



**Woolf Bond Planning**  
Chartered Town Planning Consultants

WBP Ref: SB/GR/7477

15<sup>th</sup> October 2020

Central and Eastern Berkshire Authorities Joint Minerals and Waste Plan  
c/o Hampshire Services,  
Strategic Planning,  
Hampshire County Council,  
First Floor Elizabeth II Court West,  
The Castle,  
Winchester,  
SO23 8UD

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

Dear Sir/Madam,

**CENTRAL AND EASTERN BERKSHIRE: JOINT MINERALS & WASTE PLAN PROPOSED  
SUBMISSION (AUGUST 2020) – REGULATION 19 CONSULTATION**

**REPRESENTATIONS ON BEHALF OF BELLWAY HOMES**

**LAND AT HIGHLANDS, WEST OF BASINGSTOKE ROAD, SPENCERS WOOD**

**General**

We refer to the above Regulation 19 consultation and write on behalf of our client, Bellway Homes, setting out our comments upon certain of the draft policies and proposals contained therein, including our objection to the inclusion of land at Highlands, west of Basingstoke Rad, Spencers Wood under Policies M2 and M4.

In preparing the response to the Proposed Submission Plan, we acknowledge the definition of “Mineral Safeguarding Areas” in the Glossary of the NPPF, which states is defined as follows:

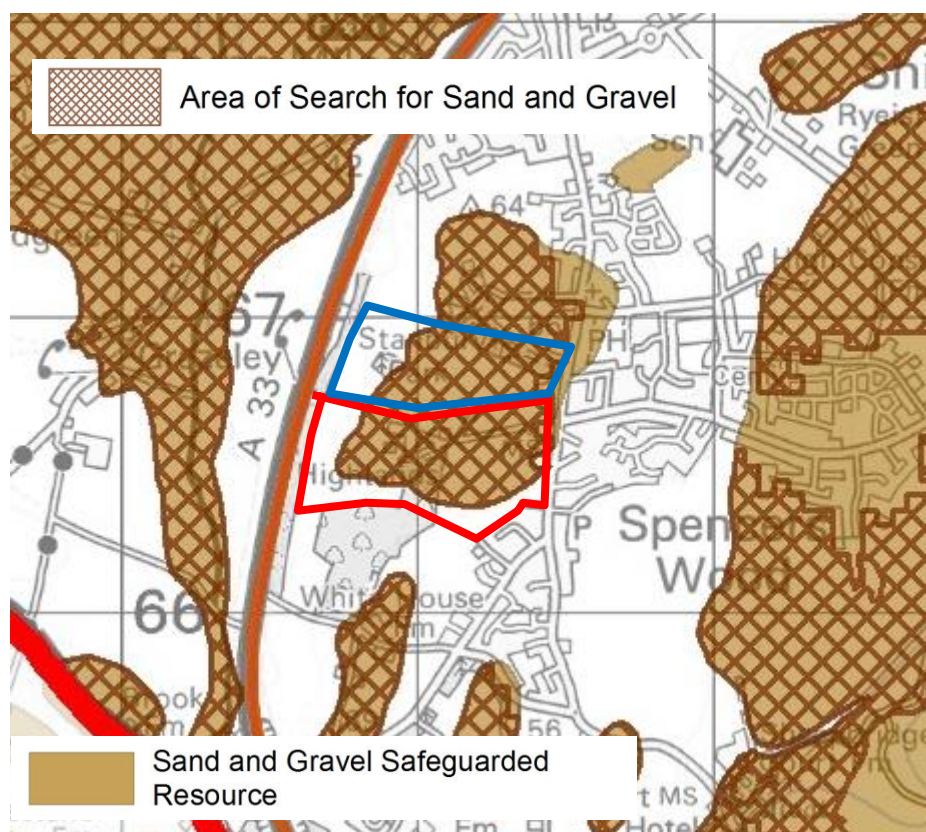
**“an area designated by minerals planning authorities which cover know deposits of minerals which are desired to be safeguarded from unnecessary sterilisation by non-mineral development”.**

## Objection to Policy M2

Draft Policy M2 and the accompanying draft Policies Map indicate that extent of safeguarded Sand and Gravel Resources. This is shown on the annotated version of the proposed Policies Map below with the extent of our clients' land at Highlands, west of Basingstoke Road, outlined in red.

The Policy Map indicates that the safeguard areas for sand and gravel resources are buff coloured on the extract below.

The area on the extract below bound in blue has outline planning permission for residential development alongside a SANG (land at Stanbury House, Basingstoke Road, Spencers Wood) through applications O/2014/2101 approved on appeal (16<sup>th</sup> September 2018) (outline application for up to 57 dwellings) and 161920 and 190747<sup>1</sup> (with respect of the SANG).



Paragraph 6.39 of the supporting text to Policy M2 states as follows:

**“the MWSAs [Minerals and Waste Safeguarding Area] will apply to sand and gravel deposits beneath existing built up urban areas. This ensures sand and gravel deposits and the possibility for prior extraction is taken into account when proposals for large scale redevelopment are considered.”**

As indicated above, the land immediately north of the Highlands site at Spencers Wood has planning permission for residential development which can be implemented without necessitating removal of the reserves prior to construction.

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<sup>1</sup> Approved 23<sup>rd</sup> February 2017 and 14<sup>th</sup> October 2019 respectively

With the lifespan of the dwellings to be constructed in under the extant planning permission extending beyond the plan period of the Proposed Submission Minerals and Waste Plan (to 2036), there will be no opportunity for minerals extraction within that part of the identified area within the extent of the area covered by the extant planning permission during the plan period.

The PPG states in relation to the appropriateness of safeguarding mineral resources in designated areas and urban areas as follows (ID ref 27-004-20140306):

**“Safeguarding mineral resources should be defined in designated areas and urban areas where necessary to do so. For example, safeguarding of minerals beneath large regeneration projects in brownfield land areas can enable suitable use of the mineral and stabilisation of any potentially unstable land before any non-minerals development takes place.”**

In terms of the mineral resources underlying the approved Stanbury Park scheme, there is unlikely to be the opportunity for redevelopment within the Plan period. Furthermore, with extensive areas of the Combined Minerals Planning Area of Central and eastern Berkshire outside of designated urban areas, it is not considered necessary to apply safeguarding measures to these areas.

In addition to the acknowledgement of the limited opportunity to redevelop sites with extant planning permission for residential during the Plan period of the Central and East Berkshire Minerals and Waste Plan, it is also recognised that the PPG (ID ref 27-018-20140306 and 27-126-20140306) highlights the appropriateness of buffers around mineral extraction areas and occupied residential properties.

Although the Draft submission Plan (paragraph 6.46) refers to buffers of 250m around quarries and 50m around other mineral operations, it is noted that the Minerals Proposals Study accompanying the document refers to 100m stand-offs between working areas and nearest residential property<sup>2</sup>.

Irrespective of which of these distances is adopted with respect of quarries, once a buffer is drawn around the approved residential development at Stanbury Park alongside the dwellings at Clements Close (to the south of Highlands), there would not be a sufficient area remaining at the Highlands site (bounded in red above) to viably extract minerals. Therefore, this area should be omitted from the Safeguarded Sand and Gravel resource as currently shown on the draft Policy Map.

The concerns over the realism of the emerging Joint Plan to rely upon mineral extraction within areas across Central and East Berkshire where development is committed was highlighted in our earlier response to the Focused Consultation to which we responded to in March this year (copy enclosed).

The approach under Policy M2 of seeking to safeguard locations with existing or committed non-mineral development together with areas where sand & gravel has already been extracted is unsound.

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<sup>2</sup> See Bray Quarry extension (site code CEB27)

It is on this basis that we consider the policy is unsound as it has not been demonstrated to be positively prepared, is not justified, will not be effective (in so far as the policy is undeliverable); and is also inconsistent with national policy.

#### Necessary Changes to Policy M2

In order to address the aforementioned soundness concerns, the extent of the safeguard areas for sand & gravel shown associated with Policy M2 on the Policies Map should be revised to exclude the following:

- a) Any area with existing or committed non-mineral development (especially residential) together with a buffer of at least 100m;
- b) Any area where sand & gravel has been extracted, especially where restoration has either been completed or is in progress; and
- c) The omission of land west of Basingstoke Road Spencers Wood.

#### **Objection to Policy M4**

Policy M4 of the draft Submission Minerals and Waste Plan also defines “Areas of Search” which are indicated on the Policies Map.

As the extract of the Policies Map above shows, the Areas of Search are defined by a cross-hatched brown notation.

Our clients object to the inclusion of the Highlands Site (edged in red above) within the Area of Search.

Once the necessary buffers from existing and committed development (later could be occupied prior to any mineral extraction) are defined, there will be insufficient areas remaining to viably extract minerals from.

Consequently, and as with our response to Policy M2, the extent of Highlands should be omitted from the defined area subject to Policy M4.

The approach under Policy M2 of seeking to define areas of search within existing or committed non-mineral development together with areas where sand & gravel has already been extracted is unsound.

It is on this basis that we consider the policy is unsound as it has not been demonstrated to be positively prepared, is not justified, will not be effective (in so far as the policy is undeliverable); and is also inconsistent with national policy.

#### Necessary Changes to Policy M4

In order to address the aforementioned soundness concerns, the areas of search for sand & gravel extraction shown under Policy M4 on the Policies Map should be revised to exclude the following:

- a) Any area with existing or committed non-mineral development (especially residential) together with a buffer of at least 100m;

- b) Any area where sand & gravel has been extracted, especially where restoration has either been completed or is in progress; and
- c) The omission of land west of Basingstoke Road Spencers Wood.

### **Summary**

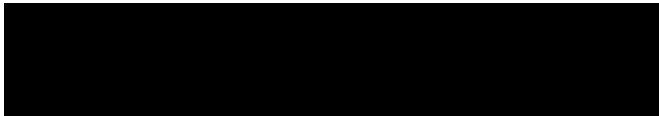
In order to ensure the adequacy and robustness of the Mineral Planning Authorities' assessment of locations for sand & gravel extraction has taken account of the points as set out above, we wish to appear at the examination of the Joint Minerals & Waste Plan.

We trust the above comments are of assistance in advancing the Plan and await confirmation of receipt of our representations in due course.

We welcome the opportunity to enter into dialogue with the Council in order to further proposals for the potential to deliver a sound Plan.

Please do not hesitate to contact the writer should you wish to discuss any matter(s) arising.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Steven Brown BSc Hons DipTP MRTPI  
Enc.