

From: [REDACTED]
Sent: 12 February 2026 14:40
To: HMWP Consultation
Subject: Patrick James Finnis' response to Hampshire Minerals and Waste Plan consultation

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Dear team

Please see below the response below to the Minerals and Waste Plan.

[REDACTED] I am submitting this response on behalf of [REDACTED] Patrick James Finnis [REDACTED]

Kind regards

[REDACTED] Patrick James Finnis

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Hampshire Minerals & Waste Plan: Response

The purpose of the Hampshire Mineral and Waste Plan is to safeguard the resources of minerals based in the region however there appears to be little regard to the timeframes that are proposed within this plan as they do not join up with schedules of the proposed mineral extraction. It is not right that communities can have this type of indefinite activity forced on them for potential the rest of their lives. All the decisions for extraction appear to be in the hands of CEMEX as the proposed extraction organisation, with no consideration for the communities that have been and would be severely blighted by this industry.

During January and February 2026 Harbridge, Midgham and parts of Fordingbridge have been and still are experiencing severe flooding which has impacted all roads and the ability for people to move around by car. The severe weather has impacted the quality of all roads and to approve a potential minerals site such as Midgham Farm, which sits surrounded by these villages/hamlets/towns would have catastrophic consequences. It is concerning that under **Policy 1: Sustainable minerals and waste development** Hampshire has made a presumption of approval for any site coming forward that is included in this plan. The infrastructure and the environment cannot support this type of activity as it has been proven it cannot currently support the existing activity in the area. This plan is not sound.

Hampshire has over successive plans overestimated the requirements for sharp sand and gravel 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 construction projects and development opportunities for the type of resources the county want to mine.

Policy 17: Aggregate supply – capacity and source reinforces this. The plan lifetime is 2040. Having this plan in place does not secure timeframes for the communities that these sites have a profound effect 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 not sound either. There is no objective body to challenge these potential planning applications which would follow if sites are included in this plan.

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 has not listened to the communities which have been blighted for nearly 40 years plus with the Hamer Warren/Bleak Hill site and are now proposing the next location to be merely a few miles down the unsuitable road to Midgham Farm. Little recognition has been given to the voices of the community in the Mineral Panels set up for the community to express their issues. Therefore this is an example that the plan is not sound as these types of community engagement structures are not taken seriously and residents/involved parties are not listened to.

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 is not recognised by the communities that have already been affected for decades. Therefore this vision is not a valid statement and therefore the objectives set out in the plan cannot be achieved, and therefore the plan is not sound.

In the section **Spatial Strategy points 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.”**

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 this again in his consultation. Additionally, the site is good, graded farmland which should be protected in the interests of the nation, thus ensuring national food security.

Policy 2: Climate change – mitigation and adaptation should be revised, as Hampshire does 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.

By not meeting this, the plan is not sustainable.

Point 4.11 and 4.12 needs 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** Hampshire specifically highlights: **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.** We have raised the importance of these factors in previous submissions; however they are not given the importance or significance they deserve. Landscape is the essence of Hampshire and we should all be trying to protect it. In reality it appears Hampshire places little value on these factors. The County Ecologist highlights the importance of these with regard to Midgham Farm, Natural England have placed significant emphasis on this with Purple Haze. Coupled with **Policy 3: Protection of habitats and species** it is difficult to see how Hampshire values the beautiful and productive landscape and environment

particularly in the Midgham Farm area, and therefore I do not agree with the inclusion of this site as it does not align with the plan's vision.

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 the plan does 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."** This does not support the inclusion of Midgham Farm as a potential site.

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."** Midgham Farm is Best and Most Versatile (Grade 3a and 3b) soil and therefore should be left untouched as this contradicts Point 4.94 in the Plan.

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, as the timeframes will be extended if the site is developed as proven specifically by the multiple extensions agreed for Hamer Warren and Bleak Hill.

"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."

I know a member of a mineral panel, and they confirm that engagement with residents is not robust. For example 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. It is also a known fact that the impact from extreme noise, pollution from silica dust and increased lorry traffic would be a severe danger to the health and wellbeing of those living close to the proposed area, especially the very young and the elderly and those with lung problems.

Policy 12: Flood risk and prevention – We are currently experiencing significant flooding in our area and each severe weather episode is impacting on the water table and creating more and more significant issues after each weather episode. 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 an ongoing challenge that the county will need to manage.

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 states **"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 live with, due to 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 can provide 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, where 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.
- 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 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 the B3081 are NOT suitable routes for HGV traffic.
- Significant protection and enhancement of 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 is not sound and is contradictory in numerous places as highlighted above. This plan is supposed to safeguard the environment, residents and 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 movements. Also there are significant health impacts from living near a quarry and the noise for us residents [REDACTED] are unacceptable and breach national levels. It is incredibly disappointing that this is still not acknowledged. I ask members to consider how they would feel if they or a member of their family (with Children) were being forced to live alongside this proposed development. The sites close proximity to the residential areas of Midgham Farm cottages, historic Harbridge and Alderholt means the impact from extreme noise, pollution from silica dust and increased lorry traffic would be a severe danger to the health and wellbeing of those living close to the proposed area, especially the very young and the elderly and those with lung problems.

This plan with its proposed site of Midgham Farm is not the answer and I believe the plan to be unsound.