

Minerals and Waste Plan: Adoption

Members' Room Document 9: Summary of consultation responses

This document summarises the responses to the consultation on modifications to the Plan (October – December 2012).

4 Summary of key issues from the consultation

1 The summary of issues was produced by officers summarising representations and combining different representations raising the same or very similar issues. It was then considered whether the issues raised required further clarification or another kind of change in the Plan or evidence base and if not, why not. 'Appendix one - Summary of responses on the proposed modifications' lists both the summaries of issues and the Hampshire Authorities response to the issues. The summaries are split as per the structure of the HMWP.

2 Previous consultation exercises generated more diverse levels of response due to the scope of previous consultation exercises. As the changes were more targeted, the levels of response have followed suite.

Vision and Spatial Strategy

3 Responses received on the '*Vision and Spatial Strategy*' focused on the changes proposed to this section of the Plan as this was redrafted. Many of the responses highlighted areas where further clarification would be of benefit e.g. Key Diagram and the role of Marine Management Organisations. Support was shown to some of the changes proposed e.g. inclusion of sites of archaeological and historical heritage and the separate provision for silica sand. A small number of responses were received on the new policy on the presumption in favour of sustainable development (new Policy 1) and the application of National Planning Policy Framework (NPPF).

Protection of Hampshire's environment

4 Responses received on the changes proposed to the section on '*Protection of Hampshire's environment*' focused on changes to policies 3, 4 and 5 (as revised numbering) on habitats and species, protection of designated sites and the countryside as well as a few other points of clarification. A response was received on the HRA compliance on Policy 3 (revised Policy 4) which was not related to a proposed change. Responses were received both in support of and raising concerns with the soundness of Policy 4 (revised Policy 5). A response was also received relating to the application of the NPPF in relation to the Green Belt and Policy 5 (revised Policy 6). Some support was received for the changes to Policy 6 (revised Policy 7) on heritage and the movement of text from the Implementation Plan into the main body of the Plan in relation to this issue. A response was also received indicating that policy provisions for bird strike may be too generalised.

Maintaining Hampshire's communities

5 Responses received on '*Maintaining Hampshire's communities*' largely focused on Policy 9 (revised Policy 10) which relates to protection of health, safety and amenity. These focused on the proximity of development to local communities and buffer zones/stand offs. Other responses were also received on the need for the

waste market to be flexible, impact on the water environment from landfill developments, flooding and impact of traffic in designated areas. Some support was received to the changes proposed to Policy 11 (revised Policy 12).

Supporting Hampshire's economy

6 Responses received on '*Supporting Hampshire's economy*' focused on a variety of minerals and waste issues.

7 A small number of responses questioned whether the resources at Whitehill Bordon have the potential to be silica in relation to Policy 15 (Safeguarding - mineral resources).

8 Although the issue of safeguarding Whitehill Bordon through the provisions of Policy 15 (Safeguarding - mineral resources) was not an issue being consulted upon, three responses were submitted still objecting to the safeguarding allocation. This has largely been as a result of the outcomes of the recent public examination of the East Hampshire and South Downs National Park Joint Core Strategy where the Inspector presiding raised concerns over the deliverability of the Whitehill Bordon Eco-town. One such issue was over the HMWP inclusion of the area for safeguarding and the associated supporting text on this issue. Although this issue was considered at the HMWP public examination previously, due to the recent event, the issue of current wording of the supporting text for Policy 15 (Safeguarding - mineral resources) has been brought to the attention of the Inspector presiding over the HMWP for his consideration.

9 Concerns were also highlighted in relation to the wording for Policy 17 (Aggregate Supply). In particular, the specification of 'limestone' as the type of aggregate to be imported into the county by rail (in policy 17 (Aggregate Supply)) was considered to be unsound and suggestions have been made that some of the figures presented in the policy are not based on the most up-to-date information and correct appraisal (ISA);

10 Proposed changes to Policy 19 (Aggregate wharves and rail depots) were considered unsound as the policy relies on maximising capacity at existing sites which may not be appropriate. In addition, the removal of safeguarding status for wharves and rail depots through the supporting text for Policy 19 (Aggregate wharves and rail depots) was also considered to be unsound by one response.

11 A number of responses considered the proposed changes to Policy 20 (Local land-won aggregate). This included clarification over triggers for review of aggregate supply. A number of responses considered the criteria for unallocated sites to be insufficient / vague / to flexible and suggested revised wording, and some even proposed that a new policy should be considered as well as doubts over the reliance on unallocated sites. One response also indicated that the policy should be reconsidered in light of the DCLG MASS guidance. A small number of responses sought further clarification / definition of terms of issues relating to the policy including 'local needs', 'extensions' and 'beneficial uses'. One response questioned the inclusion of a 'priority order' within Policy 20 (Local land-won aggregate) and considered it to be unsound;

12 In addition to the above, the introduction of a new policy and associated supporting text on silica sand is also one of the main issues for further consideration. The calculation of landbanks for silica sand sites at Kingsley and Frith End is disputed as well as the removal of the quarry sites from the permitted reserves of aggregates (with a sole focus on silica). Other opportunities for extraction of silica/soft sand in East Hampshire not allocated were also highlighted through a small number of responses.

13 As already indicated, the largest proportion of responses on one change related to the allocation at Michelmersh for brick-making clay. The majority of these responses opposed to the changes to the allocation on a variety of grounds including its potential

impact on local communities, the landscape, the conservation area, amenity and hydrology. A number of responses also indicated that they did not believe that the appropriate level of investigation into impacts and alternative options had taken place and that the site allocations also do not meet the NPPF requirement of 25 years. Utility companies and statutory consultees with an interest in the area indicated that they would like some strengthening of development considerations in relation to hydrology.

14 Some support was received for the proposed changes to the policy on locating waste developments (Policy 28 (revised Policy 29)). A response was received relating to the proposed changes to Policy 29 (revised Policy 30) on construction, demolition and excavation wastes in relation to missing an opportunity by allowing CDE waste to be disposed without recovery.

15 Although some support was given for the proposed changes to Policy 30 (revised Policy 31) on liquid and waste water management, one response raised concerns about the wording in relation to co-treatment of sewage sludges with other organic wastes.

16 A small number of responses were received relating to the changes proposed to Policy 33 (revised Policy 34) and its associated supporting text in relation to *potential minerals and waste wharves for safeguarding*. These disputed whether the changes were sound, based on the safeguarding of land to the north west of Hythe (Dibden) or on points of clarification.

Appendices

17 Responses received on the amendments to *development considerations* focused on Bramshill quarry extension, Forest Lodge Home Farm, Michelmersh and Roeshot. For example, in relation to Forest Lodge Home Farm, a nearby local landowner has raised an objection to the proposed change to the restoration specification. A large number of responses relating to Michelmersh also questioned the level of detail provided in the development considerations. Such responses indicated that they considered much more detail is required at the plan making stage. Some comments were also received on the proposed changes to Inset Map 5 (Whitehill Bordon) but these largely related to safeguarding mineral resources in this area, rather than the change to the annotation proposed.

18 Responses received on the *safeguarding list* focused on what respondents believed to be omissions or unsound inclusions.

19 A small number of responses were received in relation to the *Implementation and*

Monitoring Plan. These considered issues relating to the need for clarification on the monitoring triggers proposed. Some support was also given to the element of the Plan in relation to the historic environment.

Proposals Map (Policies Map)

20 The responses received in relation to the *Proposals Map*, focused on sites not being included on the map or sites which should be removed.

MASS guidance

21 One of the responses received on the MASS guidance indicated that Policy 20 (Local land won aggregate) should be reconsidered in light of the new guidance.

Evidence base

22 The large majority of responses received on the evidence base related to the ISA report, in particular to the appraisal of site allocations. The majority of these were outside the scope of the consultation