Hampshire County Council

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Date	30 June 2026	*Your reference*	APP/26/00324
		Email	planning.policy@hants.gov.uk

Dear Sir/Madam,

Outline planning application, with all matters reserved except for means of vehicular access to the public highway and associated highway improvements, for: the demolition of existing buildings; the erection of new residential dwellings (C3); a Local Centre (comprising local retail (E(a)), financial and professional services (E(c)(i), E(c)(ii), E(c)(iii)), restaurants, cafés, and drinking establishments (E(b) and Sui Generis), hot food takeaways (Sui Generis), medical services (E(e)), offices (E(g)(i)) and community facilities ((E(d)), E(f), F2(b), F2(c))); a Primary School (F1(a)); early years provision (E(f)); informal and formal public open space including community park; community food-growing space; Active Travel routes; drainage infrastructure; utilities infrastructure; and all other associated and necessary infrastructure at Land to the east of Denvilles, Havant, known as Southleigh.

Thank you for consulting Hampshire County Council as the mineral planning authority (MPA) on the above planning application.

The proposed development lies within the mineral and waste consultation area – 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 economically viable mineral resource deposits from needless and unnecessary sterilisation, in line with Chapter 17 of the National Planning Policy Framework (NPPF). The policy seeks to maximise the recovery of viable mineral resources prior to development, this concept is known as prior extraction.

Prior extraction is beneficial as it recovers minerals which can either be reused within the development itself or processed at a nearby aggregate recycling facility. The recovered mineral would contribute towards the local aggregate

requirement (as per the Local Aggregate Assessment) for Hampshire. In addition, this process can reduce the amount of waste generated through excavation as well as the need for imported construction material.

Although the submitted Planning Statement attempts to argue that the housing need of the area outweighs the mineral safeguarding covering the site, there is no assessment of how the applicant can minimise mineral sterilisation or consideration of any form or level of mineral extraction.

This is considered to be inadequate evidence for disregarding mineral safeguarding.

The County Council, as the MPA, consider that the site has significant mineral potential and request further exploratory work to be undertaken on site. This information must be submitted to the MPA in the form of a Mineral Resource Assessment (MRA) and should include, as a minimum, empirical data of underlying geological stratigraphy captured by borehole or trial pit sampling, undertaken on the application site. Please note a desk-based review and / or boreholes taken from outside the application site boundary will be insufficient and therefore not considered by the MPA. Recommendations on how the use of any minerals present could be maximised, ideally established through discussions with a local mineral operator must also be provided to the MPA. Extensive information on the requirements of an MRA can be found in the Minerals and Waste Safeguarding in Hampshire Supplementary Planning Document (SPD).

The emerging Hampshire Minerals and Waste Plan is currently awaiting adoption decision-making following the receipt and publish of the Inspector's Report, it should therefore be afforded great weight. **Policy 15** of the emerging Plan requires developers to produce and submit an MRA detailing their arguments for and against mineral extraction.

In the absence of further information on the mineral potential of the area and/or how this mineral potential will be handled by the development, the proposal is considered to be contrary to **Policy 15** of both the adopted HMWP and the emerging updated Hampshire Minerals and Waste Plan.

Hampshire County Council is available to discuss this further with Havant Borough Council, as well as the applicant.

Further information on Hampshire County Council's approach to safeguarding is available in the adopted Minerals and Waste Safeguarding in Hampshire SPD.

Yours faithfully,

Andy Denton
Principal Policy Planner