
From: Steve Lamb [REDACTED]
Sent: 13 October 2020 12:26
To: C&E Berkshire Consultation <Berks.Consult@hants.gov.uk>
Cc: [REDACTED]
Subject: Central and Eastern Berkshire - Joint Minerals & Waste Plan - Regulation 19 Proposed Submission Consultation Response on behalf of Summerleaze Limited
Importance: High

Dear Hampshire Services,

I am responding to the latest Regulation 19 Consultation exercise on the Proposed Submission Joint Minerals and Waste Plan.

These comments are made on behalf of Summerleaze Limited who have a number of mineral and waste operations within Central and East Berkshire.

The comments relate to the Bray Quarry Extension site which was promoted to the Minerals and Waste Plan following one of the "Calls for Sites" exercises.

Bray Quarry Extension site

Sand and gravel would be processed off-site at the nearby Monkey Island Lane processing plant operated by Summerleaze.

Sand and gravel would be transported to the processing plant by the existing conveyor that was successfully used for the adjacent Bray Triangle site and there is no requirement for vehicular access. The site would be worked without any dewatering and restoration would be to a landscaped lake with biodiversity enhancements.

The restoration would not require infilling with waste materials.

If the site remains unworked it would sterilise a nationally important mineral.

The Environment Agency objected to the inclusion of the Bray Quarry Extension site because of possible risk to the public water supply and requested a full hydrological risk assessment at the Plan making stage

Hampshire Services discussed this objection with the Environment Agency to see if it could be resolved.

Summerleaze were not invited to participate in these discussions and consequently the site was excluded from the Proposed Submission Plan due to the Environment Agency objection.

A simple amendment to the boundaries of the site could have been made to exclude that part of the site lying within the Inner Source Protection Zone (SPZ1) which would have removed the Environment Agency objection.

Summerleaze were never given the opportunity to make this amendment.

Attached to this email is a brief technical letter from [REDACTED], that confirms that the Environment Agency's objection could be satisfactorily addressed by amending the site boundary.

The recoverable tonnage of sand and gravel would be reduced from 600,000 tonnes to 450,000 tonnes as a consequence of reducing the site area although the site would still be viable with a reduced tonnage.

The site would make a material contribution to the supply of sand and gravel during the Plan period and it would be larger than some of the other sites that have been included.

Summerleaze believe that the Proposed Submission Plan is unsound.

The Plan has not been positively prepared, preferring as it does to rely on the use of Areas of Search as a way of delivering a proportion of the mineral required under the regional apportionment rather than providing clear direction by way of Preferred Areas.

The reliance on Areas of Search will not be effective as evidenced by the complete lack of suitable sites coming forward during four separate Call for Sites exercises.

Establishing whether promoted sites were flexible enough to remove objections in principle would have been straightforward.

Conclusion

The Area of Search approach is not justified and is not effective because there was in fact a very simple solution to the Environment Agency's objection in principle to the Bray Quarry Extension site that was not explored.

I trust these comments are clear.

Regards.

Steve Lamb

Chartered Mineral Surveyor

Quarryplan (GB) Ltd

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