

The Programme Officer
Hampshire Minerals and Waste Development Framework
Hampshire County Council
Environment Department
The Castle
Winchester SO23 8UD

13 July 2006

Dear Sir,

**RE: HAMPSHIRE MINERALS AND WASTE CORE STRATEGY –
SUBMISSION DRAFT**

Under the provisions of Section 24 of the Planning and Compulsory Purchase Act 2004 (the Act) the South East England Regional Assembly has assessed the general conformity of the Hampshire Minerals and Waste Core Strategy submission document against the adopted Regional Spatial Strategy (RPG9 and Alterations) and also the emerging Regional Spatial Strategy (the Draft South East Plan).

An issue of non-general conformity has been identified by the Assembly, which means that the Core Strategy fails to satisfy PPS12 'Test of Soundness' Test iv.

Whilst the majority of policies are consistent with adopted and emerging RSS, the Core Strategy does not make provision for the disposal to landfill of a proportion of London's waste, as required by Policy W3 of RPG9 as altered (June 2006), and insufficient evidence has been provided to justify this position. Whilst PPS12 states that 'the fact that a development plan document is inconsistent with one or more policies in the regional spatial strategy, either directly or through the omission of a policy or proposal, does not, by itself, mean that the document is not in general conformity' (paragraph 4.20), the Assembly considers that the inconsistency is significant to the delivery of the regional spatial strategy, and that failure to address this key strand of regional waste policy may cause significant harm to the implementation of the regional spatial strategy (PPS12 paragraph 4.20).

The Regional Assembly and the Government Office for the South East will be

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approaching the minerals and waste planning authorities for Hampshire with a request for a meeting in advance of the independent examination to clarify the reasoning behind the authorities' position and to attempt to resolve this issue.

If agreement can be reached with the minerals and waste planning authorities over amendments to their Core Strategy so that it reflects the aims of Policy W3 of RPG9 as altered, the Assembly will withdraw its opinion that the Core Strategy is not in general conformity with the regional spatial strategy. As a result the Core Strategy would (assuming no other significant policy changes were made by the authorities) be considered by the Assembly to be in general conformity with the adopted Regional Spatial Strategy (RPG9) and the draft South East Plan.

In addition to this issue, the Assembly also has a number of additional representations, which are set out in the attached documentation.

If you have any comments or questions relating to this letter please do not hesitate to contact Sue Janota, Regional Planner, on 01483 555200 or at suejanota@southeast-ra.gov.uk.

Yours faithfully,

Catriona Riddell
Planning Strategy Director

South East England Regional Assembly - Additional Representations

Representation 1 – Sub Regional Self Sufficiency

The concept of sub-regional self sufficiency in Policy W4 of RPG 9 (as altered) and Policy W4 of the draft South East Plan Policy is not accurately interpreted. The reasoned justification in paragraph 16.1 to Policy S3 of the submitted Core Strategy stops short of applying a degree of flexibility in relation to waste imports from London.

The interpretation in para 16.1 and Policy S3 of sub regional net self sufficiency should be amended to reflect the policy wording in Policy W4 of RPG 9 (as altered) and Policy W4 of the draft South East Plan.

Representation 2 – Landfill Requirements

Policy W13 of RPG 9 (as altered) and Policy W13 of the draft South East Plan require Waste Development Documents (WDD's) to provide for continuing but declining landfill capacity. This is provided in Policy S6 of the submitted document where regional diversion targets from landfill are met. However, provision is not made for London imports as set out in Policy W13 of RPG 9 (as altered) and Policy W13 of the draft South East Plan. Policy S6 of the submitted Core Strategy does not align with these policies.

It is therefore recommended that Policy S6 should make clear provision for landfill capacity of a declining amount of London waste imports in accordance with Policy W13 of RPG 9 (as altered) and Policy W13 of the draft South East Plan.

Representation 3 – Sustainability Report

The submitted Core Strategy in paragraph 16.3 makes reference to the Hampshire Sustainability Report in supporting the non-provision of landfill sites for London's waste. Specifically, the non-availability of landfill sites close to sustainable transport means is cited as the local justification.

We find no clear evidence in the Sustainability Report that supports this position. It will be necessary to clarify how this justification was reached by clearly referencing the final appraisal results on Option G2 (London's Waste to Landfill) in the attached Sustainability Report.

Representation 4 – Primary Aggregates

Policy M3 of RPG 9 (as altered) and Policy M3 of the draft South East Plan require Mineral Planning Authorities (MPA's) to maintain a landbank of at least 7 yrs of planning permissions for Land-won sand and gravel.

Paragraph 15.4 of the submitted Core Strategy refers to the draft South East Plan's provision for a 7 year landbank on land-won sand and gravel. However, a commitment to maintain a landbank of at least 7 years for land-won sand and gravel in line with Policy M3 of RPG9 (as altered) and Policy M3 of the draft South East Plan is not made. We would expect to see such a commitment to meeting the identified regional targets for reserves in Policy S8 of the submitted Core Strategy.