



Hampshire
County Council

Hampshire 2050

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Enquiries to	Edward Trevett	My reference	CONS/2025/0155
		Your reference	F/25/99007
Date	25 March 2025	Email	planning.policy@hants.gov.uk

Dear Sir/Madam,

Description: Hybrid Application at East Horton Golf Centre, Mortimers Lane, Fair Oak, Eastleigh, SO50 7EA

Phase 1 (Greenwood Course) - full planning application for the re-siting/ alterations to 1st tee box, fairway and green, enlarging 18th green and creation of event space with associated reprofiling, landscaping, footpath and drainage works following closure of existing driving range.

Phase 2 (Parkland Course) - full planning application for the creation of a driving range with associated reprofiling, landscaping and drainage works following closure of holes 14, 15 & 18 and outline planning application for the construction of a new driving range building (with all matters reserved except for access).

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

Deputy Chief Executive & Director of Hampshire 2050
Gary Westbrook

Mineral Safeguarding

We, as the MPA, acknowledge that a Minerals Resource Assessment (MRA) is not required due to the small scale of the proposed built infrastructure. However, the site lies within the MSA, so consideration of the re-use or beneficial use of any minerals excavated as part of the development should be made.

Full consideration must be given to the opportunities for mineral extraction prior to and/or as part of the proposed development ('incidental extraction'). It would be expected that high quality material, such as sand, gravel and soft sand would be processed and used for construction purposes, while lower quality material could be used for fill or similar.

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, drainage and utility infrastructure associated with the development.

Re-using the recovered mineral on site, would encourage a reduction of excavation waste removed from site as well as inbound materials for construction uses associated with reduced costs. In addition, export of the recovered mineral off-site to a local mineral operator for further treatment has potential for revenue generation. It is recommended that discussions are made between the developer and a local mineral operator at the earliest stage.

Additional vehicle movements as well as noise, dust and vibration issues should not be 'above and beyond' what is expected in the construction phase, and so sites should apply the same buffers that are used for the construction activities.

Hampshire County Council 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. On the 1st April of each year, following commencement of the development, the tonnes of minerals extracted, quantity re-used on site, and if exported from site its location of processing, shall be reported to the Mineral Planning Authority. The reporting of such shall be required until such time as the development is considered to be completed by the Local Planning Authority.

Reason: To ensure that minerals that can be viably recovered during the development operations are recovered and put to beneficial use in accordance

with Policy 15 (Safeguarding – mineral resources) of the Hampshire Minerals and Waste Plan (2013)

Soil importation

The proposals include the importation of 205,000 m² of soil onto the site, it has been assumed that this is supposed to cubic metres.

A letter from the Department for Communities and Local Government to Chief Planning Officers, dated 20th January 2009 and entitled [“Large Scale Landscaping Development Using Waste”](#) outlines the difficulty in determining whether projects, such as the one proposed, comprise waste recovery or waste disposal operations, and advises that *“the Government’s policy is to encourage the recovery of waste (which includes the re-use and recycling of waste e.g. for construction)”* and that the *“deposit of waste that does not constitute recovery is considered a waste disposal operation”*. The letter goes on to state that *“both CLG and Defra consider that landscaping developments of the scale of the current examples involving importing over 100,000 tonnes of waste would not have been undertaken if the material used to construct the landscaping were not waste. Therefore, given the quantity of waste being used such developments are unlikely to constitute recovery operations, but are more likely to be waste disposal operations”*.

On this basis, material imported for deposition over 100,000 tonnes would usually be considered a waste management development and would therefore be a County Matter to be determined by Hampshire County Council, as the Waste Planning Authority.

We ask that the applicant clarifies the following to help understand if, as is suspected, this should be a County Matter:

- the total predicted tonnage of soil importation for the project;
- the source of the soils being used;
- whether the proposed volumes / tonnages of ‘material’ are the minimum amount required to deliver the scheme;
- would the proposal be carried out with non-waste material if waste material(s) was / were not available; and
- are the proposed materials fit for the purpose required?

The Planning Statement details that the soil will be sourced from construction sites (donor sites) and imported for use. There is no mention of the [CL:AIRE Definition of Waste: Code of Practice \(DoWCoP\)](#) in the Planning Statement with regard to the handling of the imported material. It is likely that the development will require a Material Management Plan (MMP), which would be agreed by the Environment Agency and the Environmental Health Officer, which will detail how the soils will be handled between the donor sites and the recipient site.

There is a burden of proof, that lies with the applicant, that the material being imported is not for waste disposal but is instead being 'recovered' or put to a beneficial use by being used in the re-profiling works. The EA's definition of material recovery requires proof that the project would go ahead even if the applicant would have to pay for virgin material to perform the function of the imported soils.

If it is demonstrated that the proposed import material is clean (and in accordance with the 'CL:AIRE' protocol or via an EA permit) and it remains below the 100,000 tonnes threshold, we would suggest the application is dealt with by Eastleigh Borough Council. If this is the agreed approach, Hampshire County Council would be happy to assist with setting appropriate conditions for the work, if the application is granted permission in the future.

From our perspective, the key policies from the adopted Hampshire Minerals and Waste Plan (HMWP) (2013) that would need to be satisfied in order to approve such an application would be (but not limited to):

Policy 13 – High quality design of minerals and waste development – this policy seeks to ensure (minerals and) waste development does not cause unacceptable visual impact as well as maintaining and enhancing the landscape. Additionally, to show design and operational principles have been met, a relevant consideration for a proposal such as this would be to demonstrate the development is seeking to minimise the disposal of waste and maximise recovery and recycling, where possible.

Policy 27 – Capacity for waste management development – supports proposals helping to contribute to the waste targets set out in the policy.

Policy 29 (specifically 3a&b) – Locations and sites for waste management – this policy is used to assess proposals for all types of recycling, recovery and treatment facility, regardless of the type of waste being handled (inert, non-hazardous or hazardous), and it sets the general approach to considering the location and sites for new waste management facilities.

Policy 30 (Construction, Demolition, and Excavation Waste Development) – this policy supports beneficial outcomes from the use of inert construction, demolition, and excavation waste in developments.

Hampshire County Council is available to discuss this further with Eastleigh 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 Supplementary Planning Document](#) (SPD), which can be found on our [website](#).

Yours faithfully,

Edward Trevett
Technical Planning Assistant