



Hampshire Minerals and Waste Plan: Partial Update - Submission Plan

Proposed Modifications Consultation Response Form

Introduction

This response form allows you to provide your views on the proposed modifications to the Hampshire Minerals and Waste Plan: Partial Update - Submission Plan (the 'Plan') (July 2024) document.

This consultation is open from **9am 4 December 2025 until 11:59pm 12 February 2026**. If you have any queries, or require this form in an alternative format, please contact hmwp.consult@hants.gov.uk.

About this consultation

Privacy notice

The Minerals and Waste Policy Team at Hampshire County Council is collecting information about you on behalf of the Hampshire Authorities (Hampshire County Council, New Forest National Park Authority, Portsmouth City Council, South Downs National Park Authority & Southampton City Council) in order to consult on the Hampshire Authorities' proposed minerals and waste planning policy.

We will collect your name, postal address, and any other contact information you provide as well as details of your representation. A name and postal address **must be provided** for the comments to be accepted. Anonymous or confidential representations, without the required personal information, cannot be accepted. We will accept representations to consultations and use the information to draft planning policy documents and contact you in the future regarding these documents.

The legal basis for our use of this information is compliance of a legal obligation to which the Hampshire Authorities are subject. This is in relation to the Town and Country Planning Act 1990 (as amended) as well as the adopted Hampshire Statement of Community Involvement.

All representations received will be handled and made available to view publicly in accordance with the General Data Protection Regulations (2018) and the Local Government Act (1985) for the purposes of preparing planning policy documents until adoption. In accordance with national legislation and guidance, the name(s) of those making representations, will appear on our website. We will make every effort

to remove other personal details including telephone numbers, email addresses and signatures prior to being uploaded.

We may share your personal information with the Hampshire Authorities, where it relates to the preparation of a jointly prepared planning policy document, as well as the Secretary of State (and appointed Planning Inspector) during the process of public examination.

All representations received at Proposed Modifications stage will be sent to the Secretary of State for consideration as part of the Public Examination undertaken by an independent Planning Inspector appointed by the Planning Inspectorate (PINS).

On adoption of the policy document(s), all representations will be removed from the website. Electronic and paper file copies of representations will be kept by the Hampshire Authorities for seven years in line with the relevant corporate retention period. All representation received will be handled and made publicly available in accordance with the Privacy Statement (found via this link) <https://www.hants.gov.uk/aboutthecouncil/privacy/land-planning-environment/minerals-waste-planning-policy>.

The above information is the specific privacy notice for this service. For more information about your rights in relation to your personal data, see the [County Council's general privacy notice](#).

You have some legal rights in respect of the personal information we collect from you. Please see our [Data Protection page](#) for further details.

You can contact Hampshire County Council's Data Protection Officer at data.protection@hants.gov.uk.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns>.

Background

Minerals and Waste Planning Authorities have a statutory responsibility to prepare and maintain an up-to-date Minerals and Waste Local Plan. Hampshire County Council, New Forest National Park Authority, Portsmouth City Council, South Downs National Park Authority & Southampton City Council (collectively referred to as the 'Hampshire Authorities') are working to produce a partial update to the Hampshire Minerals and Waste Plan (the 'Plan') which will guide minerals and waste decision making in the Plan Area up until 2040.

The Regulation 18 Draft Plan Consultation ran for 12 weeks, between 8 November 2022 and 31 January 2023. The purpose of the consultation was to engage the Plan area's communities and relevant organisations and statutory bodies in discussions on managing minerals and waste to 2040. It also provided an opportunity to gather additional local evidence to help determine the Plan Partial Update's revised policies and draft site allocations. More information about this stage can be found on the Draft Plan webpage:

<https://www.hants.gov.uk/landplanningandenvironment/minerals-waste-planning/hampshire-minerals-waste-plan/minerals-waste-plan-partial-update-consultation/hmwp-reg-18>

The Regulation 19 Proposed Submission Plan Consultation ran for 8 weeks, between 9 January 2024 and 5 March 2024 and provided an opportunity for communities and relevant organisations to have their say on the Proposed Submission Plan before it was passed on to the Secretary of State and a Planning Inspector. All comments received to this consultation were passed on to the Planning Inspector. More information on this stage of Plan-making can be found on the Proposed Submission Plan webpage:

<https://www.hants.gov.uk/landplanningandenvironment/minerals-waste-planning/hampshire-minerals-waste-plan/minerals-waste-plan-partial-update-consultation/hmwp-partial-update>

The Examination Hearings were held at the Hampshire County Council offices between the 4th and 13th February 2025, with an additional online hearing being held on 9th September 2025.

Following the hearings, the Hampshire Authorities are proposing a number of modifications to the Submission Plan. These take the form of Main Modifications, Additional Modifications, and modifications to the Policies Map.

Proposed Modifications

Main Modifications are changes to the Submission Plan that are necessary to make it sound and legally compliant. These modifications are designed to ensure the Plan's overall effectiveness.

Additional Modifications are minor changes that the Hampshire Authorities would like to make to the Submission Plan to improve the presentation or to address or correct any typographical or factual errors. Changes can only be defined as Additional Modifications where they are not required to resolve soundness or legal compliance issues.

Policies Map modifications are specific to the Policies Map and include changes such as presentational changes as well as allocation boundary changes etc. Where the changes are material to the Plan these are also listed as Main Modifications.

The Main Modifications have been subject to Sustainability Appraisal (incorporating Strategic Environmental Assessment) and Habitats Regulation Assessment.

The proposed modifications to the Submission document and the accompanying assessments can be viewed and downloaded from the Examination Library webpage:

<https://www.hants.gov.uk/landplanningandenvironment/minerals-waste-planning/hampshire-minerals-waste-plan/minerals-waste-plan-partial-update-consultation/examination-library>

The modifications are set out in three schedules, the Proposed Main Modification Schedule (MD05), the Proposed Additional Modification Schedule (MD06), and the

Proposed Policies Map Modification Schedule (MD07). It is recommended that you refer to the modifications as you respond to this consultation.

A Proposed Modified Plan document (MD08) has also been prepared to display the proposed modifications in the context of the Plan itself. This can also be viewed and downloaded from the Examination Library webpage (above).

We would like to hear from you in respect of your views on the 'soundness' and legal compliance of the Proposed Main Modifications to the Plan and Policies Map changes. For definitions on the Tests of Soundness, please refer to the FAQs, which can also be found on the Examination webpage:

<https://www.hants.gov.uk/landplanningandenvironment/minerals-waste-planning/hampshire-minerals-waste-plan/minerals-waste-plan-partial-update-consultation/hmwp-reg22>

Where an objection is raised against the content of the Plan, this must relate either to the Plan not complying with legal requirements, or it not being sound in relation to at least one of the Tests of Soundness.

How to complete this form

A blank response form is provided below (Response Page 1-2), please fill out these pages as per your desired response. They are followed by “About You” and “Equalities” sections.

Please copy and paste (or print off) a new set of response pages for each modification to the Plan you wish to respond to. Only one “About You” section is required.

You do not need to include the current page and/or the previous pages in your final response, as they are for guidance.

A line is available for you to outline which modification you are responding to. For ease of interpretation, please be as descriptive as possible (such as using the modification reference number and the part of the Plan it relates to) as to which part of the Plan document or supporting evidence documents you are responding to.

Representations can only be made on the proposed Main Modifications to the Plan, not the full Plan as submitted for Examination in July 2024. The Inspector can only make recommendations in relation to Main Modifications and not parts of the Plan that remain unchanged. The consultation is therefore not an opportunity to repeat or raise further representations about the Plan or to seek further changes to it.

Please provide all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

The About You section will collect your name, postal address, and any other contact information you provide as well as details of your representation. A name and postal address **must be provided** for your comments to be accepted. Anonymous or confidential representations, without the required personal information, cannot be accepted.

Please return your response form via:

- Email to: hmwp.consult@hants.gov.uk
- Post to: Minerals and Waste Planning Policy, Hampshire 2050, The Castle, Winchester, Hampshire SO23 8UL

HMWP Partial Update Proposed Modifications Consultation Response

Main, Additional, and/or Policies Map Modification(s) that you are responding to:

Main, Additional and Midgham Farm

1. Do you consider this/these modification(s):

Legally compliant (prepared in accordance with legislation) Yes No

Sound (fit for purpose) Yes No

2. If you do or do not consider the above modification(s) to be legally compliant and/or sound, please explain your reasons for this:

The continued implication that within this plan the policies that are supposed to safeguard residents and the environment are valid is not compliant. Significant impacts will occur by these proposed extraction sites on the communities, and environments as laid out in our comments.

Hampshire Mineral and Waste Plan 2024 – Regulation 24 Consultation Comments

Steven and Venetia Rowland, [REDACTED]

The basis of the Hampshire Mineral and Waste Plan is to safeguard the resources of minerals based in the region with scant regard to the timeframes that are proposed within this plan together with the schedules of the mineral extraction.

Hampshire have over successive plans overestimated the requirements and therefore “not delivered” to the plan. This plan is no different. The modifications have not considered the world economic trends, the change in world order and the significant downturn of the UK’s financial stability which reflects itself in the lack of significant projects and development opportunities. **Policy 17: Aggregate supply – capacity and source** reinforce this.

The plan lifetime is 2040. Having this plan in place doesn’t not secure timeframes, which the communities that these sites have a profound effect on, can trust or depend on. Most of these new proposed sites are not likely to be extracting minerals within this timescale.

The other significant premise of this plan is that if a site is included in the plan, it is deemed suitable for extraction – this is a simplification but a very necessary one to actually state the obvious.

The modifications proposed state;

Issues for the Plan 2.17 “Communities have expressed concerns about the prospect of local minerals or waste developments and expect the adverse impacts they may experience to be recognised, reduced to a minimum, and mitigated. Communities also wish to be involved throughout the planning process.”

Hampshire have not listened to the communities which have been blighted for nearly 40 years plus with the Hamer Warren/Bleak Hill site and then the location merely a few miles down the unsuitable road to Midgham Farm. Little heed had been given to the voices of the community in the Mineral Panels set up for the community to express their issues.

Vision – Where we need to be

2.25 Vision: Carbon neutral and resilient minerals and waste development, which: supports health, well-being, and quality of life for all; enables the creation of thriving places; and respects Hampshire’s unique natural and built environment.

The vision that the plan sets out doesn’t not hold up for the communities that have been affected for decades. And therefore, is not a valid statement. And by default, cannot support the objectives set out in the plan.

In the section **Spatial Strategy 2.30 and 2.31** are specifically not adhered to in the inclusion of Midgham Farm within the plan. It has already been raised that the site will give rise to impacts to European and locally protected sites, and European and protected species. With Hampshire therefore unable to meet their obligations with regard to the Habitat Regulations, Policy 3 of the HMMP and NPPF. This has been commented upon by the County Ecologist *“Issues have arisen from an underlying underappreciation of the wider landscape value of the site, with the proximity to the SINC/Ancient woodland to the east, with the Avon Valley and New Forest European designation lying in close proximity further to the east.”*

It is also concerning that under **Policy 1: Sustainable minerals and waste development** Hampshire have made a presumption of approval for any site coming forward that is included in this plan. Hence my initial comments.

3.12 within the plan references that fact that Hampshire is not a CIL charging authority. Will this change under the devolution? It is especially galling that communities **HAVE** to take this extraction development but have nothing contributed to their communities. For example, with Hamer Warren/Bleak Hill the community of Harbridge have only had £2,000 from Cemex in the past 40 years, especially now with our local authorities set to disappear. Therefore, with the replacement “Levelling Up and Infrastructure Act” this should be used to address community funding.

Section **4. Protecting Hampshire's Environment** has some significant challenges. The Midgham Farm site sits in close proximity of designed site which I have mentioned above, and the County Ecologist has taken time to point out again in his consultation. Additionally, the site is good, graded farmland which should be protected in the interests of the nation.

Surely **Policy 2: Climate change – mitigation and adaptation** should be revised, as Hampshire do not have the mechanisms in place to adhere to this. The UK government is legally committed to achieving net-zero greenhouse gas emissions by 2050, as established by the Climate Change Act 2008 (2050 Target Amendment) Order 2019. Not meeting this, unless the government U turns on this too, the plan is not sustainable.

Point 4.11 and 4.12 would need to be revisited as Midgham Farm is within a surrounding area that has significant flooding. Over the past few years, the ground water has been significantly more in the area.

In point **4.16** you specifically highlight: **Internationally important designated sites and species include:**

Special Protection Areas (SPAs) - Sites and species protected in accordance with the Habitats Regulations;

Special Areas of Conservation (SACs) - Habitats and species protected in accordance with the Habitats Regulations;

However, in reality Hampshire place no value on these. The County Ecologist highlights the importance of these with regard to Midgham Farm, Natural England have placed significant emphasis on this with Purple Haze. But Hampshire believe they can negotiate with “off-site” considerations. However, you are missing the point – it will be an **ONSITE** impact! Coupled with **Policy 3: Protection of habitats and species** it is all smokes and mirrors with no understanding of the long-term impacts as frankly Hampshire don't have to live with it.

Policy 5: Protection of the countryside and valued landscapes is not providing the safeguarding for the setting that is destroyed by extraction. Landscapes can never really be “restored” to what they once were. Midgham Farm has one of the few open landscapes in the country, it has an ancient woodland and PRoWs crossing the site that would be lost forever. This has been raised in objections in the past, and you actually state ***“4.52 Public rights of way, common land, and access land can significantly contribute to the well-being of society and provide significant access to nature and to the countryside.”***

In **Policy 9: Protection of soils** is supposed to provide soil management which can be restored to the environment however, this is not the case in many of the extraction sites within Hampshire and other counties. In fact, point **4.94** states **“Minerals and waste development should not result in the needless loss of BMV agricultural land or**

other quality soil resources.” This plan does not address the issues we are all aware of in these sites. Midgham Farm is Best and Most Versatile (Grade 3a and 3b) soil.

In **Policy 10: Restoration of minerals and waste developments** does not provide for the landscape to be resorted to its original state. Hampshire states ***“will usually seek to assure that the land is restored to a level of quality at least equivalent to that which it was prior to development commencing.”*** But as with all developments cheaper alternatives can be offered as the original planning with run out, economics will change.

“4.116 Hampshire’s communities have an important role to play in helping to shape restoration schemes for minerals, landfill and other minerals and waste developments. In order to contribute to successful restoration and aftercare of minerals and landfill sites, the mineral and waste planning authorities encourage engagement in the planning application process and support the establishment of local liaison panels for the lifetime of any major minerals or waste site.”

As a member of a mineral panel, I can state this is not the case. Residents’ views are dismissed especially around ProW access.

I am appalled by the omissions that are now taking place in **Policy 11: Protecting public health, safety, amenity and well-being**. Hampshire have removed the safeguarding and replaced with a **“consideration”**. This doesn’t not reflect the vision objectives.

Policy 12: Flood risk and prevention – has Hampshire seen what is happening in the area with water levels. The hydrology of Midgham Farm is part of a system which is fed down to the Avon River through springs, drains, etc. With climate change this is a challenge.

Policy 13: Managing traffic – again Hampshire has not taken into consideration the impacts of traffic from mineral extraction. These vehicles are not carbon neutral; they are not electric. They pollute. There are no changes in this policy and no plans to mitigate that for residents and communities.

Under **Policy 14: High-quality design of minerals and waste development**, the changes in **5.54** once again minimise the impact on recreational use of the land. This has been changed to benefit the mineral extraction companies, not residents.

Point 6.77 under **Policy 20: Local land-won aggregates** states that Midgham Farm is to be from 2026+ - this should be amended, as Hamer Warren/Bleak Hill Quarry **should be fully restored PRIOR** to any commencement of extraction works preparation takes place.

Hamer Warren/Bleak Hill has a planning extension until 2029, but with little gravel and sand being excavated and sold this doesn’t not seem a likely end point. Hampshire actually state ***“6.78 The exact timings of new sites allocations coming on stream being developed will depend on the market conditions, extraction at other sites in the nearby area and planning permission being granted for the development.”***

Policy 25: Sustainable waste management should be updated due to the lack of inert waste that is available for infill in existing quarries. Sites that are in the plan that have been

identified for inert waste only **MUST NOT** be changed to inert /household refuse waste sites or even hazardous.

Policy 27: Capacity for waste management development should revert back to monitoring and not through the plan review. This is not acceptable to with such extended timescales.

Midgham Farm Site overview– Page 195 of revised Plan

It is noted that in this site overview the restoration is to be: ***Restoration to agriculture at the existing levels using imported inert materials, including nature conservation and increased permissive access.***

On the point ***“Ensure no significant adverse impact on the integrity of the Avon Valley SPA/Ramsar, River Avon SAC, Dorset Heaths SAC and the Dorset Heathlands SPA/Ramsar*”***. With this extraction site there will be adverse impacts as the Country Ecologist has pointed out and has specified ***“The proposal will require a long-term management plan (Ecological Mitigation and Management Plan - EMMP) that will need to be secured by a legal agreement. A legal agreement is required due to the complexity of the ongoing habitat and landscaping creation, species mitigation and monitoring, which will change and progress during the phases of the development, the aftercare process and the long-term post aftercare management. I would suggest that given the scale and timescales of the development, that the long-term post aftercare period should be set at 30 years post establishment (Aftercare) phase.”***

The plan puts forward Midgham Farm as a mineral and waste site and in doing so provides an “in principal agreement” to it moving forward. The Development Points listed provides a number of reasons exactly why this site should not go ahead.

- The significant adverse impact on the integrity of the Avon Valley SPA/Ramsar, River Avon SAC, Dorset Heaths SAC and the Dorset Heathlands SPA/Ramsar.
- The significant adverse impact on the offsite roosting, foraging and breeding areas of the qualifying bird species of nearby SPAs/Ramsars, and on their functional linkage.
- The Hydrological/hydrogeological impacts that provide a risk and inappropriate protection of works affecting nearby National Site Network sites, Ramsars, and SSSIs, including the issue of nutrient enrichment.
- The impact with no buffering for the offsite woodland, with particular focus on those areas of Ancient Replanted Woodland and Ancient and Semi-Natural Woodlands.
- The loss during excavation works for habitats within the development footprint, relating to the wider landscape, and enhance ecological networks, including provision of deciduous woodland along the boundaries of the site
- The need for buffers in the north-west corner, the western edge the adjacent residential properties along the site boundary to protect residents.
- The destruction of the hedgerows removed for the site.
- The impacts excessive dust, noise and lighting that will result from the mineral working for residents and nature.
- As the site currently has no large or small open water bodies, for landscape and airport safeguarding reasons, no water bodies should be introduced as this may affect the hydrology of the area which also includes derogation of the stream that runs from Lomer Copse and runs through Harbridge to the River Avon.

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- The Archaeological issues are likely to be significant at this site.
- The site is Best and Most Versatile (Grade 3a and 3b) and should not be lost. Restoration is unlikely to reinstate this to its original (or improved) agricultural land classification.
- The priority junction should not be for mineral traffic movements onto Hillbury Road.
- No conveyor belt to cross Lomer Lane for the second phase of extraction due to noise and impact on visas.
- The Transport Assessment should consider assess the suitability of the route, cumulative traffic impacts considering committed developments which would impact the route, and that the site is a continuation of existing extraction operations at Hamer Warren and Bleak Hill which MUST cease prior to ANY commencement at Midgham Farm. The safety of other road users (walkers, cyclists and horse riders) will also need to be considered on Hillbury Road and Harbridge Drove (due to the lack of footpath) and the lack of active travel.
- Both Harbridge Drove and Alderholt Road are NOT suitable routes for HGV traffic.
- Significant protection and enhancement of Public Rights of Way is required (Fordingbridge footpath 090/8a, Fordingbridge footpath 090/2, Fordingbridge footpath 090/3) and connectivity to the wider network.
- The site will potentially not be safe for users in times of flood, it could impede waterflows and increase flood risk elsewhere due to climate change and therefore a Hydrogeological/Hydrological Assessment is required to ensure that any impacts on groundwater flows and water quality are considered but also the impact on the SSSIs.

In conclusion

This plan will undoubtedly go forward, as Hampshire has an appetite for this, together with its grandiose ambitions with devolution, proffering sites that are not suitable being granted planning permission and that permission extended over decades time and time again. Once again, the NEED has not been clearly made.

Don't dress this up as something that safeguards the environment, residents or communities. It does exactly the opposite to that it, destroys the landscape, imprisons residents in properties that they can't move from or sell, it creates polluting traffic on lanes and roads which were never built for such a massive amount of vehicle (HGV) movements together with the health and well-being impacts of dust and noise for residents potentially resulting in health issues to be brushed aside by Hampshire.

This plan is not fit for purpose.

3. Please set out the changes you think are needed to make this modification(s) legally compliant and sound, in respect to the issues you have raised in Question 2. It will be helpful if you are able to put forward your suggested revised wording. Please be as precise as possible.

The Plan is not fit for purpose with the implied requirements for the minerals etc.

The Plan is not fit for purpose in regard to highway safety and the implications to communities and residents.

The Plan is not fit for purpose for the environmental and hydrological impacts on the River Avon and surrounding areas.

About You

Is this your own personal response or on behalf of an organisation or group?

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

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

Please note: anonymous or confidential representations cannot be accepted.

Your full name (required)	Venetia Ann Rowland Steven Rowland
Your full postal address (required)	██████████ ██████████ ██████████ ██████████
Your full postcode (required)	██████████
Contact email address (optional)	████████████████████████████████████████

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

Please note: anonymous or confidential representations cannot be accepted.

The full name of your organisation or group (required)	
The full address of your organisation or group (required)	
Your full name (required)	
Your position in the organisation or group (required)	
Contact email address (optional)	

Do you wish to be informed:

- When the examination recommendations are published Yes No
 When the Plan has been adopted Yes No
 Of future minerals and waste policy work Yes No