

MATTER 13 SAFEGUARDING AND STERILISATION OF MINERAL RESERVES (POLICIES S14 &S15)

- (i) **Are Policies S14 & S15 strong enough or will they unduly inhibit development opportunities?**

Policy S14 should safeguard all existing facilities, planned and potential rail-heads, wharfage and associated storage, handling and processing facilities for the bulk transport by rail, sea or inland waterways of minerals, particularly coal and aggregates, including secondary and marine dredged materials, in accordance with the requirements of MPS1. This safeguarding should **not** be conditional upon an internal review of facilities.

- (ii) **How will Policies S14 and S15 safeguard “new sites” identified at a later stage?**

The Key Diagram is based on a scale and format which does not identify the boundaries of the safeguarded sand and gravel deposits. The combination of draft Policy S15 and the current Key Diagram (which is too ‘broad brush’) is insufficient to ‘safeguard’ proven sand and gravel resources.

Key Diagram safeguarded sand and gravel areas should be put onto OS based plans so that they can be related to existing and proposed spatial features and developments. As currently drawn, it is impossible to relate the areas to OS based plans and they do not take into consideration areas that have already been worked for mineral, or are currently sterilised by other forms of built development.

- (iii) **Does Policy S14 adequately address the needs of the crushed rock trade, particularly in terms of deep water wharves?**

There should be no differentiation in the policy between wharves which are in use (or could be in use) for importation of crushed rock, other types of primary aggregates, secondary aggregates or marine dredged aggregates. As stated in (i) above the policy, as worded does not give sufficient emphasis to the safeguarding of all existing, planned or potential wharves.

- (iv) **Paragraph 22.4 :how does the review fit in with future work on the HM&WDF and should it be broadened in scope??**

As stated above all facilities should be safe-guarded, this requirement should not be conditional upon a review carried out by Hampshire County Council Minerals and Waste Planning Officers (or their consultants).

(v) Does Policy S15 conform with national guidance in MPG6 and with regional guidance in RPG9 and the draft South East Plan?

As stated above, the Key Diagram needs to be clearer to enable the boundaries of the Safeguarded Sand and Gravel Reserves to be identified. The wording of S15 is currently ambiguous and should refer to 'Safeguarded Sand and Gravel Reserves' rather than 'mineral deposits'.

MPS1 requires MPAs to 'encourage the prior extraction of minerals, where practicable, if it is necessary for non-mineral development to take place in MSAs'. Paragraph 13 of MPS1 also requires Mineral Safeguarding Areas (MSAs) to be shown in district LDDs.

The wording of this policy should be modified to reflect MPS1 requirements to 'encourage the prior extraction of mineral, where practicable' and to work with District Councils to ensure that MSAs are identified in their LDF documents.

(vi) Should Policy S15 refer to mineral deposits or resources, rather than reserves?

MPS1 (Paragraph 13) requires the safeguarding of 'proven resources'. For clarity it would be better to use the same term.

The emerging South East Plan Policy M5 requires existing mineral sites, and proposed sites and 'areas of search' to be identified in Mineral Development Documents...These should then be safeguarded in Local Development Documents.