

Desmond Swayne TD MP

**House of Commons
LONDON**

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Richard Read Esq,
Head of Minerals and Waste Planning,
Hampshire County Council,
The Castle,
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5th December 2007

Dear Mr. Read,

Please treat this letter as my response to your consultation which concludes on 12th December. Forgive me if I have misunderstood the comprehensive set of documents which you kindly supplied me with on CD, you may put this down to my lack of expertise because I did not find them easily accessible as a general reader. I have, however, taken expert advice.

In general, I find the plan skewed in several respects, almost to the extent that one might think that it was designed to throw up greater Downton as a preferred option. Even the rubric that precedes question 7 at paragraph 4.45 in the consultation document, drives me to that conclusion. In stating that either Ashley Manor or Downton might accommodate the processing plant re-located from Caird Avenue, it addresses a quite improper concern: where New Milton Sand & Ballast choose to apply for permission to re-locate their plant, is a matter for them. The impression that there is, even in the consultation document, a desire to smooth their way in anticipation of such an application only serves to reinforce the now widely circulating opinion that New Milton Sand & Ballast and the county council have stitched it up.

The sustainability appraisal:

The appraisal states that impacts may be greater at sites with reserves that exceed 2.5 tons and a production rate greater than 150,000 tons per year. Strictly, this might be true, but equally the impacts might well be smaller. It will depend upon the particular circumstances at each individual site, such as routes, proximity to housing and etc. To apply a general rule based on size is absurd. No justification is given in the document for this rather arbitrary cut off of 2.5m/150,000. Adopting this as the yardstick skews the assessment of all potential sites.

Given the appraisal's odd yardstick, Downton is judged of less impact and therefore more desirable as a preferred site. The sites that make up Downton Manor Farm provisional preferred area are only of medium size when taken individually but when combined in the preferred provisional area in the plan, they are very large indeed - so the impact measured by your own chosen criteria ought to be increased accordingly. (Incidentally, even individually the sites within Downton exceed by a wide margin some of the other sites that the appraisal lists as large).

The appraisal divides the Forest into two parts, north and south of Ringwood but the assumptions which underlie this division are not clear and are certainly not scrutinised. The effect of the division is to skew the analysis because the advantages and disadvantages of sites are considered against one another only within their categories and not across the whole Forest area.

I do not think that the appraisal is sufficiently consistent in the criteria it applies in its analysis of each individual site and, as a consequence, it exaggerates some impacts and fails to identify sustainable development opportunities at other sites.

When considering bio-diversity, the appraisal does not take sufficient account of the effect of intensive farming and so exaggerates impacts.

When considering transport access, the appraisal doesn't sufficiently measure the adequacy of routes, the extent of residential frontage, or accessibility. Had the appraisal adequately taken these factors into account, it would have identified greater impacts at Downton.

When measuring impacts on communities, the appraisal understates the extent to which Downton is surrounded by settlements and critically important leisure businesses.

In conclusion, the flawed analysis of the sustainability appraisal report unjustifiably points to Downton Manor Farm being identified as a provisional preferred area where a more objective and consistent analysis would have judged it less eligible than other sites.

Question 2:

In the Forest area, actual demand has fallen well below apportionment for years. The core strategy states that future need will be met by new provision from 2007-2016 and a strategic reserve from areas of search for 2017-2020. The plan, however, abandons this approach in the Forest by identifying provisional preferred areas which will yield a strategic reserve well beyond 2020. The provisional preferred areas, when combined, exceed the current apportionment rate and the current demand. It would be more sensible for the plan to fully utilise the existing reserves and so not require new reserves to come forward until the later part of the planning period.

In addition, the identified reserves substantially under-estimate the real reserve potential of the sites which will mean that other preferred production areas will unnecessarily be brought forward to address a non-existent shortfall. The plan needs to be amended to prevent over-provision in the Forest area. The core strategy states that sites should only be brought forward from the areas of search when required but the output of the provisional preferred areas in the plan will exceed the current (and I have no doubt also the future) apportionment.

Question 7:

Neither. As indicated in my answer to question 2 above, the plan will give rise to over-provision and I do not therefore consider that there is a need to develop either Downton or Ashley Manor Farm. The plan leads to over-provision of both sand and gravel because neither the reserves nor the production capacity are required to meet demand. Even were there a perceived shortfall against the current apportionment, a new apportionment is imminent: on 12th November I received a parliamentary written answer which clearly indicates that a review of the apportionment is about to take place. Informed opinion is that the apportionment will be reduced and that there is even less likelihood of any shortfall. In the event of my analysis being incorrect in this respect, a more rigorous and objective re-working of the sustainability appraisal report will yield sites with lower impacts than Downton or Ashley Manor.

Yours sincerely,

DESMOND SWAYNE TD MP