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<i>Date</i>	31 January 2020	<i>Email</i>	planning.policy@hants.gov.uk

Dear Sir/Madam,

Construction of 44 dwellings with access, open space, landscaping and associated works at Land West of Coldharbour Farm Road, Emsworth.

Thank you for consulting Hampshire County Council (HCC) as the mineral planning authority (MPA) with regards to the above planning application.

As identified within the supporting Minerals Assessment (Genesis Town Planning report ref: 17040, July 2019), the proposed development lies within the mineral and waste consultation area (MWCA) – Minerals section. This area is informed by the mineral safeguarding area (MSA) as defined through **Policy 15: Safeguarding – mineral resources** of the adopted Hampshire Minerals and Waste Plan (2013) (HMWP) and indicates where viable, safeguarded mineral resources are likely to be present.

The purpose of this policy is to protect potentially economically viable mineral resource deposits from needless and unnecessary sterilisation. The policy seeks to encourage the recovery, where possible, of potential viable mineral resources prior to development, this concept is known as prior-extraction.

Prior-extraction offers potential opportunities to reuse recovered minerals within the development itself or upcycle them to nearby aggregate recycling facilities. This in turn has strong potential to reduce the amount of waste generated through excavation on site as well as reducing the need for imported construction material.

As stated within the Minerals Assessment Report, the site was previously the subject of planning application APP/14/00360, submitted to Havant Borough Council. Upon consultation for this application HCC as the MPA raised no

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objections to the application as the prior extraction of minerals was deemed not viable.

Following a review of the Minerals Assessment Report, the previous planning application for the site and the British Geological Society records, HCC note that although no intrusive works have been undertaken, the evidence presented is sufficiently compelling to argue that prior extraction would not be a viable option for the development.

However, the MPA would still like to encourage full consideration of the opportunities for mineral extraction prior and as part of the proposed development.

Particular opportunities may lie in the recovery of mineral deposits uncovered during the preparation and construction phases of the project, for example through the excavation of footings or trenches for buildings, roads, landscaping and utility infrastructure associated with the development.

The recovered mineral could then be either re-used on site, which could encourage a reduction of excavation waste removed from site as well as inbound materials for construction uses associated with reduced costs, as well potential to export off site to a local mineral operator for further treatment which has potential for additional revenue for the developer. It is recommended that discussions are made between the developer and a local mineral operator at the earliest stage.

There should be no additional vehicle movements associated with these practices, as well as noise, vibration, dust issues.

HCC would therefore request the following conditions to be included in any permission for this planning application, to be delivered through submitted construction management plans or similar, requiring a statement outlining:

- i. a method for ensuring that minerals that can be viably recovered during the development operations are recovered and put to beneficial use; and
- ii. a method to record the quantity of recovered mineral (re-use on site or off site) and to report this data to the MPA.

Hampshire County Council is available to discuss this further with Havant Borough Council, as well as the applicant, in forming a suitable agreement following the receipt of the required information.

Further information on safeguarding and Hampshire County Council's approach to it is available in the adopted Minerals and Waste Safeguarding in Hampshire Supplementary Planning Document, which can be found on our website: <http://www3.hants.gov.uk/mineralsandwaste/planning-policy-home/hmwp-spds.htm>

Yours faithfully,

Andy Denton
Policy Officer