

Central and Eastern Berkshire

Joint Minerals & Waste Plan

**Focussed Regulation 18 Consultation:
Summary Report**

April 2020



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Summary

Hampshire Services (part of Hampshire County Council) is working in collaboration with Bracknell Forest, Reading Borough Council, The Royal Borough of Windsor & Maidenhead and Wokingham Borough Council (collectively known as the Central & Eastern Berkshire Authorities) to produce a Joint Minerals and Waste Plan ('the Plan').

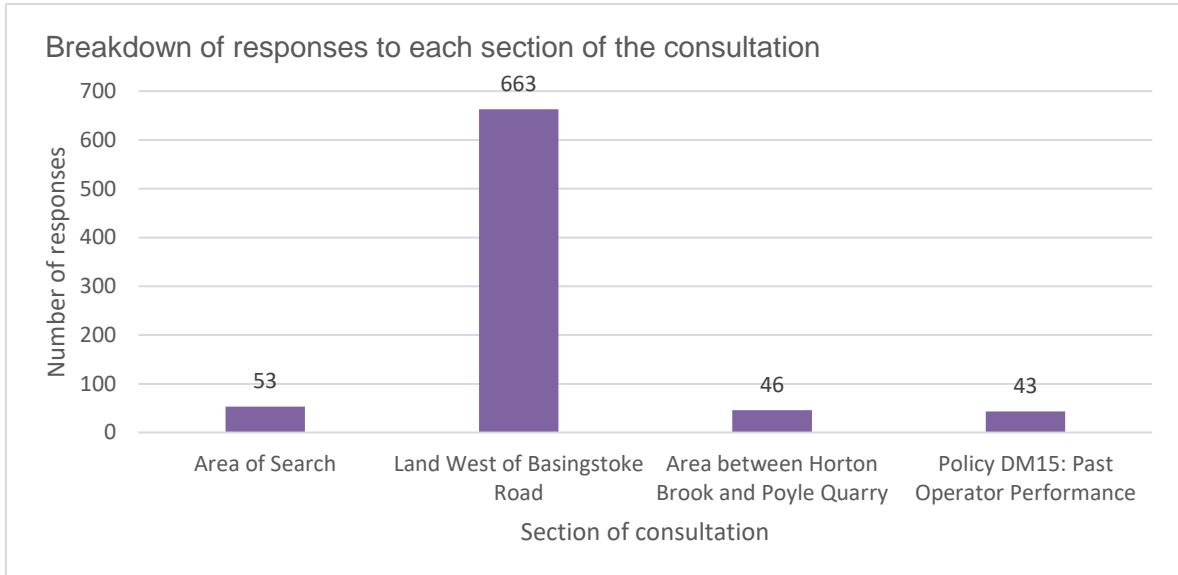
This report summarises the outcomes of the *Focussed Regulation 18 Consultation Sand & Gravel Provision and Operator Performance* ('the Focussed Consultation') which looked for opinions on an Area of Search approach, two newly proposed sand & gravel sites and a new Operator Performance Policy. The six week Focussed Consultation started on 11 February and closed on 23 March 2020. It forms an addendum to the Draft Plan consultation summary report (April 2019), and the Additional Regulation 18 Consultation on Bray Quarry Extension Addendum report (August 2019).

This report provides an overview of the general themes and key issues from the responses and comments received to the Focussed Consultation. It includes who has responded as well as capturing the issues respondents have raised.

In total, 702 responses were received, of which 686 can be noted and considered. The remaining 16 responses cannot be considered in the same way as the 686 responses since they did not meet the requirements of the consultation (i.e. they were missing necessary information (15 responses), or they were received after the consultation deadline without a prior extension having been agreed (one response)). All five sections of the Focussed Consultation received responses; the specific questions as set out in the supporting online response form were answered and respondents also took the opportunity to provide more general comments. Section five: *About you* was also completed by those who filled in the online response form.

A wide range of responses were received to the Focussed Consultation, although the most responses were made in relation to Section two (a) – one of the newly proposed sites, *Land West of Basingstoke Road* which falls within the Borough of Wokingham. Further information will feature later in this report on specifics, but predominantly responses regarding this site were highlighting concerns about the site access, transport links and inadequate local road systems, pollution (noise, dust, air quality), flooding, negative impacts on the local environment, ecological systems, countryside and amenity.

The following graph gives a brief overview of how many responses were received to the more specific sections of the Focussed Consultation (excludes sections four and five):



Additionally, responses were made under Section four: *further comments*. The issues brought to attention were anything else deemed necessary (by a respondent) for inclusion in the consultation. Comments ranged from background information on an organisation (if it was an organisation's response), to reinforcing points that had been made previously, expanding on more 'neutral' points of view or providing general feedback on the consultation process.

A large number of responses were received to the final section of the consultation – Section five: *About you*. Although the information provided in this section of the consultation does not relate to the content of the emerging Plan, it provides an insight as to who has an interest in the emerging Plan and where further work is needed in terms of engagement. This demographic information is processed separately from the main part of the Focussed Consultation and it remains entirely anonymous in accordance with the General Data Protection Regulation (GDPR) 2018¹.

The outcome of the Focussed Consultation will enhance the findings of the previous consultations held and will be used to build upon the evidence base supporting the emerging Plan. The Focussed Consultation has provided local people, businesses, and organisations with the opportunity to voice their opinions

¹ GDPR <https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation>

and concerns in relation to the proposals. Whilst most responses opposed the proposals of the Focussed Consultation, there were also responses in support.

This summary of responses report will be used to help inform the preparation of the Proposed Submission version of the Plan. A further report will later be prepared that sets out the responses to the issues raised and how these have been addressed. This report will be available during the consultation on the Proposed Submission version of the Plan.

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1. Introduction

- 1.1 Hampshire Services (part of Hampshire County Council) is working in collaboration with Bracknell Forest Council, Reading Borough Council, The Royal Borough of Windsor & Maidenhead and Wokingham Borough Council (collectively known as the Central & Eastern Berkshire Authorities) to produce a Joint Minerals & Waste Plan ('The Plan' / 'emerging Plan'). The Plan will guide minerals and waste decision making in the Plan area up until 2036.
- 1.2 This report sets out how Hampshire Services (on behalf of the Central and Eastern Berkshire Authorities) has involved the public in the preparation of the Plan. The purpose of the consultation was to engage local communities in discussions on three issues: An Area of Search approach; two newly proposed sites (Land West of Basingstoke Road in the Borough of Wokingham and the Area between Horton Brook and Poyle Quarry in the Royal Borough of Windsor & Maidenhead); and the new Policy DM15 – Past Operator Performance.
- 1.3 All stages of consultation have been carried out in accordance with the Statements of Community Involvement (SCI) for each of the Central and Eastern Berkshire Authorities². SCI documents inform each authority on how engagement with local communities should be undertaken when preparing a plan (or working on planning applications).
- 1.4 This summary document provides an overview on the (general) themes and key issues that were most prevalent in the responses received to the Focussed Consultation. These themes and issues will be used to update the evidence base, continue to support and direct the preparation of the Plan as well as inform and shape the final stages of the Plan making process.
- 1.5 Six responses were received after the official closure of the Focussed Consultation (23 March 2020). Of these six responses, five were agreed extensions to submit responses after the official consultation closure (23 March 2020) and will feature in this summary report. The one remaining late response will not be considered in the same way as the other late responses. This is because it was not agreed up front that the response would be submitted after the deadline of 23 March 2020.

² Bracknell Forest Council SCI - <https://www.bracknell-forest.gov.uk/sites/default/files/documents/statement-of-community-involvement-2014.pdf>
Reading Borough Council SCI - <http://www.reading.gov.uk/media/1051/Statement-of-Community-Involvement-Adopted-March-2014/pdf/Statement-Of-Community-Involvement-Mar14.pdf>
Royal Borough of Windsor & Maidenhead SCI - https://www3.rbwm.gov.uk/info/200209/planning_policy/460/statement_of_community_involvement/1
Wokingham Borough Council SCI - <http://www.wokingham.gov.uk/planning-policy/planning-policy-information/planning-policy-consultations/>

15 other responses were discounted because they lacked certain submission information, such as a full name.

- 1.6 It should be noted part of this Focussed Consultation took place during the COVID-19 (Coronavirus) national emergency that occurred in the UK from early Spring 2020. This caused some disruption to the Focussed Consultation. One Focussed Consultation public exhibition went ahead (11 March 2020). The decision was taken to cancel the second public exhibition due to be held at Champney Hall in Horton on 17 March 2020. This followed the advice given by Public Health England and Central Government at that time. The public exhibitions were to act as information points for local people and businesses to ask questions about the Focussed Consultation and the emerging Plan. Action was taken by Hampshire Services to place notices on the Central and Eastern Berkshire webpages and at the venue to notify of this cancellation and the presentation that was due to be delivered to Horton Parish Council, was made available online.
- 1.7 This decision was not taken lightly but the priority was to protect the health of those planning to attend the event.
- 1.8 Due to the limited number of remaining days of the consultation, the decision was taken by Hampshire Services and the Central & Eastern Berkshire Authorities not to formally extend this consultation period although specific requests for extensions were granted.
- 1.9 Including this Focussed Consultation, there have been four consultations which have taken place for the emerging Plan which fall under Regulation 18 (of the Town and Country Planning (Local Planning) (England) Regulations 2012);
- Stage 1 - *Issues and Options* – summer 2017,
 - Stage 2 (a) - *Draft Plan* (previously Preferred Options) – summer / autumn 2018;
 - Stage 2 (b) - *Additional Regulation 18 (site specific) consultation on the proposed Bray Quarry Extension site allocation*; and
 - Stage 2 (c) – *Focussed Regulation 18 Consultation: Sand & Gravel Provision and Operator Performance*.
- 1.10 The outcomes of each consultation are being used to inform the preparation of the Proposed Submission Plan.

2. Regulation 18

Stage 2(c): Focussed Regulation 18 Consultation: Sand & Gravel Provision and Operator Performance

- 2.1 The Focussed Regulation 18 Consultation: Sand & Gravel Provision and Operator Performance (the 'Focussed Consultation') ran for six weeks (11 February through to 23 March 2020).
- 2.2 During the summer of 2019, one of the proposed allocations of the Plan (Bridge Farm³) was refused planning permission. The landowner 'shelved' any plans for extraction and has not renewed the option with operator (Cemex). This meant that the site is not now able to be included as an allocation in the plan (as it is not deliverable), and that the emerging Plan was making limited provision of sand and gravel. Thus, a 'Call for Sites' was undertaken in autumn 2019 and an 'Area of Search' approach was explored. The term 'Area of Search' refers to an area of land whereby the presence of minerals is recognised but the viability of resources is less certain. The Area of Search approach in this context is to demonstrate the potential for provision of sand and gravel within the Plan area. However, it is important to note that a proposal identified within an Area of Search is not guaranteed planning permission. A planning application will still be required, and development will only be permitted if it is in accordance with all relevant policies within the Plan.
- 2.3 This 'Call for Sites' generated two potential proposals within the Plan area which could provide sand and gravel, and therefore presented the need for a further consultation under Regulation 18 to be undertaken.
- 2.4 The Land West of Basingstoke Road site and the Area between Horton Brook and Poyle Quarry site have been assessed by Hampshire Services technical specialists (Ecology, Transport, Landscape and Historic Environment) and subject to an assessment as part of the Sustainability Appraisal (incorporating Strategic Environmental Assessment), Habitats Regulation Assessment and Strategic Flood Risk Assessment.
- 2.5 The decision to propose a new Policy (DM15) for inclusion in the emerging Plan occurred as a result of the responses received to the 'Draft Plan' consultation and the concerns raised by local residents. The new policy seeks to ensure the past performance of minerals and waste operators form part of the material considerations taken into account in decision making at planning application stage.

³ Wokingham Borough Council Planning – Bridge Farm application
<https://planning.wokingham.gov.uk/FastWebPL/detail.asp?Altref=170433&>

Who was consulted?

2.6 Statutory and non-statutory bodies were consulted as part of the Focussed Consultation including:

- Natural England, Historic England, Highways England and the Environment Agency
- Parish / Town Councils located within and adjoining the Central and Eastern Berkshire Authorities
- District Councils adjoining the Central and Eastern Berkshire Authorities
- County Councils adjoining the Central and Eastern Berkshire Authorities
- Members, MPs, MEPs within the Central and Eastern Berkshire Authorities
- All contacts on the relevant Local Plan databases for the Central and Eastern Berkshire Authorities (all those who have requested to remain informed)
- Public utilities such as South East Water and National Grid
- Other bodies outlined in the relevant in each Statement of Community Involvement

How were they consulted?

2.7 Notice of the additional consultation was provided in a number of ways:

- Emails were sent to the statutory consultees
- The consultation was advertised on the Central and Eastern Berkshire consultation website (with links from each of the four authorities' own websites to the CEB website)
- Adverts were placed in local newspapers as follows:
 - Arranged by The Royal Borough of Windsor & Maidenhead:
 - Bracknell News (19 February 2020)
 - Maidenhead Advertiser and Windsor Express (20 and 21 February 2020)
 - London Gazette (21 February 2020)
 - Arranged by Wokingham Borough Council:
 - Wokingham Paper (13 February 2020)

2.8 The consultation documents were made available in appropriate locations in each of the Central and Eastern Berkshire Authorities (either Civic Offices and / or libraries), as well as online via the dedicated Central & Eastern Berkshire Authorities consultation website (hosted by Hampshire Services).

2.9 Responses to the Focussed Consultation could be submitted by post, email and via the Central & Eastern Berkshire Authorities consultation website, where a link to an online response form was available. The questions posed in the response form encouraged comments on the three specific issues under consultation (Area

of Search approach, two proposed sites with the potential to provide sand & gravel and the new Policy DM15) as well as asking for further comments from respondents.

Methodology

- 2.10 Two public exhibitions were arranged to enable members of the public to attend and learn more about the Focussed Consultation, as well as providing an opportunity for people to address any concerns or queries directly with council officers. However, as detailed previously, only one of the two events went ahead owing to the COVID-19 pandemic and advice issued by Public Health England and Central Government. The event that did proceed was held on 11 March 2020 from 16:30 to 19:00 at Swallowfield Village Hall. It was well-attended, with approximately 50 people participating during the course of the afternoon / evening. The cancelled event should have taken place on 17 March 2020 from 15:00 to 19:00 at Champney Hall, Horton, SL3 9PA. The event was cancelled on the morning of 17 March 2020.
- 2.11 Responses were received via online response forms, emails and letters. A number of phone calls were also received, mainly with queries about how to respond and the availability of information needed in order to respond accordingly to the Focussed Consultation (this is addressed in more detail in the next section *Limitations Encountered*).
- 2.12 The Focussed Consultation response form was separated into five sections, as follows:
- Section one: *Area of Search approach*;
 - Section two (a): *Site proposal: Land West of Basingstoke Road*;
 - Section two (b): *Site proposal: Area between Horton Brook and Poyle Quarry*;
 - Section three: *Proposed Policy DM15 – Past Operator Performance*;
 - Section four: *Further comments*; and
 - Section five: *About you*.
- 2.13 Several of the responses received via email and post did not follow the same structure as the dedicated response form. However, the issues raised within these emails and letters were similar. Therefore, to easily compare and analyse the responses, where possible, these comments have been assigned to an appropriate section of the response form. Where this has not been possible, additional comments have been grouped together into further comments.
- 2.14 To organise the results, this summary report has been grouped into sections according to the questions set out in the online response form, in addition to

appendices at the end of the summary report. Where appropriate, graphs / charts have been used to display results, as well as text setting out comments received to each proposal.

- 2.15 If duplicate responses have been identified i.e. someone has completed an online response form and submitted a response via email, these have been counted as one because they originated from the same person. However, all applicable comments have been taken into consideration.
- 2.16 It has been identified that some responses submitted via the online response form, which relate only to one part of the Focussed Consultation have been entered into other (incorrect) section(s) of the consultation. Where this has occurred, the comment(s) will be considered, but under the correct corresponding section of the consultation and not necessarily the section under which it was originally recorded.
- 2.17 A requirement of the Focussed Consultation was to provide a full name and full postal address, including postcode (plus an email address for organisational responses). Responses which have not met these requirements have not been included in the total number of responses received (686) and the comments made have not been considered and processed in the same way as the responses which have supplied the correct supporting information.
- 2.18 The full list of responses, once they have been redacted to comply with General Data Protection Regulation (GDPR), will be made public.
- 2.19 The analysis and outcomes of this summary will be used to inform the preparation of future stages of the Plan.

Limitations encountered

The consultation process

- 2.20 Initially, the potential mineral yield of Land west of Basingstoke Road was not available due to delays in ground investigations. Once an estimate was provided, the Central and Eastern Berkshire webpages were updated to include the amount of sand and gravel potentially available for extraction at the site.
- 2.21 The delay in this information being available was subject to criticism and questioning from a number of consultees and those with an interest in the consultation and the emerging Plan.
- 2.22 Another area which required clarification was the way in which people could respond to the Focussed Consultation. There was concern from some that a representation could only be made through the submission of a response form.

Although this was the preferred response method, it was acceptable to submit responses via email and via the post too. Following this confusion, the dedicated Central and Eastern Berkshire consultation webpages (hosted by Hampshire Services), were reviewed and re-worded to make it clearer as to how people could respond.

2.23 As already mentioned, the COVID-19 pandemic caused a limitation to the Focussed Consultation as it was necessary to cancel one of the public exhibitions.

2.24 Previous consultations have generated criticism for being too confusing and littered with jargon. This feedback was taken on board and for the Focussed Consultation, an FAQs document was produced and made available online⁴. It was hoped that people could use it as a reference point since it explained the consultation process and planning terminology. It is believed that this approach was more effective despite some criticism being received regarding the complexity of the consultation process, fewer comments of this nature were made compared with previous consultations.

2.25 Comments received from all those who responded, including the public, about the Focussed Consultation have been invaluable and will be used to inform the Proposed Submission version of the Plan.

The analysis stage

2.26 The figures provided in the datasets are only of the respondent groups who made an explicit representation i.e. they selected 'support' or 'object'. But this does not necessarily include all the respondents as comments may feature in the free text box of Section four: *Further comments*.

2.27 Please also note the following when reading this summary document:

- Not every comment is mentioned in this analysis (although every issue raised has been taken into consideration);
- Comments are not written in full;
- Comments have been summarised or combined where possible;
- Where multiple comments have been received from one organisation, they have just been counted as one organisation, rather than, for example 22 organisations;
- Comments that apply to a number of related questions are sometimes only listed under the relevant question(s);
- Comments that were noted as confidential have not been included;

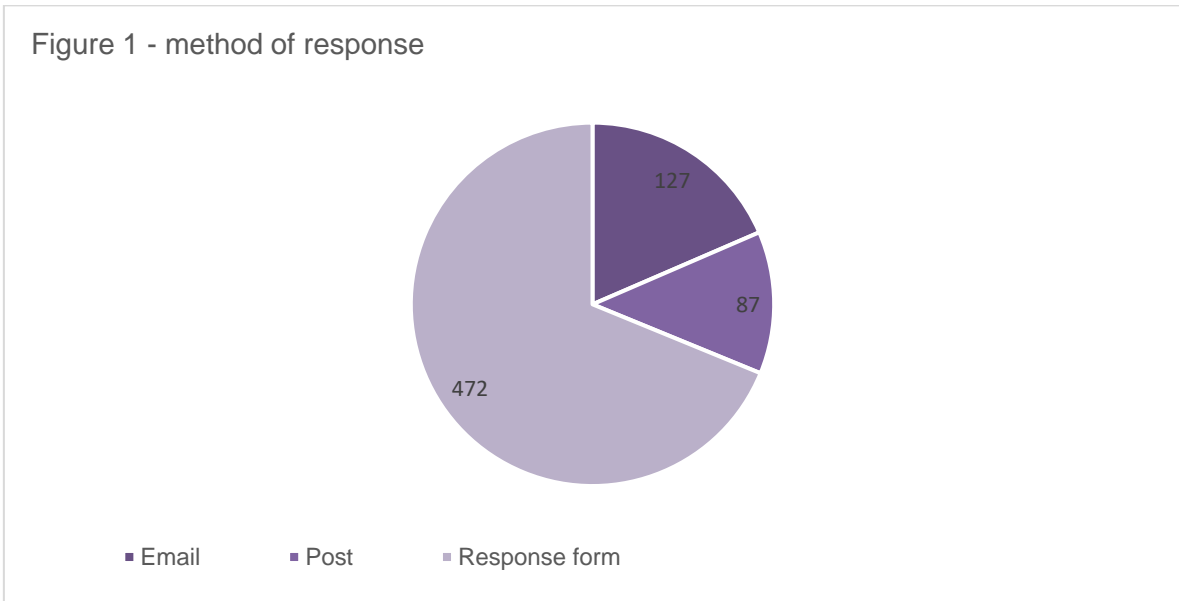
⁴ Frequently Asked Questions (FAQs)
<https://documents.hants.gov.uk/environment/JCEBFocussedRegulation18Consultation-SandandGravelProvisionandOperatorPerformance-FAQs.pdf>

- Comments may appear contradictory as opposing views have been given equal treatment;
- Comments with a high level of detail relating to particular documents, for example technical comments relating to data, methodologies or presentation have not been detailed in full but have been taken into account and actioned; and
- Summaries reflect comments made even where there may be possible inaccuracies. A document outlining how the issues were considered and acted upon will be available at the next stage of Plan preparation (Proposed Submission).

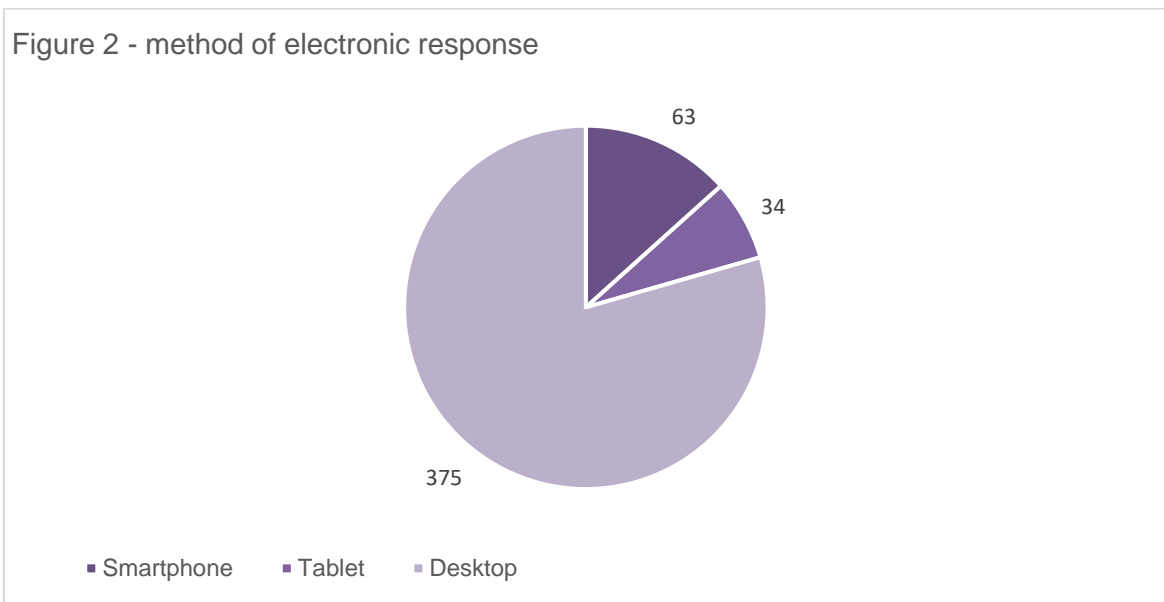
3. Consultation results

Overview of responses and respondents

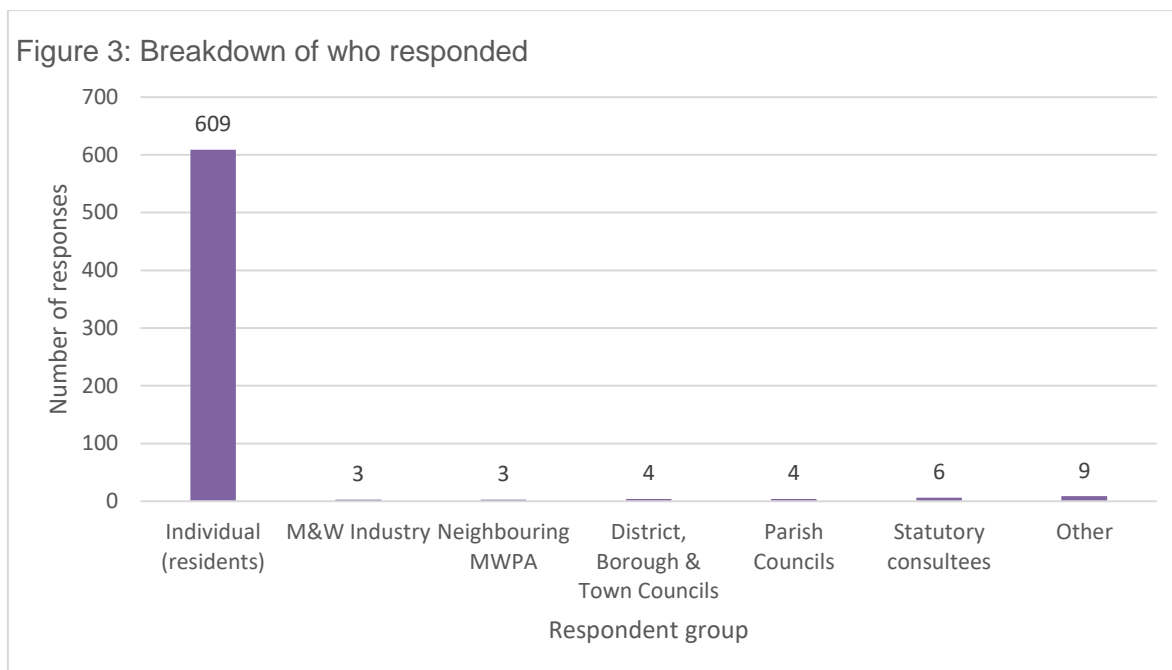
3.1 A total of 702 responses were received to the Focussed Consultation, but only 686 will be fully considered since one was received late (unauthorised) and the remaining 15 did not contain the required information to be officially accepted. Figure 1 outlines how consultation responses were submitted. Just over 87% (599) of responses were received electronically, either via email or via the online response form.



3.2 Furthermore, of those who submitted their response through the online survey, Figure 2 shows the technology used to do so:



3.3 Respondents were categorised into groups to gain a better understanding of who responded to the consultation (see Figure 3).



Note: M&W – minerals and waste, MWPA – minerals and waste planning authority

3.4 To gain a better understanding of who responded to the consultation, respondents were clustered into groups.

3.5 The following points should be noted:

- some of the organisations fell into two categories (i.e. they could be classed as a borough council and a neighbouring minerals and waste planning authority). In these instances, the capacity and nature of the response has been reviewed and the organisation placed into a respondent group which was felt most appropriate for this Focussed Consultation; and
- the 'other' category includes local businesses, interest groups, planning consultants, wildlife and garden trusts.

3.6 As can be seen from Figure 3, most responses (609 or 89%) were made by individuals / residents.

3.7 Four responses to the Focussed Consultation were from individuals living in counties other than Berkshire.

3.8 This Focussed Consultation has provoked the largest response to a consultation held in relation to the emerging Central and Eastern Berkshire Joint Minerals and Waste Plan. This includes the largest number of responses from organisations to date. It should be noted, there are some occurrences where several employees

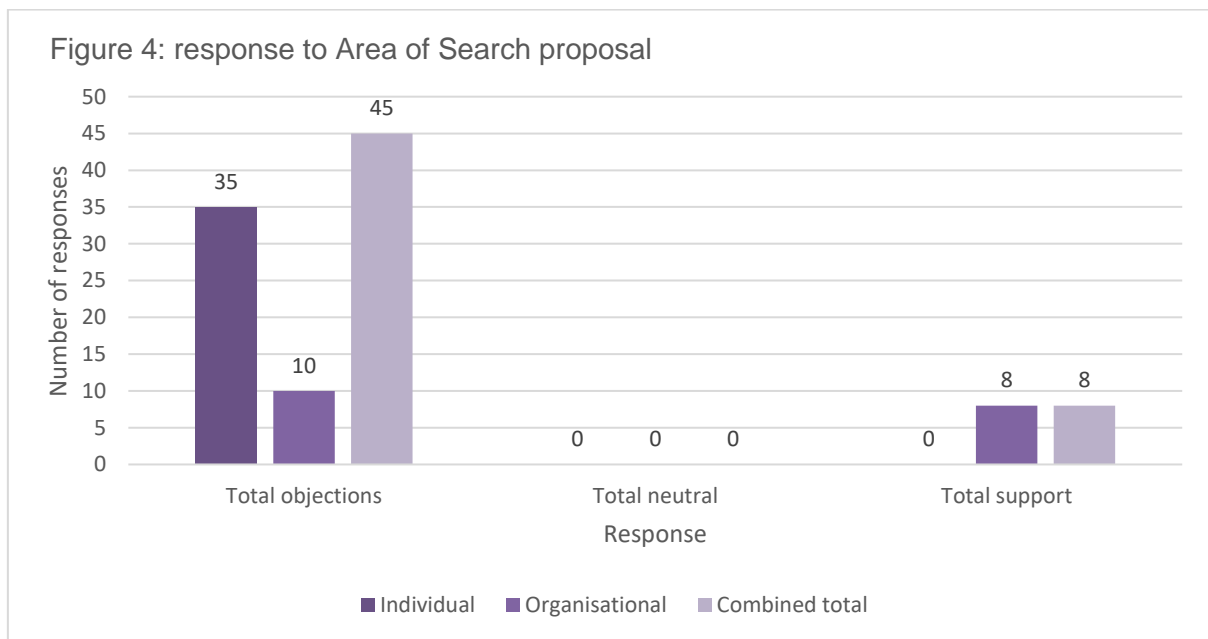
from the same organisation have submitted an individual response. In these cases, each response has been counted individually.

- 3.9 The Focussed Consultation generated responses from the following statutory consultees / statutory undertakers: Historic England, Highways England, Natural England, The Environment Agency, Transport for London and National Grid (response submitted via Avison Young). Of these six organisations, three submitted extensive comments to the consultation, raising concerns over a number of issues including (but not limited to) flooding, scheduled ancient monuments and existing utilities. One submitted more neutral comments rather than concerns, providing guidance on what actions should be taken for each proposal. These comments will feature in this summary report. Transport for London and Highways England had no comments to submit on this occasion.
- 3.10 A total of three (0.4%) of the responses came from the minerals and waste industry. Each of these representations provided extensive comments on most or all areas of the Focussed Consultation. These comments will feature in this summary report.
- 3.11 Of all the responses received, only one has been completely discounted and not dealt with under the emerging Plan, but instead referred to the respective local planning authority as the correspondence was made in relation to a monitoring issue.

Section one – Sand and Gravel Area of Search

3.12 Section one generated a total of 53 responses consisting of 35 individual and 18 from organisations.

3.13 Respondents were asked to identify whether they *supported*, *objected* or had *no view either way* regarding the proposed Area of Search approach being included in the Joint Minerals and Waste Plan. Respondents could choose to answer as much or as little of this section as they felt applicable. Figure 4 below demonstrates the split of opinion on the proposal for both individuals and organisations:

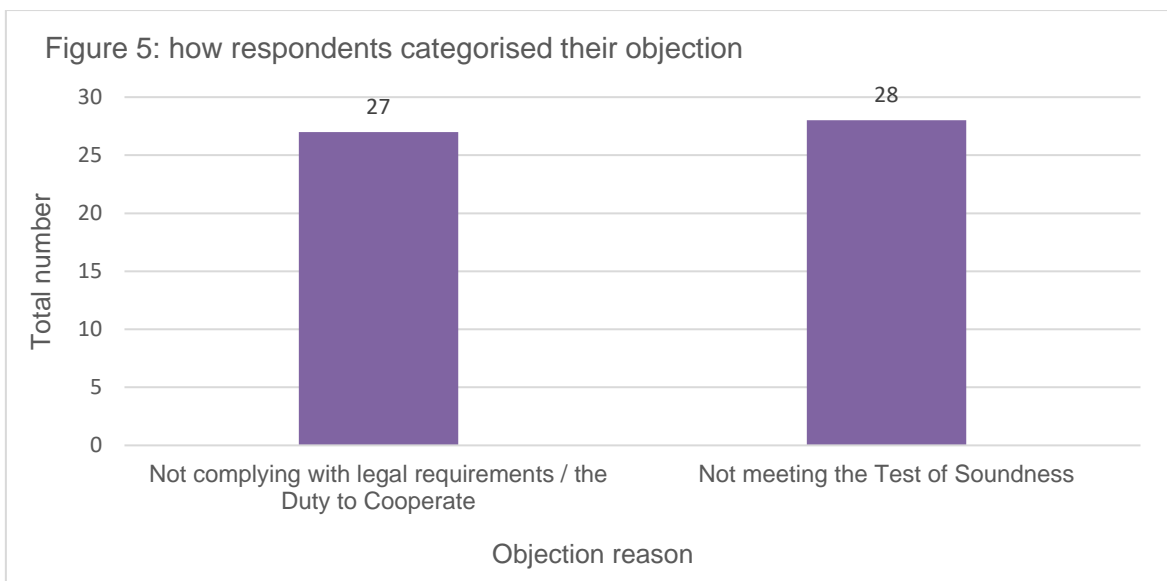


3.14 Those who supported the proposal were then asked to provide reasons for their decision. A summarised selection of the supporting comments are as follows:

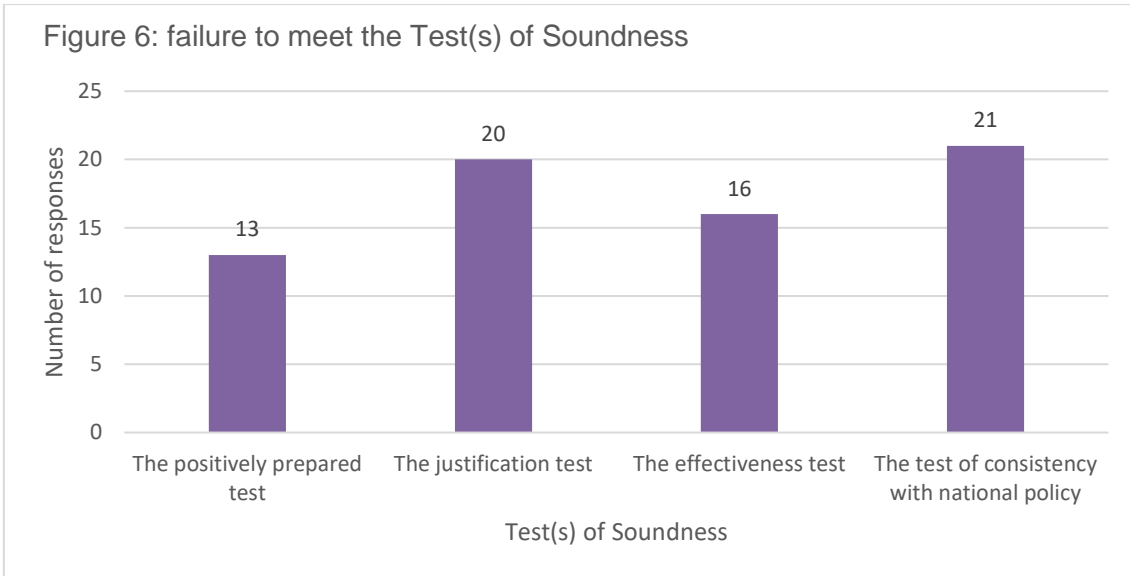
- The inclusion of the proposal would provide flexibility to meet any shortfall in aggregate provision during the Plan period;
- The proposal would help address the shortage of preferred allocations within the Plan area;
- The proposal makes sense as it streamlines where the authorities are expecting to see applications come forward, and so this should speed up the process for those applying;
- The proposed Area of Search approach was considered to be an appropriate method to follow in the circumstances; and
- The proposal was supported, but as with any Area of Search, it is difficult to determine with any certainty its future contribution.

3.15 All the comments of support were received from organisations; including the minerals and waste industry, statutory consultees, neighbouring minerals and waste planning authorities, district councils and planning consultants.

3.16 Those who objected to the Area of Search were asked to categorise their reason(s) for objecting, with a choice of either the Local Plan not complying with legal requirements / the Duty to Cooperate or it not being sound in relation to at least one of the Tests of Soundness. Figure 5 sets out how respondents had answered this question (it should be noted respondents could select as many options as they felt applicable). The graph demonstrates a reasonably even split between the basis for someone's objection:



3.17 Figure 6 sets out which Test of Soundness (*The Positively Prepared Test, The Justification Test, The Effectiveness Test, The Test of Consistency with National Policy*) respondents selected when objecting under this reason (it should be noted respondents could select as many options as they felt applicable):



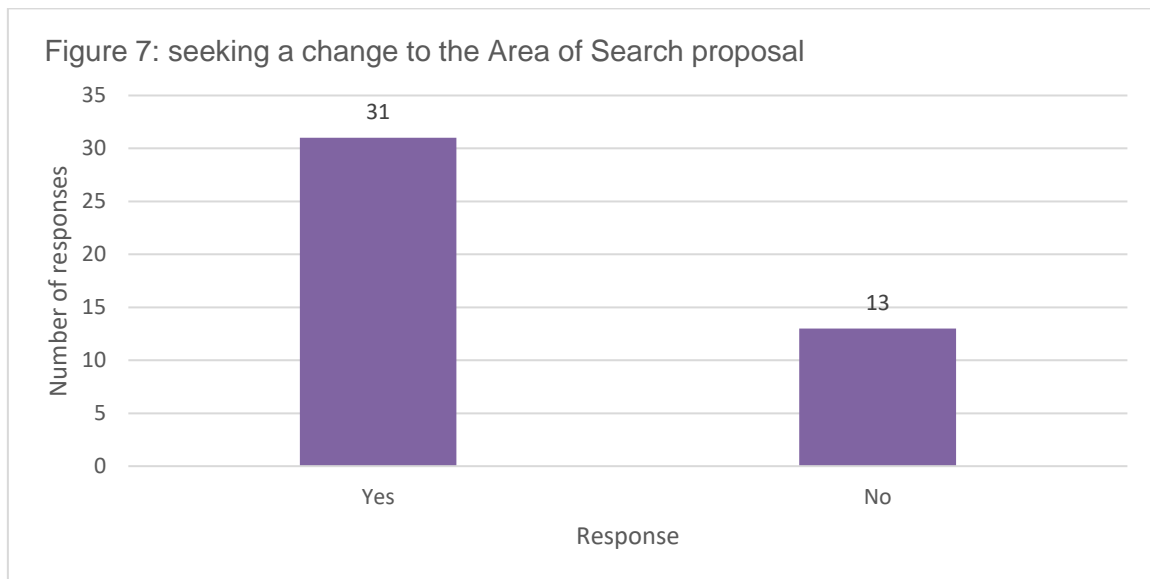
3.18 A selection (but not an exhaustive list) of the main objecting comments / themes received under this section were as follows (some of these have been summarised):

- The proposal is too open ended and fails to provide sufficient tests;
- Concern that the current criteria for identifying Areas of Search is broad enough to end up including existing 'Suitable Alternative Natural Greenspaces (SANGs)';
- Concern over the identification that the proposed Area of Search includes one or more assets of National Grid;
- Alternative mineral resource assessments provide more certain evidence about the mineral resource with part of the Area of Search in comparison to the emerging Plan; ultimately, the mineral resource is of limited economic value and its commercial interest is questionable;
- The proposal has not considered alternative options and is a reaction to the rejection of the Bridge Farm application; and
- The Plan fails to provide enough minerals to meet the needs of the area and does not make a contribution towards those of the wider area.

3.19 The comments received in opposition to the Area of Search proposal were from individuals (residents) and a mixture of organisations including:

- Those in the minerals and waste industry;
- Local businesses within the Plan area;
- Planning consultants (responding on behalf of others);
- Borough councils; and
- Local interest groups.

3.20 Some respondents went on to answer whether they would like to see a change made to the Area of Search proposal, and Figure 7 shows how this question was answered.

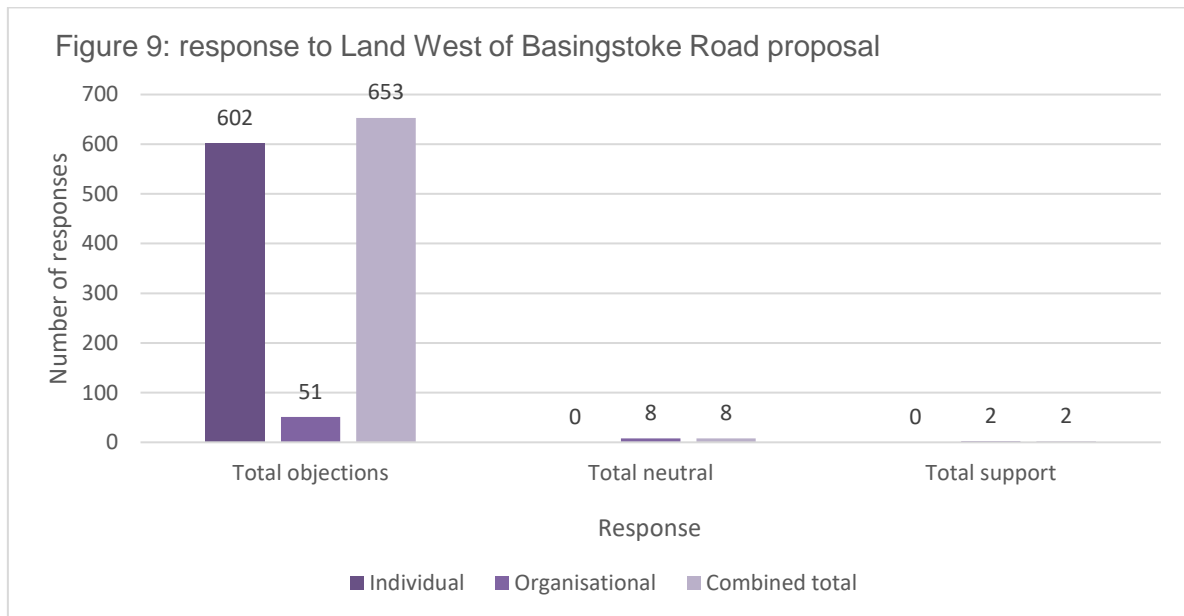


3.21 34 responses were from individuals and 10 responses were from organisations (which also included comments from a statutory consultee). Figure 8 reveals 31 respondents (70.5% of those who answered the question) indicated they wanted to see a change to the proposal. A selection (but not an exhaustive list) of the main changes suggested were as follows (please note some of these points have been summarised):

- Historic England do not object to the proposal based on the understanding the organisation is consulted on all mineral applications in this area. As such, Historic England would like to see the wording of the supporting text to the proposal amended to reflect this;
- The Area of Search proposal includes locations where sand and / or gravel has previously been extracted. Unless there is clear evidence that further reserves can be extracted, these areas must be removed from the Area of Search;
- An extra test needs to be included: "where adverse environmental or other impacts can be satisfactorily mitigated";
- Withdraw the proposal;
- The search for sites needs to be more extensive; and
- The wording of the proposal needs to be clearer.

Section two (a) – Site proposal: Land West of Basingstoke Road

3.22 Section two (a) was the part of the Focussed Consultation which generated the largest response, with a total of 663 responses made. Figure 8 below demonstrates the split of opinion on the proposal for both individuals and organisations:



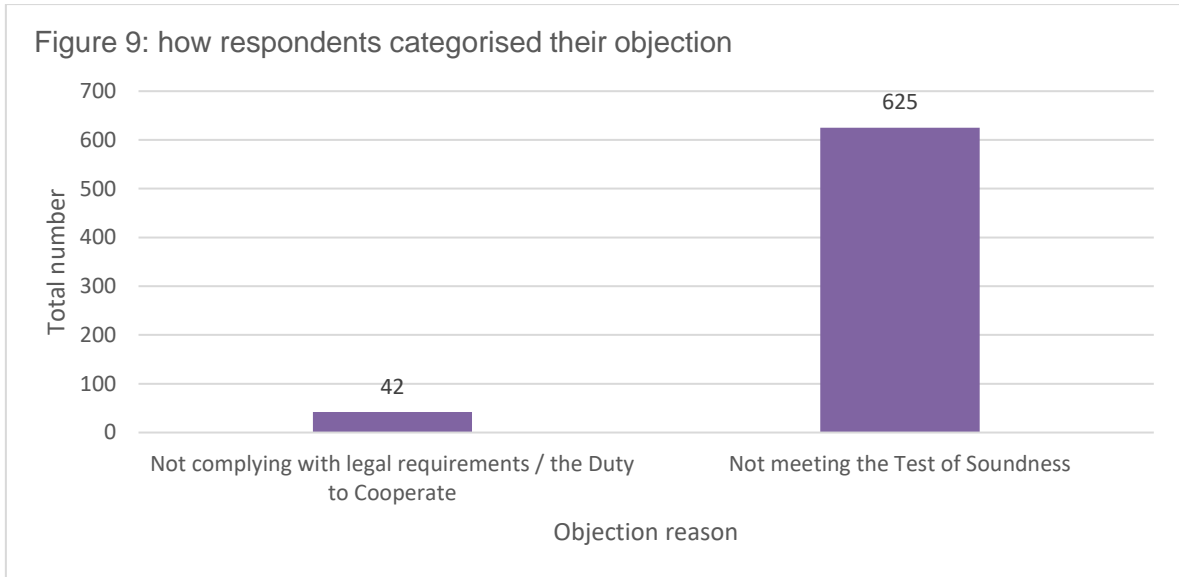
3.23 As Figure 8 demonstrates, there is very little support for the proposed site at Land West of Basingstoke Road; just 0.3% of those who responded to the section supported the inclusion of this proposed site in the emerging Plan. The two votes were submitted by organisations. A summary of the comments of support received are detailed below:

- In order to maintain a viable supply of sand and gravel the two promoted sites are supported as they look to fill the void which has occurred following the refusal of planning permission at the Arborfield site;
- The impact on the landbank is difficult to quantify but there is a credible estimate of reserves at Land West of Basingstoke Road; and
- The proposal is supported since it contributes to meeting the need.

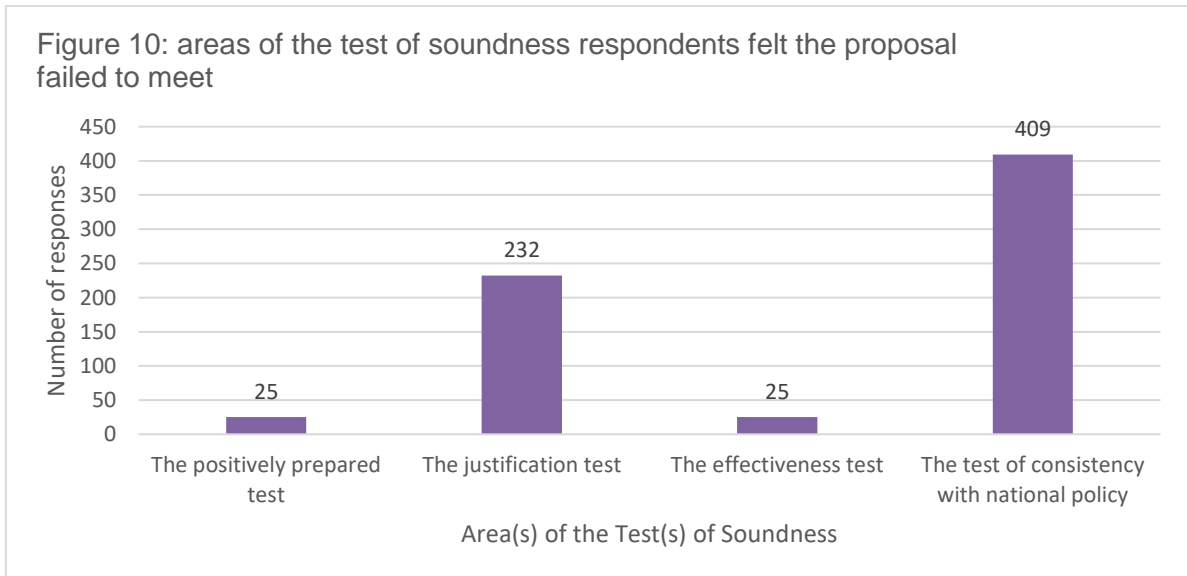
3.24 The eight neutral ('no view either way') responses all came from organisations, including planning consultants, statutory consultees, trusts and local community groups.

3.25 Those who objected to the site proposal: Land West of Basingstoke Road were asked to categorise their reason(s) for objecting, with a choice of either the Local Plan not complying with legal requirements / the Duty to Cooperate or it not being sound in relation to at least one of the Tests of Soundness. Figure 9 sets out how

respondents had answered this question (it should be noted respondents could select as many options as they felt applicable).



3.26 Figure 10 illustrates which Test of Soundness (*The Positively Prepared Test, The Justification Test, The Effectiveness Test, The Test of Consistency with National Policy*) respondents selected when objecting under this reason (it should be noted respondents could select as many options as they felt applicable):



3.27 In total, 605 comments were received in opposition to this proposed site i.e. a respondent chose to elaborate and give a reason for their objection rather than just selecting objection. A selection (but not an exhaustive list) of the main objecting comments / themes received under this section were as follows (some of these have been summarised).

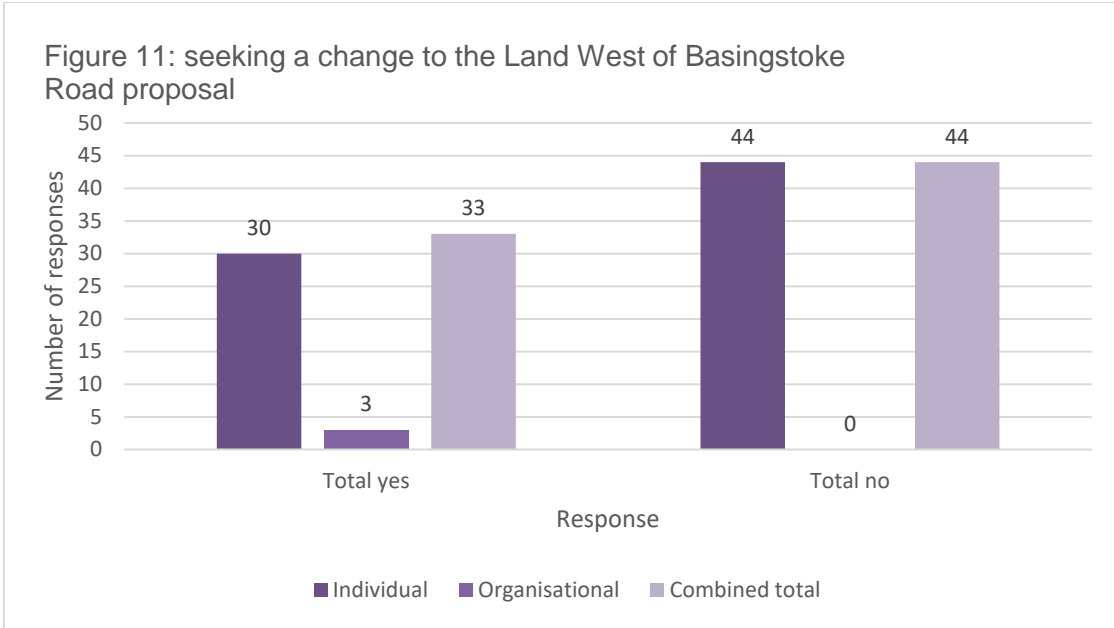
- Negative impacts on:

- Air quality particularly in relation to a nearby nursery and primary school;
 - Surrounding roads (particularly the B3349 Basingstoke Road) – the roads are already at capacity and potential further use by associated site traffic (including HGVs) would increase the risk of accidents and increase volume of traffic which subsequently means further delays.
 - The ecology and protected local species (red kites, barn owls and great crested newts and Loddon Pondweed);
 - The distinct character of the countryside and scenery; and
 - The potential loss of the visual landscape within the immediate vicinity of the proposed site.
- The site lies within an area of high archaeological potential and archaeological remains may exist which could be of equivalent significance to the designated assets;
 - Flooding: the proposed site lies within Flood Zones 1, 2 and 3b. A detailed flood risk assessment of the site needs to be provided and the application of the sequential test needs to be included;
 - The proposed site falls within the Detailed Emergency Planning Zone for AWE Burghfield which increases to 3.16km and will be implemented from May 2020 under the new Radiation (Emergency Preparedness and Public Information) Regulations 2019;
 - The proposal is not consistent with achieving sustainable development; and
 - Previous geological surveys undertaken at Land West of Basingstoke Road suggest the site is not commercially viable.

3.28 The majority of the objections came from individuals, but a reasonable proportion, 51 (8%), came from an assortment of organisations, including:

- Statutory consultees and statutory undertakers;
- Local businesses within the Plan area;
- Parish, town, district and borough councils;
- Planning consultants; and
- Local interest groups.

3.29 People were then asked whether they would like a change made to the proposal. The following graph (Figure 11) sets out how people responded to the first part of that question:



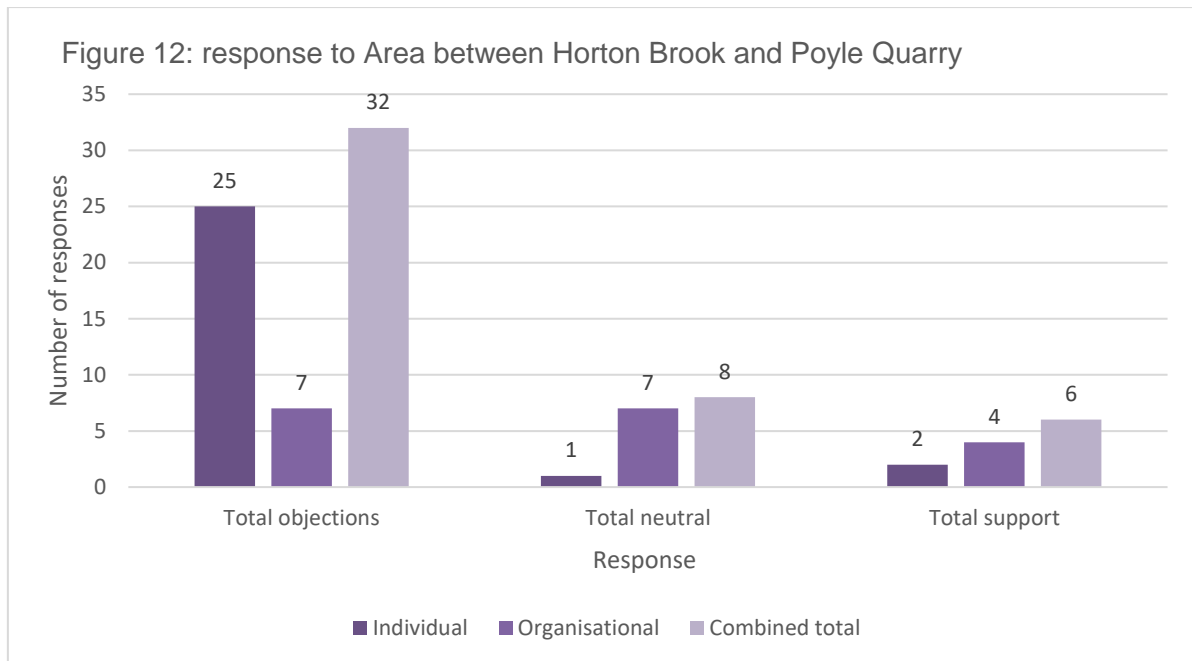
3.30 Those who responded ‘yes, they would like a change made to the proposal’ could then expand on their answer. A selection of the suggested changes are as follows (please note these have been summarised):

- Insufficient information is available to determine whether the proposed site should be taken forward as a potential allocation. More detailed information in regard to the area’s hydrology is required to inform this stage of the emerging Plan;
- The application for the sequential test needs to be included for this site, as well as a detailed flood risk assessment;
- The proposal should be removed from the emerging Plan altogether;
- Sites proposed for extraction should be located away from all residential areas;
- ‘Moated site at Sheepbridge Court’ is a scheduled monument but has been included in the ‘listed buildings’ list in the consultation. These, however, are different heritage assets and need to be listed separately for clarity. The Historic Environment Assessment summary need to include a further analysis on the impacts the proposed site might have on the nearby listed buildings; and
- Look into locating the site closer to Basingstoke to avoid impacts on smaller villages and allow easier / more direct access onto the A33.

3.31 The organisational responses to this question came from statutory consultees and wildlife trust organisations.

Section two (b) – Site proposal: Area between Horton Brook and Poyle Quarry

3.32 Section two (b) generated a total of 46 responses. The following graph shows the split of responses to this section for both individuals and organisations:



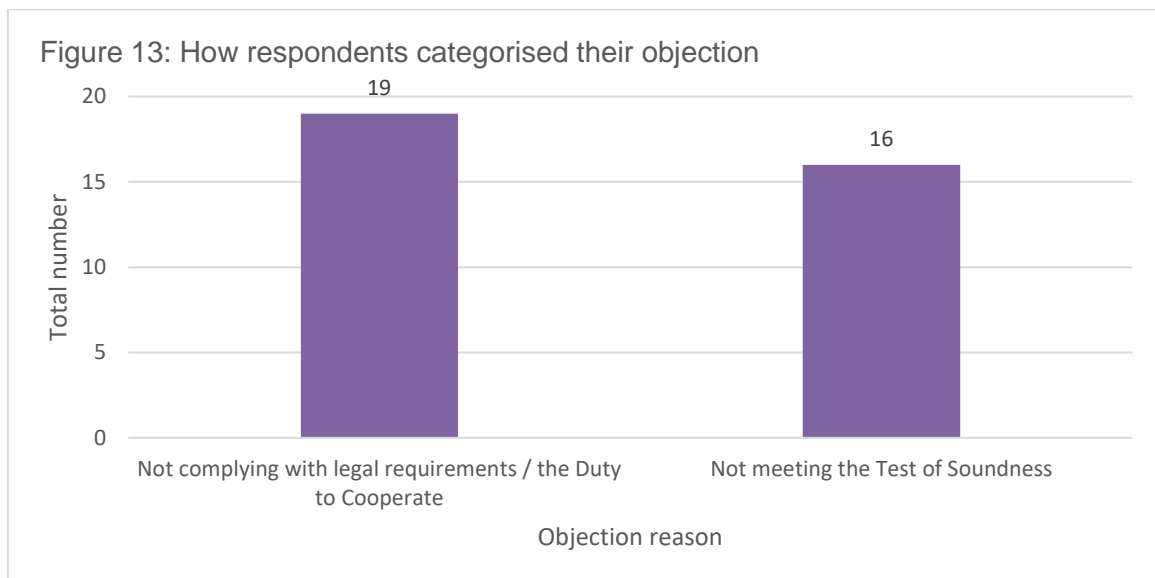
3.33 Although overall, there was more opposition than support for this proposed site, in proportional comparison to the other proposed site, Land West of Basingstoke Road, the support was higher sitting at 13% of the overall responses to this section. In contrast to Land West of Basingstoke Road, the proposed site 'Area between Horton Brook and Poyle Quarry' received two votes of support from individuals. A summary of the comments of support are detailed below:

- The proposed site is adjacent to an existing site, provision is planned for temporary traverse of the site, and once complete, the area will be reinstated;
- A logical decision to extend an existing site (and any associated development should be less intrusive than working a greenfield site);
- No major concerns regarding Area between Horton Brook and Poyle Quarry, although the Right of Way alignment would need to be agreed in theory;
- The site has the potential to provide 250,000 tonnes of sand and gravel, however consideration needs to be given to the existing bridleway which runs between the two quarries and a nearby footpath. Mitigation measures regarding traffic and transport impacts could be agreed at the planning application stage;
- If the sand and gravel between the two sites was not extracted, it would be permanently sterilised since it would be challenging to revisit the site once the Horton Brook and Poyle sites have been worked and restored; and

- Inclusion of this area will help to provide a steady and adequate supply of locally extracted sand and gravel and will contribute to maintaining the landbank.

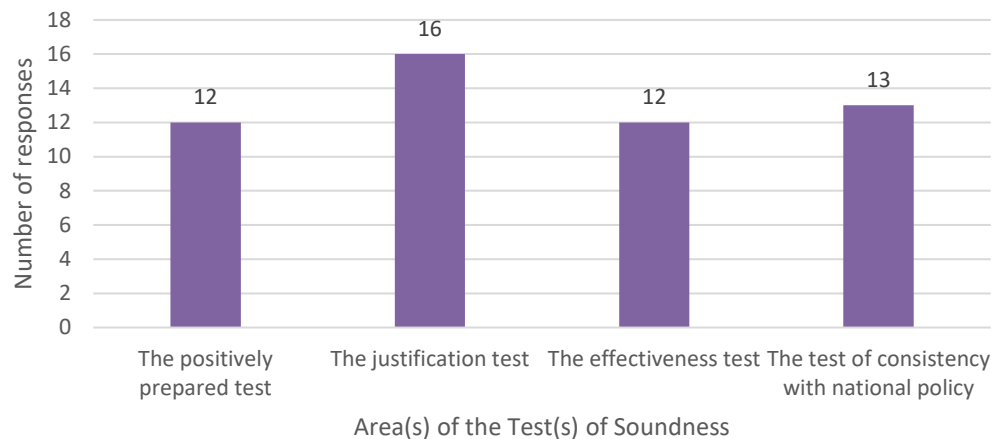
3.34 The seven of the eight neutral ('no view either way') responses came from organisations, including planning consultants, statutory consultees, trusts and parish councils. The remaining neutral response was received from an individual.

3.35 Those who objected to the site proposal: Area between Horton Brook and Poyle Quarry were asked to categorise their reason(s) for objecting, with a choice of either the Local Plan not complying with legal requirements / the Duty to Cooperate or it not being sound in relation to at least one of the Tests of Soundness. Figure 13 sets out how respondents had answered this question (it should be noted respondents could select as many options as they felt applicable).



3.36 Figure 14 sets out which Test of Soundness (*The Positively Prepared Test; The Justification Test; The Effectiveness Test; The Test of Consistency with National Policy*) respondents selected when objecting under this reason (it should be noted respondents could select as many options as they felt applicable):

Figure 14: areas of the test of soundness respondents felt the proposal failed to meet



3.37 In total, 15 comments were received in opposition to this proposed site i.e. a respondent chose to elaborate and give a reason for their objection rather than just selecting 'objection'. A selection (but not an exhaustive list) of the main objecting comments / themes received under this section were as follows (some of these have been summarised):

- There is no need for a gravel pit and the idea does not lend itself to sustainable development;
- Protected species surveys will need to be carried out prior to determination around this site as well as full and appropriate habitat compensation for the loss of linear woodland will be needed prior to any habitat clearance;
- The harm that could be caused to the Public Right of Way ('The Colne Valley Way') which is within this proposed site, outweighs any benefit from the increased supply of minerals – there is no clarity around how the proposed diversion of the route will be handled;
- Strongly recommended that 'pollution prevention' and 'water supply' are areas covered off in order that the emerging Plan be consistent with the National Planning Policy Framework⁵ (NPPF) paragraphs 20 and 170; and
- Neither the original Draft Plan nor this proposal provide sufficient infrastructure safeguards for our village [Horton], which falls within the Green Belt and contains many historical sites.

3.38 The majority of the objections came from individuals, but a reasonable proportion, 7 (22%), came from an assortment of organisations, including:

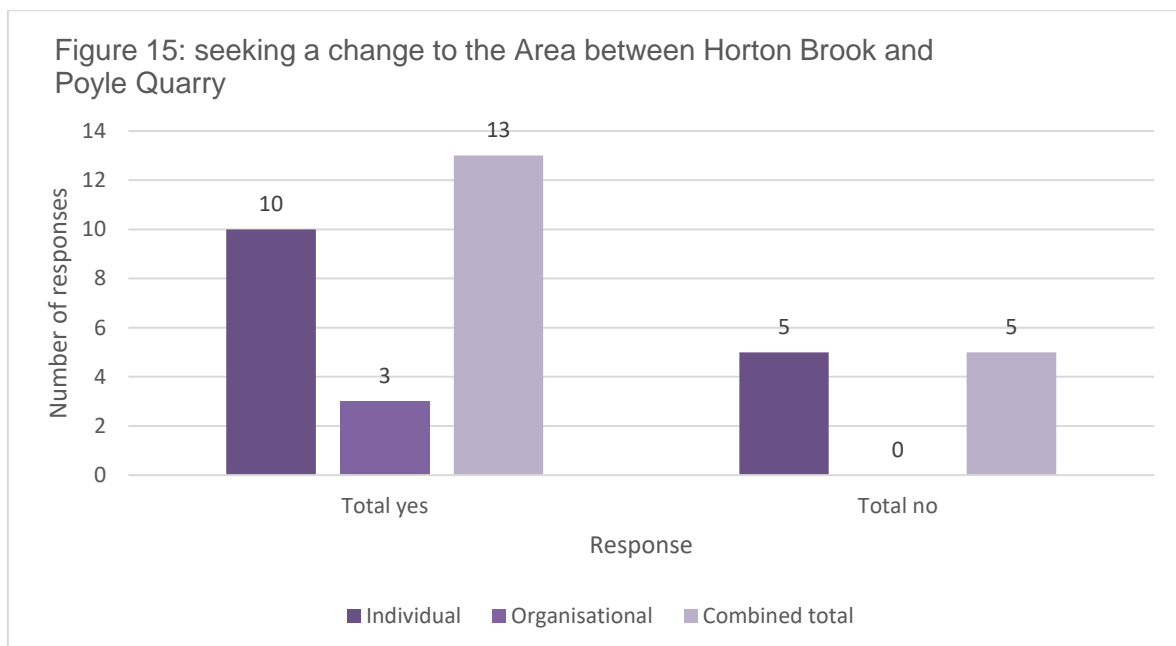
- Statutory consultees;
- Statutory undertakers;

⁵ NPPF:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

- Local interest organisations;
- Parish Councils; and
- Wildlife organisations.

3.39 Respondents were then asked whether they would like a change made to the proposal. The following graph (Figure 15) sets out the split of responses for both individuals and organisations:



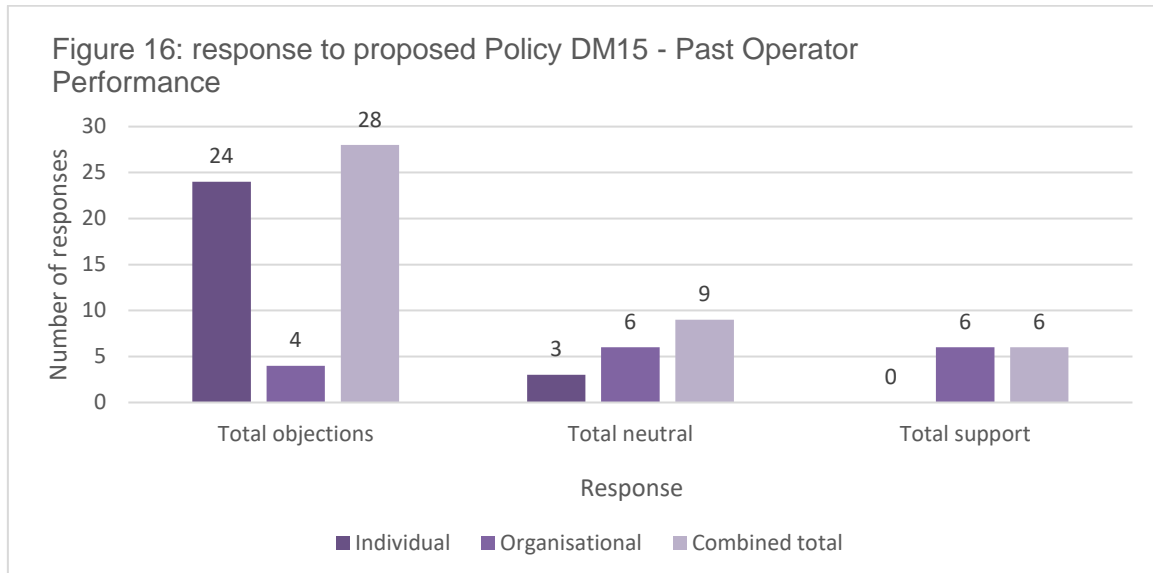
3.40 Those who responded ‘yes, they would like a change made to the proposal’ could then expand on their answer. A selection of the suggested changes are as follows (please note these have been summarised):

- The whole proposal should be fully rejected;
- Protected species surveys will need to be carried out before this site is determined, as well as appropriate habitat compensation for the loss of linear woodland;
- Habitat enhancement should meet the objectives of the Colne Valley Gravel pits and Reservoirs Biodiversity Opportunity Area;
- The policy wording needs to address the diversion of the ‘Colne Valley Way’ and any related mitigation prior to extraction taking place;
- Assurances are needed that the proposal will not impact the quality of drinking water; and
- A groundwater and hydrogeological risk assessment of all potential impacts in the area will need to be supplied.

3.41 Larger numbers of individuals responded to and expanded on their answer to this question. However, the organisational responses came from statutory consultees, community interest groups and wildlife trust organisations.

Section three – Proposed Policy DM15: Past Operator Performance

3.42 Section three generated a total of 43 responses. The following graph (Figure 16) shows the split of responses to this section for both individuals and organisations:



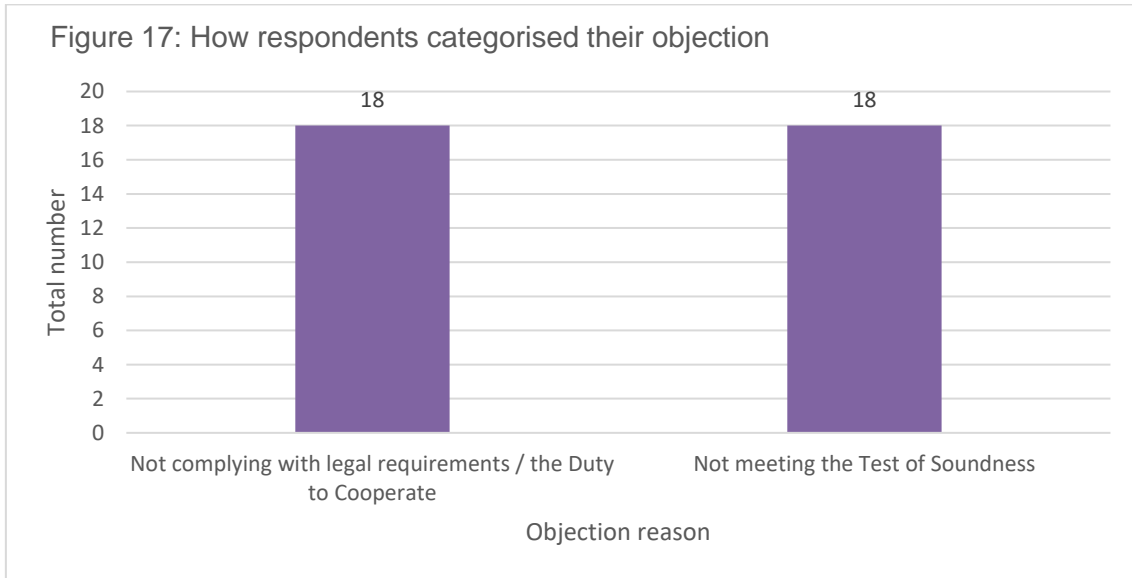
3.43 As with previous sections of the Focussed Consultation, there have been more responses of opposition rather than support. However, this proposed new policy did receive some support (12%) all of which came from organisations. Some of the comments of support received are detailed below (please note some of these have been summarised):

- The new policy is welcomed because it should encourage operators to “do the right thing”;
- The intent behind the proposed policy is appreciated;
- The proposed policy would help ensure operators are better held to account when submitting applications for sites where they are known to have been less forthcoming on previous occasions
- This is an unusual policy...nonetheless, it should be supported; and
- The proposed policy will benefit all parties if the new culture of compliance can recognise that circumstances can and do change.

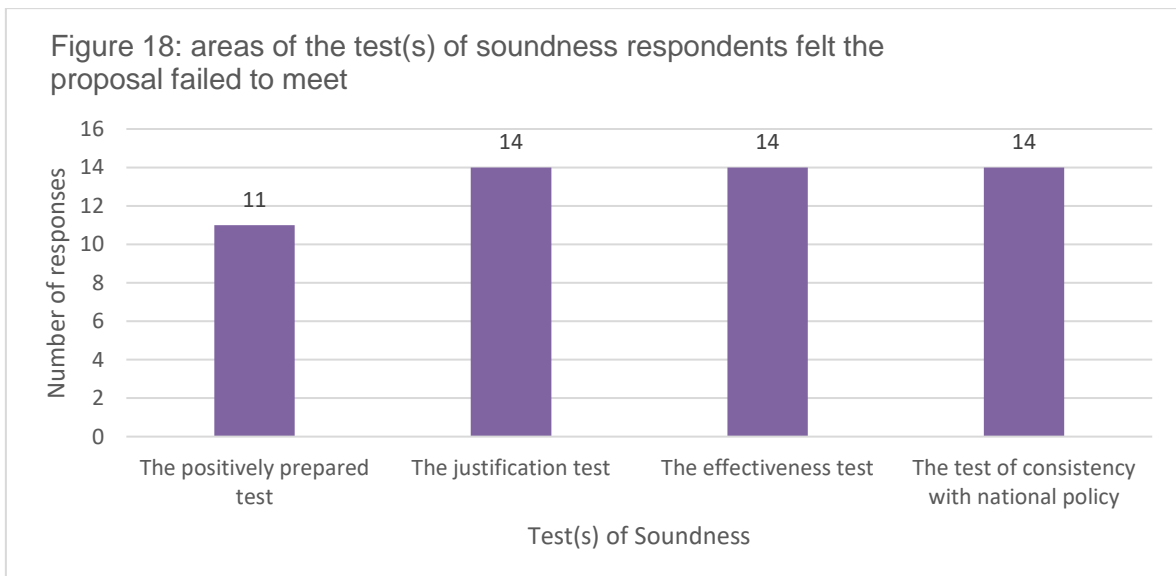
3.44 Organisations that supported this proposed policy included:

- Parish councils;
- Community interest organisations;
- Statutory consultees;
- District councils; and
- Neighbouring minerals and waste planning authorities.

3.45 Those who objected to the proposed policy DM15 (Past Operator Performance) were asked to categorise their reason(s) for objecting, with a choice of either the Local Plan not complying with legal requirements / the Duty to Cooperate or it not being sound in relation to at least one of the Tests of Soundness. Figure 17 sets out how respondents answered this question (it should be noted respondents could select as many options as they felt applicable).



3.46 Figure 17 above, demonstrates there is an equal split between the reasons people felt the need to object to the proposed new policy. However, since the Test of Soundness comprises of four elements which are needed to make a Plan sound, Figure 18 sets out which Test of Soundness (The Positively Prepared Test; The Justification Test; The Effectiveness Test; The Test of Consistency with National Policy) respondents selected when objecting under this reason. It should be noted respondents could select as many options as they felt applicable:



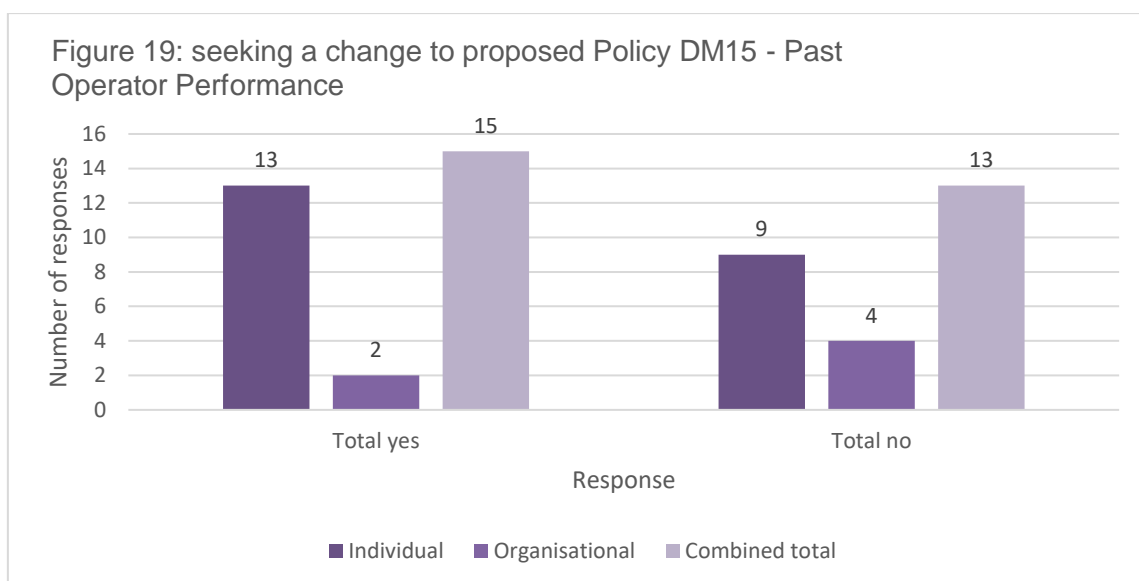
3.47 In total, 14 comments were received in opposition to this proposed policy. A selection (but not an exhaustive list) of the main objecting comments / themes received under this section were as follows (please note that some of these have been summarised):

- New operators should be judged on a 'lack of track record' – it is inevitable new operators will experience initial obstacles / problems, and this needs to be considered;
- The proposed policy seems to only deal with the appointment of an operator, but not with monitoring their following performance...a breach of regulations should be punishable by fines or an enforced site closure;
- The proposed policy is setting a test that has no measure and is not a material consideration in decision making;
- Concern over how the proposed policy may be implemented; and
- The justification for the proposed policy (as a result of issues raised during a previous Draft Plan consultation) is not a sufficient reason for its inclusion in the emerging Plan.

3.48 The majority of the objections came from individuals, but four (or 10%) came from an assortment of organisations, including:

- Minerals and waste industry experts;
- Minerals and waste Operators; and
- Local businesses.

3.49 For those who objected to the proposed policy, they were asked whether they would like to see a change implemented to it. A graph detailing how people answered this question is illustrated in Figure 19:



3.50 Those who responded 'yes, they would like a change made to the proposal' could then expand on their answer, however, some suggestions are not applicable to the proposed policy. The comments do relate to the Focussed Consultation but sit within another section. Therefore, these comments will be considered but under the appropriate section of the consultation and not under the proposed policy DM15. A selection of the suggested changes to the proposal are as follows (please note these have been summarised):

- Supportive of the principle of liaison panels, but would like the supporting text to indicate the key role of a parish council (as locally elected and accountable bodies);
- Removal of the proposed policy from the emerging Plan;
- The proposed policy should address the issue of enforcement, and make it less financially viable for operators to breach regulations;
- The wording of the proposed policy should be changed so individuals as well as companies are held accountable for any wrong doing; and
- New operators should be judged based on a lack of track record.

3.51 It is worth noting this section of the Focussed Consultation received the highest number of neutral or 'no view either way' responses, with a total of nine individuals and / organisations giving this response.

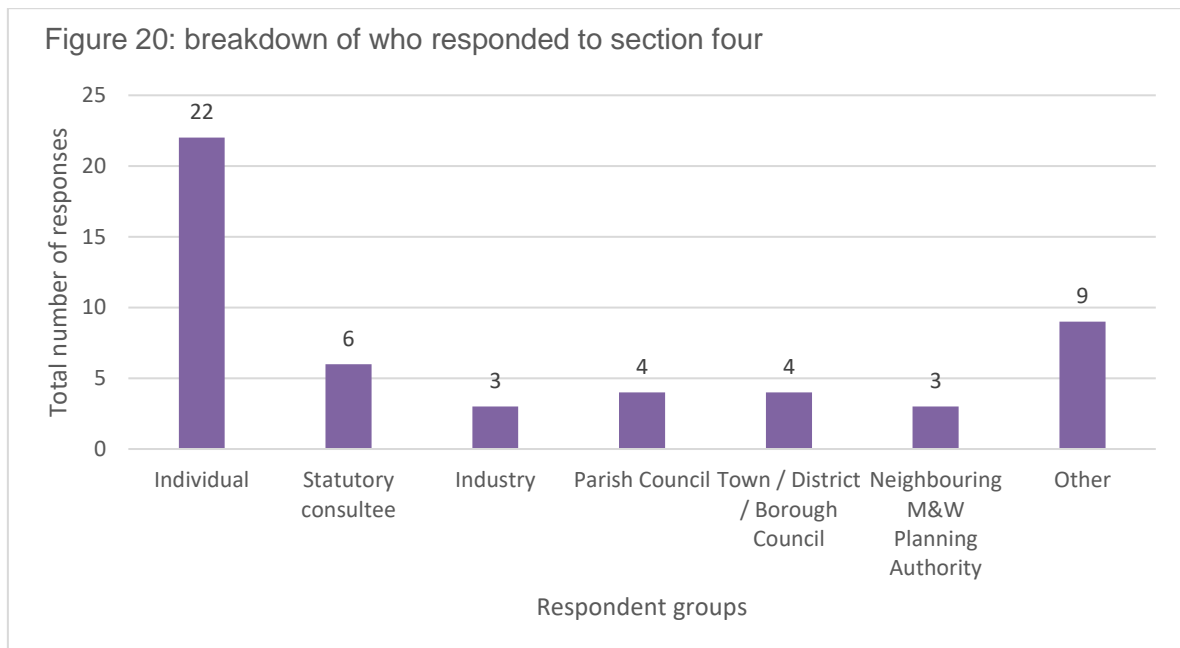
Section four – further comments

3.52 A total of 51 comments were received under this penultimate section of the consultation, comprising 22 personal responses and 29 organisational responses.

3.53 This section of the Focussed Consultation gave a free text box and allowed respondents to provide additional thoughts or comments on the consultation.

3.54 A variety of comments were received, with most respondents either reiterating points that had been made in earlier stages of the consultation, using the opportunity to highlight specific issues or concerns that could not be addressed during earlier stages of the consultation, or commenting on the consultation process. Some used the opportunity to draw attention to additional supporting documents or information that needed to be considered in conjunction with their main response. A few responses within Section four merely highlighted a respondent had no comments to make. Finally, Section four was also used to highlight issues which did not directly relate to the Focussed Consultation. These comments, where appropriate, will be noted, but they will not be considered for this consultation. If appropriate, they will be dealt with outside of the consultation process.

3.55 Figure 20 sets out who responded to this section of the consultation:



3.56 A selection (but not an exhaustive list) of the main comments / themes, both supporting and in opposition, received for this section of the consultation are as follows. Some of these comments may have been summarised:

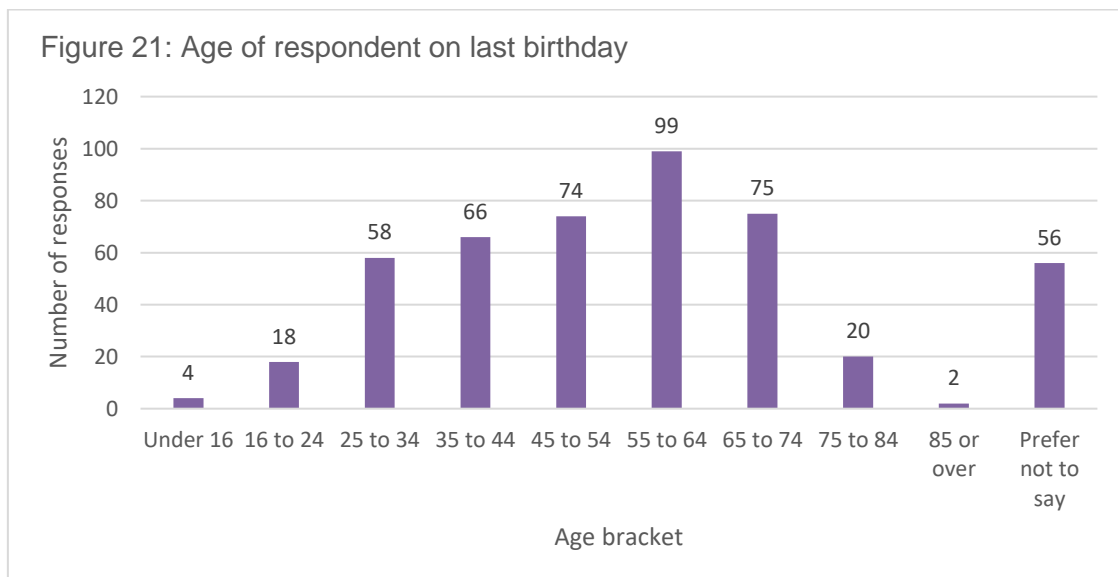
- There is a typographical error on page 13 of the Focussed Consultation Document, under Policy M4: at point four, the policy wording states that “proposals for new sites...will be supported inappropriate locations...” Should this be “proposals for new sites...will be supported in appropriate locations”?;
- Stop including proposed sites that are within residential areas – conduct better research into the impact on the area (flood plains, wildlife, impact on people’s health and no sites near to schools);
- No objection to either site being used for gravel extraction, however there is a need to ensure any permission includes requirements for reinstatement following the end of any work / extraction;
- Regarding the Area between Horton Brook and Poyle Quarry, there would be a need to ensure the HRA assessment was robust in relation to impacts upon the South West London Water Bodies SPA / Ramsar site and the potential impacts are given appropriate weight;
- Will the Central and Eastern Berkshire Authorities listen to the concerns raised or is this just humouring exercise, encouraging completion of complicated paperwork, with difficult technical terminology so it appears as if the public have been consulted? This process is disgusting;
- Welcome the continued use of the consultation process regarding the development of the overall emerging Plan;
- Query regarding Policy M4 on page 13 of the Focussed Consultation Document – point 4di) refers to soft sand, but should this refer to sand & gravel since the latter is what Policy M4 is about?; and
- Paragraph 3.8 of the Focussed Consultation Document shows the need for strategic planning across planning authority boundaries (for sharp sand & gravel and soft sand), especially those smaller in area and with fewer options and resources.

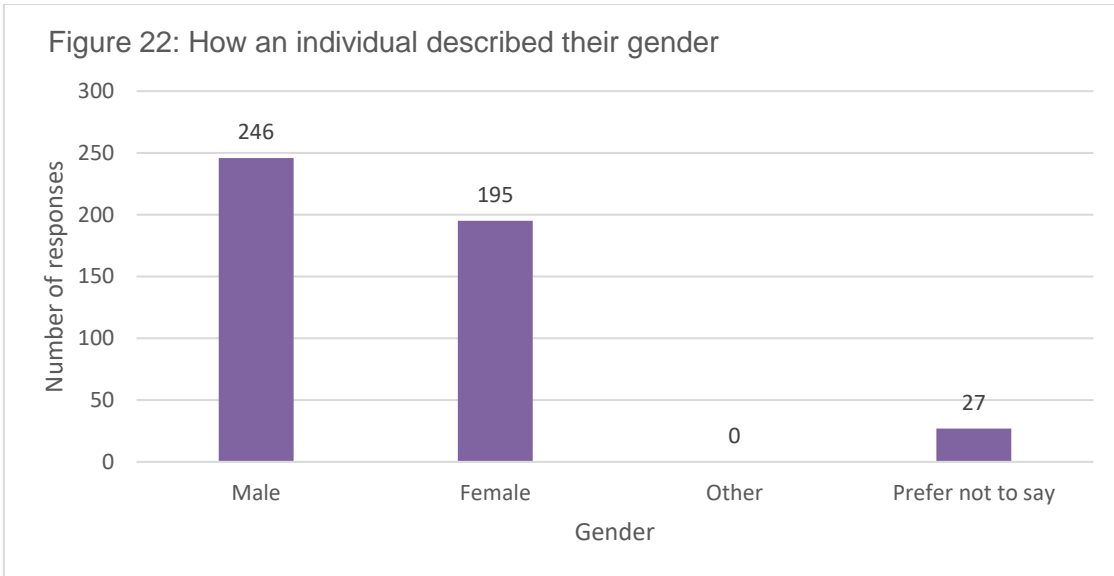
Section five – about you

3.57 The consultation response form was structured so that the minerals, waste and emerging Plan related questions were posed at the start and the final section (Section five) focussed on finding out about respondents. Although a name and full postal address were needed for a response to be deemed acceptable, there was no obligation for people to provide information on their age and their gender. Where this information was supplied, it was removed from the main response form and analysed separately so the information was immediately anonymous.

3.58 It should be noted that this additional information (age and gender) was only collated from those who completed the response form. Emails and letters did not include a respondent's age or gender, unless someone specifically decided to add this to their response. Additionally, because this information was immediately separated from the main responses, there is no way of knowing whether it relates to any of the respondents who have not had their response fully considered due to missing information / unauthorised late submission. With this in mind, the equalities data accrued has its limitations since it has not been supplied by all those who have responded to the consultation.

3.59 A total of 472 respondents answered the additional questions in Section five regarding their age and their gender. Figures 21 and 22 demonstrate responses made to these questions:





3.60 This Focussed Consultation generated responses from a broad range of ages, with answers being provided from each defined age bracket. However, there is still a need to engage more with those under the age of 24 and those over the age of 75.

3.61 The age bracket which provided the highest number of responses was 55 to 64 (21%). However, 56 people (12%) who answered this sub-section with a response of 'prefer not to say'.

3.62 For the data gathered regarding the gender of a respondent, a total of 468 people answered this section (four less than the total who answered about their age). However, this is still the highest response rate to this sort of question out of all the consultations held regarding this emerging Plan. There were 27 people (6%) who answered the sub-section with a response of 'prefer not to say'.

3.63 Overall, it is positive to see responses to this section of the consultation being submitted by a broader range of people. At appropriate future stages of the Plan making process, we will continue to engage with people as we have done previously. Comments made regarding the consultation process will be noted and where appropriate, taken into account by the Central & Eastern Berkshire Authorities.

Next steps

- 3.64 Following this Focussed Consultation, Hampshire Services in conjunction with the Central and Eastern Berkshire Authorities will review all comments received from statutory and non-statutory consultees and the local community. The key issues that have arisen will be assessed and officer responses will be provided at the next stage of the consultation. The issues brought to attention will continue to inform the development of the Joint Minerals and Waste Plan.

Appendix A – Responding organisations

Below is a list of the organisations who responded to the Focussed Consultation:

- Avison Young on behalf of National Grid
- Barton Willmore on behalf of Syngenta, Taylor Wimpey and CEG
- Berks, Bucks and Oxon Wildlife Trust
- Berkshire Gardens Trust
- Berkshire Ornithological Club
- Bray Parish Council
- Buckinghamshire County Council (now Buckinghamshire Council)
- Cemex UK Operations Ltd
- Colne Valley Park Community Interest Company
- Dicoll Data Storage Solutions
- Environment Agency
- Grundon
- GP Planning on behalf of IM Land
- Hart District Council
- Highways England
- Historic England
- Horton Parish Council
- Hurley Parish Council
- Lister Wilder Ltd
- Mineral Products Association
- Mobile Data Collection Limited
- Natural England
- Quarryplan (GB) Ltd
- Savills on behalf of Trustees of the Rayner Family Trust
- Shinfield Parish Council
- Slough Borough Council
- Surrey County Council
- Surrey Heath Borough Council
- Swallowfield Parish Council
- The Mill House Hotel
- Transport for London
- Urban Planters
- Vale of White Horse and South Oxfordshire District Council
- Wokingham Borough Council
- Woodley Town Council
- Woolf Bond Planning on behalf of Mr Rube, Bellway Homes and JJP Land
- Wycombe District Council

Appendix B – summary of responses

The following tables include the responses received for the Focussed Consultation. If the same issue has been raised by more than one person / organisation, it will only be listed once. Where possible, responses have been summarised, but this has not been done should the summarising compromise the extent and meaning of the point(s) raised.

Section one – Sand and Gravel Area of Search

Summary of comments made supporting the proposal
With regard to the development of the “area of search” method and its accompanying map (Figure 1) as part of Policy M4 this on the face of it makes sense in as much as it does narrow down where the authorities are expecting to see applications come forward and as such should speed up the process for those applying. Providing, as stated in the consultation document, the sites are all still assessed under the regular policies once they come forward. (NE)
The principle of an Area of Search for sand and gravel and soft sand is supported.
It is considered that an Area of Search policy would provide sufficient flexibility to meet any shortfall in aggregate provision during the Plan period.
Efforts to plan for a steady and adequate supply of aggregates as required by the National Planning Policy Framework (NPPF) are supported. As such, the concept of an area of search for new reserves of sand and gravel - in response to an identified shortfall in supply - is supported. The plan lists designations to be avoided in defining this area of search and this list appears to be appropriate.
CEMEX supports Policy M4 – Locations for Sand and Gravel Extraction and the inclusion of areas of search for new sites within this policy given the shortage of preferred area allocations within the plan. These sites may either be new sites or sites which can be worked as extensions through existing sites – within or close to the plan boundary. The areas of search should be for sand and gravel and soft sand reserves. CEMEX would welcome a criteria based policy to a possibility which enable new sites or extension sites which come forward during the plan period to be encouraged and assessed against a series of criteria. This policy should set out environmental and community criteria and how need will be assessed. CEMEX also considers it important to enable the working of sand and gravel under new development sites – housing and commercial before deposits are sterilized. CEMEX is aware of a screening request to Royal Borough and Windsor and Maidenhead for 150 dwellings on land between the M4, London Road and Riding Court Road – “18/01506/EIASCR EIA screening request for the construction of 150 dwellings with associated access, open space, landscaping and other infrastructure (“the proposed development”). Land Bounded By M4 And Riding Court Road And London Road Datchet Slough” CEMEX support that the need for a viability study of working the mineral within this site must be undertaken. Workable sand and gravel should not be sterilised by new development within areas of search. CEMEX consider that this site may contain circa 200,000-300,000 tonnes of sand and gravel. This site could be worked as an extension through Datchet Quarry.

The approach to identifying an Area of Search, as a means of encouraging applications for minerals development in appropriate locations, is sensible and supported.

Noting the difficulty for the steady and adequate provision within the Plan, BCC are supportive of the Area of Search approach the joint plan is proposing. We consider the approach to be an appropriate method to ensuring that sand and gravel provision within the Central and Eastern Berkshire area is provided for. With consideration to the Area of Search extending to the border of Buckinghamshire we are happy to see that any proposed applications will be assessed against the development management policies in the Plan and so considering any potential cross boundary implications. We would also wish to ensure that the future Unitary Buckinghamshire Council are consulted as an interested party for applications which may have cross boundary implications for example on the transport network or public health.

As stated within the adopted Buckinghamshire Minerals and Waste Local Plan, Buckinghamshire does not have a substantial soft sand resource however, we do recognise the need and importance for strategic cooperation between neighbouring authorities and within in the South East when planning for minerals.

The Consultation document therefore defines an 'Area of Search' for sand and gravel provision. This includes all of the mineral bearing land to the south of Slough. Policy M4 then states that proposals for sand and gravel extraction will be supported within the Area of Search provided they are needed to maintain the land bank and maximise opportunities of existing infrastructure and available mineral resources.

With regard to the development of the "area of search" method and its accompanying map (Figure 1) as part of Policy M4 this on the face of it makes sense in as much as it does narrow down where the authorities are expecting to see applications come forward and as such should speed up the process for those applying. Providing, as stated in the consultation document, the sites are all still assessed under the regular policies once they come forward.

Additional comments made regarding the proposal (neither supporting nor objecting)

Summary of comments made on how the proposed does not meet the Test of Soundness

In summary the policy is too open ended and fails to provide sufficient tests. We object to this policy as the support it offers to sites (both specifically identified and within the area of search) is too open ended and needs to refer not only to 'in appropriate locations' but also to 'where adverse environmental or other impacts can be satisfactorily mitigated'.

Concern the current criteria for identifying 'Areas of Search' is sufficiently broad as to enable locations currently designated as Suitable Alternative Natural Greenspace (SANG) to form part of the search area (which is set out in the map on page 12 of the consultation document and by way of example, incorporates Shepherd Meadows SANG, which is located within the most south westerly part of Bracknell Forest). SANGs are expected to be maintained for that use in perpetuity and as such, there is the expectation these areas should be excluded from the area of search at the outset, with mineral extraction highly likely to compromise the capacity of SANGs to fulfil their function.

This oversight of including SANGs within the area of search is something that needs to be addressed in future consultations.

Proposed development sites crossed or in close proximity to National Grid assets: Following a review of the above Development Plan Document, we have identified one or more National Grid assets within the area of search. Due to the number of National Grid assets within the area, an exhaustive list is not provided in this response. A map showing the location of National Grid assets within the area of search is included with this response [*map not included in Appendix B but available for review as and when required*]

To be considered 'sound' the Central and Eastern Berkshire Joint Minerals & Waste Plan (the "Joint Plan") needs to be positively prepared, justified, effective and consistent with national policy as set out within the NPPF (paragraph 35).

In terms of the NPPF need to be 'justified', the policies within the Joint Plan need to be based on proportionate evidence which demonstrates the chosen strategy is appropriate, which, in this instance, would need to demonstrate that it is appropriate to define an 'Area of Search' for sand and gravel provision which includes land within the ownership of Syngenta at Jealott's Hill [*the ownership plan is referred to but not attached to Appendix B. It can be made available as necessary*]. The mineral resource comprises sand and gravels associated with the residual River Terrace Deposits. Whilst the lateral extent of the resource has been identified the quality of the sand and gravel has not been fully investigated.

Our clients (Taylor Wimpey, CEG and Syngenta) are jointly promoting a science and innovation park as part of a sustainable new community based on garden village principles at Jealott's Hill, through the emerging Bracknell Forest Council Local Plan. The case for the proposals for the site is set out within submissions to the Bracknell Forest Local Plan and are based on clear exceptional circumstances. The site being promoted includes modest areas of land which would, if the Joint Plan were adopted with the approach put forward for consultation, fall within the draft Area of Search for inclusion within draft Policy M4 as shown on Figure 1 (page 12) of the consultation document (Focussed Regulation 18 Consultation: Sand & Gravel Provision and Operator Performance) (February 2020).

Planning Practice Guidance (PPG) at paragraph 008 (Reference ID: 27-008-20140306) defines an Area of Search as:

"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."

Although Areas of Search are locations where knowledge about the mineral resource is less certain, the NPPF (paragraph 31) is clear that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence, which should be adequate and proportionate. In this case, to provide a greater degree of certainty about the mineral resource. In order to evaluate the potential mineral resource available within the Jealott's Hill site area, our clients appointed RPS to prepare a Mineral Resource Assessment (MRA - April 2019) to review of the potential quantum and quality of mineral resource available based upon the available evidence (attached).

The MRA primarily relied upon regional geological mapping supplemented by the available site-specific geological data associated with BGS boreholes. The use of geological logs obtained from the British Geological Survey (BGS) found that whilst there is mineral reserve within the site, deposits from these bores

were clayey sandy gravel, with RPS describing the findings to indicate a mineral resource mixed in nature, namely sands, gravels and finds. This mix adversely affects the quality of the available mineral resource. Further, based upon the borehole data, the mineral is only a thin unit comprising about 2 metres in thickness.

The MRA also looked at factors which may constrain the quantum and quality of resource potentially available, including Buffer Zones to protect existing buildings and roads. These Buffer Zones reduced the potential area of the extractable mineral resource. Through applying appropriate buffer areas, RPS found that such zones cover around 80% of the River Terrace Deposits mineral resources within the Areas of Search within the site.

The MRA conducted by RPS estimated that the total overall mass of River Terrace Deposits (including fines) covered by the Area of Search within the site could be in the region of circa 1,387,000 tonnes. However, once Buffer Zones are applied there would be a reduction of extractable resource by circa 80%. This reduction in extractable area would then result in a corresponding reduction in the total available mineral to about 264,000 tonnes (a mixture of sand, gravel and fines).

Accordingly, RPS's assessment identifies that the available mineral resource is not significant and being a mixture of sand, gravel and fines the quality of the mineral resource is not a high quality resource. Further, RPS is clear that extracting the mineral resource may be uneconomic due to the limited quantum and poor quality of sand and gravel available and the potentially high processing and sorting costs. The mineral resource is, therefore, of limited economic value and unlikely to be of commercial interests, especially after the Buffer Zones have been applied.

The MRA demonstrably provides more certain evidence about the mineral resource at Jealott's Hill compared to the draft Local Plan.

It is recognised that the NPPF (Paragraph 203) makes it clear that it is essential that there is a sufficient supply of minerals and that policies should encourage the prior extraction of minerals (NPPF; paragraph 204), where "practical and environmentally feasible" (our emphasis), if it is necessary for non-mineral development to take place.

As already identified, the application of the Buffer Zones for environmental reasons around existing buildings and structures breakup the mineral resource into 5 small areas where the mineral deposit is thin, typically linear in nature and often situated along the periphery of poorly constrained mineral resource areas. These Buffer Zones significantly reduce the volume of viable River Terrace Deposits mineral resource within the site. Whilst RPS state that this may not represent a significant constraint on extraction itself, it does highlight the limited practicable value of extracting the mineral resource.

The RPS assessment concludes from the available evidence there is greater certainty that a quantum of mineral resource, which is of mixed type quality and depth, is significantly reduced by required Buffer Zones and is spread across 5 small areas of potential extraction.

Given the environmental considerations required alongside any mineral extraction activity, the extraction of the poor quality sand, gravel and fines from the proposed Area of Search would not represent the sustainable extraction of sand and gravel. Instead, there are other locations identified in the Joint Plan where the quantum, quality and absence of environmental constraints are such that they represent better options for sand and gravel extraction when compared to Jealott's Hill.

Paragraph 3.20 of the Joint Plan refers to “Proposed future development areas have not been excluded, as there may be opportunities for prior extraction of sand and gravel, in line with other policies in the plan.” However, the MRA states that, in the case of Jealott’s Hill, prior extraction before development occurs is unlikely to be economically viable when the quantum and quality of the resource is considered, the need to process the mineral and the need to reinstate the resulting voids are considered together. The limited value of the resource brings into serious doubt the practicality and commercial viability of extraction prior to development, primarily due to the depth of the mineral, its quality, the sub-division into 5 smaller areas, the high processing and sorting costs. Accordingly, the attractiveness of the potential mineral resource to an operators to extract is very limited.

It is clear that the site, a draft allocation within the Bracknell Forest emerging Local Plan for a science and innovation park as part of a sustainable community based on garden village principles, would not present a realistic source of mineral (sand and gravel) in contribution towards the Joint Plan providing for its needs. The inclusion of Jealott’s Hill within the Area of Search identified in Policy M4, on the basis of the findings of the RPS report, would not be practicable and, as such, it would not be justified as required by the NPPF at paragraph 35. Following on from the above, the inclusion of the site within the Area of Search identified by draft Policy M4 would also not be effective as required by the NPPF (paragraph 35).

In order to be effective, the inclusion of the site within an Area of Search would need to have some reasonable prospect of coming forward, otherwise, it would give the impression that there is more realistically potential mineral resource than is actually the case. The Joint Plan should make use of information, such as the RPS report attached with these representations, where it provides greater clarity on whether there is any merit at all in the inclusion of land (such as the site) within an Area of Search. The Policy would not be effective by including such land.

In summary, our clients’ objections to the Joint Plan are that inclusion of the Jealott’s Hill site within the draft Policy M4 Area of Search would also not therefore be consistent with national policy and would not represent sustainable development. The proposed inclusion of parts of the site at Jealott’s Hill within the Area of Search illustrated on Table 1 of draft Policy M4, would not be sound when considered against the soundness tests within the NPPF at paragraph 35, particularly in that it would not be justified, effective or consistent with national policy. *[A number of additional documentation submitted in support of this response. These can be made available upon request].*

The Draft Plan does not meet the Tests of Soundness - primarily it relies upon areas of search where there is no evidence that further sand and gravel could be extracted.

Through draft Policy M4 and the accompanying map (figure 1) provides an indication of the areas of search for sand and gravel reserves.

The current Replacement Minerals Local Plan for Berkshire (incorporating Alterations adopted in December 1997 and May 2001) illustrates the current areas of search through showing where there are sand and gravel deposits alongside those locations subject to a strong or strongest presumption against extraction on its Proposal Sheet. The Proposal Sheet also illustrates through a diagonal hatch those reserves which have already been extracted or with planning permission for its removal.

In comparing the maps of reserves within the Focused Consultation and the current Replacement Minerals Local Plan, it is clear that the Areas of Search include locations where sand and/or gravel has been extracted. Unless the Joint Minerals Authorities have clear evidence that further reserves can be extracted from these areas, they must consequently be omitted from the Areas of Search shown on figure 1. Comparisons of the extensive tracts where minerals have been or will be extracted occur across Central and East Berkshire are shown below alongside that of the areas of search within the Focused Regulation 18 Consultation document. *[maps referred to not included but can be made available upon request]*.

The examples illustrate the extensive locations within the Areas of Search across Central and East Berkshire where minerals had or were approved to be extracted at the time that the Replacement Minerals Local Plan was prepared. Since then, the areas approved for extraction are likely to have increased through subsequent permissions by the minerals planning authorities and this will consequently further reduce the locations which can be included in an Area of Search.

Additionally, the Areas of Search will also include locations where subsequent adopted or submitted Local Plans since adopted on the Replacement Minerals Local Plan will have allocated for non-minerals development. These areas would also not consequently be suitable for extraction.

Once these adjustments are made (unless the minerals planning authorities demonstrate the realism of further extraction from earlier sand and gravel workings), a robust conclusion on suitable Areas of Search will be found.

With the acknowledgement in the Focused Consultation of the ceasing of the promotion of land south of the A327 between Arborfield and Shinfield in Wokingham Borough for sand and gravel extraction, in order to maintain the minimum 7 years land bank required by the NPPF (paragraph 207), it is essential that the areas of known reserves are not sterilised by non-mineral development.

Whilst the preparation of non-minerals related local plan by the authorities in Central and east Berkshire will continue, in order to avoid sterilizing mineral reserves by allocating sites for other uses, these should be focused in areas without these resources to enable future extraction to maintain the minimum 7 year land bank.

In summary it is essential that any consideration of the Areas of Search consider the achievability of extraction within the identified areas, after acknowledging the impact of sand and gravel already quarried. The areas of search maps should therefore be revised to exclude locations where sand and gravel have been quarried.

Health and safety environment, particularly for young and old. The roads cannot cope with traffic now so additional HGVs is daft.

Unnecessary project for our infrastructure and it does not lend itself to sustainable development. As such there is no requirement for this infrastructure in the locality and thus it can only be considered to have failed the positively prepared test.

The challenge on effectiveness is self explanatory - there is no implementation plan at all. The currently proposed strategy has clearly not considered all possible alternatives and is a reaction to the rejection (and subsequent withdrawal of) the Bridge Farm application.

The consultation is being rushed through in inappropriately short timescales (spanning a school holiday period no less) and hence the communities most

<p>affected will have limited time to review and respond. Duty to Cooperate conversations haven't been had with neighboring authorities (according to the consultation document), and assumptions have been made about the response they are likely to receive.... assumptions which haven't been validated.</p>
<p>There is mention of the Aggregate survey taking place later this year - surely it would also be prudent to wait until that has been completed?</p>
<p>Locations that are currently being put forward are residential areas and no tests are being taken into account of the damage that will be inflicted on the communities, wildlife and people in the areas being affected negatively.</p>
<p>I moved 3000 miles away from the country I was born and brought up in, because of the construction in preparation for the 2022 FIFA world cup. The health concerns we had for our children could not be ignored any longer. I left my job, my entire family, social structure and friends, to come here so my kids could get a better, healthier future, only for a sand and gravel area to move close to our home and their school. This is NOT acceptable. The fineness of this type of sand has caused 1000's of respiratory illnesses in adults and kids in Qatar for years. With Acute respiratory infections being number 4 on the 2003 report for Top 10 causes of Mortality/Morbidity. The sand becomes so fine that the nasal passage is unable to prevent these from entering into the lungs. 2 out of 3 women give birth to children that either suffer from Eczema or Asthma. In 2017, Sidra Medical Center for Children in Qatar, published a report regarding health issues created in children related to this type of sand. I didn't make such a big sacrifice to bring my children here, only for them to continue to suffer all the same health issues they had before. This is not fair.</p>
<p>The Plan fails to adequately provide sufficient mineral to meet the areas need or make a contribution towards that of the wider area.</p>

<p>Summary of comments made on how the proposed should be changed</p>
<p>Seek gravel extraction locations outside of residential areas / away from schools to avoid road congestion and detrimental health impacts</p>
<p>Withdrawal / rejection of the proposal</p>
<p>No gravel extraction in suburban areas</p>
<p>Sand and gravel extraction point should be situated near rail heads so as to remove the product efficiently and with minimal disruption to the locality with regard to traffic.</p>
<p>There should be a fuller search for sites, not to include a site that the BGS maps as having no mineral and the inclusion of the Reading Beds as an area of search to provide for potential building sands. The Reading Beds are a deposit that comprises of clay, silt and sand. This geological description from the BGS sets their order quantitatively. So that whilst the potential for sand is rare any potential would be ruled out by the current wording of M4 as the deposit is excluded from the AoS.</p>
<p>It is not considered that there any objections to the principle of the policy but the wording could be clearer.</p>
<p>To reduce HGVs on Basingstoke Road and enforce, so routes are tracked and fines enforced by the council similar to Somerset Council. Managing HGVs for building sites in HPC to reduce pollution levels.</p>
<p>Inclusion of an additional test "where adverse environmental or other impacts can be satisfactorily mitigated"</p>
<p>The removal of Syngenta's land ownership at Jealott's Hill from the Area of Search.</p>
<p>An area of search criteria-based policy to ensure adequate supply -</p>

Historic England notes that this type of approach is advocated in the Planning Practice Guidance, where sufficient allocated sites cannot be identified. We do not object to this approach being taken on the understanding that we are always consulted on all minerals applications in this area. We would like to see wording to this effect included in the supporting text of the policy. This is because it is often difficult to determine the impact a site may have on the setting of a heritage asset.

The areas of search are revised to exclude locations where sand and gravel has already been extracted or is proposed to be outlined in accompanying letter [*letter not included but can be made available if required*]

Section two(a) – Site proposal: Land West of Basingstoke Road

Summary of comments made supporting the proposed site

In the interests of maintaining a viable supply of sand and gravel and the associated landbank, the additional two sites being promoted are fully supported and go some way to plugging the gap as a consequence of refusal of planning permission at the Arborfield site.

We do comment that the actual impact on the landbank is difficult to quantify given the estimated reserves at the Spencer's Wood site but understand that this is a credible estimate.

One of these sites is land and west of Basingstoke Road, Spencers Wood which is within the Borough of Wokingham and has the potential to provide sand and gravel. The site does not have any impact on Slough. The council supports identification of land west of Basingstoke road for extraction of sand and gravel as this contributes to meeting the need.

Additional comments made regarding the proposed site (neither supporting nor objecting)

We don't believe broadly that there are any show stopping issues for the two sites proposed... The larger site adjacent the Stanford End Mill and River Loddon SSSI (Land West of Basingstoke Road) will need to be adequately assessed with regard to hydrological impacts upon on the SSSI river in order to ensure that there aren't potential impacts on the flood regime, groundwater flow or water quality.

Summary of comments made on how the proposed site does not meet the Test of Soundness

General

Why is Hampshire County Council involved in producing a Minerals and Waste Plan for Central and Eastern Berkshire?

The quantity of aggregate the proposed site would provide is currently NOT identified, and there are three areas of likely negative impact (Table 3.8). Therefore, I do not understand how site CEB29 meets the tests of "justification" and "effectiveness" and the document does not explain this to me in clear and simple terms.

The mineral survey from 1980 and a local borehole search on the British Geological Survey website both show mineral extraction at the proposed site is very likely to be unviable.

There is a huge risk this will become a brownfield development after the site has finished operating

<p>It has been suggested that the site [Land West of Basingstoke Road] could be used for housing but there are concerns that the back-fill material which is claimed to be inert could be toxic and harm new residents.</p>
<p>This first background point raises concerns about demand for minerals in highly populated areas which I acknowledge is beyond the scope of this consultation, but nevertheless important and highly relevant. It is therefore incumbent on those responsible for mineral extraction planning to challenge the demands placed upon them by existing and potentially misguided policies. It is not surprising that it is proving difficult to identify suitable sites for mineral extraction in this area. That is because it is already highly developed. Under these conditions we should all question the need for mineral extraction within such regions. Connected matters include (a) the validity for additional major development in these areas which might use these minerals, based on the clear need to manage population density, slowdown climate change and be less dependent on globalisation; (b) in the context of these, how can it be an unwritten assumption in the plan documents that it is acceptable to use farmland for purposes other than farming? A local conclusion from these and similar questions about broader policy should suggest reduced expectation and need of major construction activity and that any associated reduced mineral extraction requirements should be conducted well away from existing settlements.</p>
<p>I pay rates of a high figure and don't expect to experience this sort of application</p>
<p>We didn't want a Gravel Extraction (Farley Farm) in Shinfield and we don't want one in Spencers wood for the same reasons</p>
<p>The proposal adds no value to the community, and would decrease house prices in the area if implemented</p>
<p>Bringing disruption to local community, to line the pockets of those who do not live or contribute to this area</p>
<p>A quarry would be completely out of character with the locality and represents a major identity shift in the area</p>
<p>The dust generated from the proposed site would damage and stain nearby buildings, vehicles and trees / hedgerows</p>
<p>The proposed site is too close to a number of schools and too close to residential areas, including Loddon Court Park Homes for the elderly</p>
<p>The effect of any gravel and sand extraction would have an impact not only during the time of extraction but prior to it when the infrastructure is being built to allow digging and after when all the gravel has been extracted.</p>
<p>The loss of open spaces and use of land suitable for (food) crop production. As climate change concerns are around the reduction in the consumption of meat, there is a greater need for land to be used productively to provide an environmentally friendly food source. The destruction of farmland would also mean fewer plants to absorb carbon</p>
<p>This proposal has been submitted in the spirit of complete disregard for the local community</p>
<p>It is estimated activities at the proposed site will last for at least seven years. But, by the calculations of what fits in a lorry, they will not have finished in this time and an application for an extension will be submitted to the local mineral planning authority</p>
<p>Acknowledgement that the materials for future development should be sourced as locally as possible, but why not expand other existing, local sites (e.g. Blackwater Valley pit)?</p>

<p>There are solar panels across from the proposed site that would be affected by the dust from the quarrying.</p>
<p>Berkshire Unitary Authority's 'Local Aggregate Assessments' in 2014 and 2015 concluded that there was already a 11-year land bank for gravel and sharp sand in the area, which brings into question why this application is even being considered?</p>
<p>Insufficient information is available at this stage to determine whether the site should be taken forward as a potential allocation in the Plan.</p>
<p>This proposal is opportunistic and does not accord with current national planning policies. It is no coincidence the consultation is being run alongside that of the important Local Plan Update for Wokingham Borough Council.</p>
<p>The area around Swallowfield and Spencers Wood has been designated a "strategic development location" by Wokingham Borough Council. The inclusion of an extraction site goes against Wokingham's own local and core planning policy.</p>
<p>I am a resident of Beech Hill, which is in the West Berkshire area. Although West Berkshire is not officially included in the consultation, Beech Hill is less than 2 miles from the proposed site.</p>
<p>During the live consultation period, the consultation document was amended and republished with additional information on the likely volume of gravel present at the site. This is considered as extremely improper. The document should have been locked throughout the consultation period, not least because people who have based their submissions on the first version of the document and submitted their objections have no opportunity to revise them in the light of the additional information contained in the second version. The fact that you were willing to do this at the behest of the applicants merely suggests that you are deep in their pocket. It damages your credibility as an impartial player and calls into question the whole process. It should not have been done and I deplore that fact that you made these changes. Some would surely wish to explore the legality of this action.</p>
<p>Please go down to the Kingsbridge and look at the beauty that this would destroy. It isn't even one of the three principal sand and gravel areas on Wokingham's own maps of the geology, and I suspect it just happens to have come up for consideration because the foreign owned pension fund that bought it wants to make quick money.</p>
<p>Please be aware that the environmental permits for, new quarrys, extensions to quarrys and further extraction to quarrys may need new or renewed environmental permits including those that concern waste disposal or recovery at these sites.</p>
<p>AWE Burghfield DEPZ - The proposed site falls within the Detailed Emergency Planning Zone for AWE Burghfield which increases from 1.5km to 3.16km and will be implemented in May 2020 under the new Radiation (Emergency Preparedness and Public Information) Regulations 2019</p>
<p>Nearby yards / areas with horses, donkeys and alpacas needs to be considered. The noise and air pollution of a quarry will seriously impact the health of the animals and cause them great distress.</p>
<p>Local Planning developments are being refused because of unsustainable infrastructure so it is important that permission for this quarry is not allowed</p>
<p>Negative impacts on local businesses such as Lambs Lane Business Park, local liveries sheep bridge farm, Yvols Farm, The Mill House Hotel (which is also a wedding venue). They support the community (employment wise and / or are integrated into the community) and provide revenue to Wokingham</p>

District Council in the form of business rates. Can the Council afford to lose those rates, either when the business folds due to reduction in trade, or move on when the lease expires as it is no longer a desired, safe place to do business?
There are many reasons why the plan is not sound. National Planning policy (NPPF) paragraph 182 introduces the 'agent of change principle' and requires that: Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.
The assessment of the local population has been trivialized, as described at Objective 5 on p43 of the document. What is considered to be the " <i>immediate vicinity</i> " or a " <i>low</i> " population number? Any reference to such matters has to be quantified before it can be argued that they have been " <i>justified</i> "...There needs to be a definitive description of the phrase " <i>immediate vicinity</i> ".
Air Quality
Mining for sand and gravel has a detrimental impact on the air quality in the surrounding area. Studies suggest some particles can travel up to 400m and so a number of schools / childcare settings including Lambs Lane Primary School (370m from the site), Wise Owls Nursery (550m from the site) and Warrens Croft Play Area (600m from the site) would be impacted by reduced air quality. Swallowfield pre-school and the village recreation ground are 750m away from the site
There is an increase in suspended particulate matter near sand and gravel extraction sites, and dust from a quarry can cause visible dust plumes and dust soiling. Particles up to 10 micrometres in diameter are fine enough to be breathed in and can cause detrimental health effects. Larger particles can cause soiling and staining damage when they deposit onto property, vehicles and trees. Intermediate-sized particles may travel up to 400m.
CEMEX haven't mentioned dust pollution in their air quality reports. How will good governance of the proposed site be implemented and exercised?
The reduced air quality would be incompatible with Wokingham's recent climate change emergency declaration and the authority's aim of becoming carbon neutral
This proposal promotes carbon dioxide production. It does not give due consideration to the UK's commitments to reduce carbon emissions under the Paris Agreement.
Diminishing air quality due to the CO2 emissions from HGVs and other associated site traffic
Ancient woodland is 0.7km from the site and is very sensitive to changes in air quality
The generation of aggregates is one of the highest carbon emitting activities that can be undertaken and I would expect the Council to have developed a detailed local carbon offsetting plan, consistent with the government's legal commitment to achieve carbon neutrality by 2050, before opening a new site. Even better would be to explore more sustainable alternatives to coarse aggregates to reduce emissions.

Traffic / Transport / Highways
The local roads, including the proposed site access road are narrow, windy and on an incline, all of which are unsuitable for use by HGVs. Traffic would quickly build up if an HGV got stuck behind a cyclist or if an HGV came across another large vehicle using the road
CEMEX haven't measured traffic pollution particles of PM10 and PM2.5 - these two are small enough to get into lungs and trigger or worsen respiratory diseases.
The section of the road where the proposed site access would be has two solid white lines down the centre of it. Therefore, when leaving the site, HGVs would undoubtedly cross these two lines, creating a hazard and entering into the path of oncoming traffic
Increased risk of accidents posed by the increased numbers of HGVs using the surrounding roads. One narrow pavement is the only designated path for pedestrians along the B3349. It is used (as bus services have decreased) by vulnerable people including the elderly (some of whom live in nearby sheltered housing), school children and their parents. With increased traffic movements because of the proposal, these people would be put at an even higher risk
Lorries have, in the past, mounted the pavement along the B3349 and there are concerns this would worsen with the increased volume of lorries on the road with the potential implementation of the site
Further frequent HGV movements on all surrounding roads will quickly degrade the already poor road surfaces
The report contends the increase in the number of HGVs would amount to 1%. However, they would pose a significant hazard, particularly to cyclists, when turning in and out of the site as they will block almost the whole road whilst turning and probably not allow clearance for on-coming or following cyclists.
Houses along Basingstoke Road rattle and shake as HGVs drive by
Risk that Lambs Lane and Whitehouse Lane would be used as a 'short cut' by site traffic, including HGVs
Some [HGVs] may, whether forbidden or not, turn south which leads to the bridge over the Loddon. This bridge has already needed serious work over the last two summers and was not built for frequent use by larger vehicles
The document contains no suggestion of the number of HGV movements, but it is noted that it is intended to fill the diggings with 'inert' materials, so the number of movements will be approximately twice the number required to remove the gravel.
There is a requirement to produce and provide a Transport Assessment / Statement and an HGV Routing Agreement, and consult as necessary under the Duty to Cooperate on these documents
The junction where the Basingstoke Road joins Swallowfield Street is already an accident blackspot.
There is no access point to the site that is safe with good visibility spays.
The increase in traffic should be judged along with the already rapidly increasing volumes of traffic using the local road network, especially Basingstoke Road and around Junction 11 of the M4. There are also proposals to build 15,000 new homes in the local area, so this should be considered – in terms of volumes of traffic – alongside the proposed minerals site.
Highway safety risks are on a rising trajectory and cannot be ignored. Excessive speeding along B3349 is a constant problem and the proposed entrance adjacent to the footpath by Mill House will only make matters worse.

The plans are inconsistent with the Highways planning policy insufficient access to the site.
Lambs Lane that runs round half the site is a safe route for the many horse riders in the area.
Flooding
The site lies within Flood Zones 1, 2 and 3b in accordance with our [Environment Agency] flood map for planning. Flood Zone 3 is defined as having high probability of fluvial flooding in accordance with Table 1 'Flood Risk' of the Planning Practice Guidance. The Loddon main river lies adjacent to the site running along the south eastern boundary of the site. The site lies on top of a secondary aquifer.
Fluvial flood risk management - Sequential Test – We [Environment Agency] have reviewed the paper for the site allocation at Land west of Basingstoke Road and the application of the sequential test needs to be included for this site. In accordance with paragraphs 157 and 158 of the National Planning Policy Framework (NPPF) the sequential test will need to be applied for all development in Flood Zones 2 and 3 regardless of its use.
We have read the revised wording for policy M4. Please apply the sequential test to the new quarry sites and extensions to quarries within Flood Zones 2 and 3. You will also need to apply the sequential approach to different types of development with the minerals extraction sites such as locating more vulnerable equipment and buildings associated with minerals extraction in the areas of lowest flood risk such as offices and processing equipment. Please refer to tables 1,2 and 3 concerning flood risk and flood risk vulnerability in the Planning Practice Guidance.
Flood Risk Assessment - A detailed flood risk assessment of the site needs to be provided which needs to include how the site will be operated but if we were consulted on this local plan we could not find the site unsound. Appendix A, Table 3.7 of the SEA needs to be amended to state the Land west of Basingstoke Road is located in FZ3b. We are pleased to see a commitment to not increase flood risk elsewhere and to design to reduce flood risk
The water table is low in places and the smell from it abominable in a dry Summer.
A number of flood warnings have been issued recently and this proposed site (if it goes ahead) will only going to compound the issue
If barriers were built to prevent the area flooding whilst the site was being excavated, this would change the ecology of the SSSI and be detrimental to the animals, birds and plants that currently inhabit the SSSI and flood plain.
Flooding at the southern end of the site is an annual event. There is also surface flooding and a higher than normal water table at the northern end from the soakaways of ground and roof rainwater from the adjacent business park.
Vast areas of natural drainage are being removed and the area cannot cope with a further decimation of this drainage. The inability of the local landscape to absorb rainwater will result in the water being directed elsewhere along the River Loddon leading to flooding further downstream including built up areas.
Water Quality
It is strongly recommended you cover pollution prevention and water supply for this site allocation in order to be consistent with NPPF paragraphs 20 and 170.
Pollution prevention of the River Loddon groundwater aquifers and water resources are issues which need to be included in the Development Considerations and the Site Description tables.

<p>The water framework directive (WFD) and water quality - The River Loddon has a Moderate ecological status for Water Framework Directive (WFD). The main reasons for this are barriers and habitat, and pollution from agriculture and sewage treatment works.</p>
<p>Given the rivers location and SSSI status, we would have various concerns surrounding the protection of this waterbody. There is a great risk of runoff from the site reaching the Loddon, which would impact on water quality as well as increased sedimentation. There is the potential for this proposal to be highly detrimental to the waterbody and its ability to reach good status by 2027. This river is also in the Safeguard Protection Zone for drinking water and scheme assurances would be required that this would not impact the quality of the drinking water. In order to make this site appropriate, work must be undertaken to ensure that there are no adverse effects from the site to the river, and a Net Gain approach would be recommended. We would welcome a WFD element to be included within the hydrological assessment.</p>
<p>Groundwater and hydrogeological risk assessment - a detailed hydrogeological assessment will need to be carried out for this site. The assessment must include the following:</p> <ul style="list-style-type: none"> ○ Impacts on the near-by abstraction licence TH/039/0024/004/R01 ○ Impacts on the Stanford End Mill and River Loddon (SSSI) ○ If there are plans for dewatering at this site, an abstraction licence may be needed and therefore an impact assessment will need to be carried out.
<p>We need to know that groundwater quality and supply will not be adversely impacted as a result of the proposed sand and gravel extraction</p>
<p>Environment</p>
<p>The land is currently farmland adjacent to the River Loddon with Footpath 19 crossing the site from Kingsbridge Hill to Basingstoke Road</p>
<p>The proposed site is in an environmentally sensitive location as recognised in Wokingham Borough Council's evolving Local Plan Update. The river Loddon is at the southern end of the site and to quote from the LPU "<i>watercourses are vital to the borough; they provide a range of habitats, act as wildlife corridors and are rich in biodiversity. They form a key aspect of the borough's ecological network. There are three lowland river valleys across the borough: the Thames, Loddon and Blackwater. They make a significant contribution towards the character of the landscape</i>".</p>
<p>Amenity</p>
<p>Loss of the amenity of the footpath during development</p>
<p>Increase in noise pollution (from both the operational site and the associated site traffic) which could exceed existing levels in a rural setting. The WHO suggest levels of 55dB can cause health issues for a community. The current average for this countryside setting is 29dB. A quarry of this type will have noise levels of 55dB with spikes to over 70dB.</p>
<p>Dust generated from the proposed site would decrease visibility and would increase mists and fogs as the dust becomes seeds for droplet formation.</p>
<p>Concerns regarding light pollution from the proposed site</p>
<p>I am surprised that the lessons have not been learnt from the recent rejection of mineral extraction plans at Bridge farm between Shinfield and Arborfield. Fortunately, sense prevailed there. Given what ought to be a general conclusion that mineral extraction should be planned well away from existing settlements, it is extremely surprising that this planning proposal (CEB29) makes a neutral assessment on "lifestyle impact"...How can such a</p>

<p>fundamental planning assessment criterion not be seen as negative in the context of a structured planning document? Not to do so when it is so obvious would seem like an act of desperation to comply with the demands of overriding (and probably outdated) mineral extraction policies such that planners are prepared to consider jeopardising the lifestyle of residents in this area</p>
<p>Local families, drive and walk this stretch of road constantly for access not only to and from the Infant and Primary School but also to the doctors' surgeries, the village halls - for toddler groups, meetings, clubs/sport/leisure activities, hall hire and access to recycling facilities. There is much social contact maintained throughout these villages, the various local shops and pharmacy are also close to this proposed gravel pit and the use of local facilities like the childrens' playgrounds, tennis clubs and tea rooms would be adversely impacted.</p>
<p>Walks around this beautiful area will be gone - they must be protected for future generations</p>
<p>Negative (physical and mental) health impacts, including (but not limited to):</p> <ul style="list-style-type: none"> ○ Vulnerable groups including those with existing respiratory illnesses (such as asthma) and those with existing mental health problems; ○ Vehicle pollution – diesel emissions; and <p>Site pollution risks including the implications associated with exposure to crystalline silica and quarry operations potentially causing heart attacks, strokes, hypertension and autoimmune diseases</p>
<p>Landscape</p>
<p>The site is highly visible from the road and footpath and this development would cause a loss of visual amenity</p>
<p>The site is a landscape of distinctive character which would be lost</p>
<p>The site is located between Spencers Wood and Swallowfield and provides a green gap for these settlements. In doing so, it allows each village to maintain its own identity as well as safeguarding against any further urban sprawl from south of the M4 through the villages of Three Mile Cross and Spencers Wood. Additionally, it keeps in check the prospect of Lambs Farm Business Park expanding south towards the Loddon Valley. Without question this is a very sensitive location that should be preserved.</p>
<p>This whole area has been subject to very significant development through building, such that any green farmland or amenity land should be retained</p>
<p>The proposal is likely to negate benefits of establishing SANGs as part of the South of the M4 development, encouraging people to travel, by car, for recreational purposes to other sensitive environments which the SANGs are intended to protect.</p>
<p>Ecology</p>
<p>The site is currently farmland and is home to a range of wildlife including (but not limited to) herons, bats, badgers, skylarks, tree creepers, water voles and protected species including barn owls, red kites and great crested newts. There are also invertebrate species such as white admiral, small heath and stag beetles</p>
<p>The site borders the highly sensitive Standford End Mill and River Loddon SSSI. Even working the site with a buffer zone to the river, flash storms could easily wash site material into the river harming wildlife. There is real concern of pollution of the river and leeching from the "inert" materials used in backfill once the site working life has completed</p>
<p>The site is part of a sensitive ecosystem and it has been identified that rivers can act as corridors for wildlife. This development would have extensive and</p>

<p>far reaching impacts on wildlife along the river – not just at this location. Strategies to try and work around this are not practical as the site is directly beside the river</p>
<p>The site is a haven for birdlife as well as records of sea trout having been identified recently. It is an important local bird habitat for linnets, stone curlews (these have nested on the site), buzzards, kingfishers and redwings and a foraging area for barn owls and bats</p>
<p>You will need to include snakes head fritillary (nationally rare), and Loddon pondweed (very rare, and this is the national stronghold) in your ecological assessment of this site. (We are pleased to see that you have included the River Loddon and the SSSI as part of the site considerations).</p>
<p>Standard base line assessments will be necessary (plants, badger, bats, reptiles, water voles and otters) and incorporating the recommendations for protection and enhancements into the scheme; a biodiversity calculator should be provided to demonstrate net gain and the loss/disturbance of each type of habitat</p>
<p>An ecological buffer zone will need to be provided from the top of the riverbank for the River Loddon. We are pleased to see that you have stated that a 20 metre wide buffer zone will be required and that existing vegetation here will be protected.</p>
<p>There are also opportunities for enhancement such as, deculverting of the watercourse that runs from Lamb’s Lane to the Loddon, creation of wetland areas (which increase biodiversity and contribute to net gain and habitat improvements for water voles drains and ditches). An otter survey should be carried out in addition to the ones suggested as populations are expanding.</p>
<p>The allocation of this site does not align with the biodiversity mitigation hierarchy, which requires potential harm to biodiversity to be avoided in the first instance (NPPF 2019, para 175a).</p>
<p>The environmental damage that could be caused to the Loddon Valley is contravention of existing EU directives on the aquatic environment</p>
<p>The local fishing club has done a lot to renovate the gravel spawning areas in the river and the dust and spillage from a quarry would swamp these with mud and silt and seriously degrade the health of the river.</p>
<p>The proposed site is underlain with a network of springs – how will pollution be managed from this perspective?</p>
<p>The area and it's natural flora and fauna will never recover if the proposal goes ahead</p>
<p>Swallowfield Fishing Club have undertaken substantial habitat improvement works to it's waters which start within 50 meters of the downstream boundary of the proposed works. These works have involved consented in stream habitat improvements involving the establishment of spawning beds and off line flood attenuation pools and leats for the encouragement of fish refuge points and natural breeding points. The Loddon catchment is considered to be under severe stress due to the existing permitted developments in the area already.</p>
<p>Restoration</p>
<p>The restoration opportunity should be designed to achieve a significant biodiversity uplift (at least 20% against the baseline) and enhancements should be ensured permanently and seek to meet the objectives for the Loddon Valley South Biodiversity Opportunity Area</p>
<p>Any restoration of the area to agricultural land use should be to High Nature Value farming</p>
<p>Design for restoration should increase habitat connectivity across the area.</p>

<p>What is to happen to the site when it no longer supplies gravel? Landfill, wasteland would be the next eyesore</p>
<p>Does the gravel company or Wokingham Borough Council take financial responsibility for returning the used site back to an acceptable view? If the Council can confirm this, will this come from local taxpayers?</p>
<p>In Fill of Quarry - contamination risk indications are that building materials will be used to infill the quarry yet most of the materials used in the building industry are not in themselves inert containing many impurities. What is the method of containment of infill materials being adopted to prevent leaching into surrounding areas?</p>
<p>Archaeology / Historic Environment</p>
<p>The location is an Area of High Archaeological Potential. There is a WW2 Pillbox and anti-tank ditch within site, part of a pattern of artefacts set along an historical defence line. Three listed buildings are located near the site, as well as the Scheduled Ancient Monument of Island House with its medieval moat at Sheepbridge Court Farm. A nationally important archaeological site, quarrying nearby could have an indirect impact on the archaeological significance of this monument.</p>
<p>During archaeological digs at the Langford Park development nearby, a Romano-British field system was discovered revealing the possibility of Roman remains in the wider area.</p>
<p>If this proposal is to proceed, it will directly lead to the damage and alteration of the moat and fishponds at Sheepbridge Court by accelerating their silting and eventual disappearance by them filling with increased soil runoff from the quarry.</p>
<p>The site is close to Beaumys Castle, an area of high archaeological importance</p>
<p>This site is located very close to both a scheduled monument (MOATED SITE AT SHEEPBRIDGE COURT) and three listed buildings, (MILESTONE NORTH NORTH WEST OF SHEEP BRIDGE, GII; BARN APPROXIMATELY 80 METRES NORTH OF SHEEPBRIDGE COURT, GII*; and SHEEP BRIDGE COURT, GII*). Most of the site is also within an area of high archaeological potential. The above-listed heritage assets, as well as the area of high archaeological potential, have been identified in the table associated with the site, but the scheduled monument has been included within the listed buildings section. These are different types of heritage assets and for clarity should be listed separately.</p>
<p>Historic England has some concern about the prospect of this site being allocated for the extraction of sand & gravel, on the basis of the currently available information, mainly in relation to archaeology. We also have some concerns in relation to the aforementioned listed buildings. The impact on the significance of the scheduled monument, as contributed to by its setting, will need to be fully assessed. There is a considerable amount of screening, but noise will also have to be considered. We agree with the comments made about restoration and setting in the focussed consultation document.</p>
<p>Because this site lies within an area of high archaeological potential, archaeological remains may exist which are of equivalent significance to designated assets, that is, of national importance. Footnote 63 of the NPPF states that: "Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets." NPPF para 194 states that: "Any harm to, or loss of, the significance of a designated</p>

<p>heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: ... b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.” Historic England therefore strongly recommends that the next stage of detailed assessment for the allocation should include at least geophysical survey and possibly, depending on the results of the geophysical survey, field evaluation (trial trenching).</p>
<p>Within the Historic Environment Assessment Summary section of the site assessment, it is stated: “However, such sites are likely to be discrete and of regional importance and as such unlikely to constrain the allocation. Preliminary archaeological survey prior to the determination of any future planning application is recommended.” With respect, we do not agree with this. Geophysical survey and possibly, depending on the results of the geophysical survey, field evaluation (trial trenching) should be carried out prior to allocation. The wording is also unsatisfactory in that ‘Preliminary archaeological survey’ is too vague.</p>
<p>Possible dewatering of waterlogged archaeological deposits in the areas around the site, including the scheduled monument, should also be assessed, as noted in the consultation document.</p>
<p>While the aforementioned listed buildings have been identified in the summary table accompanying this site, there is no further analysis of the impact on them in the more detailed Historic Environment Assessment Summary. These heritage assets are screened to some extent from the proposed site, but the impact on settings still needs to be considered. An appropriate buffer may be required, especially in relation to the grade II* assets, which are assets of the highest significance, according to the NPPF.</p>

<p>Summary of comments made on how the proposed site should be changed</p>
<p>Considerably more detailed information regarding the area’s hydrology is needed to inform this stage.</p>
<p>The inclusion of a water framework directive (WFD) element within the hydrological assessment would be welcomed / advised.</p>
<p>A detailed hydrogeological assessment will need to be carried out for this site.</p>
<p>The application of the sequential test needs to be included for this site.</p>
<p>A detailed flood risk assessment of the site needs to be provided which needs to include how the site will be operated.</p>
<p>To be consistent with NPPF paragraphs 20 and 170, it is strongly recommended you cover pollution prevention and water supply for this site allocation.</p>
<p>This river is also in the Safeguard Protection Zone for drinking water and scheme assurances would be required that this would not impact the quality of the drinking water.</p>
<p>To make this site appropriate, work must be undertaken to ensure that there are no adverse effects from the site to the river, and a Net Gain approach would be recommended.</p>
<p>You will need to include snakes head fritillary (nationally rare), and Loddon pondweed (very rare, and this is the national stronghold) in your ecological assessment of this site.</p>

<p>Standard base line assessments will be necessary (plants, badger, bats, reptiles, water voles and otters) and incorporating the recommendations for protection and enhancements into the scheme; a biodiversity calculator should be provided to demonstrate net gain and the loss/disturbance of each type of habitat</p>
<p>An otter survey should be carried out in addition to the ones suggested as populations are expanding</p>
<p>An ecological buffer zone will need to be provided from the top of the riverbank for the River Loddon.</p>
<p>This site is located very close to both a scheduled monument (Moated Site at Sheepbridge Court) and three listed buildings, (Milestone North North West of Sheep Bridge, GII; Barn approximately 80 metres north of Sheepbridge Court, GII*; and Sheep Bridge Court, GII*). Most of the site is also within an area of high archaeological potential.</p> <p>The above-listed heritage assets, as well as the area of high archaeological potential, have been identified in the table associated with the site, but the scheduled monument has been included within the listed buildings section. These are different types of heritage assets and for clarity should be listed separately.</p>
<p>The impact on the significance of the scheduled monument, as contributed to by its setting, will need to be fully assessed. There is a considerable amount of screening, but noise will also have to be considered.</p> <p>Because this site lies within an area of high archaeological potential, archaeological remains may exist which are of equivalent significance to designated assets, that is, of national importance. To remain in line with the NPPF (Footnote 63 and paragraph 194), Historic England therefore strongly recommends that the next stage of detailed assessment for the allocation should include at least geophysical survey and possibly, depending on the results of the geophysical survey, field evaluation (trial trenching).</p> <p>The wording is also unsatisfactory in that 'Preliminary archaeological survey' is too vague.</p>
<p>While the aforementioned listed buildings have been identified in the summary table accompanying this site, there is no further analysis of the impact on them in the more detailed Historic Environment Assessment Summary. These heritage assets are screened to some extent from the proposed site, but the impact on settings still needs to be considered. An appropriate buffer may be required, especially in relation to the grade II* assets, which are assets of the highest significance, according to the NPPF.</p>
<p>Do not proceed with the gravel pit; the proposal needs to be refused / rejected.</p>
<p>Re locate the gravel pit away from schools, residential areas and areas of green land. Explore the possibility of locating it closer to Basingstoke (allowing site traffic easier access to the A33) or somewhere close to the RE3 recycling centre</p>
<p>Consideration needs to be given to those who live and pay to live in the local area</p>
<p>To cease the desire to cover our land with further buildings and extract vital minerals from the land</p>
<p>The proposal does not meet air quality, traffic, flooding, environmental, ecology and archaeological requirements of the area.</p>

Section two (b) – Site proposal: Area between Horton Brook and Poyle Quarry

Summary of comments made supporting the proposed site
<p>The inclusion of this area as a Preferred Area in the Joint Minerals and Waste Plan is supported.</p> <p>The area was originally included within the Preferred Area 12 North of Horton site which is included in the existing Replacement Minerals Local Plan for Berkshire as an area suitable for mineral extraction and subsequent infilling. This was prior to the Preferred Area being developed in two parts.</p>
<p>Because extraction operations at Poyle Quarry have yet to commence to the east of the area it would be straightforward to work the area from the east. If the sand and gravel between the two sites was not extracted it would be permanently sterilised as it would be almost impossible to revisit the area to extract the mineral once the Horton Brook and Poyle sites had been worked and restored.</p>
<p>It is the logical candidate since it is an extension of existing quarrying activities and therefore less intrusive than that associated with a greenfield site.</p>
<p>Mineral extraction is temporary in nature. The proposal will provide for diversion of the bridleway during the period of extraction and restoration. The bridleway will then be reinstated to its former route. Sympathetic restoration through improvements to amenity and increased biodiversity will lead to a long-term gain. This will be achieved through the planting and maintenance of trees and hedgerows either side of the route.</p>
<p>Both quarries have suitable vehicle access and the development will not result in an increase in daily traffic movements which are limited by existing condition.</p>
<p>Mineral extraction is an acceptable form of development within the greenbelt as it does not impact upon its long term “openness”.</p>
<p>Inclusion of this area will help provide a steady and adequate supply of locally extracted sand and gravel. This conforms with the guidelines set out in the National Planning Policy Framework.</p>
<p>In the interests of maintaining a viable supply of sand and gravel and the associated landbank, the additional two sites being promoted are fully supported and go some way to plugging the gap as a consequence of refusal of planning permission at the Arborfield site.</p>
<p>All sand and gravel would have to be transported by dump truck either to the Poyle Quarry processing plant, which is in Slough, or else to the Horton Brook processing plant to the west. This would result in additional HGV movements on roads within Slough but it is claimed that the magnitude of change on the roads would be negligible. The Plan recognises that a Transport Assessment or Statement will be required and an HGV Routing Agreement will be needed. As a result it is considered that any mitigation measures that may be necessary can be agreed at the planning application stage.</p>
<p>A temporary diversion will have to be provided for the bridleway which forms part of the Colne Valley Way It will be important to maintain and enhance the Colne Valley Way bridle way. This is described as being not very attractive at present with the user hemmed in between two fences. The Council, along with the Colne Valley Park, RBWM and the Buckinghamshire authorities have been examining how the public footpath network and accessibility in the area can be approved as part of the work that has taken place in response to the proposed expansion of Heathrow. As a result we have agreed a Joint Connectivity</p>

Statement. This identifies a network of alternatives routes that run along the north and south boundaries of the existing and proposed gravel extraction sites. Some of these new routes could be implemented regardless of whether or not the expansion of the airport takes place. As a result it is suggested that there should be a requirement for the applicant to have to work with the Colne Valley Park and relevant Local Authorities to secure an enhanced bridleway network within the area

Subject to these [two above] requirements being met it is considered that this Council [Slough Borough Council] has no objections to the proposal to identify the area between Horton Brook and Poyle Quarry as a site for sand and gravel extraction.

Additional comments made regarding the proposed site (neither supporting nor objecting)

We wouldn't have any major concerns, given the location between two existing quarries. The right of way realignment would have to be agreed in theory with the authority and with the Colne Valley Regional Park before anything can be formally proposed. Provided that an agreed alternative route can be decided upon then the proposals for extraction here would have minimal additional impacts given the material can be processed at the adjacent processing plants for the existing quarries. The main issue to highlight here would be the need to ensure the HRA assessment was robust with regard to impacts upon the South West London Water Bodies SPA / Ramsar site and that the potential impacts are given appropriate weight when considered fully in combination with other identified plans and projects as highlighted within appendix B.

Summary of comments made on how the proposed site does not meet the Test of Soundness

General

No requirement for a gravel pit and it doesn't lend itself to sustainable development.

For decades, Horton land has gradually been eroded: agriculture replaced by vast mineral extraction sites, reservoirs, commercial and housing development. We therefore acknowledge that our objections to the further mineral extraction are generally disregarded. However, neither the original draft plan, nor this new proposal provide adequate infrastructure safe-guards for our Village which is part of the Green Belt and contains many historical sites.

Air Quality

We have seen no evidence of any air pollution measurements being documented by the RBWM. It is clear that mineral extraction and particularly infill cause substantial air pollution, as do the multiple traffic movements involved with this work. We urge the Borough to undertake controlled and careful investigations into this before any planning is approved to ensure that only safe limits of air quality are allowed in Horton.

Road cleaning – Horton Parish Council have regularly had to make contact with the owners of the existing commercial operators to ask for road cleaning. Please see our Parish Council minutes for evidence of this. The mud and dirt from the sites is carried by the wheels of the vehicles leaving the sites. Whilst we are assured that wheel washing takes place each time, clearly it is ineffective as the roads still have to be cleaned. This cleaning process is not nearly regular enough and only covers certain roads. Particularly in wet conditions, mud and dirt is further moved into the centre of the village by

<p>vehicles coming past the mineral sites. Once again we regard this as evidence that the operational history of all the companies involved in this work is far from exemplary.</p>
<p>The Royal Borough of Windsor & Maidenhead is urged to undertake investigations into air quality at the proposed site before any planning is approved to ensure that only safe limits of air quality are allowed in Horton.</p>
<p>Ecology</p>
<p>Concern that hedgerows, trees / woodland could be lost and wildlife connectivity adversely impacted. As stated on page 26 of the Focussed Regulation 18 Consultation document this corridor [Colne Valley Way] provides refuge habitat with quarries close by.</p>
<p>Traffic / transport / highways</p>
<p>The consultation quotes: 'There are residential properties adjacent. Consideration will need to be given to impact of development on factors such as noise, dust, and air quality.' Traffic Movements: In the past, we have asked, on behalf of residents, that the operational hours be restricted. This has been rejected on the grounds of commercial considerations. This is an unacceptable response. Operational hours should be limited to 07:00 – 17:00 Monday to Friday and no earlier than 08:00 until 13:00 on Saturdays. No working on Saturday afternoon, Sundays or Bank holidays. The area is already bombarded with noise from aircraft. Further noise from HGV vehicles and heavy plant machinery have a severe impact on residents' quality of life. HGV movements may be restricted to operational hours, but this doesn't take into account the 'stacking' of vehicles whilst waiting for the gates to open. This can either occur immediately outside an operational site or, in many cases, in side-roads or laybys nearby. This must be prevented. Even if such a limitation is agreed, there remains an outstanding issue of enforcement. Historically, and going forwards, the RBWM neither has the resources nor budget to enforce planning restrictions on vehicle movements.</p>
<p>Page 27 Transport Assessment Summary: Active travel routes, and the Colne Valley Way (CVW) is an important one, are part of the transport network and the considerations in that regard should come out in this assessment. It is not merely about vehicular traffic.</p>
<p>Amenity / Public Rights of Way</p>
<p>The harm to the public right of way (the Colne Valley Way) outweighs any benefit from the increased supply of minerals.</p>
<p>The Colne Valley Way (CVW) affected by this proposal is part of a strategic route but there is no clarity around how the diversion of the route will be handled and opportunities taken to improve its alignment / natural environment context. On page 24 of the Focussed Regulation 18 Consultation document it states "The public footpath would be temporarily diverted to one side of the extraction area and reinstated." This level of mitigation for the CVW, even on a temporary basis, is unacceptable. More imaginative and beneficial diversion proposals are required if this is to be considered further.</p>
<p>We [Colne Valley Park Community Interest Company] are open minded about how long term betterment for this part of the Colne Valley Regional Park (CVRP) could come about and see scope for a temporary and permanent bridleway broadly following the Colne Brook corridor with suitable crossing point(s) over the river to include facilitating easy access to the Arthur Jacobs Nature Reserve. However, in the absence of a clear policy and strategy for achieving that the very small contribution this site could make to the supply of minerals is outweighed by the disruption that would be caused.</p>

<p>We cannot see how diversion within the confines of, or adjacent to, the red lined 'CEB30' area could provide an attractive CVW route, together with extraction.</p>
<p>Page 27 Landscape Assessment Summary: Reference is made to an active recycling site and the route "hemmed in by scruffy screen mounds on one side and a flat open landscape on the other. The overall condition is moderate/poor." There are issues with the existing arrangement and impacts on the CVW. The local authority needs to address this, not compounding any errors previously made and regard the impact as highly sensitive.</p>
<p>Page 28 Development Considerations: Reference is made to a possible CVW diversion via the Eric Mortimer Rayner Memorial lakes area. Whilst this is a welcome idea to explore it is at odds with statements made elsewhere in the consultation about diversion and falls outside the current 'red line' area, reinforcing the need for a holistic approach to the whole Horton / Poyle area. We welcome reference to the 2019 Colne and Crane GI Strategy and this can inform future dialogue / policy finalisation.</p>
<p>Page 39, Table 3.8: it is not accepted that, when assessed against SA / SEA objectives, none of the factors show a negative position. Paragraph 1.1 (following table 3.8) clarifies the assessment is without mitigation so, when the Colne Valley Way (CVW) is a key part of a long distance active travel route within the CVRP, there surely must be negative scores recorded?</p>
<p>The proposal is to extract sand and gravel from the existing bridleway. Whilst re-instatement is promised, we hold no hope that this will be honoured and would ask the Royal Borough of Windsor & Maidenhead to help protect the Village of Horton from further infringement.</p>
<p>Flooding</p>
<p>The site lies within Flood Zone 1 in accordance with our [Environment Agency] flood map for planning. Flood Zone 1 is defined as having low probability of fluvial flooding in accordance with Table 1 'Flood Risk' of the Planning Practice Guidance</p>
<p>The site lies on top of a landfill</p>
<p>The site also lies on top of a principal aquifer.</p>
<p>Biodiversity and watercourses</p>
<p>The following is supported by paragraphs 170 and 175 of the National Planning Policy Framework (NPPF) which recognise that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity:</p> <ul style="list-style-type: none"> ○ there is the potential to enhance ordinary watercourses and deculvert sections through this proposal. ○ Standard base line assessments will be necessary (plants, badger, bats, reptiles, water voles and otters) and incorporating the recommendations for protection and enhancements into the scheme; a biodiversity calculator should be provided to demonstrate net gain and the loss/disturbance of each type of habitat
<p>Water Quality and pollution prevention</p>
<p>We strongly recommend you cover pollution prevention and water supply for this site allocation in order to be consistent with NPPF paragraphs 20 and 170.</p>
<p>This site is very close to two water framework directive (WFD) waterbodies (Horton Brook GB106039023040 and Colne Brook GB106039023010). The document list identifies that there may be constraints of this proposal of runoff and water quality impacts to nearby SSSI. There may also be cumulative impacts with the other schemes such as the River Thames Flood alleviation</p>

<p>scheme. This should be investigated further due to cumulative impacts of different schemes. The two waterbodies are in a Safeguard Protection Zone and assurances would be required that this proposal would not impact the quality of the drinking water.</p>
<p>A groundwater and hydrogeological risk assessment of all potential impacts in the area will need to be produced. This is to include impacts on:</p> <ul style="list-style-type: none"> ○ Near-by abstraction licences ○ Risk to the principal aquifer ○ Cumulative impacts of the neighbouring quarry sites ○ Groundwater quality in relation to impacts on neighbouring potable abstractions and the adjacent waste sites
<p>We should also be provided with details for a long-term groundwater monitoring programme (including maintenance plan for the groundwater boreholes, contingency action plan) in respect of groundwater contamination and resources, including a timetable of monitoring and submission of reports. This monitoring will need to be carried out to demonstrate that there will be no impacts to the water environment. This is also, to prevent and cause further deterioration of the drinking water protected area in the principal aquifer.</p>
<p>If there are plans for dewatering at this site, an abstraction licence may be needed and therefore an impact assessment will need to be carried out.</p>
<p>Archaeology / Historic Environment</p>
<p>The area has high archaeological potential but the large excavated areas adjacent to the proposed allocation should allow the broad nature of the archaeological deposits to be predicted with reasonable accuracy for the purposes of the detailed allocation assessment. A programme of geophysical survey and, depending on the results of the geophysical survey, evaluation (trial trenches) should take place prior to the determination of any planning application.</p>
<p>The impact on the significance of the conservation area at Colnbrook, as contributed to by its setting, should be also be assessed and responded to as appropriate.</p>
<p>Utilities</p>
<p>The proposed site either crosses or is in close proximity to one of National Grid's assets. Details as follows [<i>National Grid plan available upon request</i>]:</p> <ul style="list-style-type: none"> ○ Electricity Transmission - Asset Description - VW ROUTE: 275Kv Overhead Transmission Line route: IVER – LALEHAM
<p>Restoration</p>
<p>The restoration of this site can be integrated into the quarry schemes on either side including the Colne Brook river corridor to promote habitat connectivity and natural recovery.</p>

<p>Summary of comments made on how the proposed site should be changed</p>
<p>An appropriate suite of protected species surveys will need to be carried out in advance of determination around this site, and full and appropriate habitat compensation for the loss of linear woodland in this area will need to be provided before any habitat clearance occurs.</p>
<p>Compensatory habitat provision designed to serve a similar woodland corridor function will be needed and it should be ensured that provision for this in the vicinity of the extraction site is possible prior to approving this site.</p>
<p>Habitat enhancement should also meet the objectives of the Colne Valley Gravel pits and Reservoirs Biodiversity Opportunity Area.</p>

<p>We [Colne Valley Park Community Interest Company] ask for:</p> <ul style="list-style-type: none"> • Early dialogue around the Colne Valley Way (CVW) diversion as part of a strategy for wider restoration and improvement of the area and the quality of connectivity it offers for people. Subject to there being a satisfactory outcome to that dialogue that this be reflected in the final policy wording • The policy wording requires provision of the agreed CVW diversion and related mitigation as a first step, in advance of any extraction taking place.
<p>Standard base line assessments will be necessary (plants, badger, bats, reptiles, water voles and otters) and incorporating the recommendations for protection and enhancements into the scheme; a biodiversity calculator should be provided to demonstrate net gain and the loss/disturbance of each type of habitat</p>
<p>We strongly recommend you cover pollution prevention and water supply for this site allocation in order to be consistent with NPPF paragraphs 20 and 170.</p>
<p>A groundwater and hydrogeological risk assessment of all potential impacts in the area will need to be produced.</p>
<p>Details for a long-term groundwater monitoring programme should be produced. This should include a maintenance plan for the groundwater boreholes and a contingency action plan (in respect of groundwater contamination and resources), a timetable of monitoring and submission of reports.</p>
<p>The proposal should be rejected / refused</p>

Section three – Proposed Policy DM15: Past Operator Performance

<p>Summary of comments made supporting the proposed policy</p>
<p>The policy will, as it states, encourage existing operators to “do the right thing.”</p>
<p>The proposed policy is welcomed as it would help ensure that operators were better held to account when putting in applications for other sites where they are known to have been less than forthcoming previously (whether that be in terms of not fulfilling promises to complete restoration in time or in relation to commitments to carry out works as agreed at the time of permission being granted etc).</p>
<p>The intent behind the policy is appreciated and it is noted the NPPF provides an element of support for it.</p>
<p>Support the policy and the principle of closely monitoring operators’ performance in adhering to site conditions and good practice.</p>
<p>The Policy would empower residents and bodies (particularly Parish Councils) in the enforcing and investigating role of the Planning Authority and would allow for sensible dialogue to be maintained. It would also put the minerals and waste operators on notice that their activities are being observed and recorded on behalf of local people, and hopefully create, where necessary, an improved culture of compliance. It will benefit all parties if the new culture of compliance can recognise that circumstances can and do change over time.</p>
<p>This is an unusual policy and it is not clear on what basis it is being justified. The only reference to being able to consider past performance in the NPPF is in paragraph 76 which deals with housing permissions not starting. Nevertheless, it is considered that the Council should support the proposed policy on Past Operator Performance.</p>

Additional comments made regarding the proposed site (neither supporting nor objecting)

Summary of comments made on how the proposed site does not meet the Test of Soundness

New operators *should* be judged based on a lack of track record; to do otherwise is foolish (it is inevitable that a new operator will experience "teething issues" when establishing their processes and this needs to be taken into account).

The policy may provide a small benefit, by not granting planning applications to operators who have a poor track record. However, it will do nothing to guarantee the future performance at a site for which planning approval is being sought.

This policy appears only to deal with the appointment of an operator, not with monitoring their subsequent performance or enforcing that performance. It will therefore offer little protection to the environment and residents in the vicinity of a new site, unless regulations are enforced better than at present. Financial pressures on operators naturally push them to follow the cheapest course of action, to maximise output and meet targets; if this means breaching regulations, less scrupulous operators will do so if this yields profits in excess of any paltry fines subsequently imposed. Thus a policy that just restricts their prior appointment is of little use. Any breach of regulations should be met by massive fines or even enforced site closure, ie. something so punitive that it outweighs any benefit gained from breaching regulations. This will be the only driver that seriously improves operator performance.

Support would **ONLY** be given to the policy **IF** it is legally worded so as to ensure that the "applicant or operator" it speaks of includes individuals, not just companies; **AND** includes consideration of any previous companies with which those individuals were associated. If this is not done, there is nothing stopping unscrupulous companies or individuals trading under a new name. I could not see any explicit provision for this in the wording as it stands.

The proposed policy on operator performance is setting a test that has no measure and is not a material consideration in decision making. Justice needs to be blind. In a Court of Law the jury is not told of an offenders past offences as it would likely prejudice the current case and render it unlawful. I see no difference here.

While MPA members will operate and manage their sites to a high standard, reflecting commitments in the MPA Charter, we are concerned how the policy may be implemented.
In reality, objections may be lodged, enforcement, and in some circumstances legal action, taken on technicalities rather than due to harm caused, which may be challenged by an operator. This may be in the mineral planning authority area or elsewhere, and may reflect a range of circumstances.
The justification for the policy (para 6.1) that the issue was raised in response to the consultation on the previous draft plan does not appear to be a sufficient reason for inclusion of a specific policy. Reviewing the Consultation Summary Report reveals that this was not a common response and appears to be raised mainly in connection with a waste site, relying on anecdotal evidence and perception.

The reference to the recent amendments to PPG (in para 6.7) that is used to justify the policy is not valid, as the paragraph cited specifically concerns the

planning history of a site in the context of bringing housing development forward, rather than performance of a developer or operator.
Planning permission is with the land, not the applicant or operator. Therefore it would not be sound to consider the behaviour (perceived or actual) of an applicant rather than the merits of the application itself.

Summary of comments made on how the proposed site should be changed

The principle of local liaison panels (paragraph 6.17) is supported, but the wording should be changed to indicate the key role of Parish Councils, as locally elected and accountable bodies, in helping to bring these together and co-ordinating action. Parish Councils are also in a position to broker excellent relationships with responsible minerals and waste operators.

This is not a major point, but should the word "accept" in line 2 of paragraph 6.7, should be "expect"?

The policy needs to address the issue of enforcement, making it less financially viable for operators to breach regulations. It needs to be legally worded so as to ensure that the "applicant or operator" it speaks of includes individuals, not just companies; and include consideration of any previous companies with which those individuals were associated.

New operators *should* be judged based on a lack of track record

The site should be rejected / refused

Section four – Further comments

Summary of comments which have not been picked up elsewhere in the consultation

We [Environment Agency] have made comments about the sequential test in our response dated 19 October 2018 to the Regulation 18 consultation. If the sequential test is not applied to the minerals and waste sites then the proposed site allocation at Bray Quarry is unsound as it is not consistent with national policy, justified or effective

Please note that there is a typo in Policy M4.

Under point number 4 it is stated that proposals for new sites will be supported inappropriate locations.

The text should be proposals for new sites will be supported in appropriate locations.

Comment from EA - Policy M4 – Locations for sand and gravel extraction - Revision

We have read the revised wording for policy M4. Please apply the sequential test to the new quarry sites and extensions to quarries within Flood Zones 2 and 3. You will also need to apply the sequential approach to different types of development with the minerals extraction sites such as locating more vulnerable equipment and buildings associated with minerals extraction in the areas of lowest flood risk such as offices and processing equipment. Please refer to tables 1,2 and 3 concerning flood risk and flood risk vulnerability in the Planning Practice Guidance.

Please also be aware that the environmental permits for, new quarries, extensions to quarries and further extraction to quarries may need new or renewed environmental permits including those that concern waste disposal or recovery at these sites.

The Parish Council [Bray] has in particular much correspondence with the Planning Authority about activities at Summerleaze Gravel Works at Monkey Island Lane, in Bray.

3.3 Residents' experience with the Monkey Island Lane site is that changes to operations have been instituted by the operators without consultation with nearby homeowners, sometimes with great detriment to people's amenities. Whether or not those changes have been permitted by, or eventually regularised, by the Planning Authority, they have been made without consideration for local residents on the basis that people should not choose to live near a processing plant unless they are ready to accept the consequences. This is not how sustainable and conscientious business should operate in the twenty-first century.

While the principle of a policy on operator performance would appear to be sensible care needs to be exercised when enforcing such a policy. The following should be considered:

1. Even the most carefully operated and meticulously managed site can experience unexpected problems or a genuine mistake can occur or even go unnoticed. This should not be sufficient to affect how the operators performance is assessed.
2. Issues identified within a Monitoring Officer Assessment can be used only as a guide as these issues will vary in terms of seriousness, complexity or ease of rectification.
3. Unjustified or malicious complaints about site operations should not be considered.
4. The level of improvement in the performance of an operator should be recognised. An operator may have had a poor performance record historically but a greatly improved performance more recently.
5. What would happen when a new operator proposes to develop a site or takes over an existing site where the new operator may not have a track record at all and the site may have a poor track record. New operators should not be penalised because of a lack of a track record or because of previous operators track records.

These comments refer to restoration following extraction on the land near Spencer's Wood to the west of Basingstoke Road. There is potential for creating a substantial nett gain in biodiversity by restoring all or a large part of the site as wetland nature reserve. (1) The site is close to the epicentre of the nationally significant lower Kennet Nightingale (red list) population, whose preferred habitat is scrub surrounding water bodies on old gravel workings. Creation of suitable habitat would encourage growth of this threatened population. (2) Creation of reed-beds and marshy areas would provide habitat for a wide range of other scarce and charismatic bird species and much other wildlife. The Berkshire Ornithological Club, which holds an extensive database of birds in the county, collaborates with developers and landowners on conservation work of this type.

This irresponsible behaviour cannot continue; allowing endless deterioration in the area as well as surrounding neighbourhoods... This is atrocious but I wonder if the council will listen or we are just being humoured to complete complicated paperwork with very difficult technical terms in order to be seen to have consulted the public. I'm disgusted by this process in itself.

Stop allowing proposed sites in residential areas! Do better research into the impact to the area.

We need sand and gravel but that must be available elsewhere and railed in.

Any increase in air and noise pollution would significantly impact both the teaching and the learning/experience of those attending the local Tai Chi school.

Thank you for inviting Highways England to comment on this Consultation. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A404(M), M3, M4 and M25. We have reviewed this document and supporting evidence and we understand that there are two new sites, CEB29 - Land west of Basingstoke Road, Spencers Wood and CEB30 - Area between Horton Brook and Poyle Quarry, both of which are in response to the 'Call for Sites' during October/November 2019. The document advises that a Transport Assessment or Statement will be required along with a HGV routing agreement and due to the locations of these sites and because of these requirements we have no comment on this consultation. However, please do continue to consult Highways England as this Joint Minerals and Waste Plan progresses and we wish to be consulted if planning applications are submitted for these sites.

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed Central and Eastern Berkshire Authorities Joint Mineral and Waste Plan. The Berkshire Gardens Trust (BGT) is a member organisation of the GT and works in partnership with it in respect of the protection and conservation of historic sites, and is authorised by the GT to respond on GT's behalf in respect of such consultations within Berkshire*. One of the key activities of the Berkshire Gardens Trust (BGT) is to help conserve, protect and enhance designed landscapes within Berkshire. This wide-ranging Plan affects a number of sites within Central and Eastern Berkshire. We are therefore grateful for the opportunity to comment. Our comments are restricted to the two new proposed sites set out in the Consultation Document. Having considered those sites we do not want to make any objections to either of them being used for gravel extraction. Neither appear to affect directly any registered Garden or Parks, but we do draw attention to the need to ensure that any permission includes requirements for reinstatement at the conclusion of the works.

*The Gardens Trust, a national body recently published a guidance leaflet to explain the place of historic designed landscapes in the planning system, the importance of assessing significance, the statutory consultation obligations, and the role of County Gardens Trusts, in raising awareness of historic designed landscapes as heritage assets. 'The Planning System in England and the Protection of Historic Parks and Gardens' can be downloaded at www.thegardenstrust.org. BGT's own website: www.berkshiregardenstrust.org

The continued use of the consultation process with regards to the development of the overall Plan is welcomed.

The Berks, Bucks and Oxon Wildlife Trust (BBOWT) does not hold an in-principle objection to appropriately designed and phased sand and gravel extraction that minimises biodiversity impact, followed by exemplary ecological

restoration. However, we have the following concerns [see specific sections] about the two sites that are the subject of this focussed consultation. We trust these comments are useful and would be happy to provide more information or clarification as needed.

Thank you for consulting CEMEX on the Focussed Regulation 18 Consultation. CEMEX is searching for potential new mineral sites in the plan area. Thank you for consulting CEMEX and we would like to be involved and attend any future Examination in Public held for this Plan.

Although we have asked for this consultation to be extended due to the Covid-19 situation, our request was turned down...As stated in the first paragraph, this should be considered additional to our former response.

Clause 4b: It would be helpful for the supporting text to also make it clear that 'maintain the landbank' means that the minimum landbank of 7 years of reserves needs to be maintained (defined as 'keep in existence, not allow to become less') throughout, including at the end of, the Plan period. In line with PPG, it should also be made clear that a landbank above the minimum required level will not be a reason for refusal of otherwise appropriate applications for additional reserves.

Paragraph 3.8: Demonstrates the need for strategic planning across planning authority boundaries (for sharp sand and gravel and soft sand), particularly those smaller in area and so with fewer options and resources.

Bray Parish Council would like you to continue to take into account our previous comments, and in particular those dated 12th August 2019, responding to the Additional Regulation 18 (site specific) consultation on the potential allocation of Bray Quarry Extension.

Bray Parish Council is very concerned about the number of vehicle movements, especially HGV's (and including movements to and from locations for mineral extraction and processing) which currently take place throughout the Parish and beyond. We are particularly concerned about vehicle movements on the A330, and, especially, the A308. We are very pleased that the Royal Borough of Windsor and Maidenhead has indicated sufficient concern about traffic conditions in the "A308 Corridor" that it has agreed to work with other stakeholders to produce a study, in order to improve conditions and accommodate any necessary future development. We are also disappointed that, although the study was announced in 2018, there has been little apparent progress to date.

Our concerns about traffic conditions on these major roads relate to their inadequate capacity; the resulting frequent conditions of congestion; and the impact of the vehicle movements (and indeed vehicle queuing) on air pollution. We consider that the improvement of quality of life for our residents, in terms of elimination of noise and air pollution, as well as improving journey times, should be a priority.

These concerns are redoubled as we begin to understand the effects of Climate Change. We must oppose developments which bring about more congestion and pollution when what is required is mitigation of present conditions. The Parish Council is therefore very concerned that the future will bring further demand for mineral extraction and processing in order to serve new developments both locally and further afield (a major example being the expansion of Heathrow Airport), and that, unless careful consideration is given and careful judgement applied, these will bring further HGV movements, congestion and pollution for our residents to experience.

In the context of the current Plan therefore, and recognising the realism of paragraph 3.6, the Parish Council continues to advocate that wherever possible, alternative methods of transporting the products of mineral extraction are employed, including rail, barge, and conveyor.

Buckinghamshire County Council has no specific comments to make on the proposed additional policy. We note the gap in national policy and guidance on this particular matter within the decision-making process and will be interested in how the policy develops with the framework, legal jurisdiction and industry... As previously mentioned, Buckinghamshire County Council will no longer exist from April 1st, 2020 as the new unitary Buckinghamshire Council is established. Please can the contact details for the minerals and waste planning authority be amended to the new email address mineralswastepolicy@buckinghamshire.gov.uk.

One query in relation to Policy M4 "Location of sand and gravel", specifically point 4d i) which refers to soft sand. Should this point refer to sand and gravel as the policy is about the location of sand and gravel or does it relate to soft sand?

This is a representation in full SUPPORT of the approach set out in the focussed consultation document.

We accept that the Councils' find themselves in the unenviable position of planning for the future supply of minerals, with limited options given that little interest has been expressed by industry through the various calls for sites.

These comments respond to the Focussed Consultation in relation to the effect on the Colne Valley Regional Park.

The Colne Valley Regional Park (CVRP) is the first large taste of countryside to the west of London; an area for people, wildlife and many uses, including farming and angling. The Park, (founded in 1965) stretches from Rickmansworth in the north to Staines and the Thames in the south, Uxbridge and Heathrow in the east, and to Slough and Chalfont in the west. The Parishes of Wraysbury and Horton and part of Datchet are located within the Regional Park.

It is championed by the Colne Valley Park Community Interest Company (CVPCIC), which is submitting these comments. The CVPCIC is mindful of the potentially significant impact minerals and waste works have on the Park. The CIC's locus is to protect and enhance the Regional Park through the six objectives of the Park, which are:

1. To maintain and enhance the landscape, historic environment and waterscape of the park in terms of their scenic and conservation value and their overall amenity.
2. To safeguard the countryside of the Park from inappropriate development. Where development is permissible it will encourage the highest possible standards of design.
3. To conserve and enhance biodiversity within the Park through the protection and management of its species, habitats and geological features
4. To provide opportunities for countryside recreation and ensure that facilities are accessible to all.
5. To achieve a vibrant and sustainable rural economy, including farming and forestry, underpinning the value of the countryside.
6. To encourage community participation including volunteering and environmental education. To promote the health and social well-being benefits that access to high quality green space brings.

It is relevant to highlight that the boundary of the Park significantly coincides with the Metropolitan Green Belt, as do the six objectives with national planning policy. We would highlight paragraph 141 in the 2019 NPPF:

“Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.” (Para 141, NPPF)

This policy context is particularly relevant to the draft proposal in the Focussed Consultation for a new area of minerals extraction along the line of the Colne Valley Way (CVW), a strategic active travel route that provides opportunities for outdoor recreation and access to the countryside/ natural environment. The difficulties people may currently experience enjoying such access heightens the importance of getting right the protection and enhancement of the route. This is a particularly fragile and critical part of the Metropolitan Green Belt area with a strategic role for local communities and London generally.

We are mindful that the area around Horton and Poyle has been the subject of minerals and waste proposals and approvals for many years and yet we have seen no comprehensive improvement plan and the area suffers from ‘planning blight’ that degrades the local environment.

The proposals in this 2020 consultation must be considered in conjunction with those others in the Draft Plan and we refer to our representations to the 2018 consultation.

We await a substantive response to our 2018 representations and strongly believe that individual site proposals for this critical part of the Colne Valley Regional Park (CVRP) can only be considered in the context of a clear strategy (followed by the finer detail) for restoration and improvement of the area. With the current proposal involving diversion, whether temporary or permanent, of the Colne Valley Way seeing this wider strategy is vital.

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