



## Hampshire Minerals and Waste Plan: Partial Update - Submission Plan

### Proposed Modifications Consultation Response Form

#### Introduction

This response form allows you to provide your views on the proposed modifications to the Hampshire Minerals and Waste Plan: Partial Update - Submission Plan (the 'Plan') (July 2024) document.

This consultation is open from **9am 4 December 2025 until 11:59pm 12 February 2026**. If you have any queries, or require this form in an alternative format, please contact [hmwp.consult@hants.gov.uk](mailto:hmwp.consult@hants.gov.uk).

#### About this consultation

##### Privacy notice

The Minerals and Waste Policy Team at Hampshire County Council is collecting information about you on behalf of the Hampshire Authorities (Hampshire County Council, New Forest National Park Authority, Portsmouth City Council, South Downs National Park Authority & Southampton City Council) in order to consult on the Hampshire Authorities' proposed minerals and waste planning policy.

We will collect your name, postal address, and any other contact information you provide as well as details of your representation. A name and postal address **must be provided** for the comments to be accepted. Anonymous or confidential representations, without the required personal information, cannot be accepted. We will accept representations to consultations and use the information to draft planning policy documents and contact you in the future regarding these documents.

The legal basis for our use of this information is compliance of a legal obligation to which the Hampshire Authorities are subject. This is in relation to the Town and Country Planning Act 1990 (as amended) as well as the adopted Hampshire Statement of Community Involvement.

All representations received will be handled and made available to view publicly in accordance with the General Data Protection Regulations (2018) and the Local Government Act (1985) for the purposes of preparing planning policy documents until adoption. In accordance with national legislation and guidance, the name(s) of those making representations, will appear on our website. We will make every effort

to remove other personal details including telephone numbers, email addresses and signatures prior to being uploaded.

We may share your personal information with the Hampshire Authorities, where it relates to the preparation of a jointly prepared planning policy document, as well as the Secretary of State (and appointed Planning Inspector) during the process of public examination.

All representations received at Proposed Modifications stage will be sent to the Secretary of State for consideration as part of the Public Examination undertaken by an independent Planning Inspector appointed by the Planning Inspectorate (PINS).

On adoption of the policy document(s), all representations will be removed from the website. Electronic and paper file copies of representations will be kept by the Hampshire Authorities for seven years in line with the relevant corporate retention period. All representation received will be handled and made publicly available in accordance with the Privacy Statement (found via this link) <https://www.hants.gov.uk/aboutthecouncil/privacy/land-planning-environment/minerals-waste-planning-policy>.

The above information is the specific privacy notice for this service. For more information about your rights in relation to your personal data, see the [County Council's general privacy notice](#).

You have some legal rights in respect of the personal information we collect from you. Please see our [Data Protection page](#) for further details.

You can contact Hampshire County Council's Data Protection Officer at [data.protection@hants.gov.uk](mailto:data.protection@hants.gov.uk).

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns>.

## Background

Minerals and Waste Planning Authorities have a statutory responsibility to prepare and maintain an up-to-date Minerals and Waste Local Plan. Hampshire County Council, New Forest National Park Authority, Portsmouth City Council, South Downs National Park Authority & Southampton City Council (collectively referred to as the 'Hampshire Authorities') are working to produce a partial update to the Hampshire Minerals and Waste Plan (the 'Plan') which will guide minerals and waste decision making in the Plan Area up until 2040.

The Regulation 18 Draft Plan Consultation ran for 12 weeks, between 8 November 2022 and 31 January 2023. The purpose of the consultation was to engage the Plan area's communities and relevant organisations and statutory bodies in discussions on managing minerals and waste to 2040. It also provided an opportunity to gather additional local evidence to help determine the Plan Partial Update's revised policies and draft site allocations. More information about this stage can be found on the Draft Plan webpage:

<https://www.hants.gov.uk/landplanningandenvironment/minerals-waste-planning/hampshire-minerals-waste-plan/minerals-waste-plan-partial-update-consultation/hmwp-reg-18>

The Regulation 19 Proposed Submission Plan Consultation ran for 8 weeks, between 9 January 2024 and 5 March 2024 and provided an opportunity for communities and relevant organisations to have their say on the Proposed Submission Plan before it was passed on to the Secretary of State and a Planning Inspector. All comments received to this consultation were passed on to the Planning Inspector. More information on this stage of Plan-making can be found on the Proposed Submission Plan webpage:

<https://www.hants.gov.uk/landplanningandenvironment/minerals-waste-planning/hampshire-minerals-waste-plan/minerals-waste-plan-partial-update-consultation/hmwp-partial-update>

The Examination Hearings were held at the Hampshire County Council offices between the 4th and 13th February 2025, with an additional online hearing being held on 9th September 2025.

Following the hearings, the Hampshire Authorities are proposing a number of modifications to the Submission Plan. These take the form of Main Modifications, Additional Modifications, and modifications to the Policies Map.

## Proposed Modifications

Main Modifications are changes to the Submission Plan that are necessary to make it sound and legally compliant. These modifications are designed to ensure the Plan's overall effectiveness.

Additional Modifications are minor changes that the Hampshire Authorities would like to make to the Submission Plan to improve the presentation or to address or correct any typographical or factual errors. Changes can only be defined as Additional Modifications where they are not required to resolve soundness or legal compliance issues.

Policies Map modifications are specific to the Policies Map and include changes such as presentational changes as well as allocation boundary changes etc. Where the changes are material to the Plan these are also listed as Main Modifications.

The Main Modifications have been subject to Sustainability Appraisal (incorporating Strategic Environmental Assessment) and Habitats Regulation Assessment.

The proposed modifications to the Submission document and the accompanying assessments can be viewed and downloaded from the Examination Library webpage:

<https://www.hants.gov.uk/landplanningandenvironment/minerals-waste-planning/hampshire-minerals-waste-plan/minerals-waste-plan-partial-update-consultation/examination-library>

The modifications are set out in three schedules, the Proposed Main Modification Schedule (MD05), the Proposed Additional Modification Schedule (MD06), and the

Proposed Policies Map Modification Schedule (MD07). It is recommended that you refer to the modifications as you respond to this consultation.

A Proposed Modified Plan document (MD08) has also been prepared to display the proposed modifications in the context of the Plan itself. This can also be viewed and downloaded from the Examination Library webpage (above).

We would like to hear from you in respect of your views on the 'soundness' and legal compliance of the Proposed Main Modifications to the Plan and Policies Map changes. For definitions on the Tests of Soundness, please refer to the FAQs, which can also be found on the Examination webpage:

<https://www.hants.gov.uk/landplanningandenvironment/minerals-waste-planning/hampshire-minerals-waste-plan/minerals-waste-plan-partial-update-consultation/hmwp-reg22>

Where an objection is raised against the content of the Plan, this must relate either to the Plan not complying with legal requirements, or it not being sound in relation to at least one of the Tests of Soundness.

## How to complete this form

**A blank response form is provided below (Response Page 1-2), please fill out these pages as per your desired response. They are followed by “About You” and “Equalities” sections.**

**Please copy and paste (or print off) a new set of response pages for each modification to the Plan you wish to respond to. Only one “About You” section is required.**

You do not need to include the current page and/or the previous pages in your final response, as they are for guidance.

A line is available for you to outline which modification you are responding to. For ease of interpretation, please be as descriptive as possible (such as using the modification reference number and the part of the Plan it relates to) as to which part of the Plan document or supporting evidence documents you are responding to.

**Representations can only be made on the proposed Main Modifications to the Plan, not the full Plan as submitted for Examination in July 2024. The Inspector can only make recommendations in relation to Main Modifications and not parts of the Plan that remain unchanged. The consultation is therefore not an opportunity to repeat or raise further representations about the Plan or to seek further changes to it.**

Please provide all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

The About You section will collect your name, postal address, and any other contact information you provide as well as details of your representation. A name and postal address **must be provided** for your comments to be accepted. Anonymous or confidential representations, without the required personal information, cannot be accepted.

Please return your response form via:

- Email to: [hmwp.consult@hants.gov.uk](mailto:hmwp.consult@hants.gov.uk)
- Post to: Minerals and Waste Planning Policy, Hampshire 2050, The Castle, Winchester, Hampshire SO23 8UL

## HMWP Partial Update Proposed Modifications Consultation Response

**Main, Additional, and/or Policies Map Modification(s) that you are responding to:**

MM43 – Appendix A Site Allocations - Purple Haze

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**1. Do you consider this/these modification(s):**

Legally compliant (prepared in accordance with legislation)  Yes  No

Sound (fit for purpose)  Yes  No

**2. If you do or do not consider the above modification(s) to be legally compliant and/or sound, please explain your reasons for this:**

It is considered that the Plan is unsound as MM43 contains proposed modifications that are not justifiable, potentially impact on the effectiveness of the plan and risk making the site undeliverable.

The main modifications proposed under MM43 are still considered to be too prescriptive and are largely based on the ongoing determination of the planning application at Purple Haze. As has been conveyed at the Examination in Public and subsequent hearing session, the Applicant's hydrological experts have serious doubts in relation to Natural England's assessment of the project and their interpretation of the hydrological regime at the site.

Grundon Sand and Gravel Ltd maintain the position that the results of detailed investigations, based upon sound data and undertaken by specialists with prolonged experience of assessing hydrological systems, conclude that the potential for adverse impact upon the water regime arising from the proposals is insignificantly small.

While the independent advice sought by HCC has assisted somewhat in understanding NE's position, it still requires removal of all scientific doubt which is an impossible metric in any natural system. It is also at odds with the core scientific principle of evidence-based assessment.

The result of this level of proof is the inclusion of a requirement for hydrochemical and ecohydrological assessments to be undertaken. As currently drafted, MM43 focuses far too much on the current planning application proposals currently being determined by HCC. It fails to allow sufficient flexibility for any future alternative schemes to come forward (should the current planning application be withdrawn or refused) without undertaking these onerous assessments.

In relation to the text under the 'Restoration' heading, it is considered that the inclusion of a requirement for the minimisation of the use of silts and clay while also requiring restoration using site-won material only in the same sentence is far too prescriptive and potentially confusing. Clays can be used for stabilisation works along reinstated tracks for example without jeopardising heathland creation. This level of detail would be picked up in a soil handling strategy or detailed

restoration scheme as part of a planning application. Furthermore, the current wording requires pre-development habitats to be replicated but then requires heathland creation.

**3. Please set out the changes you think are needed to make this modification(s) legally compliant and sound, in respect to the issues you have raised in Question 2. It will be helpful if you are able to put forward your suggested revised wording. Please be as precise as possible.**

The use of the word 'must' when describing the Purple Haze allocation development consideration requirements is at odds with most of the other proposed allocations where they are more positively worded i.e. the word 'should' is used instead. In accordance with the NPPF, the plan should be prepared positively, in a way that is aspirational but deliverable. Therefore, it is requested that the wording used is consistent with the rest of the Plan.

Text suggested to be deleted has been struck through while red text is proposed to be added.

**Restoration:** ~~Predevelopment habitats and drainage characteristics of the site to be replicated at lower levels using site-won material only, minimising silts and clay to an acceptable level to ensure~~ heathland creation. The site will eventually be used for a combination, heathland habitats, nature conservation areas, enhanced **informal** recreational areas and public open space, linked to the Moors Valley Country Park.

**Development Considerations:**

4. Hydrological/hydrogeological ~~hydrochemical and ecohydrological~~ assessments are required to determine the risk and appropriate protection of nearby National Site Network sites, Ramsars and SSSIs. This includes the issue of nutrient enrichment, the protection of the water quality and recharge of the underlying aquifer, groundwater and surface water and safeguarding the hydrological/ecohydrological regimes of Ebblake Bog and Moors River System Sites of Special Scientific Interest potentially through the limiting or exclusion of extraction in the north of the site\*

## About You

Is this your own personal response or on behalf of an organisation or group?

- This is a personal response  
 This response is on behalf of an organisation or group

If this is a personal response, your name and postal address must be provided for your comments to be accepted. Please include these below.

**Please note: anonymous or confidential representations cannot be accepted.**

Your full name <b>(required)</b>	[REDACTED]
Your full postal address <b>(required)</b>	David Jarvis Associates, 1 Tennyson Street, Swindon
Your full postcode <b>(required)</b>	SN1 5DT
Contact email address <b>(optional)</b>	[REDACTED]

If this response is on behalf of an organisation or group, please tell us a little more about yourself and the organisation you are responding on behalf of:

**Please note: anonymous or confidential representations cannot be accepted.**

The full name of your organisation or group <b>(required)</b>	Grundon Sand and Gravel Ltd
The full address of your organisation or group <b>(required)</b>	[REDACTED]
Your full name <b>(required)</b>	[REDACTED]
Your position in the organisation or group <b>(required)</b>	Planning Consultant on behalf of Grundon
Contact email address <b>(optional)</b>	[REDACTED]

Do you wish to be informed:

- When the examination recommendations are published  Yes  No  
When the Plan has been adopted  Yes  No  
Of future minerals and waste policy work  Yes  No