

15<sup>th</sup> October 2020



Sent by email to: [berks.consult@hants.gov.uk](mailto:berks.consult@hants.gov.uk)

[Redacted]

**Our Ref:** JCEB Reg. 19

Consultation

**Your Ref:**

**Please ask for:** Minerals and Waste  
Planning Team

[Redacted]

Dear Sir/Madam,

**RE: Joint Central and Eastern Berkshire Minerals and Waste Local Plan Reg. 19 Consultation.**

This is a response at officer level and has not gone through any formal sign off procedure in West Berkshire District Council.

**Sharp Sand and Gravel Supply**

The strategy for sharp sand and gravel supply in Central and Eastern Berkshire is to allocate two sites for extraction, although it is recognised that this will not meet the requirements over the Plan period. The shortfall is anticipated to be made up from windfall sites and supply from surrounding authorities including West Berkshire District Council (WBDC).

WBDC can confirm that it will plan to positively meet the need for sharp sand and gravel in West Berkshire through the emerging Minerals and Waste Local Plan. This does not include specific provision for any other particular authority area, but it does include consideration of current and historic movements of sharp sand and gravel.

**Soft Sand Supply**

It is noted that the strategy for soft sand supply in Central and Eastern Berkshire is to recognise current supply relationships and rely on surrounding authorities, including WBDC, for the supply of this aggregate mineral over the Plan period.

WBDC does not currently have any permitted extraction sites for soft sand, the last site having ceased production in 2019. The issue of soft sand supply in West Berkshire is being addressed through the emerging West Berkshire Minerals and Waste Local Plan which is due for consultation under Regulation 19 of the Town and Country (Local Planning) (England) Regulations in January/February 2021. It is proposed to make provision to maintain the LAA rate in West Berkshire over the Plan period through a site allocation, with the rest being made up through supply from other authorities.

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Consequently, it is unlikely that WBDC will be able to specifically provide for an unmet need of this aggregate in other authority areas. This is particularly the case due to the fact that most of West Berkshire's viable soft sand deposits are located within the North Wessex Downs Area of Outstanding Natural Beauty.

### **Recycled Aggregate Provision**

While it is noted and accepted that Central and Eastern Berkshire currently rely on capacity in West Berkshire for recycled aggregates, there doesn't appear to be any quantification of this reliance, which makes it difficult to determine the ability of West Berkshire to continue to meet this need over the Plan period.

### **Waste Capacity Provision**

There do not appear to be any capacity estimates for the proposed allocated waste sites. Therefore it isn't possible to determine to what extent any capacity shortfalls will need to be made up from reliance on windfall sites and provision from other areas (of which WBDC is specified in terms of inert recycling capacity). This therefore makes it difficult to determine if the strategy has been 'positively prepared' in order to meet the assessed need in line with NPPF paragraph 35, and to what extent the plan area may be relying on other areas for waste management capacity throughout the plan period.

### **Specific Comments**

#### Policy M3

Given the strategy for aggregate minerals to rely on other areas for supply over the Plan period, this policy doesn't appear to be entirely correct in specifying that 'provision will be made for *the release of land* to allow a steady and adequate supply of sand and gravel for aggregate purposes'.

Yours faithfully,

**West Berkshire Minerals and Waste Planning Team**