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|--------------|-----------------|----------------|--------------------------------------------------------------------------------|
| Enquiries to | Andy Denton     | My reference   | CONS/2024/0630                                                                 |
|              |                 | Your reference | V/24/98389                                                                     |
| Date         | 1 November 2024 | Email          | <a href="mailto:planning.policy@hants.gov.uk">planning.policy@hants.gov.uk</a> |

Dear Sir/Madam,

**Request for an EIA Screening Opinion for the development of up to 250 new dwellings with access from Mortimer's Lane, and associated open space, landscaping, and engineering works (pre-application enquiry Q/23/96485) at Mortimers Farm, Mortimers Lane, Fair Oak, Eastleigh SO50 7EA**

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

The EIA Screening Report (Ref: BLOS3037, Turley, dated Oct 2024) fails to identify the site as falling within the Minerals Safeguarding Area (MSA) as defined by **Policy 15: Safeguarding – mineral resources** of the adopted Hampshire Minerals and Waste Plan (2013) (HMWP). This was highlighted, by ourselves, in our response to Q/23/96485 pre-application enquiry under consultation reference CONS/2023/0721, dated 14 Dec 2023.

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 potentially 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.

It would be expected that mineral extraction is considered under the Waste and Resources section of an EIA.

The County Council, as the MPA, has requested in-situ exploratory work be undertaken on site and submitted to us in the form of a comprehensive minerals safeguarding report or assessment. This report should include empirical data of underlying geological stratigraphy captured by borehole or trial pit sampling, as well as recommendations on how the use of any minerals present could be maximised (ideally established through discussions with a local mineral operator). The report would enable the MPA to interpret the data and provide a position in relation to **Policy 15** and make a recommendation for the extent of viable extraction options and for suitable conditions to be incorporated if appropriate.

For any planning application the MPA would need to see these investigations but more importantly it would need to be convinced that the resources are not viable, before consenting to their sterilisation. Extracting minerals can be done to varying degrees from full extraction to use of any material that is dug up anyway during the construction phase. We would encourage discussions with a minerals operator to ensure all opportunities for using this material have been fully explored.

While the MPA is not in receipt of the above and previously requested assessment we request that mineral extraction is considered within the EIA for the proposed development.

HCC would like to take this opportunity to convey that prior-extraction usually occurs during the construction phase of developments. As such, site assessments, i.e. dust, noise and vibration, should take this into account at this stage.

The Minerals & Waste Policy Team at Hampshire County Council is available to discuss this further and will be happy to receive further consultations regarding the proposed development.

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  
Principal Policy Officer