

Central & Eastern Berkshire Authorities
Hearing Position Statement
Main Matter 2 – The Spatial Strategy

Word count: 1771

This Hearing Position Statement should be read in conjunction with the Schedule of Proposed Modifications (MD01).

Issue: Whether the Vision, Strategic Plan Objectives and Spatial Strategy are appropriate, positively prepared and are soundly based and provide an appropriate basis for meeting the future demand for minerals and managing waste sustainably.

2.1 Does the Plan reflect the future patterns of growth in Central and Eastern Berkshire?

Yes, the future patterns of growth have been considered in greater detail in the Minerals Background Study (HS64, particularly Appendix 2 and Appendix 3, looking at future demand) and Waste Background Study (HS65, Para. 10.7 – 10.15).

As insufficient sites were identified during extensive 'Call for Sites' exercises, it was not possible for the Plan to choose mineral sites based on future patterns of growth. Furthermore, minerals can only be worked where they are found. Due to the expected shortfall of mineral allocations, the mineral Area of Search covers any mineral resources that are not considered to be significantly constrained in order to maximise opportunities for mineral sites to come forward.

Similarly, there were insufficient waste sites proposed to choose from them based on future patterns of growth. However, specific criteria are outlined in Policy W4 to encourage waste proposals to come forward in appropriate locations. The term 'appropriate locations' is defined in Para. 7.105. In addition, the criteria include sites should have good connectivity to areas of major new development or the sources of waste or markets of the types of waste to be managed. Areas of major new development are likely to align with patterns of future growth.

2.2 *Does the Plan cover everything necessary, as set out in the NPPF, PPG, National Planning Policy for Waste and the Waste (England and Wales) Regulations 2011 which transposed the requirements of the EU Waste Framework Directive (2008/98/EC)? How has the Plan had regard to wider Waste Strategies including the Waste Management Plan for England and Our Waste, Our Resources: A Strategy for England?*

Yes, Para. 1.9 of the Joint Minerals & Waste Plan outlines that the Plan accords with everything necessary. However, it is recognised that the NPPF has been subject to a further update following submission of the Plan. Where necessary, specific references are made to relevant NPPF, PPG or National Planning Policy for Waste paragraphs throughout the Plan.

The Waste Background study includes more detailed consideration of the relevant national policy and legislative requirements regarding waste, including the Waste Framework Directive, 25 Year Environment Plan, Waste Management Plan and Waste and Resource Strategy for England (HS65, see Para. 2.1-2.34). At the time the Waste Background Study was prepared the final outcomes of Brexit, or the Brexit negotiations, were uncertain, however with the legislation that has come forward transposing the Waste Directive it is considered that the conclusions of the Waste Background Study are still relevant.

The Plan itself follows the principles and aims of these documents by supporting treatment higher up the waste hierarchy, encouraging a zero waste economy and a reduction in 'waste miles' (strategic plan objectives 12, 13 and 14 under 3.6). These objectives are then reflected in policies W1, W3 and W4 in particular.

2.3 *Does the Plan have appropriate regard to the adopted Development Plans of the Authorities? How have these been taken into account in the Plan?*

Yes, the Development Plans and related documents of the Authorities have been considered throughout the preparation of the Plan. For example, the calculated local housing need has been used to develop a housing led scenario for soft sand need (Minerals Background Study, HS64, 6.15-6.19)

Site assessment, including the analysis of the industrial areas and the mineral Area of Search, has included information from the adopted and proposed Development Plans.

Furthermore, the Plan itself makes reference to the Development Plans where relevant. For example, the need to consider restoration proposals within that context (Policy DM8) or when considering the reworking of landfills (7.122).

However, it is also recognised that some of the Central & Eastern Berkshire Authorities are currently preparing Development Plans which are at varying stages. The housing figures which support these Development Plans have been taken into account in the preparation of the Joint Minerals & Waste Plan, but it is also recognised that these are subject to change, not only due to changes and updates in data but as the Development Plans progress through the plan-making system. For example, greater certainty can be placed on the housing figures for Reading Borough Council as the Development Plan is recently adopted.

2.4 How are the Vision, Strategic Plan Objectives and Spatial Strategy collectively consistent with national policy?

The Vision, Strategic Plan Objectives and Spatial Strategy are collectively consistent with national policy as they provide a positive vision and framework for delivering sustainable minerals and waste development to meet the needs of Central and Eastern Berkshire, while incorporating local circumstances and knowledge. They are consistent with national policy by following the principles of the NPPF and National Planning Policy for Waste, while adding elements where national policy is silent or there are known future directions of travel. They have also been shaped by early and on-going engagement with statutory consultees, local communities, businesses and minerals and waste operators.

2.5 How do the outcomes of the SA reflect the principles of sustainable development and influence the spatial strategy and policies, with particular regard to climate change, sustainable transport and sustainable waste management?

The Plan was assessed against a bespoke framework (refer Table 2.3 of the Environmental Report, SD06). The framework comprised 11 objectives covering social, economic, and environmental issues. Specifically objective 7 relates to greenhouse gases and climate change, Objective 6 relates to air quality which has indirect effect on climate change, Objective 6 specifically relates to sustainable transport options and Objective 8 relates to support sustainable extraction, re-use and recycling of waste, mineral and aggregate resources.

Appendix D of the Environmental Report (SD06) also outlines the Full Appraisal of the Plan objectives which seek to implement the Vision and the Spatial Strategy. The Full Appraisal sets out what changes have occurred through the evolution of the Plan including the recommendations that have been made through the SA process. This framework is followed

for the policies in Appendix E (Development management), Appendix F (waste policies) and Appendix G (minerals policies).

2.6 Do the allocations acknowledge the spatial dimension to the Plan in terms of minerals, including such matters as geology and distances to markets?

Mineral allocations are based on proposals from the 'Call for Sites' exercises, which have included estimates of mineral present based on operator/applicant knowledge and investigations. The majority are also within known areas of mineral extraction, thereby acknowledging the relevant geology.

The proposed Area of Search is based on likely presence of minerals, based on data from the British Geological Survey.

Insufficient sites were promoted to enable a selection based on distances to markets, however policy DM12 requires a consideration of connectivity and movements.

2.7 Do the allocations for waste management acknowledge the spatial dimension to the Plan in terms of proximity to main centres?

Insufficient sites were proposed to enable a selection based on proximity to main centres. However, Policy W4 includes specific criteria encouraging waste proposals to come forward in areas of major new development or near the sources of waste or the markets of the types of waste to be managed. The main sources of waste, in particular, are likely to be the main centres in the Plan area so this criterion should encourage sites to come forward in these areas.

The three allocations are for different forms of waste management which influences their location. Berkyn Manor (WA1) and The Compound (WA3) are being allocated to meet a specific local need. However, Horton Brook Quarry (WA2) is providing recycling of inert materials which due to the impacts associated with this activity is not suited to developed areas. In addition, the site is in relatively close proximity to the sources of inert waste due to its location close to Slough and London.

2.8 Does the Plan demonstrate that adequate consideration has been given to cross-boundary issues and strategic priorities?

Cross boundary issues and strategic priorities have been explored extensively through the Plan preparation and particularly through the Duty to Cooperate, as detailed in the Duty to Cooperate Statement (SD05).

Waste matters have been discussed through the South East Waste Planning Advisory Group, as detailed in the Waste Background Study (HS65, e.g. 3.14 and 4.11), particularly noting the growing regional nature of landfill (HS65, 11.48). The Authorities are signatories to the SEWPAG Statement of Common Ground (SoCG) Strategic Policies for Waste Management (SD05, Appendix 8), which covers a number of strategic and cross-boundary issues such as net self-sufficiency, movements of waste between authorities, permanent deposit of inert excavation waste, Green Belt, National Parks, AONBs and non-hazardous landfill. The Plan and its evidence base cover all these issues. A particular bilateral cross-boundary waste issue is the use of the Lakeside Incinerator which is the subject of a Statement of Common Ground being developed with Slough Borough Council and is in line with the proximity principle of waste management.

Minerals issues have been discussed through the South East England Aggregate Working Party and regional (soft sand supply, SD05, Appendix 3) and sub-regional (soft sand supply and sharp sand and gravel supply, SD05, Appendix 9 and 10) SoCGs have been developed, covering the key cross-boundary movements of minerals. A bilateral SoCG has been developed with West Berkshire, considering in particular the strategic issues of crushed rock and aggregate recycling (SD05, Appendix 7).

2.9 Does the Spatial Strategy adequately reflect the Vision and Strategic Plan Objectives for both minerals and waste?

The Vision and Strategic Plan Objectives were in development from the earliest stages of Plan preparation and so were drafted and consulted upon at Regulation 18 (Issues & Options) stage (HS12). The Vision and Strategic Plan Objectives guide the Spatial Strategy, including in evidence base preparation and Plan preparation. The Spatial Strategy was then influenced by local circumstances including the availability of minerals and waste sites at the Regulation 18 (Draft Plan) stage (HS27).

While not every element of the Vision and Strategic Plan Objectives is currently being delivered due to circumstances outside the control of plan-making (such as insufficient sites proposed through successive Calls for Sites or the poor quality of the known soft sand resources), it is considered that the Spatial Strategy reflects them and enables suitable development to come forward in order to ultimately deliver both.

While the Vision includes Climate Change considerations and the Plan has addressed these, they are not specifically stated as a principle of the Spatial Strategy, so this is amended through proposed modification MM2.

2.10 Does the Strategic Flood Risk Assessment (SFRA) include sufficient evidence to support the choice of proposed allocations for minerals and waste development?

The concerns raised regarding the SFRA by the Environment Agency (EA) as set out in their Regulation 19 response (REP 27) are noted. A meeting was held with the EA on 18th August 2021 to discuss the concerns. This concluded that updates were required to address the issues outlined.

A revised SFRA has been prepared following discussion with the EA (HS69a) to address the concerns. This includes an explanation of why the choice of sites were subject to a sequential test, clarification of those sites withdrawn and therefore not fully assessed in terms of flood risk, a revised assessment of the sites in relation to the assessment of Flood Zone 3b (with an Annual Exceedance Allowance of 5%) and clarification on the climate change allowance.

2.11 How would including an updated climate change allowance affect the conclusions of the SFRA, including in relation to the site allocations?

A section on climate change (page 25) has been included in the revised SFRA (HS69a). Although climate change is generally assessed and accounted for as part of the site-specific risk assessments undertaken as development comes forwards, it was considered necessary to ensure that the addition of climate change would not make the identified sites unviable. Sand and gravel extraction is water compatible, and an assessment has been undertaken to ensure there is sufficient space remaining outside the floodplain to sequentially assess the site layout and locate structures outside the floodplain even with an addition for climate change. This has led to an additional Development Consideration for Poyle Quarry Extensions (MA2) to require more detailed assessment in ensuring nil detriment to the floodplain. Therefore, proposed Modification (MM16) has been prepared to address this point.