

BY EMAIL ONLY TO [berks.consult@hants.gov.uk](mailto:berks.consult@hants.gov.uk)

09/10/20

Dear Sirs,

### **Central and Eastern Berkshire - Joint Minerals & Waste Plan**

Thank you for consulting with the Berks, Bucks and Oxon Wildlife Trusts (“BBOWT”) on the Central and Eastern Berkshire Joint Minerals and Waste Plan (“the Plan”). As a wildlife conservation charity our comments relate specifically to the protection and enhancement of biodiversity. As BBOWT is currently in between Senior Biodiversity and Planning Officers for Berkshire, our comments are more limited than is usually the case. Our silence on any particular aspect of the Plan, does not necessarily equate to support, but more reflects our limited capacity to currently respond in full.

#### **Overview**

We are not in principle opposed to the extractive industry, but we believe its works have to be sensitively sited and managed with negative impacts for nature avoided and sites restored to deliver a net benefit for wildlife in perpetuity. Priority should be given to reducing demand for minerals, including through use of recycled aggregates, and that level of need for minerals should be based on thorough assessment. Any possible minerals sites that would directly impact on a designated nature conservation site should not be taken forward.

#### **Protecting and enhancing habitats**

Whilst we support the importance placed on particular habitats in policy DM3, we have several concerns that potentially undermine the soundness of the Plan.

DM3.1 sets a target of 10% biodiversity net gain. This is far from ambitious enough and a minimum of 20% biodiversity net gain should be set to ensure the opportunities for habitat creation that the restoration of minerals sites present are fully taken.

DM3.4 would permit the destruction of Sites of Special Scientific Interest, nature reserves, priority habitats, Local Wildlife Sites and other irreplaceable habitats. Habitats and biodiversity should be a primary consideration, rather than something to be simply compensated for. There should be absolutely no adverse impact on the protected habitats and species and where development would have negative impacts on such habitats, it should not go ahead. Policy DM3 need to be amended to significant increase its ambitions for not only protecting sites and species, but contributing to their restoration.

## **Biodiversity-led restoration**

BBOWT supports many of the aims of policy DM8. However, we feel that it should have stronger aspirations for biodiversity. A biodiversity-led restoration strategy would recognise the unique opportunity that the restoration of minerals workings can provide in large scale priority habitat creation.

The strategy should support the delivery of biodiversity net gain across the area.

A biodiversity-led restoration strategy should include the following:

- (i) treat biodiversity as the primary consideration in the restoration of mineral sites;
- (ii) give preference to allocating and / or permitting mineral development in areas where it will have the greatest potential to maximise biodiversity benefits; and minimise damage to existing biodiversity;
- (iii) create priority habitat at a landscape scale, either on individual sites or on clusters of sites in close proximity;
- (iv) integrate habitat creation on restored mineral sites into the existing ecological network in the surrounding area;
- (v) set targets for the area of priority habitat that will be created on allocated sites.

Such policies should be integrated into DM8. All restoration opportunities should be designed to achieve a significant biodiversity net gain of at least 20% uplift and enhancements should be secured in perpetuity.

## **Nature Recovery Networks**

Whilst we broadly support the objective in Policy DM8 for the restoration of minerals and waste developments to contribute to the delivery of objectives for biodiversity, specific reference should be made to the contribution the restoration of such sites can make to Nature Recovery Networks and Nature Recovery Strategies as currently being legislated for in the Environment Bill. Berkshire will be required to prepare a Nature Recovery Network and Nature Recovery Strategy and the restoration of minerals and waste developments could play an important role in the delivery of such plans and strategies. Nature Recovery Networks seek to deliver habitat connectivity on a landscape scale. The plan has great potential to make a positive contribution across its area by adopting the goal to create a natural green network by connecting and restoring adjacent habitats.

## **Climate change**

Although we support the fact that Policy DM2 identifies the importance of mitigating the causes of climate change, specific reference should be made to the role that the creation of priority habitat on restored mineral sites can play in adapting to climate change. For example, larger and more connected areas of priority habitat can help these habitats to be more resilient in the face of climate change and enable associated species to move between habitats to areas with a more suitable climate. Further, wetland habitats can, for example, provide a means to store floodwater, retain sediment and regulate

water quality which will be beneficial should climate change increase winter / summer rain and increase storminess as predicted.

Thank you again for consulting us.

Yours sincerely,



Matthew Stanton  
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