would be expected which in normal circumstances would warrant action under the noise nuisance provisions of the Environmental Protection Act 1990; and*
- (iii) concern is also expressed at the environmental impact of HGV movements from the site, in that whilst the consultant are proposing a 40mph restriction on the Ringwood Road/Station Road route, seeking to make it less attractive*

- than the preferred route via the Bakers hanging junction and the A338, the District Council are sceptical that this would work in practice and there are a number of houses on the roads which would be affected; and*
- (iv) *in the case of Drove End Farm, lorries travelling southwards would result in virtually a four-fold increase in HGV movements, and in all other cases an increase by a factor of 2.5, which will be perceived by residents as peaks of noise, probably up to 40 dB(A) above the background noise level."*

It should be noted that these aspects are totally missing from the Development Considerations listed on page 184 the HCC M&W Draft Plan. The Site Proposal Study (page 62) barely mentions the outcomes for residents - only "Loss of the tranquil pastoral landscape" and the comment "The site area should be reduced so that the north west corner does not extend up to the edge of Alderholt village". This factor alone will impact the economic viability of the site.

The 1995 application proposed the use of lower weight capacity HGVs, compared to today where the gravel HGVs have a weight in excess of 32 tonnes with the associated increase in vibration and noise. Page 64 of the Site Proposal Study quotes 110 two-way HGV movements per day. Such increased road usage will impact heavily on Dorset's roads.

It should be noted that in the officer's report on application 05721 at para 5.11 the Dorset County Surveyor states the following requirements for a legal agreement: -

- (i) *confirmation of Traffic Regulation Orders for weight and speed restrictions on Ringwood Road and Hillbury Road;*
- (ii) *routeing of all vehicles generated by the development to the south of the site via Bakers Hanging junction and on to the A31 trunk road;*
- (iii) *a maintenance agreement for "making-good" damage to the public highway caused by the HGVs;*

As there doesn't appear to be any reference to earlier agreements for no HGVs to come through Alderholt unless delivering within the parish, we request that this should be a development consideration for all the proposed site allocations – both for extraction and landfill.

The Transport Assessment Study considers Hillbury Road, Harbridge Drove (C102) as being suitable for HGV traffic. However, in the officer's report re application 050721 6.3(ii)(i) "*at the last Public Inquiry the Inspector and County Council declared that "Harbridge Drove was totally unsuitable for heavy lorry traffic and this was one of the reasons for refusing this site in the current Minerals Local Plan (1993)."* Para 10.1 of that report: states, - "*The application site does not lie within a preferred Area in the adopted Hampshire Minerals Local Plan 1987, nor is the site included as a Preferred Area in the Hampshire Minerals and Waste Local Plan – Deposit Plan (1993). The site's omission from the Deposit Plan clearly reflects the county Council's view that the site is not suitable in principle for release for mineral working"*.

There will be an unacceptable and adverse impact resulting from an increase in the volume of traffic, particularly HGV movements with a cumulative effect as a result of the ongoing extraction and infill at Hamer Warren Quarry and the potential development of the Copley Wood minerals site opposite Hamer Warren.

It is noted on page 62 of the site Proposal Study under landscape character, that the remaining parts of the Avon Valley that are intact ie that below the ridge at Midgham

Farm, are becoming more important and that this is considered to be a highly sensitive area (water meadows) with regard to ecological interest and biodiversity.

In the 1995 refused application 057021, the officer's report majors on the ecology in para 10.11.1&2 and the extensive hydrology issues under section 10.13 where the numerable springs are mentioned alongside the potential removal of water storage within the gravel aquifer. This is of a concern considering the increasing pressure on water supplies with global warming and climate change as per last summer (2022).

There is also the ongoing flooding issue in the area eg footpath E34/7 from Hillbury Road to Midgham Farm floods every wet winter together with adjoining fields that make up the site. The following photos show the level of standing water on 29th December 2022 and certainly don't reflect the summer photographs that were included in the request for Pre-application advice for the site sought by Cemex on 3rd December 2021.



Left:- standing water by access point parallel with hedgerows on Hillbury Road
Right:- the proposed access point with standing water across the field (site) towards Lomer Lane.



Bottom left: view west across the site from Lomer Lane showing standing water in the field towards the far side, and cultivation has stopped because of the ground conditions.



The following pair of photos taken from Hillbury Road looking west show the level of standing water in the field abutting the Alderholt Recreation Ground. There is an unknown potential detrimental impact to this amenity space which already suffers from waterlogging during the winter months.



This is borne out by local knowledge: -

- During wet periods the water table is very high and ponds appear in the southern end of the Midgham proposed area. This is due to the closeness of the clay, once at field capacity there is nowhere else for the water to go and quite regularly there is a pond in excess of two acres. Water sits on the ground during a wet spring. The fields to the west of Hillbury Road are also flooded at this time.
- One does not know what the outcome would be to the fields west of the extraction due to the changing of the water table. The long-term outlook position of the water table is unknown at this present moment in time because it also depends on what materials are used to backfill after the gravel has been extracted. This operation depends on the material available at the time and the ground conditions when reinstating the agricultural land. There could be either one of two options: - the water would flood through resulting in the water table being lowered, or it could seal off any aquifers in the ground and cause water to rise in the Alderholt recreation ground!

Far more investigatory work is essential before any decision is made to take this forward in the Plan.

Allowance for climate change including frequency and intensity of rainfall events must be included in any assessment of this site.

There are problems with hydrology in this whole area, covering the proposed sites at Midgham Farm & Cobley Wood as well as the ongoing extraction at Hamer Warren and Bleak Hill. These are brought to the fore in paras 143 -148 of the Officer Report on Planning Application 19/11326 (to extend the permission for extraction, restoration and aftercare of Hamer Warren Quarry - Bleak Hill 111 site to 2025) which identifies the following concerns:

Para 145 states: -

The concerns raised in representations relating to impact on the groundwater are noted. The EA conclude that overall, the effects of the proposed extension on water resources is insignificant, and although there could be significant impacts on water quality, these can be mitigated for. Long term impacts on groundwater levels and stream flows are also ruled as not considered to be significant, but all the same it is proposed that monitoring will be undertaken, and mitigation measures implemented if required. However, given the scale and duration of the proposed extension any dewatering raises concerns that adequate monitoring and mitigation measures may not be in place for the protection of groundwater, surface water and private wells. The Applicant will need to apply for a Water Resources Abstraction Licence for the proposed Transfer for any dewatering is to be carried out from the excavation void(s) and conditions will be imposed to require review of the ground water monitoring data and a Monitoring Strategy based on that review.

Para 165 states: -

Restoration for Bleak Hill I and II is to agriculture land with nature conservation and biodiversity enhancements. The proposed restoration scheme delivers a balance of agricultural land with features for nature conservation together with public access extended across the site, including the existing landholding.

Para 174 (the report conclusions) state,
It is considered that the proposal would:

- *contribute to maintaining an adequate and steady supply of sand and gravel for Hampshire though the development of an extension to an existing mineral extraction site identified in the adopted Hampshire Minerals and Waste Plan (2013);*
- *be a time limited mineral extraction in the countryside which is subject to a **requirement for restoration and aftercare** and not cause an unacceptable visual impact;*
- **protect soils;**
- *not adversely affect local archaeology and cultural heritage;*
- *not have a significant adverse effect on designated or important ecology and biodiversity;*
- *be acceptable in terms of highway capacity and safety and cumulative impacts;*
- **not cause any additional flood risk and protect the quality of groundwater and surface water;** and
- *not cause unacceptable adverse amenity or other cumulative impacts.*

From observation it is evident that the restoration to agriculture at Bleak Hill I is unacceptable, as there have been many attempts to grow cereal crops here all of which have failed.



The photo left taken from the east boundary on 29th December 2022 shows that the field is waterlogged. The presence of test strips suggests the operators are trying to identify the cause of the problem and what appropriate remedial action, if any, can be taken.

Repeated problems with groundwater and attempts to cultivate wet ground will adversely impact both soil quality and soil ecosystems. It should be noted that high inputs of nutrients must be avoided to ensure nutrient neutrality of the Avon.

Thus, it appears that all three proposed allocations would fail to comply with Policy 8, Water Resources page 43 of the HCC M&W Plan, on the available evidence.

The Site Proposal Study on page 63 highlights the significant archaeological issues that are likely to occur on this site, resulting in a possible 10 to 15% reduction in mineral yield incurring an economic impact on the viability of the site.

It is anticipated that the equipment on site needed for extraction, along with a conveyor over Lomer Lane to facilitate the second phase of extraction would have an adverse impact on the landscape character and tranquillity of this highly valued rural area.

This proposal will affect the "Quality of Life" particularly as the machinery is to be located at the northern edge of the site closest to Alderholt, so having a severe negative impact on Alderholt residents.

Are you seeking a change to this section?

Yes

No

If you are seeking a change to the above section, what change are you seeking and why?

The removal of the Midgham Farm site from the draft plan, as there have been no changes to the criteria of site since the 1995 application 050721 which following the extensive officer's report was withdrawn. In fact, the local road network is under even greater duress and usage, with no apparent improvements. This report also mentions the cumulative impact (section 10.17) of yet another site being put into operation whilst the existing sites – Hamer Warren, Bleak Hill, Plumley Wood are in operation the Harbridge area, alongside the expansion of the Ibsley site and the Purple Haze site.

Do you have any further comments on this section?

We question the viability of the whole site as gravels and sands do not stop in a straight line they merge together and go off at different angles. Having spoken to some of the operatives on the Hamer Warren site we question the viability of the whole Midgham site and suggest that more exploratory bore holes are drilled before inclusion of the site in the Plan. This request is made having been witness to the Blue Haze and Nea Farm excavations. The vein of sand at Nea Farm just carried on going down and down and down whereas at Blue Haze the material was of such poor quality it was hauled across the road to backfill Nea Farm. The quantity of recoverable sand and gravel at Plumley Wood is far less than anticipated in the relevant Plans and applications. It should be noted that this area is on the edge of the gravel beds and is very unpredictable regarding quantity and quality, unlike the gravel beds through the Avon valley at Blashford.

We believe that the long list of Development Considerations relevant to this site on page 184 of the HCC M&W Draft Plan render the site less sustainable and less

viable than other sites within the Draft Plan, Add to this the fact that with the proposed access onto Hillbury Road, this road will have to be widened substantially to accommodate the HGV traffic and this is under the control of the adjoining authority – Dorset Council.

Please note there is no consideration of the combination impact with the proposed large scale housing and commercial development in Alderholt.

Since the launch of the consultation, the House of Lords has reported on the need for land use planning to reflect all aspects including agricultural land to deliver food security <https://publications.parliament.uk/pa/ld5803/ldselect/ldland/105/105.pdf> This should be taken into account for all sites.

HMWP Partial Update Regulation 18 Draft Plan Consultation Response

Document and section that you are responding to:

Minerals and Waste Plan October 2022 - Cobley Wood – pages 166 &167

Site Proposal Study August 2022 - Cobley Wood - pages 69 to 72

Into which of the following categories does your representation fall?

- Support
- No view either way
- Objection

If your comment is in support of the above-named item, please explain your reasons for this:

N/A

An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions on the Tests of Soundness, please refer to Q11 & Q12 of the FAQs, which can be found at www.hants.gov.uk/minerals-waste-update.

Please tick all that apply

- Not complying with legal requirements / the duty to co-operate
- Not meeting the Test of Soundness

If you are objecting on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? Please tick all that apply

- The positively prepared test
- The justification test
- The effectiveness test

The test of consistency with national policy

If you are objecting on the grounds that it does not meet the Test of Soundness, please include below your comments on how it does not meet the Test of Soundness:

This is an exceedingly small site only 1Mt of sharp sand and gravel extraction anticipated, within an attractive and tranquil area, with the highly sensitive Hamer Copse 1A SINC less than 900m to the south and a grade 2 listed building Primrose Cottage which is actually located within the proposed allocated site. These two factors and the immense amount of mitigation buffering and post extraction restoration planting listed on page 166 of the Draft Plan in our view render this site less sustainable and economic than others within the HCC M&W Draft Plan.

Are you seeking a change to this section?

Yes

No

If you are seeking a change to the above section, what change are you seeking and why?

Removal of the Cobley Wood site from the plan. The site is small, close to the woodland SINC to the south and other important ecological and biodiversity sites listed with the Site Proposal Study pages 69 to 72. The unacceptable adverse impact on Primrose Cottage Grade II listed property which is already impacted by the continuing extraction and infill at Hamer Warren Quarry, particularly the latest extension at Bleak Farm which is opposite.

The location of this site on the western escarpment of the Avon Valley, will be clearly visible from the New Forest National Park, as there is no effective tree cover to mitigate the visibility of the extraction equipment and conveyor. The following two photos are taken from Harbridge Drove looking east across the Cobley Wood site and Avon Valley towards the New Forest National Park.



Residences are clearly visible.



Do you have any further comments on this section?

The cumulative effect of progressing this site and the proposed Midgham Farm site, along with the continuation of extraction and infill at Harmer Warren all of which access Harbridge Drove for HGV movements will have an even greater detrimental impact on Harbridge Drove (C102) which is currently not wide enough to allow for two HGVs to pass in opposite directions safely. This has resulted in damage to ancient boundary banks, verges and their flora where 2 HGV vehicles try to pass one another. The size/weight of the vehicles used has gradually increased since extraction began, without any substantial improvements to the road.

The Cobley Wood site was not included in the previous HCC Minerals & Waste Plan of 2013, so what has changed locally to make this site a viable option now?

HMWP Partial Update Regulation 18 Draft Plan Consultation Response

Document and section that you are responding to:

Minerals and Waste Plan October 2022 – Hamer Warren Quarry – pages 174 & 175 and Policy 29 pages 109 to 111.

Site Proposal Study August 2022 – Hamer Warren Quarry - pages 135 to 137

Into which of the following categories does your representation fall?

- Support
- No view either way
- Objection

If your comment is in support of the above-named item, please explain your reasons for this:

N/A An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions on the Tests of Soundness, please refer to Q11 & Q12 of the FAQs, which can be found at www.hants.gov.uk/minerals-waste-update.

Please tick all that apply

- Not complying with legal requirements / the duty to co-operate
- Not meeting the Test of Soundness

If you are objecting on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? Please tick all that apply

- The positively prepared test
- The justification test
- The effectiveness test
- The test of consistency with national policy

If you are objecting on the grounds that it does not meet the Test of Soundness, please include below your comments on how it does not meet the Test of Soundness:

As this site is already undergoing restoration under the approved planning application 19/11325 in respect of Bleak Hill 1 and 2, we are very concerned that the proposed change to infill of a Hazardous nature will have detrimental impact on the future of the area by way of public access –a footpath crosses the site, following the southern edge of the proposed infill area shown in red on the map (page 175).

Having read Policy 29 we object to this site being included as we don't consider it fully meets the criteria of 1ii of the policy. The existing road structure rural lane Harbridge Drove (C102) is not considered suitable for such transportation.

Added to this, none of the criteria of point 3 within Policy 29 are deemed to have been met.

Also, on reading the relevant pages (174 & 175) of the Draft Plan, all of the development considerations have a high priority where the only reason for changing the type of infill already agreed under the existing permission appears to be a financial one!

Are you seeking a change to this section?

Yes

No

If you are seeking a change to the above section, what change are you seeking and why?

Removal of Hammer Warren Quarry from the list of sites under Policy 29 suitable for Hazardous Waste infill, as this contrary to the existing planning application for Bleak Hill 1 and 2 19/11325 and it doesn't meet the criteria of Policy 29 except for point 2c.

Do you have any further comments on this section?

However, should this site be included under Policy 29, by virtue of being an existing quarry site point 2c of the policy, it is essential that the stated Asbestos being the designated hazard waste in the Draft Plan for Harmer Warren Quarry is strongly adhered to and conditioned so that its form cannot be changed in the future.

As this site is in a rural setting it is essential that the land is restored as per the requirements of the existing planning application.

HMWP Partial Update Regulation 18 Draft Plan Consultation Response

Document and section that you are responding to:

Minerals and Waste Plan October 2022 – Purple Haze – pages 188 & 189

Site Proposal Study August 2022 – Purple Haze - pages 57 to 60

Into which of the following categories does your representation fall?

- Support
- No view either way
- Objection

If your comment is in support of the above-named item, please explain your reasons for this:

N/A

An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions on the Tests of Soundness, please refer to Q11 & Q12 of the FAQs, which can be found at www.hants.gov.uk/minerals-waste-update.

Please tick all that apply

- Not complying with legal requirements / the duty to co-operate
- Not meeting the Test of Soundness

If you are objecting on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please tick all that apply*

- The positively prepared test
- The justification test
- The effectiveness test
- The test of consistency with national policy

If you are objecting on the grounds that it does not meet the Test of Soundness, please include below your comments on how it does not meet the Test of Soundness:

Are you seeking a change to this section?

- Yes

No

If you are seeking a change to the above section, what change are you seeking and why?

Do you have any further comments on this section?

Having previously commented on this site which is allocated in the currently adopted Hampshire Minerals and Waste Plan 2013, at a planning application stage (21/10459):-

Alderholt Parish isn't directly affected by this proposal, but it will undoubtedly have an impact on the traffic using the B3081 for the 20 years duration of operation - estimated 90 vehicle movements per day. It should be noted that no blasting or crushing is to take place on site and the hours of operation are 7.00 to 18.00 Monday to Friday and 7.00 to 13.00 Saturday. The full range of documents supplied indicate that the applicants have taken into account the necessary requirements for rerouting the cycle path, minimal lighting, mitigation for wildlife and the restoration of the site (woodland, heathland, grassland and ponds) as extraction is completed. In the light of the above, we have no objection.

we can only emphasise our concerns that all the Development Considerations listed on pages 188 & 189 are fully and exhaustively taken into account.

We also wish to comment on the overall adverse cumulative effect that the development of all the local sites (Midgham Farm, Cobley Wood and Purple Haze) will have on the area by way of damage to the surrounding landscape and environment through potential pollution, noise, disturbance of water flows, loss of wildlife species and habitats.

There will also be large cumulative impact of extraction and infill traffic within the immediate area encompassing Alderholt, for a further 25 years or more.

About You

Is this your own personal response, or are you responding on behalf of an organisation or group?

- This is a personal response
 This response is on behalf of an organisation or group

If this is a personal response, your name and postal address must be provided for your comments to be accepted. Please include these below.

Please note: anonymous or confidential representations cannot be accepted.

Your full name (required)	
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Your full postal address (required)	
Your full postcode (required)	
Contact email address (optional)	

If this response is on behalf of an organisation or group, please tell us a little more about yourself and the organisation you are responding on behalf of:

Please note: anonymous or confidential representations cannot be accepted.

The full name of your organisation or group (required)	Alderholt Parish Council
The full address of your organisation or group (required)	The Council Office 1 Station Road Alderholt Fordingbridge Hants SP6 3RB
Your full name (required)	Ms Lee Ellis
Your position in the organisation or group (required)	Clerk & RFO
Contact email address (optional)	Clerk@alderholtparishcouncil.gov.uk

We would like to know a bit more about you to help us understand the views of different groups. You do not need to answer these questions if you do not wish to.

What was your age on your last birthday?

- | | |
|-----------------------------------|--|
| <input type="checkbox"/> Under 16 | <input type="checkbox"/> 55 to 64 |
| <input type="checkbox"/> 16 to 24 | <input type="checkbox"/> 65 to 74 |
| <input type="checkbox"/> 25 to 34 | <input type="checkbox"/> 75 to 84 |
| <input type="checkbox"/> 35 to 44 | <input type="checkbox"/> 85 or over |
| <input type="checkbox"/> 45 to 54 | <input type="checkbox"/> Prefer not to say |

How would you describe your gender?

- Female
 Male
 Other
 Prefer not to say

For 'other', please describe:

If you would like the Hampshire Authorities to keep you informed on the different stages of the Hampshire Minerals and Waste Plan, please tick the box below.

x Keep me informed