



Hampshire
County Council

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Date	18 October 2021	Email	planning.policy@hants.gov.uk

Dear Sir/Madam,

Erection of 194 No. dwellings, means of access, public open space, play areas, associated infrastructure and landscaping at Land east of St. Georges Avenue, Havant.

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

As outlined within our response to the pre-application advice consultation, dated 5 February 2021, 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.

As part of our pre-application advice, we requested that a Minerals Safeguarding Report or Assessment be submitted at the planning application stage. We are pleased to see that a Minerals Resource Assessment, Report ref: ST18915-001 produced by Wardell Armstrong, dated June 2021, has been submitted as part of application APP/21/01010.

Hampshire County Council, as the MPA, have reviewed the Minerals Resource Assessment and other submitted information and would like to provide the following comments.

Director of Economy, Transport and Environment
Stuart Jarvis BSc DipTP FCIHT MRTPI

Within our response to the pre-application consultation, we requested that exploratory work be undertaken on the site and included within the Minerals Resource Assessment. The Wardell Armstrong report utilises a single British Geological Society borehole within the site boundary, albeit in the far north west corner, and does not include any laboratory particle size distribution testing which is considered to be insufficient evidence to draw suitable conclusions from;

There is no evidence of local mineral operators being approached for their assessment of the site's extraction viability;

The use of a 100m buffer on sensitive receptors is inappropriately applied within the report. Paragraph 5.15 of the HMWP outlines that a 100m buffer is standard practice, however, this distance is applied on a case-by-case basis. Mineral extraction has been permitted with buffers as small as 50m elsewhere in Hampshire, for example at Forest Lodge Home Farm, Hythe under planning application 16/10450; and,

The groundwater monitoring data used as evidence in the report was gathered between Dec 2019 and Mar 2020 as well as Oct 2020 and Feb 2021. These dates correspond to the wettest months of the year where the water table is at its highest, while this data is appropriate for the construction of housing, mineral extraction would be timed to occur during the summer months, when no groundwater data has been provided. Furthermore, the inclusion of the groundwater monitoring results from BH5 (the shallowest recordings) would be in direct contradiction to the use of a 100m buffer on sensitive receptors, under which the area of BH5 would not be included in the extraction area.

Having reviewed the Ground Investigation Report, produced by Richard Jackson Ltd. (report ref: 61195, dated August 2021), groundwater monitoring undertaken during the intrusive investigation and several weeks later (both during the summer months) showed significantly lower groundwater levels than the Minerals Resource Assessment.

Based upon the exploratory borehole and trial pit logs, provided within the Ground Investigation Report, as well as the laboratory soil sample testing Hampshire County Council are satisfied that the geology underlying the site is likely to be unsuitable for prior extraction due to its high clay content.

However, the MWPA 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