

Hampshire Services  
c/o Strategic Planning, Economy, Transport and  
Environment Department  
Hampshire County Council  
The Castle, Winchester  
Hampshire. SO23 8UD.

Our ref: HD/P6038/

Your ref:

Telephone

Fax

14<sup>th</sup> July 2017

Dear Sir or Madam,

### Central and Eastern Berkshire Joint Minerals and Waste Plan: Issues and Options

Thank you for your e-mail of 8<sup>th</sup> June advising Historic England of the consultation on the Issues and Options for the Central and East Berkshire Joint Minerals and Waste Plan. We are pleased to make the following comments.

General advice on minerals and the historic environment can be found in our publications: "Mineral Extraction and The Historic Environment"

(<https://content.historicengland.org.uk/images-books/publications/mineral-extraction-and-historic-environment/mineral-extraction.pdf>) and "Mineral Extraction and Archaeology: A Practice Guide" (<https://content.historicengland.org.uk/images-books/publications/mineral-extraction-and-archaeology/mineral-archaeology.pdf>).

We also have the following detailed comments and responses to the questions posed in the Consultation Paper. These comments and responses reflect our remit for, and knowledge of, the historic environment, and we have not provided responses to questions outside that remit and knowledge.

**Paragraphs 2.3 and 2.6:** we expect the evidence for the Plan to include the recently-completed East Berkshire Historic Landscape Character Assessment and any existing archaeological investigations /assessments. There may also be a need for Heritage Impact Statements if any of the sites are likely to affect designated or non-designated heritage assets.

**Paragraph 3.4:** Historic England is a prescribed body by virtue of Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and is therefore required to co-operate in relation to planning of sustainable development with local planning authorities and other prescribed bodies by Section 33A of Part 2 of the Planning and Compulsory Act (as inserted by Section 110 of the Localism Act 2011).

Our understanding of the Regulations is that the duty applies in respect of all strategic matters. However, the National Planning Practice Guidance advises that the prescribed bodies *"should be proportionate in how they do this and tailor the degree of cooperation according to where they can maximise the effectiveness of plans"*.

Historic England confines its involvement in planning issues to matters that involve or otherwise affect the historic environment. Historic England's duty to co-operate is therefore appropriate in respect of strategic matters that would involve or otherwise affect the historic environment, including the heritage assets therein.

We would emphasise that co-operation need not be constrained to only as regards designated heritage assets - for local plan purposes we take a broad view of the historic environment in line with the definition in the National Planning Policy Framework.

We would, however, highlight that the other issues may also have implications for the historic environment. We will, of course, be able to express any views we may have on such implications during the consultation periods on the Local Plan, but we would ask that if discussions are to be held about other issues that have a specific implication for the historic environment, we be invited to participate.

We would also emphasise our willingness to work with the Councils on matters affecting the historic environment that do not fall within the definition of "strategic matter" and therefore are not covered by the duty to co-operate. We would be particularly pleased to liaise with the Councils outside the formal consultation periods on the Plan

**Paragraphs 5.1 – 5.3:** Historic England has published advice on Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment, which can be found at: <http://www.historicengland.org.uk/images-books/publications/strategic-environmental-assessment-sustainability-appraisal-historic-environment/>

**Q1:** Yes

**Q3:** We note that whilst there is a reference in the Vision to the natural environment, there is no reference in the Vision to the historic environment. Minerals extraction tends to be, for obvious reasons, harmful to the significance of heritage assets, particularly historic landscapes and below-ground archaeology.

Of potential particular significance in the Plan area are potential Palaeolithic deposits within the gravels. As an example of how important these deposits may be, although outside the Plan area, the Middle Kennet Valley has been identified by Historic England as one of the 50 outstanding areas of England for Exceptional Wetland Heritage, on the basis of well-preserved



Late Upper Palaeolithic and Mesolithic archaeology found in association with waterlogged environmental evidence, typically at the interface of the sands and gravels and the overlying alluvium on the floodplain.

The National Planning Policy Framework requires local planning authorities to conserve heritage assets in a manner appropriate to their significance and makes it clear that the conservation and enhancement of the historic environment is an integral part of sustainable development.

**Q4:** We therefore consider that the Vision should include a specific reference to the conservation and enhancement of the historic environment e.g. the addition of. *"whilst avoiding or minimising harm to the historic environment"* at the end of the first paragraph. Alternatively, we note that the Vision for the West Berkshire Minerals and Waste Local Plan includes *"in accordance with national planning policy"* and in locations which meet the needs of the communities and economy of West Berkshire *"in the most sustainable way"*. Similar wording in the Vision for the Central and East Berkshire Minerals and Waste Plan would address our concern.

**Q5:** We have no objections to the Strategic Plan Objectives per se, except Objective 6. The National Planning Policy Framework makes it clear that *"to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system"*. We note that each Objective is to be considered equally important and, together, cover the three strands of sustainable development. However, we would still welcome a reference to environmental sustainability in Objective 6. such as there is in Objective 7.

**Q6:** We would welcome the addition to Objective 6 of *".....from appropriately located and environmentally acceptable sources"* .

**Q7:** We welcome principle ix of the Spatial Strategy, in principle, although we would prefer it to say *"...the important sites and areas for biodiversity, landscape and heritage from development or the effects of development"* – we do not agree that only the most important sites should be protected. The National Planning Policy Framework requires local planning authorities to recognise that heritage assets are an irreplaceable resource and to conserve them in a manner appropriate to their significance.

**Q8:** As above.

**Q9:** No.



**Q11:** Given the potential for Palaeolithic archaeology in the Plan area, and that the true potential for Palaeolithic archaeology is unlikely to be represented on the Historic Environment Record, owing to depth of burial and lack of previous investigation, this aspect of archaeology is likely to require specific assessment by a specialist familiar with the period to provide a robust evidence base.

The evidence in support of any allocation site that lies on the floodplain would benefit from the construction of a geoarchaeological deposit model, to identify the nature of the deposits that would be impacted and their archaeological significance.

The East Berkshire Historic Landscape Character Assessment should form part of the evidence base for the Plan, informing the choice of minerals extraction sites.

**Q13:** Yes.

**Q14:** No.

**Q16:** No.

**Q31:** No.

**Q32:** No.

**Q34:** Potential archaeological interest.

**Q41:** No.

**Q51:** Only subject to the need to conserve any archaeological remains.

**Q52:** No.

**Q67:** Yes.

**Site Assessment Methodology:** We are pleased to see that the historic environment is one of the criteria against which each site will be assessed. The weight attached to the conservation of the historic environment in the assessment should be commensurate with that set out in the National Planning Policy Framework i.e. recognising that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance, with any harm requiring clear and convincing justification.

The historic environment should include designated heritage assets, assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments and other non-designated assets such as historic landscapes. The other

assessments referred to in paragraph 4.27 should include specific archaeological studies e.g. of Palaeolithic remains.

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Where archaeological remains are known to exist, or there is a high potential for such remains, further investigation should be undertaken prior to a site being considered suitable for allocation.

We hope these comments are helpful. Please contact me if you have any queries.

Thank you again for consulting Historic England.

Yours faithfully,

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Martin Small  
Principal Adviser, Historic Environment Planning  
(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)

