

REGULATORY COMMITTEE

24TH JULY, 2002

**REDLYNCH: PROPOSED EXTRACTION OF SAND AND GRAVEL
FROM O.S. PARCEL 8650, HAMPTWORTH ESTATE,
WITH HAULAGE BY OFF-ROAD VEHICLE TO EXISTING
POUND BOTTOM SAND PIT FOR MINERAL PROCESSING,
ESTABLISHMENT OF DUAL SURFACE-MOUNTED PIPELINE FOR
WATER SUPPLY AND SILT DISPOSAL, RESTORATION TO
AGRI-FORESTRY AND WETLAND USING QUARRY SPOIL -
BIG FIELD, HAMPTWORTH ESTATE
(Application No. S.01.0780)**

Purpose of Report

1. To comment on the application and supporting Environmental Statement, and to recommend that planning permission be **REFUSED**.

Background

2. Planning permission was first given for waste disposal at Pound Bottom in 1978 with further permissions being granted in 1987 and 1989. In 1991, planning permission was granted for sand extraction and waste disposal on a new area of 11.94 hectares known as Pound Bottom Phase IV. The sand reserves permitted at that time have now been exhausted, but the site still receives industrial/commercial and construction waste for landfilling sourced mainly from Hampshire. There are currently no permitted reserves of sand and gravel in central or southern Wiltshire and therefore demand in South Wiltshire must be met either from North Wiltshire or from adjoining counties, i.e. Dorset or Hampshire. Permitted reserves of soft sand exist at only one other site in South Wiltshire (i.e. at Moor Farm, Whiteparish) which the existing operator proposes to work at some stage.
3. During site investigation works carried out in 1997 near to the current operations, a potential sand and gravel resource was identified in two fields under arable cultivation. This planning application seeks permission to extract the sand and gravel together with an underlying sand deposit, and restore the void using excess spoil from the sand extraction operations at Pound Bottom.

The Site

4. Big Field and Pound Bottom are located close to the Hampshire-Wiltshire boundary approximately 3 km south east of Hale and Woodfalls and 14km from Salisbury (see **Appendix 1**). The application site incorporates the majority of OS parcel 8650 known as "Big Field" and when combined with the access route to the public highway, comprises an area of 14.5 hectares. The site, which lies within the New Forest Heritage Area (NFHA), is a woodland clearing in the forested area of the Hamptworth Estate and is currently used for arable agriculture.

The Application

5. The application and supporting Environmental Statement propose the extraction of 584,000 tonnes of saleable sand and gravel (282,000 gravel and 302,000 sand) from 14.2 hectares of agricultural land (Big Field) located some 700 metres to the north east of the existing Pound Bottom sand quarry and landfill site, together with the construction of a 500 metre haul road to link the Big Field and Pound Bottom sites. The estimated rate of production would be 117,000 tonnes per annum (57,000 tonnes of gravel; 60,000 tonnes of sand) over a 5-year period. Extracted mineral would be transported via the internal haul road to the existing facilities at Pound Bottom for processing. Access to the main highway would be via the existing access road from the Pound Bottom site to the B3080 in Hampshire. The Big Field site would be restored by infilling with quarry spoil (clay) from the existing quarry at Pound Bottom, with restoration being partly at a low level to create a water feature with wetland areas, and partly to original levels for grass land and forestry. The removal of clay from Pound Bottom would enable maximum landfill void for commercial/industrial waste at that site.
6. The applicant estimates that an average of 56 lorry movements per day (28 loads) would be generated by the proposed mineral extraction. However, if granted planning permission the development would enable the continued landfilling and recycling of commercial and industrial waste at Pound Bottom. These waste management activities generate an average of 122 lorry movements (61 loads) per day (52 waste plus 9 recycling). Therefore, the development would generate a total of 178 lorry movements per day over five years, albeit that this would largely be a continuation of existing traffic flows to and from the Pound Bottom site.
7. No footpaths or bridleways cross the site and there is no public access to the site. The nearest public highway is an unclassified road approximately 900 metres to the east. Current vehicular access to the site is only by 4-wheel drive vehicles either from Pound Bottom landfill or via the byway open to all traffic that leaves the unclassified metalled road 800 metres to the east of the site.
8. Proposed hours of operation of the site are 0700-1730 Monday-Friday and 0700 to 1300 hours on Saturday. Material excavation and movement would be carried out using a backactor and a maximum of two dump trucks on the single-track haul road between Big Field and Pound Bottom.

Consultations

9. Responses to the extensive consultation exercise, together with representations are set out in **Appendix 2**.

Planning Considerations

10. The application should be judged in the light of the information contained in the Environmental Statement, relevant Development Plan policies and all other material considerations.

National Policy

The New Forest Heritage Area (NFHA) and New Forest National Park (Designation) Order 2002

11. The Big Field and Pound Bottom sites are located within the NFHA. In planning terms, this designation means that the same planning principles applied to National Parks also apply to the NFHA. Following the making of the New Forest National Park (Designation) Order by the Countryside Agency in January 2002 the area has moved one step nearer to achieving full National Park status. Although a Public Inquiry may be held to discuss representations and objections, it is considered likely that National Park status will be achieved in due course.
12. In addition to the proposed National Park status the application site is close to sites of both National (Sites of Special Scientific Interest (SSSI)) and European (Candidate Special Area for Conservation and Special Protection Area (cSAC and SPA)) nature conservation importance.

Strategic and Local Policy

13. At strategic level the Adopted Wiltshire Structure Plan 2011 (January 2001) contains relevant policies at MSP2 which refers to the NFHA and MSP5 which deals with the need to maintain a landbank for sand and gravel and soft sand in accordance with MPG 6.
14. At the local level the Adopted Wiltshire and Swindon Mineral Local Plan (Adopted November 2001) contains a number of relevant policies including Policy 1 (Need), Policy 7 (Mitigating Surface Impacts), Policy 15 (Water Flows, Levels and Quantity), Policy 22 (Landscapes of National and Local Importance, i.e. NFHA), Policy 35 (Identification of Preferred Areas for Sharp Sand and Gravel) and Policy 36 regarding areas outside preferred areas. Relevant Policies are set out in **Appendix 3**.
15. The Salisbury District Local Plan (Adopted 1996) contains policies which seek to protect the NFHA, i.e. Policy HA2 and other policies which deal with environmental planning issues in the NFHA.
16. The application raises the following main planning issues:-
 - (i) Conformity with National and Local Policy.
 - (ii) Need for the development (i.e. land bank).
 - (iii) Environmental implications of the development.

(i) Conformity with National and Local Policy

New Forest Heritage Area/New Forest National Park

17. The Big Field and Pound Bottom sites are located within the NFHA. Central Government announced in July 1994 that the same planning principles apply to the NFHA as to a National Park (page 12 PPG 7: The Countryside, Environmental Quality and Economic and Social Development DOE 1997). Prior to this in April 1994 Minerals Planning Guidance Note No. 6 (MPG 6) entitled “Guidelines for Aggregates Provision in England” paragraph 70 stated that:-
- “The Government considers that major developments should not take place in these areas (i.e. National Parks, the Broads and AONBs) and the New Forest save in exceptional circumstances. Because of the serious impact that mineral developments may have on the natural beauty of these areas, the Government considers that all mineral applications must be subject to the most rigorous examination and all mineral developments should be demonstrated to be in the public interest before being allowed to proceed.”*
18. Crucial to this rigorous examination would be the matters of need, environmental impact, and alternative supplies available.
19. The point has been made by consultees that the proposed development is not consistent with the NFHA designation and is not consistent with the proposed higher designation of a National Park. The two prime objectives of a National Park are:-
- (i) To conserve and enhance the natural beauty of the countryside, its wildlife and cultural heritage and,
 - (ii) To promote opportunities for public understanding and enjoyment of its special quality.

The granting of planning permission for mineral extraction at Big Field and the consequential prolonging of infilling Pound Bottom landfill would be inconsistent with these objectives. If permission were granted the overall character of the New Forest would be detrimentally affected through the visual impact, noise, dust, traffic and general disturbance associated with mineral extraction and landfilling operations. It should be noted that the original planning permission for extraction and landfill was granted in 1991 prior to the designation of the NFHA and to the more recent moves towards achieving full National Park status.

Adopted Wiltshire Structure Plan 2011

20. Interpreting national policy the Adopted Wiltshire Structure Plan 2011 discourages mineral working in the NFHA. It states:-

MSP2 - WITHIN AREAS OF OUTSTANDING NATURAL BEAUTY AND THE NEW FOREST HERITAGE AREA PROPOSALS FOR THE EXTRACTION OF SAND AND GRAVEL, CRUSHED ROCK, CLAY OR CHALK SHOULD BE ASSESSED AND DEMONSTRATED TO BE IN THE PUBLIC INTEREST AND WILL ONLY BE PERMITTED IN EXCEPTIONAL CIRCUMSTANCES

21. It is not considered that exceptional circumstances exist which would warrant the release of the Big Field site in an area which is increasing in status in national terms. Paragraph 10.13 (supporting text) to MSP2 states that:-

“In assessing whether the proposals in these areas constitute an “exceptional circumstance”, they must be demonstrated to be in the public interest”.

22. The text then goes on to consider that mineral applications in such areas should include an assessment of the following; need for the development, alternative supplies available and scope for meeting the need some other way, detrimental effects on the environment and landscape, and whether any enhancement to the local landscape might be achieved. These are considered at paragraphs 37 to 47 of this report.

Adopted Wiltshire and Swindon Minerals Local Plan – November 2001

23. The Wiltshire and Swindon Minerals Local Plan was formally adopted in November 2001. This Plan contains policies and proposals, which seek to control the extraction of minerals in order to strike the right balance between society’s needs for minerals and the need to protect the environment.
24. The Minerals Local Plan supports Policy MSP2 of the Adopted Wiltshire and Swindon Structure Plan where it refers to the NFHA at Policy 22. Policy 22 states that:-

MINERALS DEVELOPMENT WHICH MAY PREJUDICE THE PURPOSE OF THE DESIGNATION OF THE NEW FOREST HERITAGE AREA OR ANY AREA OF OUTSTANDING NATURAL BEAUTY WILL ONLY BE PERMITTED WHEN IT CAN BE PROVEN THAT:

- (i) THERE IS AN OVERRIDING NEED FOR THE DEVELOPMENT TO TAKE PLACE IN THE PUBLIC INTEREST, WHICH CANNOT BE PRACTICALLY MET FROM ANY MORE ENVIRONMENTALLY ACCEPTABLE LOCATION OUTSIDE THE DESIGNATED AREA; AND
- (ii) THE PROPOSAL MINIMISES THE LANDSCAPE IMPACT OF THE DEVELOPMENT TO ACCEPTABLE LEVELS.

25. The question of “need” is considered at paragraph 37. However, with regard to environmentally acceptable locations for sand and gravel extraction in the County, the Minerals Local Plan identifies “Preferred Areas” for sand and gravel extraction, which are capable of meeting the County’s need for minerals. Preferred areas are identified in Policy 35: Preferred Areas for Sharp Sand and Gravel. This lists the following sites, all of which are situated in the parishes of Latton and Marston Meysey in the Cotswold Water Park:

- (i) Land east of Latton
- (ii) Eysey Manor Farm
- (iii) Alex Farm
- (iv) Land north west of Water Eton House
- (v) Round House Farm
- (vi) Land north west of Latton

The Preferred Areas are the least constrained resource areas in terms of environmental designations and constraints and there is a presumption in favour of granting planning permission for these areas. The Big Field site is not included in this list of preferred areas and so does not accord with this policy.

26. The Minerals Local Plan recognises that outside the Preferred Areas there are sand and gravel resources capable of being worked. In order to take account of this, Policy 36 of the Minerals Local Plan looks at sand and gravel proposals outside preferred areas and stipulates that sand and gravel extraction can be considered outside preferred areas under certain circumstances where, i.e. there is a forecast landbank shortfall, the site complies with the site selection criteria policies of the Plan, a site is equally or more acceptable on its merits in planning terms than defined preferred areas, or there is a particular use requirement for the mineral in question. However, the Plan states:-

It is considered that limited resource blocks which are free from overriding constraints can be found close to the preferred areas in the Upper Thames Valley, west of Castle Eaton and in the Bristol Avon Valley. Proposals for mineral extraction under Policy 36 should come from within these resource blocks.

27. The implication here is that outside preferred areas the only potential resource blocks for sand and gravel which should be considered are those identified above. The Big Field site is not included in the list of secondary resource areas so again there is a presumption against granting planning permission for the site.

28. With regard to soft sand, there are sufficient permitted reserves to maintain production requirements until towards the end of the Plan period. Consequently, the Local Plan does not identify preferred areas for soft sand extraction. However, Policy 37 allows for any forecast shortfalls to be met by considering a limited number of unconstrained resource blocks in much the same way as was outlined above with regard to sand and gravel. Paragraph 4.9.9 states:-

The Sieve Map exercise identified limited unconstrained resource blocks close to the existing workings at Calne, while other resource areas, unconstrained by national designations were found west of Devizes and south east of Salisbury (to the north of the New Forest Heritage Area). Proposals for mineral extraction to maintain a 7-year landbank at the end of the planning period should come from within these resource blocks.

29. Again, Big Field is not included in the list of resource areas within which future soft sand mineral reserves might be permitted. The Minerals Local Plan policies support the need to look for unconstrained resources elsewhere in the County rather than look at constrained resources within the NFHA.

Extension to Existing Workings – Policy 38

30. Policy 38 of the Minerals Local Plan considers the issue of extensions to existing sites and states:-

NOTWITHSTANDING THE REQUIREMENTS OF POLICY 36 (I.E. WORKING OUTSIDE OF PREFERRED AREAS) EXTENSIONS TO EXISTING SOFT SAND AND SHARP SAND AND GRAVEL WORKINGS WILL BE PERMITTED PROVIDED THAT EITHER:

- (i) THE DEVELOPMENT WILL MEET AN ACTUAL OR FORECAST SHORTFALL IN THE SOFT SAND OR SHARP SAND AND GRAVEL LANDBANK, OR
- (ii) THE MINERAL WOULD BE STERILISED IF PLANNING PERMISSION WERE NOT GRANTED, AND

IN ALL CASES THE PROPOSALS COMPLY WITH ALL OTHER RELEVANT POLICIES OF THIS PLAN.

31. The Big Field site cannot be regarded as an extension site, since it is 700 metres from the existing Pound Bottom site. Consequently, there would be a presumption against permitting mineral working at the site even if it met the criteria listed above.
32. In summary there is a presumption against the Big Field site on the grounds that:
- (a) It is not a Preferred Area.
 - (b) It is not an unconstrained site outside a Preferred Area and
 - (c) Does not constitute an extension site.

Salisbury District Local Plan – Adopted 1996

33. The Salisbury District Local Plan was adopted in March 1996. Although there is a section on NFHA Policies which relate to a whole range of planning matters, the main policy which relates to the proposed development is Policy HA2, which states that:-

WITHIN THE NEW FOREST HERITAGE AREA IN SALISBURY DISTRICT DEVELOPMENT WILL NOT BE PERMITTED IF IT WOULD:

- (i) HAVE AN ADVERSE EFFECT ON THE OVERALL CHARACTER OF THE AREA INCLUDING THE LANDSCAPE, ECOLOGY, CULTURAL HERITAGE AND BACK-UP GRAZING LAND; AND/OR
 - (ii) LEAD TO AN INTENSIFICATION OF EXISTING USES WHICH WOULD INCREASE HUMAN OR ANIMAL PRESSURE ON THE NEW FOREST.
34. The Big Field proposed extraction area would be located within a forest clearing, some 700 metres from the existing Pound Bottom landfill, processing and recycling area. It would therefore occupy new land. Whilst it would be linked to the existing site it represents a new land use, thus extending and prolonging the area affected by mineral working and landfilling operations. It is considered this would have an effect on the overall character of the New Forest through its visual impact, noise, dust, traffic and general disturbance.
35. The conservation of the natural beauty of the countryside must be given due consideration in development control decisions in National Parks according to Planning Policy Guidance Note No. 7 relating to Development in the Countryside. The main aim of the Policies is to resist all activities which could adversely affect the overall character, natural beauty, ecology, historical importance or functioning of the New Forest whilst allowing limited development to sustain the local economy. The impact of prolonged and intensified activity at Pound Bottom and at Big Field would be significant in terms of landscape disturbance, noise, dust and traffic using the Forest roads. Given the level of protection that applies to the NFHA, it is considered that this is an inappropriate location for this type of further development. It would adversely affect the overall character of the New Forest, intensify human pressure on the area and adversely impact on the amenity of visitors to the area.

Special Landscape Area

36. Both the Pound Bottom and the Big Field sites lie within a Special Landscape Area as designated in the Structure Plan and Salisbury District Local Plan where Policies seek to restrict development to that essential to the rural economy or desirable for the enjoyment of its amenities. Developing Big Field would prolong the period of landscape disturbance in the area, and could not be regarded as essential to the rural economy or desirable for the enjoyment of the New Forest.

(ii) **Need for the Development**

37. National, strategic and local policy seek to restrict development in the NFHA unless “exceptional circumstances” can be demonstrated and that they are required in the “public interest” and that there is an “overriding need” for the proposed development to take place. The question of need is crucial to any development relating to the extraction of minerals and is concerned with ensuring that there is a landbank of permitted reserves. Policies MSP1 and MSP2 of the Adopted Wiltshire Structure Plan 2011 (2001) and Policy 3 of the Adopted Wiltshire and Swindon Minerals Local Plan (November 2001) have regard to the requirement to consider the need for the mineral and how it would affect the landbank (Policy 34) for sand and gravel and soft sand in accordance with Government Guidance set out in Minerals Planning Guidance No. 6 which advises Mineral Planning Authorities to maintain a landbank of at least seven years. At the present time (2002) it has been estimated that the landbank for sand and gravel stands at a little over seven years and for soft sand eleven and a half years. The sharp sand and gravel landbank does not take account of the Roundhouse Farm site (1.2 million tonnes) which has been granted planning permission in principle but which is subject to a Section 278 Highway Agreement. The soft sand landbank takes account of the recent permission granted at Compton Bassett (May 2002).
38. With regard to the need for the development at Big Field, it can be seen from the above that the County Council is currently fulfilling its requirement to ensure at least a seven year landbank of permitted reserves for both sharp sand and gravel and soft sand and therefore does not need to grant any further planning permissions at this time. Any permission granted for sharp sand and gravel should be from “preferred areas” as designated in the Adopted Minerals Local Plan and not from the NFHA or other constrained areas. In the case of soft sand there is well in excess of the minimum requirement of seven years and so no further resources are required at present and for the foreseeable future. There are no exceptional circumstances surrounding the need requirement which would warrant the granting of planning permission for the Big Field site.

(iii) **Environmental Implications of the Development**

Nature Conservation

39. With regard to the impact of the development on nature conservation, the Big Field site is located within an Area of High Ecological Value (AHEV) and falls close to sites of both National (SSSI) and European (cSAC and SPA) nature conservation importance. A number of Policies in different Development Plans refer to the need to maintain and enhance the County’s nature conservation resources, e.g. C1, C2, C3 of the Wiltshire Structure Plan, Policy HA2 of the Salisbury District Local Plan and Policies 19, 20, 21 of the Minerals Local Plan.

40. English Nature have concerns regarding the following;
- (i) Dust generation, which could blanket the Quar Hill SSSI.
 - (ii) Effect of the proposed development on protected species along the length of the current and proposed haul road.
 - (iii) Measures required to protect the SSSI/cSAC units from increased haul road usage.
 - (iv) Impact of continual movements of large haulage vehicles for a further five years throughout the New Forest cSAC/SSSI.
 - (v) English Nature would prefer to see heathland based restoration rather than the restoration proposed.
 - (vi) Possible detrimental effect of corvids upon ground nesting birds.
 - (vii) The need to implement National, Structure Plan, and Local Policies in a robust manner.
41. It is considered that the development would adversely affect the integrity of these internationally designated sites by prolonging and intensifying the use of Forest roads and roads within the site.

Impact on the Water Environment

42. No objection to the proposed development has been raised by the Environment Agency subject to conditions on any permission granted. The proposal is not, therefore, considered to give rise to an adverse impact on the water environment.

Landscape Impact

43. The Big Field and Pound Bottom sites lie within an area designated as a Special Landscape Area. Although it is accepted that the Big Field site is a clearing within existing woodland and that, to an extent the visual intrusion is contained, the Big Field site is acknowledged to be a highly sensitive site because of its location in the NFHA and in an AHEV. At present the area is a quiet, tranquil area and it is this tranquillity which would be affected. The whole nature of the area would change from what it is at present to a completely different after-use and there would be disturbance for a five-year period.

Residential Amenity – Noise and Dust

44. The closest residential property to the site is at a distance of approximately 750 metres.

45. The applicant's noise assessment has indicated that the predicted noise levels would be within the Government's Guidance as set out in MPG 11 – (The Control of Noise at Surface Mineral Workings), at the nearest residential dwellings. Although it is accepted that the noise emanating from the proposed development would comply with noise acceptability criteria for surface mineral working, it is also acknowledged that an additional source of noise disturbance would be an intrusion into the tranquility of the NFHA.
46. With regard to dust, although it has been recognised that existing dust control on the site can be inadequate in drier months due to a lack of water supply, the applicant has made arrangements to improve water supply for dust suppression. Given the distance of the site from residential properties and public access points, and the measures proposed for dust suppression there is unlikely to be an adverse impact due to dust. However, English Nature has maintained their concern regarding the possible impact of dust on the Quar Hill SSSI.

Highways and Traffic

47. The access to the site is on to Hampshire roads and therefore consultations were carried out with both Wiltshire and Hampshire Highway Authorities. No objections to the development were raised by either Highway Authority on highway engineering grounds since the proposed development would involve a continuation of existing traffic flows. However, concerns have been raised by a number of consultees and local residents regarding the impact of current HGV traffic on residential amenity and on the character of the NFHA. HGVs generated by the existing Pound Bottom site have been having significant adverse environmental impacts on the road network of the northern part of the New Forest within Hampshire, particularly on the B3080 and B3078 roads, which are unfenced roads across open common land. The amenity of local residents (including Redlynch, Downton, Godshill and Hale) have been affected and there have been impacts on visitors and users of the New Forest. The proposed development of Big Field, if granted planning permission, would result in the continuation of the significant adverse environmental impacts for a further period of five years.

Conclusions – Options Considered

48. The application and information contained in the Environmental Statement must be judged on its merits and against relevant Development Plan Policies and all other material considerations.
49. The proposal involves the extraction of gravel and underlying sand from Big Field, processing at Pound Bottom and restoration of the Big Field site to wetland, agriculture and forestry.

50. Although the applicant puts forward a number of reasons as to why the development proposed should be allowed to go ahead, e.g. maximising the Pound Bottom void by using waste clay from it to restore Big Field, and the need to serve South Wiltshire with soft sand and sand and gravel produced locally, these are not substitutes for the requirement to consider relevant Development Plan Policies and other material considerations. The site is located in the NFHA, which has National Park planning status, and moves are underway at national level (Countryside Agency) with local support (Counties, Districts and Parishes) to achieve full National Park status. Consequently, this has to be a major consideration in planning policy terms in deciding whether the proposed development should be allowed.
51. It is acknowledged that planning permission was granted in the past for mineral extraction and waste disposal at the Pound Bottom site. However, this was prior to the NFHA being given National Park status and prior to the designation of European level conservation sites. The proposal must be considered in the context of the new level of protection, which applies. As a result of the consultation process it is concluded that the development would have an impact on the New Forest in terms of opening up what is at present a sensitive and tranquil area and would prolong the life of operations on the site by an additional five years. This would lead to significant effects on the overall character of the New Forest, including its landscape, ecology and the amenity of its residents and visitors.
52. The Wiltshire Structure Plan 2001 highlights the requirement for minerals proposals within areas such as the NFHA to be “in the public interest” and only “permitted in exceptional circumstances” (MSP2). It has been shown in this report that these two requirements have not been met. The Salisbury District Local Plan (Adopted 1996) also has sections within it devoted to policies which set out to protect the NFHA from unacceptable development. (HA2 in the March 1996 Adopted Plan and HA1 in the more recent (1998) emerging Local Plan). The proposed development at Big Field does not comply with the spirit of these policies.
53. The Adopted Wiltshire and Swindon Minerals Local Plan 2001 identifies “preferred areas” for sand and gravel extraction where there is a presumption in favour of granting planning permission subject to suitable applications being submitted. The Big Field site is not a preferred area in the Plan and is not mentioned in the list of unconstrained resource blocks for either sharp sand and gravel or soft sand. In this respect, therefore, the Big Field site is contrary to policy and should be refused because it does not meet an actual or forecast shortfall in the landbank and does not comply with the site selection criteria set out in chapters 2, 3 and 5 of the Plan.
54. Considering the issue of “need”, it has been demonstrated that at present the landbank for sand and gravel stands at seven years and the soft sand landbank eleven and a half years. There is therefore no requirement to grant further planning permissions at this time and any permissions which are granted in the future should be from preferred areas and not from constrained sites such as Big Field.
55. With regard to the environmental impact of the development, concerns have been raised regarding the potential impact on nature conservation in view of the importance of national and international level designations on the site. There are also concerns raised regarding the impact of the development on a quiet tranquil area in terms of noise and dust generated by the development if granted planning permission.

56. The development would last for five years if granted permission which would mean that higher levels of HGV traffic would be maintained for this period, rather than the reduced levels which would exist were only the landfill operation being undertaken at Pound Bottom as is the case at present. HGVs from the site have been having a significant adverse environmental impact on the road network of the northern part of the New Forest in Hampshire and in South Wiltshire.
57. Overall, having considered all the information contained in the application and Environmental Statement it is considered that on policy, need and environmental grounds, the proposed development cannot be justified. The adverse impact the development would have on the NFHA which is recognised as a national and international wildlife, landscape and recreational resource, far outweighs any benefits which may be brought about by the development taking place.
58. In view of the overwhelming case against the proposed development as set out above, there are no alternative options available for consideration which would overcome the major policy, need and environmental concerns raised.

Recommendation

59. That planning permission be **refused** for the following reasons:-
- (i) The proposed development would result in prolonging the use of the existing site and open up what is at present a quiet tranquil area which would not be in accordance with the objectives of the NFHA designation and proposed National Park designation. It would adversely affect the overall character of the NFHA and increase the level of human pressure which would be contrary to Policy HA2 of the Adopted Salisbury District Local Plan (1996).
 - (ii) The proposed development would be contrary to the Adopted Wiltshire Structure Plan 2011, Policy MSP2 in that the proposals are not considered to be in the public interest and there are no exceptional circumstances surrounding the requirement for the development which would warrant granting approval.
 - (iii) The proposed development would be contrary to the Adopted Wiltshire and Swindon Minerals Local Plan 2001, which identifies preferred areas which aim to ensure that minerals are worked from these areas and from areas which are least constrained.
 - (iv) The proposed development does not meet an actual or forecast shortfall in the County's landbank and does not comply with the site selection criteria set out in chapters, 2, 3 and 5 of the Adopted Minerals Local Plan 2001.
 - (v) The proposed development would be likely to have an adverse impact on the nature conservation interest of adjacent designated sites, namely the New Forest Site of Special Scientific Interest, Special Protection Area for Birds, and candidate Special Area of Conservation.

Reason for Recommendation

60. The development proposed is contrary to Development Plan Policies and there has been no demonstrated need for the development which would overcome the detrimental environmental implications and impacts it would have if granted approval.

RICHARD J. LANDER

Director of Environmental Services

The following unpublished documents have been relied on in the preparation of this Report:

Consultation responses and correspondence

Environmental impact of the Recommendations contained in this Report:

These are detailed in the main body of the report. The proposed development is considered to have adverse environmental effects on the New Forest which outweigh the wider environmental benefits of permitting extraction and restoration and is therefore recommended for refusal.