

Planning Policy,
Ell Court,
The Castle,
Winchester,
Hampshire,
SO23 8UD

Our Ref: TAR-301-P
Date: 12th February 2026

To whom it may concern,

REPRESENTATIONS ON BEHALF OF TARMAC TRADING LIMITED TO PROPOSED MAIN MODIFICATIONS - HAMPSHIRE MINERALS AND WASTE PLAN PARTIAL UPDATE

Introduction

Heatons have been instructed by our clients, Tarmac Trading Limited ('Tarmac'), to prepare and submit a formal representation to the main modifications consultation in relation to the operation of Bedhampton Wharf and proposed safeguarding minerals infrastructure policies.

Policy 16: Safeguarding – Minerals Infrastructure

At present, we consider the current policy wording (as modified) is overly prohibitive to operators.

As recognised in Tarmac's 2021 representations, Bedhampton Wharf is not currently viable for marine-landed aggregate operations and as such, is inactive. Significant investment is required to bring the wharf back to viable operation and it is likely that the wharf will remain inactive for the foreseeable future, particularly, as Tarmac's operations at alternative wharves have proven capable of accommodating capacity necessary to serve their local markets.

To ensure that the policy is not overly prohibitive to alternate and compatible uses, we suggest the following (additions underlined).

A redevelopment of all or part of a safeguarded site to non-mineral use will only be

supported where it can be demonstrated:

- a) the infrastructure is no longer needed or viable (as confirmed by the relevant Mineral Planning Authority); or*
- b) The capacity of the infrastructure is reprovided within the Plan area. In such instances, alternative capacity must:
 - i. be at least equal to the proposed loss, unless a decrease has been supported by the relevant Mineral Planning Authority (as per criterion a), and must be delivered in advance of redevelopment of all or part of the existing site; and*
 - ii. be appropriately and sustainably located; and*
 - iii. conform to the relevant environmental and community protection policies in this Plan; or**
- c) the proposed development is part of a wider programme of reinvestment in the delivery of enhanced capacity for minerals supply.*

Evidence Base

For clarity and for the information of the reader, it is noted that the Wharves & Rail Depot Topic Paper (August 2022) incorrectly identifies Bedhampton Wharf as an active wharf. The wharf has been inactive since 2020, as per submitted representations.

Yours sincerely,



Heatons