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### Ready for you NOW . . . what we're going to tell Hampshire

#### The Consultation . . .

The public is being consulted on proposed Main Modifications (*changes*) to Hampshire's Minerals & Waste Plan (*HM&WP*) and also on whether it fits with recently published government guidelines on planning for aggregates (*sand, gravel, etc.*) referred to as the "DCLG Guidelines".

Response forms, together with all the other information provided by Hampshire, are available [online](#). The consultation closes at 5:00 pm on Monday, 17 December 2012.

#### FoRF Draft Response available NOW . . .

We have prepared a DRAFT response which is available [online](#) for you to review, comment on, add to or to use as guidance if you wish to submit an individual response to Hampshire.

#### What did we find?

We believe we have focussed on identifying the correct key areas which could impact the proposed Purple Haze site allocation.

Here are summaries of some of the key concerns we have identified and what we will be telling Hampshire:

- The DCLG Guidelines advise that there should be cross boundary liaison on aggregates planning. This is important because on 13 October 2011 HCC Council members, and the public present, were told the majority of the soft sand extracted from Purple Haze would be used by Dorset.

Although we've looked everywhere for it, no hard evidence could be found that Dorset is going to be dependent on Purple Haze for its soft sand. Dorset has its own soft sand reserves. If Dorset isn't going to need soft sand from Hampshire, then their

"need" calculations must be reviewed. Basically we are challenging why soft sand from Purple Haze is needed at all.

- Hampshire's need for aggregates is based on a straight 10 Year Sales Standard Average. In other words, 10 years' worth of Sales (*as supplied by mineral operators*) are taken, averaged out and forecast forward. Based on the evidence available, we have shown why we believe this is NOT appropriate for calculating soft sand needs.

One reason we have challenged this methodology is because the DCLG Guidelines say that knowledge about local markets can also be taken into account and we have found no evidence this has happened in relation to soft sand and Purple Haze.

- A new landbank (*how many years worth of a particular mineral have to be available on demand*) has been introduced for silica sand (*in this case, processed soft sand used mainly for sports pitches & golf courses*). We believe that the sale of silica sand extracted at one quarry has been counted twice and from another quarry, completely ignored in Hampshire's landbank calculations.

This means that the calculations for soft sand likely to be needed by Hampshire are, at best, inaccurate and, at worst, vastly inflated. Purple Haze is Hampshire's proposed strategic site for soft sand because of these calculations – and we want them to be reviewed, clarified and corrected.

- Soft sand is not a sustainable resource in the construction industry as it cannot be recycled after first use. Demolished materials using soft sand and also plaster board, as examples, have to go to landfill as inert fill (*such as might be used to backfill any quarry created at Purple Haze*).

Building regulations are changing accordingly to encourage greater use of sustainable (*recyclable*) materials and every good developer wants to meet the latest standards. We have shown that demand for soft sand in the construction industry is already reducing, and will decline even further over the coming years, and that Hampshire's soft sand "need" calculations must be reviewed as they do not take this decline into account.



- The DCLG Guidelines say that aggregates must be appropriate. We have not seen the borehole evidence for Purple Haze's soft sand reserves and their location in relation to the water table is in question. We have, however, received enough information to have continuing grave concerns about its likely quality, and therefore its "appropriate" suitability for the construction industry. The details behind this key argument are provided in the DRAFT response.
- Another key concern is the minor change (DC38) to wording concerning Buffer Zones (*the "no mans land" area between a quarry/landfill and surrounding areas and sensitive receptors*). Hampshire proposes that while a 100 metre minimum is ideal, buffer zones would be set on a "case by case basis". No parameters have been defined.

Our worry is the potential impact of this change for a narrow site such as Purple Haze. We are therefore objecting strongly and saying we consider this to be a Main rather than minor change.

- Our review of all the paperwork has also highlighted a number of inconsistencies within Hampshire's updated evidence.

Some of these could be important as they create confusion about the status of Purple Haze with regard to environmental screening that has been or should be undertaken and also the suitability of Purple Haze when compared with other potential soft sand extraction sites which have been excluded already from Hampshire's Plan. We have included these inconsistencies in the DRAFT response.

### What you can do next is . . .

Please read the DRAFT response, consider whether you would wish to provide a personal response or at least **let us have your feedback on what we'd like to say to Hampshire on your behalf.**

Also, if you have any questions or concerns about any aspect of the DRAFT response, please let us know as soon as possible at [info@forf.org.uk](mailto:info@forf.org.uk).

### And, finally –

A big "THANK YOU" goes to everyone who has helped prepare the DRAFT response which has been hard, very challenging for people who aren't planning, quarrying or landfill experts and, at times, very tedious & mind-numbing.

These volunteers, who also have busy home & work lives, have given up a tremendous amount of personal time to make things happen on behalf of the campaign – you know who you are and that we definitely couldn't have done it without you.

We must also say another big "THANK YOU" to the partners & families of this small hardworking team without whose support & understanding this response would not have been written.

Let's hope for a good outcome – and Good Luck to us all!

*Your feedback, comments and/or questions will be welcomed by the Campaign Team – please email us at [info@forf.org.uk](mailto:info@forf.org.uk)*