

**ANNEX 1 TO HERITAGE SUBMISSION TO HAMPSHIRE COUNTY COUNCIL  
ON HAMPSHIRE MINERALS PLAN – REGULATION 26 CONSULTATION  
(EMAIL VERSION)**

DAMAGE/HERITAGE

c/o Mr J Sey  
“Coppins”  
Barnes Lane  
Milford-on-Sea  
Hampshire  
SO41 ORR

6<sup>th</sup> December 2007

Dear Mr Sey

**HAMPSHIRE MINERALS PLAN  
REGULATION 26 CONSULTATION  
REPRESENTATIONS**

Further to your instructions I set out below my assessment of four issues in the above Plan, where I believe the perception, inference and conclusions inadequately reflect real requirements. In such circumstances I believe the provisions in the Plan need substantial amendments. This letter and the following assessment should be included as part of any representations made by DAMAGE

**1.0 Soft Sand and Question 1**

1.1 This question raises the relevance of a distinction between soft sand and sharp sand and gravel and the subsequent question of the need or otherwise to make separate provision for soft sand.

1.2 First, it is important to confirm that whatever basis is used to make provision, be it a combined approach or one which separates the materials, all the materials contribute towards meeting the apportionment. Soft sand is not excluded as a contributor to apportionment as appears to be assumed by some parties.

1.3 It is true that the terms ‘soft sand’ and ‘sharp sand and gravel’ have been used in the past as general terms to describe material suitable for mortar sand and concreting sand respectively. The terms were used at point of sale but the planning process linked the terms to particular geological horizons, equating soft sand with sand produced from solid sands (such as the Folkestone Beds and Tertiary sands) and equating sharp sand with Quaternary terrace sand and gravels.

1.4 However, the terms have not been used in BS specifications for many years and are not used in current European specifications. BS specifications specifically advised against using the terms because they are imprecise and give a misleading impression as to potential end use. Used in the planning process, this misleading impression perpetuates assumptions about the potential end uses of materials, which impression is out of step with commercial reality.

1.5 European standards have taken the matter further and replace the term ‘sand’ by ‘fine aggregate’, reflecting the position that fine aggregate suitable for use in mortars can come from a wide range of resources including crushed rock, recycled or secondary aggregate and terrace sands and gravels.

1.6 In both standard specifications the purpose is not to pre-judge the suitability of a material for a specific end use by its geology but to assess the potential due to the physical nature of the product after processing. It is whether a processed fine aggregate is fit for a particular purpose that is of importance, not its geological origins.

1.7 There has therefore developed a dislocation between use, commercial considerations and technical requirements on one hand and common usage in planning on the other. On that basis alone, providing a distinction is a false and misleading route and no longer a valid approach.

1.8 The concept that solid sands only produce soft sands and are therefore can only be a source of mortar sand and not a source of concreting sand, conflicts with the current situation in many parts of the UK. In the adjoining counties of West Sussex, Surrey and Dorset, substantial quantities of fine aggregate suitable for concrete production is produced from solid sands.

1.9 Solid sands therefore represent a flexible resource, which, according to plant arrangements, can produce aggregate for either concrete or mortar use. Indeed, within current specifications there can be direct replacement between fine concreting aggregate and fine aggregate for mortar.

1.10 If coarse, crushed rock imports increase in use in concrete, the solid sands can be processed to produce fine concrete aggregate to provide a suitable concrete mix. This process is already underway in the area and was first identified as an outcome from importing crushed rock over thirty years ago in the final report of the Wessex Sand & Gravel Working Party (1974).

### **1.11 Conclusion**

***The separation of soft sand is no longer justifiable or relevant. Soft sand (solid sand) resources should be incorporated in their entirety in the general apportionment provision.***

## **2.0 Land Won Sand & Gravel Supply (Para 2.13-2.19) and Question 2**

2.1 This section of the Plan sets out and explains the basis for the volumes to be provided in allocations. The future provision is based on using the current apportionment figure (1.163 mtpa for the Forest area) set out in the Core Strategy (CS). The CS and the Plan sub divide this future provision into 'New' provision for the period 2007-2016 and a 'Strategic Reserve' for the period 2017-2020. Question 2 asks if the Plan would lead to over provision of sand and gravel.

2.2 The CS states that the provision for the Strategic Reserve will be made by way of Areas of Search (AsOS). The reason for this approach is the uncertainty relating to the relevance of the current apportionment figures far into the future. The uncertainty arises because a review of apportionment is, in relation to the timescale of the Plan, imminent and because production is well below apportionment.

2.3 It is widely acknowledged that in Hampshire and in the Forest area, actual demand has been well below the apportionment figure for many years and falling year on year. Interim figures on sales for the Forest show that they were 542,000 tonnes in 2006, less than 50% of the apportionment figure. The implication of this is that the revised apportionment will probably provide for a reduced requirement.

2.4 Given the objective to prevent over development of sand and gravel resources (Question 2) the identification of proposed Preferred Areas (pPA's) should only relate, if actually required, to the period 2016. This is confirmed in paragraph 2.18 of the Plan, which states that AsOS will be defined for the Strategic Reserve period "until a clearer picture of the post 2016 need for sand and gravel is gained".

2.5 Further, paragraph 4.3 notes that the requirements for sand and gravel are under review and in the meantime that the Plan has to address the apportionment in the CS. However, 4.3 also provides for changes such that if "there is a reduced demand" (no mention is made of an increase in demand presumably because it is widely acknowledged that the new apportionment will be lower than existing) land will only be released to meet the new requirement.

2.6 Contrary to the stated approach, which rightly is cautious about defining pPAs for the period beyond 2016, the Plan identifies a raft of pPAs for the Forest area which would provide for the Strategic Reserve period as well. Paragraph 4.2 states that this would be sufficient for the Forest period "until 2020". That is a considerable understatement. Bringing all the pPA's identified in the Plan forward would provide supply to meet the apportionment figure not just until 2020 but well beyond that period.

2.7 That situation pertains, given the areas defined as pPAs. However, there are serious concerns with the assumptions used to inform that process and with the development timetable set out in Table9 in Appendix 5. These assumptions lead to significant over provision. These concerns include:

- The individually production rates postulated, when combined, significantly exceed the current apportionment rate and greatly exceed current demand, thereby requiring additional pPAs to be developed to maintain that ‘enhanced’ production..
- The unrealistic slow tapering off of production from existing permitted reserves provides for production from such reserves beyond 2020, thereby limiting production in the short-term and requiring (according to the Plan) all the pPAs to be developed early in the Plan period to make up for an apparent ‘shortfall’ in production capacity.
- The more probable scenario would fully utilise existing permitted reserves early in the Plan thereby not producing an early ‘shortfall’ and not requiring any ‘new’ reserves to come forward before 2016 due to the revised apportionment.
- The postulated reserves, particularly at Roeshot, substantially underestimate the real reserve potential, thereby apparently requiring additional pPAs to come forward within the Plan period to make up for the apparent ‘shortfall’ in total reserve potential.
- The annual production rates, particularly for Roeshot, are unjustifiably depressed in relation to potential reserves, thereby requiring additional pPAs to come forward to make up for the apparent ‘shortfall’ in production capacity.

2.8 The impact of these points is examined later in relation to representations on Question 7 and the provisions for the Forest. However, the implications are that an excessive provision of pPAs is set out in the Plan which would provide not just “until 2020” but to 2030.

2.9 Because of the commitment thus created within a ‘plan-led’ system, the current provision of pPAs in the Plan is excessive in relation to current apportionment, excessive in relation to future apportionment, excessive in relation to demand but also excessive and contrary to the whole approach to supply set out MPS1, in the CS and as stated as being the approach in the Plan.

2.10 MPS1 (paragraph 42 Practice Guide) makes it clear that the required annual monitoring of LDDs, such as this Plan, will enable both industry and MPAs to bring forward sites as and when required from AsOS. In this case there is no pressing need for PAs and what need might be required can be addressed in such annual reviews.

### **2.11 Conclusion**

***In relation to Question 2 it is clear that the pPA provisions in the current Plan would lead to over supply in the Forest area based on either the current apportionment or any reduced (an increase is improbable) changed apportionment. The Plan needs amendment to prevent this over provision. The suggested amendments for the Forest area are set out in relation to Question 7***

### **3.0 Sustainability Appraisal and Eliminated Locations**

3.1 There are serious concerns that the judgements in the Sustainability Appraisal Report (SAR) and the basis for excluding sites shown in the Eliminated Locations list (Appendix 4) are not justified.

#### **The Sustainability Appraisal Report**

3.2 The SAR would appear to be a superficial and narrow appraisal which thereby distorts the weight given to some potential sites in relation to the sustainability objectives of the Plan.

3.3 There is an unjustified bias applied in the SAR where it states in paragraph 7.21 that impacts “may therefore be greater” at large sites with more than 2.5 million reserves and a production rate of 150,000 tonnes per annum. There is no justification for that statement or the relevance of the cut-off figures used. A small site near property and a nature conservation interest with a difficult access will give rise to greater impacts than a large site distant from property/nature conservation and with a satisfactory access. The generalisation applied in the SAR on this point will have had serious implications on the judgement of those undertaking the appraisal and on the sites which have been subsequently identified for inclusion in the current consultation stage for further consideration.

3.4 Of directly related concern is the exclusion of Downton (which in the context of this representation refers to the Downton Manor Farm pPA as shown in the Plan and not just the individual Downton Manor Farm site) from the sites listed as ‘large’ in paragraph 7.21 of the SAR. On the above basis development at Downton is implied by the SAR as having less impact and is therefore a preferential location for a pPA.

3.5 However, while Downton is excluded, because the SAR states it to be only of medium scale, the list includes a number of sites (referred to individually, as being ‘large’ and therefore apparently giving rise, according to the appraisal, to greater impacts) which do not meet the relevant parameters, and indeed fall far short of those parameters (for example only 600,000 tonnes at Hucklesbrook). Such sites will, on the basis of the SAR, have been perceived to have more impacts than Downton and therefore be less preferential locations for a pPA and will have been discounted in preference of non ‘large’ sites such as Downton.

3.6 The SAR notes in paragraph 7.22 that the sites that make up Downton pPA are individually considered only to be of medium scale (although they individually substantially exceed some areas listed as ‘large’ in the SAR). However, when combined, as in the pPA in the Plan, the potential reserves exceed the parameters. The site should therefore be included in the ‘large’ category and any relevant implications on impacts applied.

3.7 The SAR considers the impacts for sites in the Forest area but split into two parts of North Ringwood and South of Ringwood. The reason for this split is not explained or justified. There is no basis for separate analysis as both the County Council and the

conclusion of the Inspector in his report into the Core Strategy state that there were no supply subdivisions in demand and supply in the Forest. This split in the SAR produces a process which compares sites within each sub-area but does not compare sites between those in the whole of the Forest. This is not justified and is a further bias built into the SAR.

3.8 The analysis section of the SAR has a narrow and misleading basis and outcome. The impact of this is to wrongly identify impacts and fail to identify sustainable development opportunities. An additional concern is the unevenness of the appraisal for individual sites. Some shortcomings of the SAR are identified below.

3.9 In considering biodiversity impacts (Issue A1) the SAR identifies a number of sites (Bickton, Hucklesbrook, Roeshot Hill, etc) in the Avon Valley as being harmful. However, these sites are currently the location of intensive agriculture. These existing operations are more harmful to biodiversity (arising from nutrient, chemical, herbicide and biocide inflows, etc) than mineral extraction and the net outcome from extraction is the potential to assist biodiversity.

3.10 This biodiversity gain from mineral extraction has been demonstrated dramatically elsewhere in the Avon Valley and in other similar locations in the Country. In the case of Roeshot Hill, the site is 'downstream' from the ecological interest (which is located on the higher land to the east) and extraction could not produce any identifiable harm to that interest. As noted above extraction could provide greater diversity both during and after operations. In the case of Downton however, the site is 'upstream' from the area of ecological interest and harm is a relevant consideration. Unfortunately the assessment fails to consider such relationships and is therefore misleading.

3.11 Similarly landscape enhancement (Issue A2) would follow from mineral extraction in the areas of currently intensive agriculture noted above and extraction would not be a constraint in such areas.

3.12 In considering prudent use of resources (Issue A5) no account is taken of the yield potential of sites and therefore the potential reduction in disturbance overall to soils and habitat by the preferential development of higher yielding sites.

3.13 The transport assessment (Issue A7) takes no account of the adequacy of routes, accidents, congestion, extent of residential or built-up frontage or accessibility. Such an assessment would have identified greater impacts with development at Downton.

3.14 The impacts on communities (Issue A9) understates the extent to which Downton is surrounded by settlements and equates the impact at Downton as equal to limited public access at Plumley Wood

### **Eliminated Locations**

3.15 The justification for removing some sites in the Forest area, which sites are now included in the Eliminated Locations list, seem weak or at odds with the inclusion of

Downton as a pPA. Some of the sites eliminated have a yield potential greater than indicated because the mineral is thicker than suggested and extends beyond the area identified.

#### ***Walkford & Beckley Farms***

3.16 The exclusion of this site relates, in particular, to concerns about nearby housing, burial grounds and access. There are considerably more houses surrounding Downton and acknowledged serious traffic problems from traffic en route from the location.

#### ***Bleak Hill***

3.17 This site is excluded because it is stated to be unlikely to be started within the Plan period. The site adjoins an existing operation with reserves that will expire well before 2020. The site is required before 2020 and can therefore contribute to the Plan period. One significant reason why the Plan suggests that the area may not be required perhaps flows from the over-provision of pPa's elsewhere in the Forest area on Greenfield sites. The site has an adequate access route along a 'C' class road which has very few properties adjoining and is very lightly trafficked. This contrasts with the A337 route to Downton, which is very heavily trafficked, has numerous junctions and accesses and a substantial number of properties fronting or adjoining.

#### ***Bickton Ash, Bickton Corner and other land at Bickton***

3.18 It is stated that this wide area is excluded primarily due to proposals with fewer impacts. While there are scattered residential properties in the vicinity, development here would affect a substantially less number of adjacent residents than at Downton. Access is considerably better than access to Downton.

#### ***Hucklesbrook & North Gorley***

3.19 It is stated that requirements can be met by proposals with fewer impacts. There are few residential properties adjacent to this area and access is considerably better than access to Downton.

#### ***Midgham Farm***

3.20 It is stated that requirements can be met by proposals with fewer impacts. The site is further excluded because it could only be worked as an extension to Bleak Hill, which it is stated would be outside the Plan period, or by conveyor to Bickton. The conveyor to Bickton raises the concern of potential harm to an SSSI. However, the Bleak Hill deposit is relatively small and given the likely rate of production the Bleak Hill extension itself would be worked out before 2020. A conveyor from the Bleak Hill extension to Midgham Farm would overcome the concerns in relation to the SSSI. Residential and traffic impacts would be less than any operations at Downton.

#### ***3.21 Conclusion***

***The SAR produces a distorted analysis. This is serious given the resulting steer on site selection. The bias created unjustifiably leads to Downton as being identified as a pPA. This bias needs to be corrected and due weight given to the constraints that apply at Downton in relation to the constraints and opportunities at other sites. The***

*supposed basis for eliminating a number of sites is not justified by the relevant impacts identified. The individual planning impacts of developing such sites are less than the impacts of developing Downton.*

#### **4.0 The 'Forest' Area and Question 7**

4.1 This section of the Plan deals with supply for the Forest area. Question 7 asks "which location is preferable – Downton (pPA13) or Ashley Manor Farm (pPA14) ?". This question has leapfrogged prior questions about (i) the need or otherwise for any allocations of pPA's to be identified in the Forest area and (ii), if such pPA's are required, are other sites better than Downton because of less impacts.

4.2 As generally indicated in relation to representations on question 2, the current proposals in the Plan provide for over-provision, therefore there is no need to develop Downton. In addition, representations on the Sustainability Appraisal indicate that developing other sites (other pPA's and Eliminated Sites) would produce less impact than development at Downton.

4.3 The overprovision is clearly demonstrated in Table 9 of Appendix 5. That table shows excessive production continuing well beyond the Plan period and also shows that the provision in the Forest area is thereby being made contrary to the basis set out in the Plan and the Core Strategy.

4.4 The first objective should therefore be to identify the shortfall in supply, if any, from existing reserves and existing PA's in the period to 2016 and any resulting requirement from pPA's needed in that period to satisfy any shortfall. A subsidiary question to that is the process of providing for the period 2017-2020.

4.5 The attached table, DAMAGE Table 1, identifies the relevant shortfall for the period based on a realistic run-down of existing permitted reserves and supply from the existing PA at Plumley Wood. This identifies a shortfall for the period to 2016 inclusive, of 1.091 million tonnes with a further shortfall of 2.692 million tonnes to cover the period 2017-2020. This shortfall is based on comparison with the current apportionment of 1.163 million tonnes per annum.

4.6 However, given the imminent review of apportionment, it is likely that a revised apportionment figure will be available before the Plan is adopted. That revised apportionment will, it is generally accepted, be considerably lower than the current figure and it is therefore unlikely that an actual shortfall would occur before 2016. It is therefore contrary to the objective of the prudent use of resources to make the provision set out in the Plan

4.7 However, using the current apportionment, it is the supply of the possible 1.091 million tonnes shortfall which the Plan should have addressed in relation to pPA's. The provisions in the Plan, as set out in Table 9, and as identified in the Forest supply section, include Downton in the supply scenario. Apart from creating substantial overprovision, it is contended that identifying Downton as a pPA is less optimal because extraction at

Downton would produce more negative impacts than extraction at other sites and because this would be a less prudent use of resources due to the low yield at Downton.

4.8 If pPA's are required, it is contended that other sites perform substantially better than Downton due to less impact and should be considered for development prior to bringing Downton forward.

4.9 If therefore further pPA's are required they should be brought forward solely on the basis that they represent the least harmful and the most prudent use of resources. It is considered that a number of sites perform significantly better than Downton in relation to those parameters. The choice of pPA to supply a shortfall, if any supply is actually needed, should therefore be made from the following sites prior to considering Downton.

#### **Provision if a pPA is Required in the Forest Area**

4.10 To cater for the period to both 2016 and from 2017-2020 and indeed well beyond that date, the shortfall could be resolved by bringing forward Purple Haze (pPA 15) and one of Roeshot Hill, Bleke Hill/Midgham Farm or Bickton, each of the latter could provide production in excess of 0.4 million tonnes per annum.

#### **Roeshot Hill**

4.11 Roeshot Hill can be developed without the level of impacts associated with Downton. The site is an extensive area of open land used for intensive agriculture. There are only a few scattered properties adjoining the site. Access and transport would involve substantially less impact than that arising from Downton. The site lies downstream from an area of ecological interest. A former mineral working adjoins the area of ecological interest. In landscape and ecological terms the site has a very low value. Restoration following mineral extraction could substantially enhance the landscape and ecological value of the site. In addition the site contains a substantial deposit (significantly more than identified in the Plan) such that working this site accords with prudent use of resources. The size of the deposit is described below.

4.12 The Plan refers to a yield of 3 million tonnes from an area of about 88 hectares, indicating a deposit of less than 2.5 metres thickness (2.27). This identified yield conflicts with available public domain information (Mineral Assessment Report 51 published by the Institute of Geological Sciences, now British Geological Survey (BGS)). The terrace sand and gravel in this area is of substantial thickness and overlies solid sand which has been classified as mineral by the BGS. The average thickness of mineral from this resource block (discounting the underlying solid sand) has been calculated by the BGS as 5.4 metres. Using the same area of 88 hectares, the realistic but conservative gross yield of mineral (discounting the solid sand) from this area is therefore in excess of 7 million tonnes (7.128 million tonnes).

4.13 However, for some undefined reason the pPA area in the Plan does not extend to cover contiguous land within Hampshire underlain by the same terrace (the same terrace extends north of the Hampshire boundary into Dorset, where there are further substantial resources of around 30 million tonnes). Given the basis for definition of a PA in

paragraph 2.15 of the Plan, and in paragraph 39 of MPS1 Practice Guide, the exclusion of this area is not justified in principle and there does not appear to be any stated reason why that land has been excluded.

4.14 Analysis of planning considerations does not indicate that there is any substantial or significant difference in such considerations between the included or excluded land which might justify exclusion of the contiguous land. Given that PAs should be defined on areas of known resources, irrespective of ownership, there does not appear to be any justification in not including that adjacent land in the pPA. That would increase the pPA area to over 120 hectares producing, on the basis of BGS data, a gross yield in excess of 9.5 million tonnes (9.720 million tonnes).

4.15 Figure JFC 1 attached is an extract from the 1:50,000 scale solid and drift geological map of the area around Roeshot Hill. On this extract the boundary of the pPA, the excluded land and the county boundary have been defined. The extensive terrace of sand and gravel running north from Christchurch on the east side of the Avon valley is clearly shown.

4.16 The deposit at the Roeshot Hill pPA is located in a relatively younger terrace. Such younger terraces tend to have a higher proportion of gravel than older terraces. This is confirmed by the BGS report which identifies that the resource block extending across the Roeshot site contains on average 63% gravel. This imparts a substantial mineral resource conservation and commercial advantage in favour of working the deposits in this younger terrace, as at the Roeshot Hill pPA, compared to working the Downton pPA which is located in an older terrace producing, on average (according to the BGS MAR Report 122 for that area) only 49% gravel. That advantage is enhanced by the substantial improved yield per hectare at Roeshot Hill compared to that at Downton.

#### **Bleke Hill and Midgham Farm**

4.17 Bleke Hill is a possible extension to an existing site. Midgham Farm adjoins Bleke Hill and could be worked as an extension to Bleke Hill via a conveyor. MPS 1 indicates that development of extensions to existing sites may be preferable. These two sites could be considered as a pPA.

4.18 Most of the land is in intensive agricultural use. Except for the extreme north west of the site there are very few residential properties adjoining. Access is currently along a 'C' class road to the B3081 and then via a grade separated junction on the A31 which avoids the A31/A338 roundabout. The 'C' class road is well aligned, of adequate width and lightly trafficked. Using a conveyor to Bleke Hill and the 'C' class road would remove possible impacts on ecological interests involved in a conveyor across the River Avon. The site is not within the Green Belt.

4.19 The potential resource at Midgham Farm has been noted by HCC as being approximately 4.5 million tonnes. However, as with Roeshot Hill, this contradicts indicated yield identified by the BGS Mineral Assessment Report for the area. Further

the 4.5 million tonne yield ignores the potential from the underlying solid sand. Excluding the solid sand potential a more realistic gross yield from Midgham Farm is 7.5 million tonnes.

**Bickton Sites**

4.20 The various areas at Bickton could be considered as a single pPA. Most of the land is in intensive agricultural use of little landscape or ecological interest. Restoration could considerably enhance the landscape and ecological value. There are a few scattered residential properties adjoining. Good access to the A338 and then the A31 is available. The site is not in the Green Belt

4.21 The yield in parts of the area has been underestimated and mineral bearing land has been excluded. The indicated yield is circa 3.0 million tonnes. The more realistic gross yield is in excess of 6.0 million tonnes.

**4.22 Conclusion**

*In relation to Question 7 it is concluded that the Plan leads to overprovision of sand and gravel and the question as to the development of Downton or Ashley Manor Farm does not in practice arise because neither the reserves nor the production capacity are required to meet demand to 2016. It is further concluded that if and when sites need to come forward as pPA's that development of sites other than Downton would involve less impact and would be more prudent use of resources.*

.....

Yours sincerely

John Cowley

### **DAMAGE Table 1**

#### **Supply and Shortfall to 2020 based on Existing Reserves and Preferred Areas (thousand tonnes)**

Year	Existing Reserves	Plumley Wood	Total Supply	Shortfall
2007	820		820	
2008	820		820	
2009	920	243	1163	
2010	820	343	1163	
2011	723	490	1163	
2012	673	490	1163	
2013	673	490	1163	
2014	493	490	983	180
2015	303	490	793	370
2016	132	490	622	541
2017		490	490	673
2018		490	490	673
2019		490	490	673
2020		490	490	673

**Shortfall to 2016 = 1.091 million tonnes**

**Shortfall 2017 – 2020 = 2.692 million tonnes**

**ANNEX 2 TO HERITAGE SUBMISSION TO HAMPSHIRE COUNTY COUNCIL  
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**Gravel Supply and Shortfall to 2020 based on Existing Reserves and Preferred Areas (thousand tonnes)**

Year	Existing Reserves	Plumley Wood	Total Supply	Shortfall
2007	820		820	
2008	820		820	
2009	920	243	1163	
2010	820	343	1163	
2011	723	490	1163	
2012	673	490	1163	
2013	673	490	1163	
2014	493	490	983	180
2015	303	490	793	370
2016	132	490	622	541
2017		490	490	673
2018		490	490	673
2019		490	490	673
2020		490	490	673

**Shortfall to 2016 = 1.091 million tonnes**

**Shortfall 2017 – 2020 = 2.692 million tonnes**

**ANNEX 3 TO HERITAGE SUBMISSION TO HAMPSHIRE COUNTY COUNCIL  
ON HAMPSHIRE MINERALS PLAN – REGULATION 26 CONSULTATION**

**HERITAGE FIGURES FOR FOREST GRAVEL EXTRACTION**

<b>Year</b>	<b>Plumley Wood(1)</b>	<b>Roeshot Hill(2)</b>	<b>Purple Haze</b>	<b>Contribution from new proposals</b>	<b>Contribution from existing sites</b>	<b>Total</b>	<b>Shortfall/Excess re. local apportionment</b>
2007					820,000	820,000	-343,000
2008					630,000	630,000	-533,000
2009					630,000	630,000	-533,000
2010		250,000			480,000	730,000	-433,000
2011	500,000	250,000		750,000	480,000	1,230,000	67,000
2012	500,000	250,000		750,000	480,000	1,230,000	67,000
2013	500,000	250,000	250,000	1,000,000	220,000	1,220,000	57,000
2014	500,000	250,000	250,000	1,000,000	220,000	1,220,000	57,000
2015	500,000	250,000	250,000	1,000,000	220,000	1,220,000	57,000
2016	500,000	250,000	250,000	1,000,000	220,000	1,220,000	57,000
2017	500,000	250,000	250,000	1,000,000	220,000	1,220,000	57,000
2018	500,000	250,000	250,000	1,000,000	220,000	1,220,000	57,000
2019	500,000	250,000	250,000	1,000,000	220,000	1,220,000	57,000
2020	500,000	250,000	250,000	1,000,000	220,000	1,220,000	57,000
sub-total to 2016	<b>3,000,000</b>	<b>1,750,000</b>	<b>1,000,000</b>	<b>5,750,000</b>	<b>4,400,000</b>	<b>10,150,000</b>	<b>-1,252,000</b>
sub-total 2017-2020	<b>2,000,000</b>	<b>1,000,000</b>	<b>1,000,000</b>	<b>4,000,000</b>	<b>880,000</b>	<b>4,880,000</b>	<b>228,000</b>
<b>Total to 2020</b>	<b>5,000,000</b>	<b>2,750,000</b>	<b>2,000,000</b>	<b>9,750,000</b>	<b>5,280,000</b>	<b>12,570,000</b>	<b>-1,024,000</b>

**Explanatory notes**

(1) Based on TARMAC figures given at HCC meeting on 26 December 2007

(2) As the gravel available has been under-estimated annual production could be increased if an additional surplus is required

\* Greater Downton: HCC figures introduce 200,000 metric tonnes as from 2008.

\*HCC have stated that these figures are wrong as there can be no production in the near future.

\*Verbal Statement of Joint Managing Director of NMSB at the 26 November 2007 HCC meeting that extraction cannot start at Greater Downton prior to 2012.

\*This table shows that HCC will reach its current target, with a surplus, only by 2011

\*By 2009 the revised apportionment will be known and in force.

\*This table proves that there is no need for the Greater Downton site.

\*The shortfall in the totals to 2020,(Column I28) at the current apportionment, is made up of 1,842,000 metric tonnes of shortfall from 2007-2010 and partially offset by a surplus of 590,000 metric tonnes from 2011-2020.

**Annex 4: Map of Roeshot Hill highlighting additional area not considered by HCC in its proposals**

