ALDERHOLT PARISH COUNCIL

PARISH OFFICE, 1 STATION ROAD, ALDERHOLT, FORDINGBRIDGE, HANTS SP6 3RB
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Minutes of a Meeting of Alderholt Parish Council Planning Committee held in the Committee Room at Alderholt Village Hall at 7pm on Monday 17th February 2025.

Present: Cllr G Logan (Chairman), Cllr A Butler, Cllr S Butler, Cllr A Hibberd, Cllr D Tooke, Mrs K Brooker (Asst Clerk)

08/24 Welcome from the Chairman and housekeeping notices:
Cllr Logan welcomed everyone to the meeting and explained the emergency procedures.

09/24 To receive and accept apologies for absence:
None received.

10/24 To receive declarations of interest and/or consider the granting of dispensations:
No declarations of interest were received or dispensations granted.

11/24 To confirm the minutes of the Planning Meeting held on 20th January 2025 are a correct record of that meeting:
Members unanimously **RESOLVED** to approve the minutes as a correct record of that meeting and they were signed by the Chairman.

12/24 Chairman's Announcements:
Cllr Logan announced that the Midgham Farm application was now showing on the Planning Portal as follows.

P/FUL/2024/07568 Link to view application: Planning application: P/FUL/2024/07568 - dorsetforyou.com	**Location: Land At Midgham Farm Hillbury Road Alderholt** **Proposal: Proposed extraction of sand and gravel with associated access, internal haul roads, processing plant, silt and freshwater lagoons, stockpiles, conveyors, offices, weighbridge, and other ancillary infrastructure, creation of a new permissive path, and restoration with inert materials to agriculture, amenity and nature conservation. **THIS IS FOR INFORMATION ONLY AS THIS IS NOT YET OPEN FOR CONSULTATION****

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13/24 To receive a report from Planning Chair, Cllr Logan regarding the independent examination of the Hampshire Minerals and Waste Plan – Partial Update which includes the potential Midgham Farm site.
Cllr Logan gave a brief update on her attendance at the independent Examination hearing – Matter 8. Representatives from Hampshire County

Council, neighbouring Councils and the applicant were also in attendance.

14/24 Public Forum:

There were no members of the public in attendance.

15/24 To consider new planning applications received from Hampshire and Dorset County Council for comment by this committee.

APPLICATION NUMBER	LOCATION AND APPLICATION DETAILS	MEMBERS DECISION
HCC/2024/0755 NF178 **Link to view application: https://planning.hants.gov.uk/Planning/Display/HCC/2024/0755**	**Proposed extraction of sand and gravel with associated access, internal haul roads, processing plant, silt and freshwater lagoons, stockpiles, conveyors, offices, weighbridge, and other ancillary infrastructure, creation of new permissive path, and restoration with inert materials to agriculture, amenity and nature conservation at Midgham Farm, Near Fordingbridge, Hampshire SP6 3DA**	Members unanimously **RESOLVED** to strongly object to this application **as per the attached report.**
P/ADV/2025/00344 Reporting Councillor: Cllr A Hibberd	**Location: Land North of Ringwood Rd, Alderholt** **Proposal: 6 flags on flagpoles (flags 900 x1800mm, poles 6m). There are two pairs (either side of the site entrance from Ringwood Road) and two at the NW corner of the site.** **2x 'stack sign' (non-illuminated, 1500 x 3050mm. base of sign 1000m above ground), located on the northern side of the site entrance from Ringwood Road and**	Members unanimously **RESOLVED** "No Objection"

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	the southern corner of the site. 2x 'monolith sign' (non-illuminated, , 1220 x 2440mm). Located within the site, on the northern side of the site entrance (double sided) on Ringwood Road and on the southern side of the site entrance on Ringwood Road.	
P/HOU/2025/00492 Reporting Councillor: Cllr D Tooke	Location: 17 Wren Gardens, Alderholt, SP6 3PJ Proposal: Erect a two storey extension to replace existing single garage and utility room	Application was declared invalid and is likely to come back to a future meeting.

With no further business the Chairman closed the meeting at 7.30pm.

Chairmans signature:

Date Ratified:

Response from Alderholt Parish Council

Application: - HCC/2024/0755

Proposed extraction of sand and gravel with associated access, internal haul roads, processing plant, silt and freshwater lagoons, stockpiles, conveyors, offices, weighbridge, and other ancillary infrastructure, creation of new permissive path, and restoration with inert materials to agriculture, amenity and nature conservation at Midgham Farm, Near Fordingbridge, Hampshire SP6 3DA

Alderholt Parish Council strongly objects to this application as it has been made prior to the conclusion of the Regulation 22 Independent Examination of the Hampshire, Portsmouth, Southampton. New Forest National Park & South Downs National Park Minerals and Waste Plan: Partial Update – Submission Plan (July 2024), taking place in February 2025. Thus, the inclusion of the Midgham Farm site in the Plan is yet to be determined.

When considering this application against the yet to be determined Partial Update Submission Plan (2024), with regard to the need for land won sharp sand and gravel (SSG) we believe the need for SSG has been overestimated. The table below shows the following:

Table 6.1 – Average sales of aggregate in Hampshire (2013 – 2022) (million tonnes)

Aggregate type	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	10-year average
Land-won: Sharp sand and gravel	0.73	0.78	0.71	0.75	0.73	0.96	0.66	0.83	0.68	0.55	**0.74**
Land-won: Soft sand	0.12	0.11	0.12	0.2	0.23	0.23	0.23	0.02	0.13	0.09	**0.16**
Land-won: Sub-total	*0.85*	*0.88*	*0.83*	*0.95*	*0.96*	*1.18*	*0.90*	*0.85*	*0.81*	*0.64*	***0.90***
Rail & Sea: Imports: Crushed rock**	0.39	0.46	0.46	0.55	0.57	0.69	0.66	0.52	0.5	0.38	**0.52**
Marine-won: Sharp sand and gravel	1.43	1.36	1.55	1.55	1.52	1.42	1.34	1.35	1.33	1.2	**1.40**
Recycled and Secondary	0.93	1.11	0.99	0.83	0.76	0.72	0.77	0.67	0.75	0.74	**0.83**
Total	**3.6**	**3.81**	**3.83**	**3.88**	**3.81**	**4.01**	**3.67**	**3.39**	**3.39**	**2.96**	**3.65 (sum)**

Average sales were only 0.74Mt over the 10 year period, and with the exception of 2018 & 2020 show significant annual declines which are likely to continue being made.

The requirement for SSG is noted at Table 6.3 and para 2.33:
To meet the local land-won sand and gravel requirement of 0.9mtpa, Hampshire will need to provide 17.1 million tonnes (mt) of aggregate by 2040. This will be met from: • existing (permitted) reserves - 10.59mt; • sites identified within the Plan, including extensions and new sites – 11.2mt; and • unallocated opportunities - 2.75mt. (based on time period 2030 – 2040)

Table 6.3 – Local land-won requirement up to 2040

	Sharp sand and gravel (mt)	Soft sand (mt)	Total (mt)
Hampshire Provision Rate	0.74 pa	0.16 pa	0.90 pa
Requirement to 2040 (Provision Rate x Plan period of 19 yrs - based on plan period of 2023-2040)	14.06	3.04	17.1
Existing reserves	9.42	1.167	10.59
Sites in Draft Plan (yield)	7.2	4.0	11.2
Unallocated (minimum)	-	-	2.75 (0.25 pa)
Total (excluding rates)	**16.62**	**5.167**	**24.54**
Please note - Numbers in table may not sum due to rounding. Yields stated within plan period only *Source: AM2022 Survey*			

Thus, although the total tonnage is 24.54mt and the SSG is 17.10mt, this gives rise to an HCC land bank of some 7.44mt over the estimated requirement. When referring to SSG alone, the requirement figure is 14.06mt whilst the existing and new sites if approved would deliver 16.62mt. This gives an excess of 2.56mt and when added to the minimum/nominal 2.75mt arising from unallocated and unplanned opportunities, the excess becomes 5.31mt, which of itself is far greater than the anticipated 3.6mt expected from the Midgham Farm site.

We therefore suggest that the Midgham farm site should be omitted from the plan and this application refused. Commercially the decline in sales is reflected in the reduced demand.

We believe that instead of quarrying, a greater use be made of recycled and secondary aggregate production, which is borne out in Policy 18 of the Partial Update Submission Plan 2024:
Recycled and secondary aggregates development Recycled and secondary aggregate production will be supported by encouraging investment and further infrastructure to maximise the availability of alternatives to marine-won and local land-won sand and gravel extraction. Development capacity will be supported to maximise the recovery of construction, demolition and excavation waste and to encourage production of high-quality recycled/secondary aggregates. A minimum capacity will be maintained of at least 1.8Mtpa to support production.

Historically, the Hampshire County Planning Officer commented in the June 1995 report on the Planning Application 92/NFDC/050721 at Para 10.1:

"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".

It should be noted that the original application for Hamer Warren was granted planning permission on 23 February 1983, with all work to be completed by 31 December 2000. There have now been numerous extensions up to 2029 – adding an extra 30 yrs of operations!

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 then current Hampshire Minerals and Waste Local Plan. Subsequently this site was not included in the previous HCC Minerals and Waste Plan of 2013, nor the 2018 review.

There is no evidence to show that the issues of 1995 still existing today can be resolved.

This rural area on the extreme edge of the HCC authority area abuts the Dorset village of Alderholt and is very close to important biodiversity sites (as listed extensively in paras 10.102, 103 & 104 of the Planning Statement Vol 1), all of which would be adversely impacted should this site be developed.

It is noted in para 4.25 of the Planning Statement Vol 1 that an estimated total mineral tonnage is to be around 3.6million tons (mt). This value is less than that envisaged in the Regulation 18 documents of the HCC Minerals & Waste Plan Partial Update (Jan 2023) 4.4mt, and even less than the figure of 5.9mt cited in the original planning application of 1992. This reduction is brought about by the need for additional and larger buffer zones. Thus, we question whether the actual site is viable bearing in mind the level of mitigation currently envisaged if this application should be granted approval.

Our reasons for objecting to the application are detailed below: -

Loss of good quality agricultural land

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. We note the long-term intention to eventually restore it, but our need for food security is urgent now. As priorities are likely to be established as part of the Land Use Framework and it was be folly to even contemplate sterilising this land for uses other than agriculture until we know the outcome of that later this year.

Evidence of past flooding at Hamer Warren – Bleak Hill 1(see photo below) suggests that following extraction and then infill with inert material, the hydrology will be impacted thus rendering the site unable to support food production as it will adversely impact the soil quality and soil ecosystems. The resulting outcome was the provision of a solar farm.

The photo taken from the east boundary of Bleak Hill 1 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.

Noise, vibration, dust, pollution and other hazards

Noise

Noise will have a 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. NFDC 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; Shalotte 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 consultants 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."

When comparing the above with the results in Chapter 7 of the ES and the information at paras 10.220 to 10.227 of the Planning Statement Vol 1**,** we note that the calculations give rise to decibel levels that are only just below the levels currently conditioned for Bleak Hill, where the activity and location of the plant, is much further away from residential properties. The impact on Drove End Farm properties, as well as Alderholt – (Hillbury Park Homes, Wren Gardens & Kestrel Way,) plus Holmwood and Hillbury Farm will therefore have a significant adverse impact on the wellbeing of the residents.

During much of the operations, simultaneous extraction and infilling will be taking place (although in different phases – these are adjacent ie 4, 5 & 6 undergoing extraction whilst 3 is being infilled). Thus, the increase in noise levels will be significant, greater than the conditioned 45dB(A) at Bleak Hill for noise-sensitive properties.

Although the hours of operations are given in para 10.223, the hydrology of the area will necessitate DE-WATERING during all the phases of operation except for phase 2, see para 6.13 of the Planning Statement Vol 1, with the water being continually pumped to the freshwater pond at phase 1. The effect of this operation below the water table, will require the continual use of water pumps 24/7 for the life of the site, with the ensuing background noise and inevitable outcome of an unacceptable adverse impact on the wellbeing of the residents of Alderholt nearest to the Midgham Farm site, which may well last for 3 decades!

Should the application be approved we request that in order to mitigate against the adverse impacts of noise to the wellbeing of Alderholt residents, the operational hours for Monday to Friday are restricted for the duration of the work to no more than 08.00hrs to 18.00hrs and that no variation of condition is allowed.

Dust, pollution and other hazards

Throughout the operations (phases 1 to 8) there will be large expanses of water – the freshwater pond and lagoons A and B. These 3 large expanses of water in the northern section of the site are closest to the residents of Alderholt. With Climate Change, it is anticipated that we'll be getting increased numbers and species of Mosquito including those that are vectors for diseases that are currently not established here. THIS SITE IS THEREFORE A POTENTIAL NUISANCE AND HEALTH HAZARD PARTICULARLY FOR ALDERHOLT RESIDENTS, AND IT MUST BE INVESTIGATED AS A MATTER OF URGENCY, WITH A VIEW TO MITIGATION MEASURES THAT CAN BE CONDITIONED.

It must be noted that should the application be approved, in order to maintain the wellbeing and quality of life in the nearby residences and Alderholt, that all the mitigation suggestions listed in paras 12.6.2 to 12.6.7 of the Environmental Statement Vol 2 Chapter 12 must be strictly adhered to through conditions (a management plan), monitored effectively and any required enforcement action implemented promptly. It should be noted that the existing quarterly meetings of the liaison panels have proved somewhat inadequate.

Transport / HGV movements

HGVs - 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 as well as destruction of the verges along the prescribed route.

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 plus Old Barns and The Bothy at Drove End Farm. Because of their proximity to the proposed site access all of these properties will be adversely impacted by the daily HGV movements.

Extrapolated from para 6.35 of the Planning Statement Vol 1, the operation of the site gives 90 vehicle movements per day for years 1 to 3 (extraction), 90 plus 42 for years 4 to 15 (extraction and infill) and 90 for years 16 to 20 (infill). Such increased road usage will impact heavily on Dorset's roads – particularly Hillbury Road/Harbridge Drove/Alderholt Road (C102). The extensive damage caused to the verges by the existing Hamer Warren/Bleak Hill operations is clearly visible in the photos on the next page (Spring 2023), and continues. It results in considerable soil erosion.

These verges are important wildlife corridors and they need to be protected from further denigration.

Transport

The Transport Assessment Study considers Hillbury Road, Harbridge Drove/Alderholt Road (C102) as being suitable for HGV traffic.

However, the narrowness of the road (5.1m to 5.3m) particularly north of the existing quarry site entrance has resulted in a requirement to widen to the road for a minimal stretch of 250m to obtain a 6m width.

The whole length of the route to Bakers Hanging junction with the B3081, is as a rural lane of limited variable width, where two HGV's can only pass by slowing down or stopping at various sections along its length. This road is classed as a Type 4 construction road which is built to support half a million standard axles. HGVs are not supported on this type of road. Should the application be approved, a further 20 to 30 years of HGV movements due to the quarrying and infill at Midgham Farm will not only result in increased deterioration of the road, but also increased safety implications as undoubtedly more traffic will be using the route, as a result of increased future development in the area.

The Inspector's report on Alderholt Meadows Appeal - APP/D1265/W/23/3336518 commented on traffic issues raised at para 40:

"The document "HS2 Rural Road Design Criteria" is more relevant to the circumstances. It was created for works on rural roads, to address the perceived gap between the trunk road-oriented Design Manual for Roads and Bridges on the one hand and street design criteria based on Manual for Streets and Manual for Streets 2 on the other. It is intended to provide a safe, consistent and proportionate approach to the design of rural roads. It is recognised that its origins are in the HS2 project, and it relates to new highway design. Nevertheless, the document makes clear statements as to the appropriate carriageway widths for rural roads. These are based on safe passing widths, which are generally applicable, so there is no logical reason why these criteria should be regarded as limited to roads designed as part of the HS2 project. The document states that 5.5 metres is the minimum width for two cars to pass in safety at low speed; 6.0 metres is appropriate for lengths with occasional use by buses or heavy goods vehicles; and ***6.8 metres should be used for roads where buses or heavy goods vehicles are likely to pass each other on a regular basis****. If these criteria were applied to the road network around Alderholt, considering the volumes of traffic in the*

2033 scenario plus development, and the mixed nature of that traffic, 5.5 metres would not be adequate for most links. They would require a carriageway of at least 6.0 metres with the potential for 6.8 metres along the roads with highest and most mixed flows. The assessment of the capabilities of the network against a 5.5 metre standard, and the proposed widening measures to achieve a carriageway width of 5.5 metres, must be seen in this context."

In essence, the document criteria highlight the fact that the existing winding C102 route with inconsistent width, variable forward visibility and poorly delineated edges, isn't suitable for regular HGV movements.

The above is borne out 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)."*.

In our recent objection to the extensions Bleak Hill III (HCC/2024/0204) and Bleak Hill I & II (HCC/0204/0205) we noted that HCC have not conducted any meaningful assessment of the suitability of the Harbridge Drove/Alderholt Road since the initial planning application in 1982. Even that was restricted to "desk-based assessments". HCC have stated that erosion of the highway verges is grounds for considering any road unsuitable for the existing traffic.

In a Transport Research Laboratory study in 2008 which looked into the likely effects of longer and/or heavier goods vehicles, the relevant part of the study attributed a damage cost per axle kilometre of HGV traffic on various types of roads. The damage cost was then £0.32 per axle km (some £0.60 at today's prices) for Local Authority (non-principle) roads. Given the 4 axles and 15km return journey A31 to the existing Hamer Warren quarry entrance, the resulting damage cost of one return HGV journey would be £36. This gives a daily total damage cost of some £4000 to £8000 or £1.2M to £2.0M per year!

Should the application be approved, it is essential that a far greater sum than the previous £1000 per year agreed (for 4 years) for the recent Bleak Hill extensions (HCC/2024/0204 & 0205) be obtained from the applicant to ensure there is adequate money available to go towards a "maintenance agreement" for mitigation to offset the anticipated damage to the prescribed lorry route.

There will be an unacceptable and adverse impact resulting from an increase in the volume of traffic, particularly HGV movements with a cumulative effect if as intimated, operations are commenced at the Midgham Farm site before the infill and restoration are completed at Bleak Hill. It is essential that all works at Bleak Hill are completed prior to any works commencing at the application site.

One other major concern is that the HGV movements must be to the south thereby avoiding Alderholt and Fordingbridge – (the cost savings to the developers of routing northwards through Alderholt and Fordingbridge would be considerable). The technology is available to monitor and control all lorry movements, and we ask that should the application be approved, then the installation and usage of such technology is a condition of the approval, and enforced. This is of particular concern with regard to sub-contractors being used, and this condition must be part of any contract so that enforcement of HGV movements can be managed, for the wellbeing of both Alderholt and Fordingbridge residents.

Public Rights of Way
It is noted that the footpaths within the site are to be diverted and that a new permissive footpath is to be installed as per dwrg ITB14187-GA-019D in ES Ch7 Vol Appendix 2.4 southwards from the access to Hillbury Park to the Drove End car park where there is access to the forest tracks within Whitefield Bottom. This to be welcomed for use by pedestrians, but as a permissive path has no guarantee of being kept beyond the lifetime of the site, its future is questionable.

With regard to the horse riders utilising Ringwood Road from the livery stables to access the tracks from the Drove End car park, the junction of Ringwood Road with Hillbury Road/Harbridge Drove will become much more dangerous with the increase in HGV numbers (total of 142 movements per day with extraction and infill). The suggestion that the permissive path is utilised by them is not practical as access between the livery stables and Hillbury Road is itself beset with problems – no short safe route, only roads that are heavily used by traffic of all kinds, and numerous parked cars – urban as opposed to the rural Ringwood Road. This does not provide mitigation against the dangers of potential accidents at the Ringwood Road junction.

The highway system which is meant to be safe for all road users is totally compromised, impacting heavily on the local horse riders.

Hydrology
At the Regulation 18 Consultation on the HCC Minerals & Waste Plan Partial Update 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, on an international and national level (SSSI).

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 major concern considering the increasing pressure on water supplies with global warming and climate change as per summer 2022.

Paragraph 10.156 of the Planning Statement Vol1 lists the numerous streams, brooks, drainage ditches, an artificial drain and two spring-fed ephemeral streams, which indicate the complexity of the hydrology of the area in and around the site.

Flooding doesn't stop at the county boundary!

Local knowledge: -

- During wet periods the water table is very high and ponds appear in the southern end of the Midgham Farm proposed area. This is due to the closeness of the clay to the soil surface, 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 – see photos on next page. The fields to the west of Hillbury Road are also flooded at this time – see photos below.

- 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 the applicant has not investigated the impact of dewatering, nor identified how the infill material ("inert" but of unknown composition) used to backfill after the gravel has been extracted will impact. 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!




These photos taken from Hillbury Road looking west opposite the proposed Midgham Farm site 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. Above 15th January 2023 and left 27th January 2025.

The following 4 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.


Top Left standing water by access point parallel with hedgerows on Hillbury Rd.
Bottom Left more standing water across the site..
Top Right the existing access point with standing water across the field (site) towards Lomer Lane.
Bottom Right view west from Lomer Lane - standing water.


The photo shows footpath No. 3 linking Hillbury Road to Lomer Lane to the east.

Note that Footpath E34/7 from Hillbury Road to Midgham Farm floods every wet winter together with adjoining fields that make up the site, as shown in the photos above.

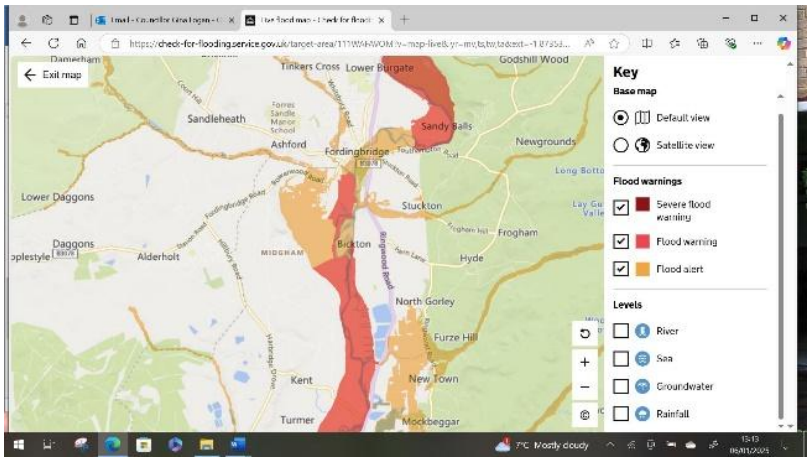
There is also flooding every winter at the Harbridge Drove / Ringwood Road junction as shown in the pair of photos below taken on 15th January 2023 and the other on 27th January 2025.:

In referring to the Vol 2 Environmental Statement Chapter 8 (Vol 2 ESC8) and the relevant sections within the Planning Statement Vol 1 we make the following observations: -

1. We strongly question that the hydrological impact hasn't been assessed on a far larger area, encompassing the Dorset residences in Alderholt. We are very concerned that the removal of the deposits, ie the aquifers will inevitably impact the existing hydrology and the subsequent infilling will then have a further impact possibly on the bedrock clays surrounding and under the site, resulting in possible shrinkage and/or waterlogging & flooding over a much larger area. THIS MUST BE ADDRESSED.

2. At par 8.4.10 (Vol 2 ESC8) the average groundwater levels are 3 to 6m below ground surface, with a seasonal variation in the winter of 1 to 3m higher. Thus, in winter with a variation of 3m the ground is wet the ground water level becomes the surface, hence the regular flooding.

3. Thus, reference must be made to the Dorset flooding checker held by HMGovt which appears to be valid on a short-term basis[1] and the Dorset Council groundwater levels data[2] both of which are available on line.



This shows the flooding situation on the Dorset Hampshire border on 6th January 2025.

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 site at Midgham Farm 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.

Restoration
Wetlands
In referring to the Restoration Phase text at para 8.9.3 (Vol 2 ESC8) says: -
The cumulative impact of the proposed restoration of the Site and the remaining areas of Bleak Hill II and III using inert fill of lower hydraulic conductivity has the potential to cause local changes to the patterns of groundwater movement through the River Terrace Deposits aquifer. Hydraulic continuity will remain within the restored areas allowing lateral movement

[1] Check for flooding in Alderholt, Fordingbridge, SP6 3BG - GOV.UK

[2] Strategic Flood Risk Assessment

of groundwater and whilst there may be localised slight increases in groundwater level upgradient of infilled areas and slight decreases downgradient of infilled areas the in-combination effects are not considered significant.

We would argue that these ground water movements are not insignificant, bearing in mind that the Restoration Plan – dwrg 24-03/L1/Midgham/Scheme-Rest paras 10.270 & 10.272 mention the ponds A, F and E to the north and ponds B, C1, C2, C3 plus ponds D1 & D2 all within the southern margins of the site. The supporting text at Vol2 ES Chapters 1 to 6 para 2.41 quantifies the actual areas covered by ponds and other required wetlands necessitated by the hydrology of the area as: -

4.7 hectares of ponds
8.4 hectares of willow scrub
6.0 hectares of reed beds

which gives a total of 19.2 hectares of "wetland". This amounts of just under 22% of the total site area(!) which we consider to be an extraordinary situation, resulting from extraction and infill having to occur below the groundwater table. We believe this situation alone should render the application site unsuitable for quarrying, and is another reason for our objection.

During and post restoration, it is essential that there is a maintenance plan in place for the ponds in the south (B, C1, C2, C3 and D1 & D2) as with the intended additional tree cover (advance planting areas and restoration woodland) dwrg 24-03/L1/Midgham/Scheme-Rest there will be an inordinate amount of annual leaf fall as well as the usual arboreal works required to maintain any woodland.

Infill

With regard to infill on the site being of inert waste (assumed builders' rubble, clay and soil) we ask what sort of additional quality control measures will be implemented to ensure that any additional rubbish that can contaminate inert waste is excluded ie batteries (including rechargeables), left over sandwiches, drinks cans, electrical waste, resin bonded building materials, old insulation and rags etc. Added to this, we need an absolute commitment that residual domestic waste will be excluded from the site as any such inclusion will give rise to significant adverse impact on Alderholt residents and those using the PRoW, by way of unacceptable odours and a potential fire risk. The environment will also be under the threat of potential pollution from leached chemicals and micro plastics adversely impacting – the aquifer, protected and designated habitats.

Silt

The land at Midgham Farm has a high silt content and we are not only concerned about its accumulation in the River Avon from run-off during operations, but also the potential air borne spread from the extensive array of bunds surrounding the site, and the air borne spread of dust that will occur from any tracts of soil that are not covered by grass during the operational phases of the application site.

We fully concur with the comments made by the East Dorset Environment Partnership on this and all other matters pertaining to this planning application.

Potential for a Conveyor

We note that in Dorset Council's initial response to the Regulation 18 consultation on the HCC M&W Plan - Partial Update which is included in document EX06[3] pages 7 & 15: -

"Consideration should be given to taking the mineral from Midgham Farm by conveyor over the Hillbury Road to the existing Bleak Hill/Hamer Warren site, to process and export it from there".

We fully support this suggestion, if a conveyer is installed from the southern end of the proposed Midgham Farm Site to the existing extraction site at Bleak Hill (Hamer Warren Quarry) across Harbridge Drove/Hillbury Road, it will facilitate the continued use of the infrastructure (central aggregate processing plant in Bleak Hill 1), thereby negating the need for such new infrastructure on the proposed site, and more importantly the requirement for extraction HGVs to use Harbridge Drove & Hillbury Road northward beyond the existing the quarry entrance. This will benefit the wellbeing of Alderholt residents and the users of Hillbury Road & Harbridge Drove – particularly the cyclists, pedestrians and horse riders.

It should be noted that in the HCC M&W Plan – Partial Update (submission July 2024) under Managing traffic impacts para 5.44: -

"Alternative methods of transport may provide opportunities to reduce and manage impacts of traffic and reduce potential carbon emissions associated with HGV movements. This may help to offset potential impacts on the climate. The section on 'Climate change' considers climate change in more detail. Alternative methods may include the use of field conveyors, internal site haul roads, pipelines and the use of sea, rail and inland waterways to transport minerals and waste. The use of one of the above methods, in particular the use of field conveyors and/or site haul roads at mineral sites, could be implemented in combination with road transport, in order to help reduce the impacts from road transport. In Hampshire, conveyors and pipelines are already used to move aggregates and oil and gas across county to avoid capacity issues on the public highway".

and in Policy 13 Managing traffic para 1: -

"Minerals and waste development should have a safe and suitable access to the highway network and where possible minimise the impact of its generated traffic on communities and the environment through the use of alternative methods of transportation such as sea, rail, inland waterways, conveyors, pipelines and the use of reverse logistics. Use of low emission/more sustainable fuels should be used as suitable options become available".

This clearly demonstrates that the use of conveyers is acceptable and should be promoted, as it will reduce the level of carbon emissions, retain and improve the biodiversity, and help maintain the wellbeing of residents by reducing adverse transport impacts of noise, vibration and dust.

We note in para 7.10 of Vol1 Planning Statement, that the applicant considers the provision under Harbridge Drove unattainable due to a number of factors: -

"Using a conveyor to move mineral across Harbridge Drove to the existing processing plant at Hamer Warren is also not viable as it would cross land in several ownerships not in control of the applicant, and therefore would necessitate agreement from a number of third parties,

[3] Microsoft Word - Dorset CC SoCG Statement of Common Ground FINAL 16.11.2023 Signed

which is very unlikely to be secured. It would also require the plant at Hamer Warren to remain in place for an extended period, compromising the restoration of that part of the site. A further issue with this option would be difficulties in the management of silt arisings from processing off-site, in terms of limited capacity at Hamer and/or the need to return silt back to Midgham as part of the restoration programme."

We understand that CEMEX owns the relevant parcels of land, and as they are able to provide the under-ground conveyor beneath Lomer Lane to facilitate extraction from the eastern side of the site, then surely a conveyer can be provided to link the application site with the existing Bleak Hill site, thereby negating the need for much of the plant and the extraction HGV movements.

We therefore ask that the feasibility of providing a conveyor taking the material from Midgham Farm to the existing Hamer Warren/Bleak Hill site is revisited as a matter of urgency and given great weight, as this provision will benefit the wellbeing of Alderholt residents. This needs to be undertaken before any permission is granted on this application.

Community Fund
This is a large application, adversely impacting the Dorset residents of Alderholt and others for an anticipated 30 years. We therefore request that the residual harm caused by the extraction and infill operations at this site be offset by the provision of a Community Fund to Alderholt.

If the Planning Authority is minded to approve the application, then the details of providing a Community Fund can be discussed within the Section I06 Agreements.

Conclusions
Alderholt Parish Council strongly objects to this application and asks that the application is REFUSED on the grounds that the site is unsuitable for development due to issues of actual Need, Loss of good quality agricultural land, Transport, Hydrology, and the detrimental adverse impact on the amenity and wellbeing of Alderholt residents, as described above.

We ask that the following issues are explored further before determination of the application:

- Feasibility of a conveyer linking the application site with the existing Bleak Hill site
- A larger area encompassing more of Alderholt to the north west of the site to be tested and examined with regard to the extensive hydrology issues of the area, and the resultant impact of de-watering, extraction and infill on them.
- Investigation into the potential nuisance and health hazards of greater numbers and species of mosquitos as a result of the large areas of wetlands.

If, however, approval is granted the following conditions should be applied: -

- Hours of operations Monday to Friday be from 08.00hrs to 18.00hrs.
- A realistic contribution via S106 is obtained for a "maintenance agreement" to offset damage to the prescribed lorry route.
- All Bleak Hill operations (extraction and infill) are completed before works commence at the application site.
- Use of technology to monitor and control all lorry movements to and from the site.
- A larger area encompassing more of Alderholt to the north west of the site to be tested and examined with regard to the extensive hydrology issues of the area, and the resultant impact of de-watering, extraction and infill on them.

- A Maintenance management plan for the ponds (B, C1, C2, C3 and D1 & D2) that can be effectively monitored so as to maintain and ensure their operational effectiveness.
- An Arboreal maintenance management plan that can be effectively monitored with regard to the extensive woodland surrounding the site.
- Explicit controls and conditions preventing both contaminated inert waste and domestic waste being used for infilling.
- All areas not under operation to be fully grassed to prevent soil erosion and dust pollution.