



Woolf Bond Planning
Chartered Town Planning Consultants

WBP Ref: SB/GR/7477

23rd March 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

Dear Sir/Madam,

FOCUSSED CONSULTATION UNDER REGULATION 18 ON SPECIFIC ASPECTS OF THE MINERALS AND WASTE LOCAL PLAN – SAND & GRAVEL PROVISION AND OPERATOR PERFORMANCE.

We respond to the above focused consultation on behalf of a number of clients with land interests in Bracknell Forest, Reading, Wokingham and Windsor & Maidenhead Borough's.

In preparing the response to the focused consultation, we acknowledge the definition of "Mineral Safeguarding Areas" in the Glossary of the NPPF. This indicates that these are "an area designated by minerals planning authorities which cover known deposits of minerals which are desired to be safeguarded from unnecessary sterilisation by non-mineral development".

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

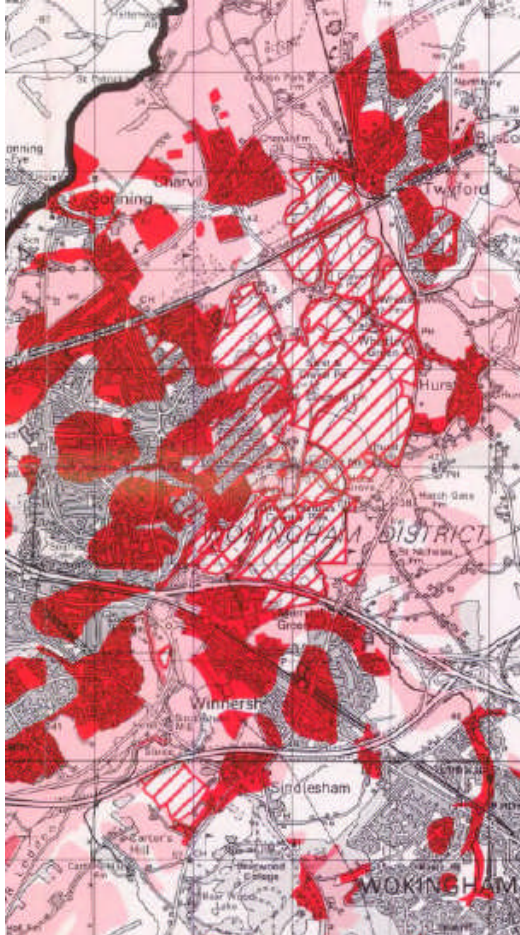
The current Replacement Minerals Local Plan for Berkshire (incorporating Alterations adopted in December 1997 and May 2001) illustrates the current areas of search through showing where there are sand and gravel deposits alongside those locations subject to a strong or strongest presumption against extraction 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

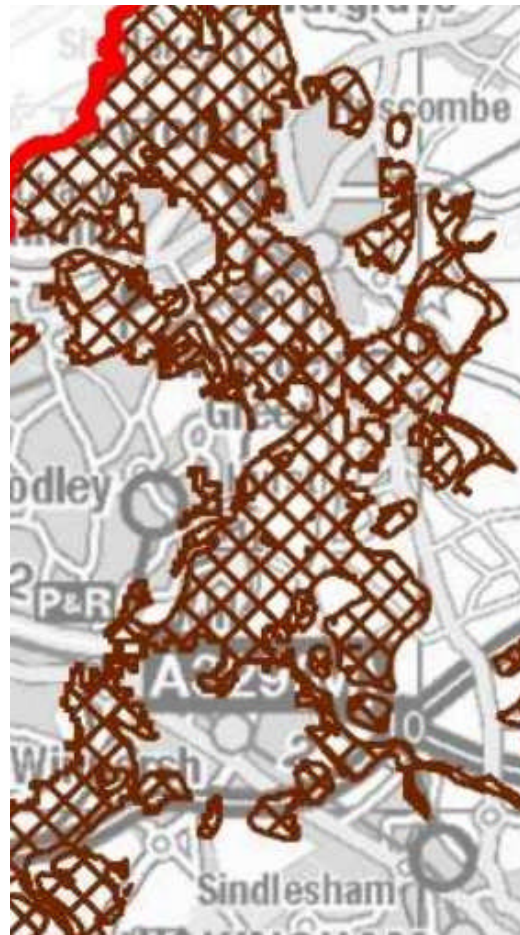
evidence that further reserves can be extracted from these areas, they must consequently be omitted from the Areas of Search shown on figure 1.

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.

The Loddon Valley to the east of Reading

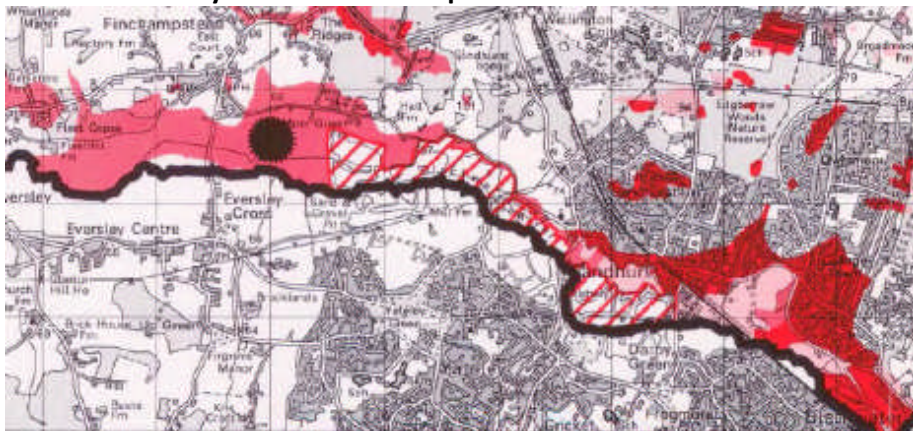


Replacement Minerals Plan



Focused consultation document

Blackwater Valley between Finchampstead and Sandhurst

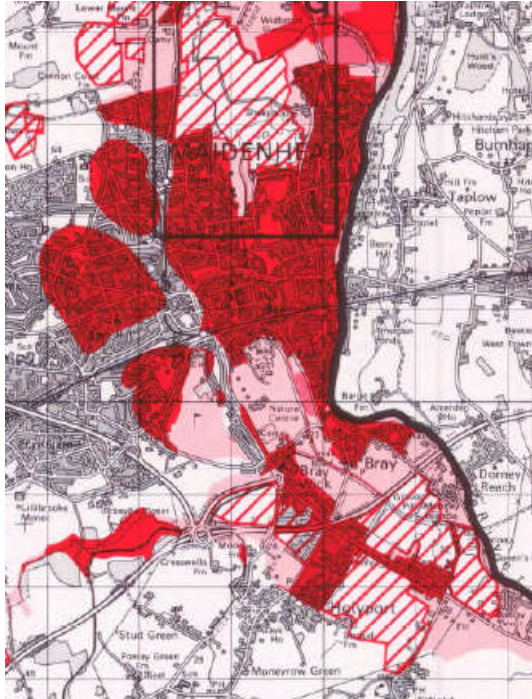


Replacement Minerals Plan



Focused consultation document

Thames riverside north and south of Maidenhead

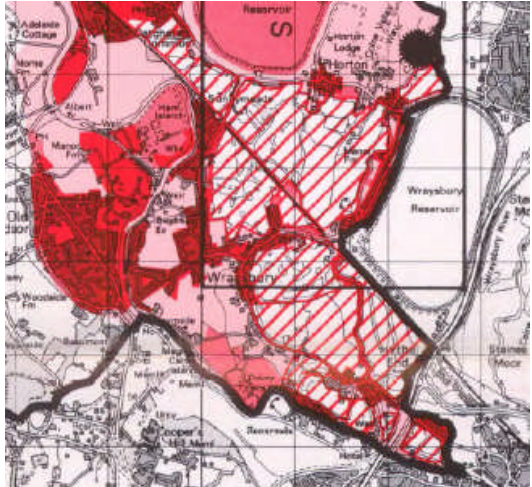


Replacement Minerals Plan



Focused consultation document

Thames riverside at Horton



Replacement Minerals Plan



Focused consultation document

The above 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.

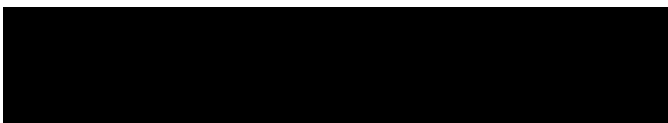
With the acknowledgement in the Focused Consultation of the ceasing of the promotion of land south of the A327 between Arborfield and Shinfield in Wokingham Borough for sand and gravel extraction, in order to maintain the minimum 7 years land bank required by the NPPF (paragraph 207), it is essential 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.

I look forward to hearing from you in the near future, if however, I can be of any further assistance please do not hesitate to contact me.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Steven Brown BSc Hons DipTP MRTPI

Enc.