

Proposed Approach to site identification in the Central and Eastern Berkshire – Joint Minerals and Waste Plan

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Planning Practice Guidance (PPG) states that:

‘Mineral planning authorities should plan for the steady and adequate supply of minerals in one or more of the following ways (in order of priority):

- 1. Designating Specific Sites – where viable resources are known to exist, landowners are supportive of minerals development and the proposal is likely to be acceptable in planning terms. Such sites may also include essential operations associated with mineral extraction;*
- 2. Designating Preferred Areas, which are areas of known resources where planning permission might reasonably be anticipated. Such areas may also include essential operations associated with mineral extraction; and/or*
- 3. Designating Areas of Search – areas where knowledge of mineral resources may be less certain but within which planning permission may be granted, particularly if there is a potential shortfall in supply.’*

In addition, the National Planning Policy for Waste states that:

‘Waste planning authorities should identify, in their Local Plans, sites and/or areas for new or enhanced waste management facilities in appropriate locations’

In preparing the Joint Minerals and Waste Plan, the intended approach was to designate specific sites for minerals and waste development. Where there was a recognised shortfall in provision of sites, a criteria-based approach was applied to provide a steer in decision-making on where sites were expected to come forward.

This approach is recognised as providing the most certainty to developers and local residents, as set out in the PPG:

‘Designating Specific Sites in minerals plans provides the necessary certainty on when and where development may take place. The better the quality of data available to mineral planning authorities, the better the prospect of a site being designated as a Specific Site.’

Despite numerous ‘call for sites’, sufficient provision of both minerals and waste sites has not been achieved.

Therefore, alternative approaches to site identified have been considered.

Waste

The proposed approach to waste site identification in the Joint Plan includes priority provision at selected industrial and employment areas. These areas have been selected based on their suitability to locate certain waste management activities. The priority has been placed on these areas (referred to as 'Preferred Waste Areas') rather than specific sites as they have an established land use which is classed as suitable for certain waste activities. The Waste Preferred Areas are located outside of Green Belt designations.

It is recognised that not all waste management activities can be located on employment or industrial land due to suitability of the location and/or capacity may not be available. Therefore, second priority is given to specific sites within the Joint Plan. These sites are limited (there are currently three sites) and are located within the Green Belt.

Should these sites not be suitable or available, the final option is to apply a criteria-based approach to help determine the suitability of a site for waste management use.

Determining whether permission would be granted for proposals on these sites would need to take into consideration all other relevant policies within the Joint Plan as well as other development plans and strategies for the area (such as the relevant Local Plan).

It is recognised that there are several waste movements outside of the Plan area, some of which are due to contractual arrangements. As such, where necessary, Statements of Common Ground have been prepared with relevant waste planning authorities to recognise the relationship between areas to enable suitable waste management provision.

Minerals

A Soft Sand Study has been prepared to support the Joint Plan. The Study outlines that resources of soft sand within the Plan area are variable in quality and that sand suitable for building purposes is dispersed and limited. There have been no active soft sand quarries in over 10 years and no proposals have been put forward by industry for consideration as allocation.

Therefore, the approach to soft sand supply has been to safeguard the resources to enable the assessment of suitable resources should they arise, and to recognise that supplies of soft sand from outside of the Plan area will continue. The Study outlines that soft sand is supplied from several different mineral planning authority areas. This means that supply is not dependent on one area. Therefore, a sub-regional soft sand Statement of Common Ground has been prepared between the relevant authorities in the wider Thames Valley area.

A recent planning decision by Wokingham Borough Council regarding a planning application at Bridge Farm, Arborfield has meant that the ability to support the site as an allocation in the plan is untenable. This has reduced the provision of sharp sand and gravel in the emerging Joint Plan to such a level that it is not possible for the Plan to demonstrate it can maintain a steady and adequate supply, as required by the National Planning Policy Framework.

A further 'call for sites' is proposed but, based on previous rounds, this is not expected to yield significant new proposals.

A lack of provision in the Joint Plan suggests that provision will be made elsewhere, most likely in neighbouring mineral planning areas which have sand and gravel resources. In order to demonstrate security of supply, 'Duty to Cooperate' discussions will need to be held with neighbouring authorities.

As Central and Eastern Berkshire contains sharp sand and gravel resources, it is expected that there will be a reluctance by neighbouring authorities that the burden of supply will be placed on their communities rather than within the Plan area.

Therefore, to demonstrate that the Central & Eastern Berkshire Authorities are seeking to enable provision within the Plan area, the approach to site identification in the Joint Plan needs to consider either 'Preferred Areas' or 'Areas of Search'.

Table 1 sets out the approaches and the factors which need to be considered in determining the preferred approach. It concludes that the 'Area of Search' approach is the most suitable way forward.

It is proposed that the Area of Search will be supported by a sub-regional sharp sand and gravel Statement of Common Ground involving neighbouring authorities with suitable resources. Currently, the only data source for movements of sand and gravel is the national Aggregate Monitoring survey carried out on behalf of the Ministry for Housing, Communities and Local Government. The survey was last carried out in 2014 and referenced only 'Berkshire' not the Unitary Authority areas. However, it is intended that the survey would be run again in 2020 which would cover the period 2015 to 2019 and it is hoped that the data will be to Unitary level.

The 2014 survey suggests that Hampshire, Wiltshire and Oxfordshire were the main sources of sand and gravel.

The Statement would be updated as and when the data was made available to determine the sources of supply to the Plan area.

The Statement may also be extended to include marine sand and gravel resources which is likely to include Hampshire and Greater London (based on 2014 data).

Table 1: Site Identification Approaches and Determining Factors

Site Identification Approach	Benefits	Constraints
Specific Sites	<ul style="list-style-type: none"> • Based on resource information and known constraints to development. • Greater certainty on location and that development will take place. • Priority approach set out in the NPPF. 	<ul style="list-style-type: none"> • Requires sufficient level of evidence to demonstrate extraction in the locations is deliverable. • Potential for significant level of resistance but in specific areas. • Requires provision of deliverable sites to meet requirements in the Plan. • If this is not achievable, an additional/alternative approach may be required to ensure Plan is sound.
Preferred Areas	<ul style="list-style-type: none"> • Based on resource information and known constraints to development. • Greater certainty over locations which reduces the number of communities that may be concerned. • Approach supported by the NPPF if specific sites cannot be allocated. • Can be used in addition to Specific Sites. 	<ul style="list-style-type: none"> • Greater level of evidence is required, and insufficient information has been provided by operators/landowners to provide certainty that applications will come forward in the Areas. • Evidence may be more open to dispute. • Potential greater level of resistance from communities close to Preferred Areas as expectation applications will come forward. • Likely to place greater emphasis on existing areas of extraction i.e. RBWM.
Areas of Search	<ul style="list-style-type: none"> • Based on resource information and known constraints to development. 	<ul style="list-style-type: none"> • Potential greater number of communities that will resist the Area. • Reduced certainty where extraction will take place.

	<ul style="list-style-type: none"> • Less susceptible to challenge as based on factual information which cannot be disputed e.g. resource and national/internationally important designations. • Demonstrates broader distribution of resources and may encourage extraction in new areas. • Approach supported by the NPPF if specific sites or Preferred Areas cannot be allocated. • Can be used in addition to Specific Sites. 	
<i>Conclusion</i>	<p>Having a more defined area does not necessarily provide more certainty that extraction proposals will come forward. There are currently insufficient site proposals to meet the requirements of the Plan. There are few operators active in the Plan area who will be seeking security of supply and evidence is likely to be limited to known future proposals (possibly including those recently refused or not considered further through the plan-making process). There are limited constraints that would be showstoppers in preventing extraction without consideration of other factors. Therefore, proposals should be considered on a case-by-case basis and development would then be managed by the DM policies in Plan. As such, it is recommended that the Area of Search Approach is the preferred option which also highlights the broader availability of resources that could be explored.</p>	