

HERITAGE

Hordle and Everton Residents In Tandem Against Gravel Extraction

**Reply to: 4 Yeatton House, Hordle Lane, Hordle
Lymington, Hampshire, SO41 0HW.**

Planning Policy Team,
Planning & Development,
The Environment Department,
Hampshire County Council,
The Castle, Winchester,
Hampshire, SO23 8 UD

09 December 2007

Dear Sir/Madam,

Regulation 26 Consultation Response

Please find attached the HERITAGE response to the above consultation. This response comprises the following:

- Page 2 of the HCC Consultation Response Form
- The response, relating to questions within the Form, in the form of a Statement
- Annex 1: Expert Opinion
- Annex 2: Table Indicating supply shortfall based on Existing Reserves and Preferred Areas
- Annex 3: Table providing figures for gravel extraction to 2020 (our revision of HCC Table 9 of Appendix 5 in the Consultation Document)
- Annex 4: Map of Roeshot Hill highlighting additional area not considered by HCC in its proposals

We wish to place on record our disappointment at:

- The very limited time of six weeks allowed for review of a complex issue with far-reaching consequences for local communities whose quality of life may be impacted by gravel extraction.
- Significant errors and misinterpretation in the information provided in the Consultation Document leading to an apparent bias in the presentation of the information.
- In our view very poor community consultation: from the refusal to meet with local communities other than brief workshops for very limited participants, to hard to access information for those who are not computer literate or without easy access to local libraries. Either HCC did not wish a proper consultation or they do not understand the make-up of local communities and their needs. Either explanation is alarming.
- A Consultation Response Form which, at 18 pages, is extremely difficult to follow and which contains questions leading to certain conclusions rather than allowing for other views. It is for this reason that HERITAGE has responded with a Statement as we do not agree with the way the questions in the Response Form have been presented.

- The difficult access to the documentation on the HCC website.
- Our inability to understand from HCC responses what consideration was given to HERITAGE and other objections to the long-listing of Yeatton and Leagreen Farms as preferred sites in 2006 and the sudden inclusion of Greater Downton as one huge site with only six weeks for review of such complex documentation.
- The way in which HCC attempted to put the Milford/Hordle parishioners and those from New Milton against each other over the two pPAs at Greater Downton and Ashley. This is an appalling way for a Council to act. It highlights, together with the concerns above, a lack of understanding of both consultation and the needs of the local population. It also hits one with a pre-determined decision ie no matter what anyone has to say, nor what other evidence/information may be available someone has decided that come what may either Greater Downton or Ashley will become gravel pits.

We understand how much work has been involved for HCC officials in developing a minerals plan and we can accept that some mistakes will be made. However, the cumulative effect of the issues listed above has, in our view, exceeded what can normally be accepted as human error.

Whilst wishing to place on record the issues above our priority at present is to respond directly to the Regulation 26 Consultation Document within the time limit. However, we wish to place on record that we will be following up our concerns about the manner in which this Consultation has been carried out separately.

Yours faithfully,

Angela Meads
Chair, HERITAGE

Maureen Connelly
Secretary, HERITAGE

HERITAGE RESPONSE TO HAMPSHIRE COUNTY COUNCIL REGULATION 26 CONSULTATION ON GRAVEL PLANS

1. HCC have requested replies to be on the 18 page Consultation Form. This Form is complex, user unfriendly and does not permit freedom of views. To the extent possible HERITAGE's response will refer to the particular question/section of the Form. It is however expected that this response, together with its annexes, will be included in total as the input into the public consultation of Hordle and Everton Residents in Tandem Against Gravel Extraction (HERITAGE) on behalf of the residents of Hordle Parish,. This response refers in particular to the 326 acre pPA13 Downton (referred to on p130 of the Regulation 26 Consultation Document as Downton, Downton, although it impacts two parishes and four villages and is incorrectly designated as Downton). In this response in order to more accurately reflect the size and impact of this proposed site for shortlisting it will be referred to as **Greater Downton** to avoid any confusion with that part of the site known as Downton Manor Farm, which has been the subject of extensive review and inspection already).

General comments, not related to specific questions

2. Prior to its substantive comments HERITAGE wishes to refer to the Regulation 26 Consultation Document (hereafter referred to as the Document) and the consultation process in general. We submit that:

- The Document reflects no apparent consultation/coordination with the New Forest District Council (NFDC) who are in the process of preparing both a Core Strategy Development Plan and a Sustainable Community Strategy. The fact that both HCC and NFDC have published major planning documents simultaneously, both with an entirely unreasonable consultation period of six weeks for review and comment is not conducive to real public consultation. The weighty documentation for both consultations is complex and, unless one is a professional planner, is not easy to follow. If real public consultation was intended then the intention has not been achieved. In addition one wonders why Inspectors, who are professionals, of public planning proposals have months in which to consider and the public have such a short time to review complex issues
- Errors and limited information in the Document and pre-determined questions which appear biased to a limited view appear to prevent a consultation based on accurate facts and review of the total situation as required.
- Insufficient attention has been paid to ensuring accurate information is accessible to and consultation undertaken with the concerned population. The Council has misunderstood the consultation needs of an aging population who live in villages with limited public transport, no local library and who do not have access to a computer/computer skills.

- To pre-determine that either Ashley or Greater Downton will be selected and to request in Q7 Ashley and Downton to choose which of these sites is preferable does not reflect a genuine consultation on options and could be seen as a blatant attempt by the County Council to a. undermine community relations ; and b. to (attempt to) prevent a proper discussion on whether either of these sites needed by making a pre-decision that one of them is required. This limits consultation and is unacceptable. We note that these are the only two sites in Hampshire which are under the control of New Milton Sand and Ballast (NMSB) should planning permission eventually be granted, but equally we note that Hampshire County Council have strongly affirmed that they are interested only in the best use of resources and meeting the need not on who is developing and managing the site.

Response to specific questions/issues

3. Introduction

3.1 HERITAGE and DAMAGE commissioned an expert opinion from Mr. John Cowley (BSc Special (Hons) Geography & Geology at London University, formerly Minerals Officer-Dorset County Council) on the Document as it relates to:

- a. Need and supply from the Forest area (Q2); and
- b. The Greater Downton Site (Q7)
- c. Other issues relevant to a. and b.

3.2 Parts of this Expert Opinion are included in this response and the full expert opinion is attached as Annex 1. Annex 1 is an integral part of this response.

3.3 Briefly, HERITAGE submits that there is no proven need for either the Greater Downton or Ashley sites based on the information provided in the Document, the expert opinion obtained by HERITAGE and DAMAGE, and other publicly available information. Therefore neither site should become a preferred site.

4. Q1.a) *Is it appropriate for the Hampshire Minerals Plan to make a distinction between soft sand and sharp sand and gravel?*

4.1 This question raises the relevance of a distinction between soft sand and sharp sand and gravel and the subsequent question of the need or otherwise to make separate provision for soft sand.

4.2 It is important to confirm that whatever basis is used to make provision, be it a combined approach or one which separates the materials, all the materials contribute towards meeting the apportionment. Soft sand is not excluded as a contributor to apportionment as appears to be assumed by some parties.

4.3 The terms have not been used in BS specifications for many years and are not used in current European specifications. BS specifications specifically advised

against using the terms because they are imprecise and give a misleading impression as to potential end use. Used in the planning process, this misleading impression perpetuates assumptions about the potential end uses of materials, which impression is out of step with commercial reality.

4.4 There has therefore developed a dislocation between use, commercial considerations and technical requirements on one hand and common usage in planning on the other. On that basis alone, providing a distinction is a false and misleading route and no longer a valid approach.

4.5 Conclusion: The separation of soft sand is no longer justifiable or relevant. Soft sand (solid sand) resources should be incorporated in their entirety in the general apportionment provision.

4.6 Paragraphs 1.0-1.11 of Annex A, Expert Opinion refer.

5. Q2. *Will the suggested approach prevent over-development of sand and gravel resources in the event Hampshire has a changed 'apportionment' for sand and gravel while ensuring there will be sufficient provision for sand and gravel production to meet future requirements? (Paras 2.13-2.19 of the Document)*

HERITAGE Response:

5.1 The CS states that the provision for the Strategic Reserve will be made by way of Areas of Search (AsOS). The reason for this approach is the uncertainty relating to the relevance of the current apportionment figures far into the future. The uncertainty arises because a review of apportionment is, in relation to the timescale of the Plan, imminent and because production is well below apportionment.

5.2 It is widely acknowledged that in Hampshire and in the Forest area, actual demand has been well below the apportionment figure for many years and falling year on year. Interim figures on sales for the Forest show that they were 542,000 tonnes in 2006, less than 50% of the apportionment figure. The implication of this is that the revised apportionment will probably provide for a reduced requirement.

5.3 That situation pertains, given the areas defined as pPAs. However, there are serious concerns with the assumptions used to inform that process and with the development timetable set out in Table 9 in Appendix 5. These assumptions lead to significant over provision. These concerns include:

- The individually production rates postulated, when combined, significantly exceed the current apportionment rate and greatly exceed current demand, thereby requiring additional pPAs to be developed to maintain that 'enhanced' production..
- The unrealistic slow tapering off of production from existing permitted reserves provides for production from such reserves beyond 2020, thereby limiting production in the short-term and requiring (according to the Plan) all the pPAs to be developed early in the Plan period to make up for an apparent 'shortfall' in production capacity.

- The more probable scenario would fully utilise existing permitted reserves early in the Plan thereby not producing an early 'shortfall' and not requiring any 'new' reserves to come forward before 2016 due to the revised apportionment.
- The postulated reserves, particularly at Roeshot, substantially underestimate the real reserve potential, thereby apparently requiring additional pPAs to come forward within the Plan period to make up for the apparent 'shortfall' in total reserve potential.
- The annual production rates, particularly for Roeshot, are unjustifiably depressed in relation to potential reserves, thereby requiring additional pPAs to come forward to make up for the apparent 'shortfall' in production capacity.

5.4 The impact of these points is examined later in relation to representations on Question 7 and the provisions for the Forest. However, the implications are that an excessive provision of pPAs is set out in the Plan which would provide not just "until 2020" but to 2030.

5.6 Conclusion: It is clear that the pPA provisions in the current plan would lead to over supply in the Forest area based on either the current apportionment or any reduced (an increase is improbable) apportionment. The Plan needs amendment to prevent this over provision. The suggested amendments for the Forest area are set out in relation to Question 7.

5.7 Paragraphs 2.0-2.11 of Annex A, Expert Opinion refer. See also Annex 3 for Heritage's predictions of gravel availability to 2020.

5.8 It is further concluded that an annual tonnage of 500,000 metric tonnes per annum from Plumley Wood, as stated by Tarmac at the recent HCC meeting, as opposed to the Document figure of 400,000 metric tonnes will require a total revision of the HCC figures, which it is contended are already presented in a confusing manner.

6. Q7 Which location is preferable a) Downton (pPA13) or b) Ashley Manor Farm (pPA14)?

HERITAGE Response:

6.1 This question has leapfrogged prior questions about (i) the need or otherwise for any allocations of pPA's to be identified in the Forest area and (ii), if such pPA's are required, there are other sites better than Greater Downton because of less impacts.

- the current proposals in the Plan provide for over-provision, therefore there is no need to develop Greater Downton. The overprovision is clearly demonstrated in Table 9 of Appendix 5. A revised Table prepared by HERITAGE based on publicly available information,

proving there is no need for either the Greater Downton or Ashley sites is attached as Annex 2.

- representations on the Sustainability Appraisal indicate that developing other sites (other pPA's and Eliminated Sites) would produce less impact than development at Greater Downton (see response under unnumbered question "Comments on eliminated areas, and other areas).
 - The first objective should therefore be to identify the shortfall in supply, if any, from existing reserves and existing PA's in the period to 2016 and any resulting requirement from pPA's needed in that period to satisfy any shortfall. See Annex 2 for Expert Opinion on Supply and Shortfall based on existing resources and Preferred Areas (thousand tonnes) (referred to as Table 1 in Expert Opinion at Annex 1).
 - it is the supply of the possible 1.091 million tonnes shortfall which the Plan should have addressed in relation to pPA's.
 - It is therefore contrary to the objective of the prudent use of resources to make the provision set out in the Plan
 - it is contended that identifying Greater Downton as a pPA is less optimal because extraction at Greater Downton would produce more negative impacts than extraction at other sites and because this would be a less prudent use of resources due to the low yield at Greater Downton.
 - If pPA's are required, it is contended that other sites perform substantially better than Greater Downton in relation to less impact and should be considered for development prior to bringing Greater Downton forward
 - If further pPA's are required they should be brought forward solely on the basis that they represent the least harmful and the most prudent use of resources.
 - The choice of pPA to supply a shortfall, if any supply is actually needed, should therefore be made by bringing forward either Roeshot Hill, Bleke Hill/Midgham Farm or Bickton, each of the latter could provide production in excess of 0.4 million tonnes per annum and should be considered prior to considering Greater Downton.
- **Roeshot Hill.** Roeshot Hill can be developed without the level of impacts associated with Downton. The site is an extensive area of open land used for intensive agriculture. There are only a few scattered properties adjoining the site. Access and transport would involve substantially less impact than that arising from Downton. The site lies downstream from an area of ecological interest. A former mineral working adjoins the area of ecological interest. In landscape and ecological terms the site has a very low value. Restoration following mineral extraction could substantially enhance the landscape and ecological value of the site. In addition the site contains a substantial deposit (significantly more than identified in the Plan) such that working this site accords with prudent use of resources. The size of the deposit is described below.

The Plan refers to a yield of 3 million tonnes from an area of about 88 hectares, indicating a deposit of less than 2.5 metres thickness (2.27). This identified yield conflicts with available public domain information (Mineral Assessment Report 51 published by the Institute of Geological Sciences, now British Geological Survey (BGS)). The terrace sand and gravel in this area is of substantial thickness and overlies solid sand which has been classified as mineral by the BGS. The average thickness of mineral from this resource block (discounting the underlying solid sand) has been calculated by the BGS as 5.4 metres. Using the same area of 88 hectares, the realistic but conservative gross yield of mineral (discounting the solid sand) from this area is therefore in excess of 7 million tonnes (7.128 million tonnes).

However, for some undefined reason the pPA area in the Plan does not extend to cover contiguous land within Hampshire underlain by the same terrace (the same terrace extends north of the Hampshire boundary into Dorset, where there are further substantial resources of around 30 million tonnes). Given the basis for definition of a PA in paragraph 2.15 of the Plan, and in paragraph 39 of MPS1 Practice Guide, the exclusion of this area is not justified in principle and there does not appear to be any stated reason why that land has been excluded.

Analysis of planning considerations does not indicate that there is any substantial or significant difference in such considerations between the included or excluded land which might justify exclusion of the contiguous land. Given that PAs should be defined on areas of known resources, irrespective of ownership, there does not appear to be any justification in not including that adjacent land in the pPA. That would increase the pPA area to over 120 hectares producing, on the basis of BGS data, a gross yield in excess of 9.5 million tonnes (9.720 million tonnes).

Annex 4, attached, is an extract from the 1:50,000 scale solid and drift geological map of the area around Roeshot Hill. On this extract the boundary of the pPA, the excluded land and the county boundary have been defined. The extensive terrace of sand and gravel running north from Christchurch on the east side of the Avon valley is clearly shown.

The deposit at the Roeshot Hill pPA is located in a relatively younger terrace. Such younger terraces tend to have a higher proportion of gravel than older terraces. This is confirmed by the BGS report which identifies that the resource block extending across the Roeshot site contains on average 63% gravel. This imparts a substantial mineral resource conservation and commercial advantage in favour of working the deposits in this younger terrace, as at the Roeshot Hill pPA, compared to working the Downton pPA which is located in an older terrace producing, on

average (according to the BGS MAR Report 122 for that area) only 49% gravel. That advantage is enhanced by the substantial improved yield per hectare at Roeshot Hill compared to that at Downton.

- **Bleke Hill and Midgham Farm.** Bleke Hill is a possible extension to an existing site. Midgham Farm adjoins Bleke Hill and could be worked as an extension to Bleke Hill via a conveyor. MPS 1 indicates that development of extensions to existing sites may be preferable. These two sites could be considered as a pPA.
- **Bickton sites.** The various areas at Bickton could be considered as a single pPA. Most of the land is in intensive agricultural use of little landscape or ecological interest. Restoration could considerably enhance the landscape and ecological value. There are a few scattered residential properties adjoining. Good access to the A338 and then the A31 is available. The site is not in the Green Belt. The yield in parts of the area has been underestimated and mineral bearing land has been excluded. The indicated yield is circa 3.0 million tonnes. The more realistic gross yield is in excess of 6.0 million tonnes

6.2 Conclusion: In relation to Question 7 it is concluded that the Plan leads to overprovision of sand and gravel and the question as to the development of Greater Downton or Ashley Manor Farm does not in practice arise because neither the reserves nor the production capacity are required to meet demand to 2016 and beyond. It is further concluded that if and when sites need to come forward as pPA's that development of sites other than Greater Downton would involve less impact and would be a more prudent use of resources.

6.3 In addition there are areas within the Forest not considered for development which have considerable gravel deposits, which we believe are available for development.

6.4 Paragraphs 4.1-4.22 of Annex A, Expert Opinion refer and information is also set out in table form in Annexes 2 and 3.

7. Unnumbered question: Comments on eliminated areas, and other areas

HERITAGE Response:

7.1 There are concerns that the judgements in the Sustainability Appraisal Report (SAR) and the basis for excluding sites shown in the Eliminated Locations list (Appendix 4) are not justified.

8. The Sustainability Appraisal Report

8.1 The SAR would appear to be a superficial and narrow appraisal which thereby distorts the weight given to some potential sites in relation to the sustainability objectives of the Plan.

- There is an unjustified bias applied in the SAR where it states in paragraph 7.21 that impacts “may therefore be greater” at large sites with more than 2.5 million reserves and a production rate of 150,000 tonnes per annum.
- Greater Downton is excluded, the list includes a number of sites, referred to individually, as being ‘large’ and therefore apparently giving rise, according to the appraisal, to greater impacts, which do not meet the relevant parameters, and indeed fall far short of those parameters (for example only 600,000 tonnes at Hucklesbrook). Such sites will, on the basis of the SAR, be perceived to have more impacts than Greater Downton and therefore be less preferential locations for a pPA.
- The SAR notes in paragraph 7.22 that the sites that make up Greater Downton pPA are individually considered only to be of medium scale (although they individually substantially exceed some areas listed as ‘large’ in the SAR). However, when combined, as in the pPA in the Plan, the potential reserves exceed the parameters. The site should therefore be included in the ‘large’ category and any relevant implications on impacts applied.
- The SAR considers the impacts for sites in the Forest area but split into two parts of North Ringwood and South of Ringwood. The reason for this split is not explained or justified. There is no basis for separate analysis as both the County Council and the conclusion of the Inspector in his report into the Core Strategy state that there were no supply subdivisions in demand and supply in the Forest. This split in the SAR produces a process which compares sites within each sub-area but does not compare sites between those in the whole of the Forest. This is not justified and is a further bias built into the SAR.
- The analysis section of the SAR has a narrow and misleading basis and outcome. The impact of this is to wrongly identify impacts and fail to identify sustainable development opportunities. An additional concern is the unevenness of the appraisal for individual sites. Some shortcomings of the SAR are identified below.
- In considering biodiversity impacts (Issue A1) the SAR identifies a number of sites (Bickton, Hucklesbrook, Roeshot Hill, etc) in the Avon Valley as being harmful. However, these sites are currently the location of intensive agriculture. These existing operations are more harmful to biodiversity (arising from nutrient, chemical, herbicide and biocide inflows, etc) than mineral extraction and the net outcome from extraction is the potential to assist biodiversity. This is demonstrated dramatically elsewhere in the Valley. In the case of Roeshot Hill, the site is ‘downstream’ from the ecological interest (located on the higher land to the east), extraction could not produce any identifiable harm to that interest and extraction could provide greater diversity both during and after operations. In the case of Greater Downton however, the site is ‘upstream’ from the area of ecological interest and harm is a relevant

consideration. Unfortunately the assessment fails to consider such relationships and is therefore misleading.

- Similarly landscape enhancement (Issue A2) would follow from mineral extraction in the areas of currently intensive agriculture noted above and extraction would not be a constraint in such areas.
- In considering prudent use of resources (Issue A5) no account is taken of the yield potential of sites and therefore the potential reduction in disturbance overall to soils and habitat by the preferential development of higher yielding sites.
- The transport assessment (Issue A7) takes no account of the adequacy of routes, accidents, congestion, extent of residential or built-up frontage or accessibility. Such an assessment would have identified greater impacts with development at Greater Downton.
- The impacts on communities (Issue A9) understates the extent to which Greater Downton is surrounded by settlements and equates the impact at Greater Downton as equal to limited public access at Plumley Wood.

Paragraphs 3.2-3.14 of Annex A, Expert Opinion refer.

9. Eliminated Locations

9.1 The justification for removing some sites in the Forest area, which sites are now included in the Eliminated Locations list, seem weak or at odds with the inclusion of Downton Manor Farm as a pPA. Some of the sites eliminated have a yield potential greater than indicated because the mineral is thicker than suggested and extends beyond the area identified.

- **Walkford & Beckley Farms:** The exclusion of this site relates, in particular, to concerns about nearby housing, burial grounds and access. There are considerably more houses surrounding Greater Downton and acknowledged serious traffic problems at Greater Downton.
- **Bleak Hill:** This site is excluded because it is stated to be unlikely to be started within the Plan period. The site adjoins an existing operation with reserves that will expire well before 2020 and the site can therefore contribute to the Plan period. One significant reason why the area may not be required flows from the over-provision of pPa's elsewhere in the Forest area on Greenfield sites. The site has an adequate access route along a 'C' class road which has very few properties adjoining and is very lightly trafficked. This contrasts with the A337 route to Greater Downton, which is very heavily trafficked, has numerous junctions and accesses and a substantial number of properties fronting or adjoining.
- **Bickton Ash, Bickton Corner and other land at Bickton:** It is stated that this wide area is excluded primarily due to proposals with fewer impacts. While there are scattered residential properties in the vicinity, development here would affect a substantially less number of adjacent

residents than at Greater Downton. Access is considerably better than access to Greater Downton.

- **Hucklesbrook & North Gorley:** It is stated that requirements can be met by proposals with fewer impacts. There are few residential properties adjacent to this area and access is considerably better than access to Greater Downton.
- **Midgham Farm:** It is stated that requirements can be met by proposals with fewer impacts. The site is further excluded because it could only be worked as an extension to Bleak Hill, which it is stated would be outside the Plan period, or by conveyor to Bickton. The conveyor to Bickton raises the concern of potential harm to an SSSI. The Bleak Hill deposit is relatively small and given the likely rate of production and, as noted above, the Bleak Hill extension itself would be worked out before 2020. A conveyor from the Bleak Hill extension to Midgham Farm would overcome the concerns in relation to the SSSI. Residential and traffic impacts would be less than any operations at Greater Downton.

9.2 Conclusion: The SAR produces a distorted analysis. This is serious given the resulting steer on site selection. The bias created unjustifiably leads to Downton Manor Farm as being identified as a pPA. This bias needs to be corrected and due weight given to the constraints that apply at Downton Manor Farm in relation to the constraints and opportunities at other sites.

9.3 The supposed basis for eliminating a number of sites is not justified by the relevant impacts identified. The individual planning impacts of developing such sites are less than the impacts of developing Downton Manor Farm.

9.4 Paragraphs 3.15-3.20 of Annex A, Expert Opinion refer

10. Unnumbered question: General Comments

10.1 Our response under this question refers predominantly to the part of the 'Greater' Downton site north of the A337. Where it refers to the whole site we state this.

10.2 According to the most recent Census Hordle Parish, which lies on the edge of the New Forest National Park, has a population of 5095 in 2372 dwellings. Of these 28.7 percent of the population is over 65, and of these over 67 percent require assistance. Thus those requiring assistance make up over 19 percent of the total residents of Hordle Parish. It is a growing Parish with considerable new development, meeting the national need for increased housing.

10.3 The A337, which is at the southernmost side of the Parish, is the main east-west (tourist and local traffic) route along the south coast from Lymington

to Bournemouth, passing through towns, villages and built-up areas. It is a single carriageway between Lymington and Highcliffe. The 'Greater' Downton site straddles this road.

10.4 As will be seen from the above figures, the parish of Hordle is a major retirement area as well as providing services to the tourist industry (an internationally recognised garden, caravan sites, garden nurseries, etc.) and providing housing for those who work in nearby towns and Southampton. The Parish Council have recently embarked on drafting a Community Plan to outline priorities and needs for the next 10-20 years. NFDC are also preparing a development plan for the area. It is a growing rural area, to which people move because it has an attractive rural landscape and available amenities in which, on the one hand children can be raised safely, and on the other retired people can live peacefully.

11. Proximity to Housing and community buildings

11.1 A number of homes, including listed buildings, lie within 100 metres of the boundaries of the site. Tourist-related businesses, including Apple Court Gardens, a bed & breakfast and a caravan site are also within this area. Apart from these, to the north east of the boundary of Yeatton Farm is a crowded housing area (OL22 SZ27609470) a considerable part of which falls within 250 metres of the site. Within 500 yards of the northern boundary there is significant housing and business premises, as well as a large church and Hordle Primary School, both of which are listed buildings.

11.2 If gravel extraction and subsequent infilling proceed, these sites will have a direct impact over an area of approximately one square mile, encompassing large parts of the Parish villages (both Hordle and Everton), including homes and businesses on the southern side of the A337.

11.3 In addition, we understand that the area directly north of the Yeatton Farm boundary (Coal Yard) has the potential for housing development. This is only one area of potential development in the Parish which will be directly affected if mineral extraction should proceed.

11.4 We believe that there is a serious potential conflict between the threat of gravel extraction/landfill on this site and the NFDC and the Parish development plans, which will include proposals to satisfy the requirements of the national housing targets. It is inconceivable that: a) developers would invest in housing and public amenities in such close proximity to a potential (or actual) gravel extraction/landfill site; or b) if they did, that people would want to live in them.

11.5 There will be a serious impact on the value of peoples homes. There is already one case of a home close to the Yeatton Farm boundary where a sale has fallen through solely because of the threat of gravel extraction. The longer term impact of this on a village with a significant elderly population is significant as those who require more assistance will find it difficult to sell their homes to move to more sheltered accommodation with adequate support.

12. Health and Environmental Issues

12.1 Gravel sites and landfill over an extended area (totalling 326 acres) will have a detrimental effect on the health and well-being of residents of both villages. The population includes a high proportion not only of the elderly but also children. Many of these latter attend a primary school within 500 yards of the north-western boundary of Yeatton Farm. A large gravel pit/landfill site will undoubtedly generate huge quantities of dust and air pollution as well as noise, which will result in increased health and medical problems for those most vulnerable in the community, ie the elderly and the very young. We have personal witness available of a family with an asthmatic child who moved from near to the NMSB Caird Avenue site to a home close to the Yeatton Farm boundary and whose medical records show a dramatic improvement in her health after the move. It is easy to imagine the fears of the family with the current proposal.

12.2 We have serious concerns as to what will happen to the water table in the event of gravel extraction. The water table, where it is known, is only three feet below the surface. We receive considerable amounts of rain and roads and lanes in the area rely heavily on ditches along their edge to remove excess water. Removal of hundreds of square yards of gravel could significantly increase the possibility of excessive flooding in areas not directly affected by the gravel extraction. This in turn could affect the environmental balance of a large part of the Parish. Many of the more isolated houses which will be affected by their close proximity to a gravel extraction site do not have mains sewerage and we have concerns about the contamination of the ground water system. As far as we are aware no hydrological survey has recently been done but wish to raise our concerns at this stage. The site is close to the coast and there are additional concerns that large amounts of water being removed from the site could exacerbate our already rapidly eroding coastline, having an impact beyond the immediate area of the site. In 1995 when rejecting an appeal by Tarmac Roadstone Southern Ltd to the omission of the Yeatton Farm part of the site the Council stated:

- *“The site lies near to the Danes Stream and tributaries cross the site. Whilst this is not an overriding constraint the NRA indicates that extraction and infilling may cause flooding problems downstream and this would be a strong constraint.”*
- *“The site was put forward for consideration in the preparation of the local plan and as an objection to the Consultation Draft Plan but rejected primarily on landscape, local amenity and cumulative impact grounds.”*

12.3 In addition an extract from a hydrological survey, believed to have been commissioned by a company interested in gravel extraction from this site, obtained under the Freedom of Information Act states:

“The sands and gravels at Yeatton Farm are shown from site investigation to be partially saturated, with a water table present in the major part of the deposit.

It will therefore be necessary to dewater the site to win the mineral effectively to the base of the proven deposit.”

Any dewatering exercise has the potential to adversely impact nearby water dependent features. At Yeatton Farm there are no licensed water user rights at risk of derogation. The Blackbush Stream is at some risk of direct derogation of existing low summer flows, due to the proximity of its headwaters to the site and lack of topographic level separation. This can be overcome, subject to a formal consent to discharge from the Environment Agency, by dewatering to this stream.”

12.4 This confirms the impact on the whole area, including Applecourt Gardens, which as stated elsewhere is dependent on groundwater to maintain its stock of rare plants. It also raises the question of how this would have been worded if it had been commissioned by, or prepared in consultation with, local residents who might be impacted by such changes.

12.5 Twelve years later we have many examples of climate change, and concerns expressed by NFDC of increased flooding and coastal erosion. To the best of our knowledge no research has been undertaken to ascertain the environmental impact of very large gravel pits in proximity to the coast. It is vital that these concerns are taken into account in any survey of the impact on the environment by the development of Greater Downton in view of the size of the site and its proximity to the coast. Any development raises great concern that there will be a serious impact on coastal erosion and localised flooding and there does not appear to be any evidence that this has been adequately researched by the Council. As Greater Downton, at its southern boundary is less than one kilometre from the coast this is a serious concern. We suggest that the other sites, discussed under Q7, would present less of a problem for coastal erosion.

12.6 We understand that many issues will only be addressed at the Planning Application stage. But, we would suggest that important environmental aspects, particularly where climate change might affect local areas, should be considered in advance of becoming a preferred site, particularly when it is a large site, rather than after it is shortlisted and subject to a planning application.

12.7 Within the radius of 100 metres of the proposed site are both listed and historic buildings. Renovation of these buildings was undertaken at council tax payers` expense. An internationally acclaimed garden which includes important national collections of day lilies and hostas, as well as a number of rare plants is situated within 50 metres of Yeatton Farm. The garden relies on the high water table and any changes to this would risk losing large numbers of rare plants.

12.8 There is a public footpath crossing Yeatton Farm and an historic byway open to all traffic which runs along the side of Lea Green Farm and which at one point crosses the farm. This byway is reputed to have been used to transfer King Charles 1st from Hurst Castle to London for execution.

12.9 At the conclusion of the section on the Environment in the 1995 Public Enquiry the Inspector notes: *“In the absence of a demonstrated need for these sites the County Council considers there to be an overriding cumulative impact constraint ...”* We submit that this remains the case given the evidence presented elsewhere in this response.

13. Landscape and Agricultural Land

13.1 The whole site is at present high grade arable greenbelt land. It is not possible to obtain planning permission to build on these sites. So, it is somewhat bizarre that they can be destroyed by becoming gravel pits and subsequently landfill sites, which will ensure they are destroyed forever as arable land. The three sites are flat rural landscape with little natural screening. In addition they are the habitat of deer, foxes, birds and a variety of other fauna and flora. At the northern end of the Yeatton Farm part of the site is a badger set and there is evidence of slow worms on the site. On parts of the site, and in adjoining properties are a significant number of mature trees, including oaks. They are reliant on a high water table to thrive. Even if screening is put in place it will without doubt result in a totally different landscape with an adverse long term impact on an area that at present supports important trees and land sustaining abundant flora and fauna.

13.2 We submit that a change of use of land and landscape so close to human settlement would be intrusive and have a drastic impact on the character of the landscape. This is contrary to Issue A2 in the SAR and is not in keeping with the Preferred Options of the NFDC Core Strategy Development Plan (see below).

14. Economic Impact on Village development

14.1 The Parish of Hordle lies on the southern boundary of the New Forest National Park. The existence of a large gravel extraction area will have a devastating economic impact on the villages of Hordle and Everton.

14.2 Both Hordle and Everton villages have seen considerable growth in recent years to meet the demand for housing from those starting out on house purchase, those within the community downsizing and those moving into the area either for employment (locally or in nearby towns and cities) or to retire. This increase is supported by increased amenities in the village and nearby. The NFDC is supporting Hordle Parish Council, through community participation, to formulate a community development plan for the coming years at the same time as it formulates the District strategy. It is not possible

to plan with the threat of gravel extraction/landfill sites threatening the villages for the coming 20 or so years.

14.3 This prospect will discourage people from moving into the area, will seriously impact on the price of property or the ability of those who wish to move to find buyers for their houses, will have a negative impact on local services and businesses servicing the local community and will seriously discourage businesses from investing in the Parish. Local shops and services are important to villages such as Everton and Hordle in view of the number of elderly and amongst those the very high number requiring care to continue to live in their own homes.

15. Tourism

15.1 Hordle Parish is part of the New Forest District, one of the country's major tourist attractions, and its proximity on the border of the national park both Hordle and Everton villages contain tourist amenities (pubs, shops, services) and businesses which are dependent on visitors (local and tourists) – gardens, garden centres, caravan sites, guest houses.

15.2 We submit that the negative economic impact on the livelihoods and lives of those who live and/or own businesses in Everton and Hordle would far outweigh the benefits from employment opportunities offered by a major gravel extraction/landfill operation, particularly when there is no proven need for such gravel in view of the points raised in response to Q2 and Q7 above.

15.3 Particular attention is drawn to the Applecourt Gardens, open to the public and attracting a wide range of international visitors in view of the rarity of the plants it holds. Attention is also drawn to the fact that the historic garden (with centuries old haha and two very rare trees) of Yeatton House borders the Yeatton Farm part of the site.

16. Transport and Road Network

16.1 The A337 is a busy, important, route from Lymington to Christchurch, for both local and tourist traffic, as well as lorries servicing the needs of the area. There is already serious traffic congestion, particularly during peak traffic hours and the tourist season. At the southern end of the three sites, which borders the A337, the road is narrow and the Downton crossroad (used by residents, for access and by vehicles delivering children to the primary school) is already difficult to negotiate. The junction could not cope with a large number of lorries entering and leaving nearby gravel/landfill sites. In addition the A337 is a designated ambulance and fire response route, which should be given priority consideration for health and safety reasons.

16.2 The roads and lanes off this part of the A337 are narrow, unlit, have no footpaths, no white line markings, have many tight bends with ditches close to the uneven road edges. These are unsuitable for heavier traffic, whether increased light vehicle traffic or lorries. Concerns are already expressed about people who walk along these roads, without any pavements.

16.3 We believe that any increase in traffic and congestion on the A337 will result in side roads and lanes being used as alternative routes and that this would be hazardous to those who live or attend school or businesses on these roads.

16.4 We note the argument that because lorries already use this route due to the gravel extraction/landfill site at Pennington and the NMSB operation in New Milton there will be no increase in traffic. We believe that there will be an increased number of lorries using the route, that the possibility of accidents will increase because of the Downton crossroads and the bends in the road between the Downton Crossroads and Everton Road and that these factors will result in additional congestion on this important road. In the last five years, on the A337 from the Everton Road junction with the A337 and the Ashley Lane junction with the A337 there have been 38 accidents involving injury to person (police statistics). We submit that the narrow and winding A337 is clearly unsuitable for a large number of lorry movements. Even in 1996 in the Inspector's report on the Hampshire Minerals and Waste Local Plan (December 1996) Part 2, Section A, pg 118, para 5AQ.240 states that traffic on the A337 often exceeded the accepted capacity of 13,000 vehicles per day back in 1994. It is clear that development of a gravel pit at Greater Downton will ensure that the volume of traffic continues to exceed the accepted capacity of the A337.

16.5 The argument that road users currently have to tolerate congestion caused by gravel lorries at the Pennington site is perhaps rather spurious. The situation at present is unacceptable and dangerous. Our view is that if 200-300 lorry movements per day were no longer using the route and causing congestion by waiting to turn into or out off the site, both local residents and tourists would benefit from decreased pollution, improved traffic flow, better road safety and road surface conditions.

16.6 NFDC have designated the Lymington to New Milton part of the A337 to be 'remote from a road trunk network'. In Dorset, whose border starts at the Western end of New Milton on the A337 at the Chewton Glen roundabout traffic, including lorries, has no option but to travel through the narrow road at Highcliffe and the busy Christchurch urban area, which, for anyone who uses the road regularly, is a nightmare driver on a narrow part of the A337, through a densely built up area bordering the road

17. Other Issues

17.1 HERITAGE wishes to highlight two further issues which require further investigation as part of the consideration on these sites.

- There is an electricity sub-station off Barnes Lane, adjacent to the Eastern Boundary of NFT041 Leagreen Farm (b). It is considered that the location of the sub-station is such that prevailing south-westerly winds would allow dust build up over the insulators which, together with salt laden winds and associated humidity, could cause high voltage

tracking over the insulators, thus causing short circuiting conditions leading to a serious malfunction of the sub-station.

- The main Pennington sewage pipes runs along the north side of the Yeaton Farm part of this pPA, where it is marked by concrete posts.

17.2 Finally, it should be noted that the New Forest District Council (NFDC) is in the process of consulting the NFDC population through The Sustainable Community Strategy for the NF District, in which it states:

“The district holds considerable reserves of sand and gravel which is relied on by the construction industry and others in the area. Mineral extraction and associated transport provides specific challenges. It generates problems for landscapes, habitats and the general quality of life as a result of noise and air pollution coming from the size and frequency of traffic movements in what is often a sensitive area.”

17.3 It does not address these challenges and neither does the HCC Document, although NFDC have made it clear that they object to both the ‘Greater’ Downton and Ashley sites.

17.4 In the NFDC Core Strategy Development Plan – Preferred Options their reasons are perhaps explained in part by the NFDC statement:

“The Plan Area lies in an attractive part of southern England. It is a popular area in which to live and work, or to visit. It is generally of high environmental quality and is located in a part of southern England that is particularly rich in terms of biodiversity.”

17.5 NFDC aims:

“To provide for a high quality, safe and attractive living environment for communities in both urban and rural areas in a way that respects and safeguards the special qualities, character and local distinctiveness of the Plan area and the adjoining New Forest National Park.”

17.6 NFDC has designated Lymington to New Milton as a area remote from a road trunk network and states:

“Access to the Lymington and New Milton area (total population 49,000 including neighbouring villages) from the north is either by the B3054 across open Forest or by the A337 (north), most of which runs through the National Park and can be subject to serious and unpredictable delays in the summer months particularly at Lyndhurst.”

17.7 And proposes to:

“improve access to the southern coastal towns area (working closely

with the New Forest National Park Authority)”

17.8 These are simply a few quotes which illustrate a lack of consultation by HCC with NFDC on issues they consider important, and where aims appear to be incompatible. And yet each claim to have the Regional Spatial Strategy as part of their basic documentation.

18. Conclusion on general issues relating to that part of the site running to the north of the A337. Based on the foregoing HERITAGE submits that development of this site for gravel extraction/landfill will destroy our local environment and community, seriously affect the health and wellbeing of those who live here and it will have a tragic impact on the economy and future of the Parish. We do not accept that this site is required for the reasons set out in our response to Q2 and Q7 nor do we believe it is acceptable on the grounds of the adverse impact that such a development would be likely to have on the environment, particularly on the local landscape, and the potential cumulative impact on the local area and highways, particularly the A337.

19. In summary, There is no proven need for a new site based on the evidence and calculations contained above and in the Expert Opinion, attached as Annex 1.

PREPARED BY THE HERITAGE COMMITTEE ON BEHALF OF THE PARISHIONERS OF HORDLE PARISH WHO WILL BE AFFECTED, DIRECTLY AND INDIRECTLY, BY THE ESTABLISHMENT OF GREATER DOWNTON AS A PREFERRED SITE FOR GRAVEL EXTRACTION OVER THE NEXT 20 OR SO YEARS

Annexes:

1. Full text of expert opinion, contracted jointly by HERITAGE and DAMAGE
2. Expert Opinion calculations of Supply and Shortfall to 2020 based on Existing Reserves and Preferred Areas
3. Heritage forest for table of gravel availability in the Forest area to 2020
4. Map of Roeshot area highlighting adjoining area to Roeshot Hill which has not been considered, also showing County boundary.