Central and Eastern Berkshire Joint Minerals and Waste Plan

Regulation 19 Proposed Submission Plan Consultation

Introduction

Local Planning Authorities have a statutory responsibility to prepare and maintain an up-to-date local plan. Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor and Maidenhead and Wokingham Borough Council (collectively referred to as the 'Central & Eastern Berkshire Authorities') are working in partnership to produce a Joint Minerals and Waste Plan which will guide minerals and waste decision-making in the Plan area for the period up to 2036.

This response form allows you to provide your views on the Joint Minerals and Waste Plan Proposed Submission Plan document for Central and Eastern Berkshire.

This consultation is open from 3 September until 15 October 2020. If you have any queries, or require this form in an alternative format, please contact [redacted]

When you have completed this questionnaire, you can return it by post to:

Central and Eastern Berkshire JMWP
[redacted]

Or by email to [redacted]

Please note: a full name and full postal address (including postcode) are required in order for a response to be accepted. Responses submitted which do not include this information will **not** accepted.

About this consultation

Privacy notice

The Strategic Planning Team at Hampshire County Council is collecting information about you on behalf of the Central & Eastern Berkshire Authorities (Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor & Maidenhead and Wokingham Borough Council) in order to consult on Central & Eastern Berkshire Authorities' proposed minerals and waste planning policy.

We will collect your name, postal address and any other contact information you provide as well as details of your representation. A name and postal address must be provided for the comments to be accepted. Anonymous or confidential representations without the required personal information cannot be accepted. We will accept representations to consultations and use the information to draft planning policy documents.

The legal basis for our use of this information is compliance of a legal obligation to which the Berkshire Authorities are subject. This is in relation to the Town and Country Planning Act 1990 (as amended). All representations received will be available to view publicly in accordance with the Local Government Act (1985) for the purposes of preparing planning policy documents until adoption.

Your personal information will be shared with the Central & Eastern Berkshire Authorities as well as the Secretary of State (and appointed Planning Inspector) at the point a policy document (such as the Joint Minerals & Waste Plan) is submitted to government for public examination. Your representation will be submitted through and processed by Snap Surveys acting as a processor on behalf of Hampshire County Council.

On adoption of the policy document, all representations will be removed from the website. Electronic and paper file copies of representations will be kept by the Central & Eastern Berkshire Authorities for at least three years in line with the relevant corporate retention period. All representation received will be handled and made publicly available in accordance with the Privacy Statement (found via this link) www.hants.gov.uk/berksconsult.

You have some legal rights in respect of the personal information we collect from you. Please see our website Data Protection page for further details. You can contact Hampshire County Council's Data Protection Officer at data.protection@hants.gov.uk. If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at https://ico.org.uk/concerns/.

Background

The Joint Minerals and Waste Plan will replace the adopted minerals and waste plans for the Central and Eastern Berkshire area. It will improve, update and strengthen the policies and provide details of strategic sites that are proposed to deliver the vision.

Several information gathering consultations were undertaken between 2017 and 2020 to inform the Plan, each of these form part of Regulation 18. This Regulation 19 stage includes the publication of the Proposed Submission Plan and outlines the version that is intended to be submitted to the Secretary of State for independent examination. Representations made on the Proposed Submission Plan and other relevant documentation will be compiled and submitted to the Secretary of State for independent examination.

The Joint Minerals and Waste Plan Proposed Submission Plan document can be downloaded at www.hants.gov.uk/berksconsult. It is recommended that you refer to this document as you respond to this consultation.

WE would like to hear from you in respect of your views on the 'soundness' and legal compliance of the Proposed Submission Plan document and its accompanying material. For definitions of the Tests of Soundness, please refer to page four of the Joint Minerals and Waste Plan Proposed Submission Plan document or Q18 and Q19 of the FAQs. Both documents can be found by visiting www.hants.gov.uk/berksconsult.

This consultation response form is split into eight sections:

Section one: the introduction, background & context, spatial vision and key diagram in the Proposed Submission Plan document

Section two: the policies and implementation & monitoring ('supporting text') in the Proposed Submission Plan document

Section three: waste facility categories (Appendix B) in the Proposed Submission Plan document

Section four: the evidence base (Appendix D) in the Proposed Submission Plan document

Section five: safeguarded sites (Appendix E) in the Proposed Submission Plan document

Section six: glossary & acronyms in the Proposed Submission Plan document

Section seven: further comments

Section eight: about you

Section one – the introduction, background & context, spatial vision and key diagram in the Proposed Submission Plan document

Introduction

This is referenced on pages 7 to 13 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

What are your comments on the introduction?

Background and context

This is referenced on pages 14 to 16 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

What are your comments on the background and context?

Spatial vision for minerals and waste, including strategic plan objectives and spatial strategy

The vision – this is referenced on pages 17 to 22 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

The vision of the Joint Minerals and Waste Plan is set out at paragraph 3.5 of the Proposed Submission Plan document.

Regarding the vision, into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you have supported the vision, please explain your reasons this:

An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions on the Tests of Soundness, please refer to Q18 and Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the vision on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the vision on the grounds that it does not meet the Test of Soundness, please include below your comments on how it does not meet the Test of Soundness:

Are you seeking a change to the vision?

- ❑ Yes
- ❑ No

If you are seeking a change to the vision, what change are you seeking and why?

Do you have any further comments on the vision?

Strategic plan objectives

The strategic plan objectives – these are set out at paragraph 3.6 of the Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Regarding the strategic plan objectives, into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the strategic plan objectives, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions on the Tests of Soundness, please refer to Q18 and Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the strategic plan objectives on the grounds that they do not meet the Test of Soundness, what Test(s) of Soundness do you consider that they fail? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the strategic plan objectives on the grounds that they do not meet the Test of Soundness, please include below your comments on how the strategic plan objectives do not meet the Test of Soundness:

Are you seeking a change to the strategic plan objectives?

- ❑ Yes
- ❑ No

If you are seeking a change to the strategic plan objectives, what change are you seeking and why?

Do you have any further comments on the strategic plan objectives?

Spatial strategy

The spatial strategy – this is set out at paragraphs 3.7 to 3.10 of the Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Regarding the spatial strategy, into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the spatial strategy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions on the Tests of Soundness, please refer to Q18 and Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the spatial strategy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the spatial strategy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the spatial strategy does not meet the Test of Soundness:

Are you seeking a change to the spatial strategy?

- ❑ Yes
- ❑ No

If you are seeking a change to the spatial strategy, what change are you seeking and why?

Do you have any further comments on the spatial strategy?

Key diagram

The key diagram – this is referenced on page 23 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Regarding the key diagram, into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the key diagram, please explain your reasons for this:

An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions on the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the key diagram on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the key diagram on the grounds that it does not meet the Test of Soundness, please include below your comments on how the key diagram does not meet the Test of Soundness:

Are you seeking a change to the key diagram?

- ❑ Yes
- ❑ No

If you are seeking a change to the key diagram, what change are you seeking and why?

Do you have any further comments on the key diagram?

Section two – the policies and implementation & monitoring ('supporting text') in the Proposed Submission Plan document

This consultation contains 28 policies, including details on implementation & monitoring ('supporting text') for each policy. The policies are as follows:

Policy DM1 – Sustainable Development
Policy DM2 – Climate Change – Mitigation and Adaptation
Policy DM3 – Protection of Habitats and Species
Policy DM4 – Protection of Designated Landscape
Policy DM5 – Protection of the Countryside
Policy DM6 – Green Belt
Policy DM7 – Conserving the Historic Environment
Policy DM8 – Restoration of Minerals and Waste Developments
Policy DM9 – Protecting Health, Safety and Amenity
Policy DM10 – Flood Risk
Policy DM11 – Water Resources
Policy DM12 – Sustainable Transport Movements
Policy DM13 – High Quality Design of Minerals and Waste Development
Policy DM14 – Ancillary Development
Policy DM15 – Past Operator Performance
Policy M1 – Sustainable Minerals Development Strategy
Policy M2 – Safeguarding Sand and Gravel Resources
Policy M3 – Sand and Gravel Supply
Policy M4 – Locations for Sand and Gravel Extraction
Policy M5 – Supply of Recycled and Secondary Aggregates
Policy M6 – Chalk and Clay
Policy M7 – Aggregate Wharves and Rail Depots
Policy M8 – Safeguarding Minerals Infrastructure
Policy W1 – Sustainable Waste Development Strategy
Policy W2 – Safeguarding of Waste Management Facilities
Policy W3 – Waste Capacity Requirements
Policy W4 – Locations and Sites for Waste Management
Policy W5 – Reworking Landfills
Energy Minerals supporting text only (**this is not a policy**)

Policy DM1 – Sustainable Development

This policy is described on page 25, with the 'supporting text' detailed on pages 25 to 27 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy DM2 – Climate Change – Mitigation and Adaptation

This policy is described on page 28, with the 'supporting text' detailed on pages 28 to 30 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

☒ Support ❑ No view either way ❑ Objection

If you support the policy, please explain your reasons for this:

We support this policy as we expect to see climate change being addressed in flood risk assessments and when considering the habitats associated with the Berkshire watercourses.

An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

This policy does not state that development should not result in increased flood risk elsewhere or seek to reduce flood risk overall. This wording should be included in this policy to be consistent with Policy DM10.

Policy DM3 – Protection of Habitats and Species

This policy is described on page 33, with the 'supporting text' detailed on pages 31, 32 & 34 to 36 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

☒ Support ❑ No view either way ❑ Objection

If you support the policy, please explain your reasons for this:

An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

We need to see wording in the main policy text which not only protects rivers and their associated river corridors, but also enhances these features. Paragraphs 5.32 and 5.33 both state that river corridors should be protected and enhanced. Moving this into the main policy text will again provide a clearer message to developers on the position of the Minerals and Waste Plan with regards to the importance of these features. Currently, policy DM3 doesn't specifically mention rivers and their ecological buffer zones at all.

The Natural Environment and Rural Communities Act require Local Authorities to have regards to nature conservation. Article 10 of the Habitats Directive stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats and promote the expansion of biodiversity. Such networks of undeveloped buffer zones might also help wildlife adapt to climate change and will help restore watercourses to a more natural state as required by the river basin management plan. These amendments also support the Government's environmental objectives, set out in the 25 Year Environment Plan.

Additionally, they will help to ensure that Policy DM3 point 3g is delivered, which states that features which function as 'stepping stones' or form part of a wider network of features are protected and enhanced. This also link up with Policy DM11 which states that 'planning permission will be granted for minerals and waste development where proposals do not result in the deterioration of the physical state, water quality or ecological status of any water resource and waterbody.' Our approach is directly supported by the Local Authorities individual local policies which constitute this Berkshire Minerals and Waste Plan, namely Wokingham Borough Council's Policy CP7 Biodiversity, Royal Borough of Windsor and Maidenhead's Policy QP4 River Thames Corridor, Bracknell Forest’s Draft Local Plan Policy LP36 Biodiversity and Reading Borough Council's Policy EN12 Biodiversity and the Green Network.

Policy DM4 – Protection of Designated Landscape

This policy is described on page 37, with the 'supporting text' detailed on pages 37 to 38 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions pf the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy DM5 – Protection of the Countryside

This policy is described on page 39, with the 'supporting text' detailed on pages 39 to 40 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy DM6 – Green Belt

This policy is described on page 41, with the 'supporting text' detailed on pages 41 to 43 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy DM7 – Conserving the Historic Environment

This policy is described on page 45, with the 'supporting text' detailed on pages 44 to 46 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy DM8 – Restoration of Minerals and Waste Developments

This policy is described on page 48, with the 'supporting text' detailed on pages 47 to 50 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

☒ Support ❑ No view either way ❑ Objection

If you support the policy, please explain your reasons for this:

We support this policy because it requires high standards for restoration, after care, long term monitoring and the delivery of objectives for biodiversity.

An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions on the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

❑ Not complying with legal requirements / the duty to co-operate
❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

❑ The positively prepared test
❑ The justification test
❑ The effectiveness test
❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

When we receive a mineral application which impacts water resources, we need to see that an aftercare monitoring plan was considered as part of the restoration plan. This should be included in this policy in point 1 under ‘long-term management’.

Policy DM9 – Protecting Health, Safety and Amenity

This policy is described on page 51, with the 'supporting text' detailed on pages 51 to 53 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy DM10 – Flood Risk

This policy is described on page 54, with the 'supporting text' detailed on pages 54 to 55 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

☒ Support ❑ No view either way ❑ Objection

If you support the policy, please explain your reasons for this:

We are pleased to see that a separate flood risk policy has been included in the local plan following the comments we made in our letter dated 19 October 2018 in response to the Regulation 18 local plan consultation.

An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

We support this policy in general however points a and b of this policy have been worded incorrectly.

The Regulation 19 policy states:

“a. Apply the sequential test, exception test, where required, and sequential

approach within the development site directing the most vulnerable

development to the areas at lowest risk from flooding;

b. Not result in an increased flood risk elsewhere and, where possible,

reduce flood risk overall;”

We required the flowing wording:

“a) Apply the sequential test, exception test and sequential approach within the development site directing the most vulnerable development to the areas at lowest risk from flooding

b) Not result in an increased flood risk elsewhere and seek to reduce flood risk overall;”

Point a will need amending or clarified in the supporting text as the sequential test is required for all development in Flood Zones 2 and 3 unless it is minor development in accordance with paragraph 164 sand footnote 50.

Point b is weaker in the Regulation 19 version of this policy by including the words ‘where possible’ when seeking to reduce flood risk overall. This is not in accordance with the Planning Practice Guidance which does not use the wording ‘where possible’

In addition to this in the supporting text you need to refer to the flood risk tables 1-3 in the Planning Practice Guidance and this sets out which kind of development is acceptable or not in each Flood Zone.

In the flood risk policy DM10 or in the restoration policy DM8 there should be wording included to say that flood risk will not be increased elsewhere in the restoration phases of the minerals quarrying.

Paragraph 5.104 - This paragraph says:

“Landfill and hazardous waste facilities will not be permitted in Flood Risk Zones 3a and 3b”

Please be aware that in the Planning Practice Guidance it says that Landfill and sites used for waste management facilities for hazardous waste are More Vulnerable and that should not be permitted in Flood Zone 3b but can be located in Flood Zone 3a following the application of the sequential test and exception test. Please also be aware that there are other development types that should not be permitted in Flood Zones 3a and 3b. This paragraph also refers to pollution prevention which should be covered in a separate paragraph to one about flood risk.

<u>Environmental Permit</u>

Either the SFRA or the main Minerals & Waste Plan document should include an informative about sites which are adjacent to, or include, a main river needing an environmental permit. Currently environmental permits are only mentioned in the glossary of the Plan.

Suggested wording: “Developments may require an Environmental Permit from the Environment Agency under the terms of the Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations 2016 for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of designated ‘main rivers’. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. An environmental permit is in addition to and a separate process from obtaining planning permission. Further details and guidance are available on the GOV.UK website: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits.”

Policy DM11 – Water Resources

This policy is described on page 56, with the 'supporting text' detailed on pages 56 to 58 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

☒ Support ❑ No view either way ❑ Objection

If you support the policy, please explain your reasons for this:
We are pleased to see the inclusion of a local plan policy that considers the protection of water quality, water resources, source protection zones and groundwater aquifers.

An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions on the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

We would like to see the following addition and change considered in this policy:

In point 1c – The following text needs to be added, “Nearby private and licensed abstractions”

In point 2 – The texts needs to be amended. A hydrogeological/hydrological assessment should be carried out for all applications that present a hazard to water resources, quality and abstractors, not just sites located in a Source Protection Zone. This is in line with N7 ‘Hydrogeological Risk Assessment’ of ‘The Environment Agency’s approach to groundwater protection’. The text in policy DM11 for this point should be modified to consider this.

Policy DM12 – Sustainable Transport Movements

This policy is described on page 60, with the 'supporting text' detailed on pages 59 to 62 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy DM13 – High Quality Design of Minerals and Waste Development

This policy is described on page 63, with the 'supporting text' detailed on pages 63 to 64 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy DM14 – Ancillary Development

This policy is described on page 65, with the 'supporting text' detailed on pages 65 to 66 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy DM15 – Past operator performance

This policy is described on page 67, with the 'supporting text' detailed on pages 67 to 69 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy M1 – Sustainable Minerals Development Strategy

This policy is described on page 74, with the 'supporting text' detailed on pages 71 to 75 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy M2 – Safeguarding Sand and Gravel Resources

This policy is described on page 78, with the 'supporting text' detailed on pages 76 to 80 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy M3 – Sand and Gravel Supply

This policy is described on page 83, with the 'supporting text' detailed on pages 81 to 84 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy M4 – Locations for Sand and Gravel Extraction

This policy is described on page 86, with the 'supporting text' detailed on pages 85 to 88 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall regarding **the proposed extraction of remaining reserves at the following permitted sites**?

	Support	No view either way	Objection
Horton Brook quarry, Horton	❑	❑	☒
Riding Court Farm, Datchet	❑	❑	☒
Sheephouse Farm, Maidenhead	❑	❑	☒
Poyle Quarry, Horton	❑	❑	☒
Water Oakley, Holyport	❑	❑	☒

Into which of the following categories does your representation fall regarding **the proposed extension to the following sites**?

	Support	No view either way	Objection
Horton Brook & Poyle Quarry, Horton (MA1)	☒	❑	❑
Poyle Quarry, Horton (MA2)	❑	❑	☒

Into which of the following categories does your representation fall regarding **proposals for new sites not outlined in Policy M4, in appropriate locations, where**:

	Support	No view either way	Objection
They are situated within the Area of Search (as shown on the policies map)	❑	❑	☒
They are needed to maintain the landbank	❑	❑	☒
They maximise opportunities provided by existing infrastructure and available minerals resources	❑	❑	☒
The site contains soft sand	❑	❑	☒
The resources would otherwise be sterilised	❑	❑	☒

The proposal is for a specific local requirement	❑	❑	☒

If you have supported one or more of the proposals (either proposed extraction of remaining reserves, proposed site extensions or proposals for new sites not outlined in Policy M4), please explain your reasons of support:

Horton Brook & Poyle Quarry, Horton (MA1) lies within Flood Zone 1 and therefore this site doesn't need to be sequentially tested

An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ☒ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ☒ The justification test
- ☒ The effectiveness test
- ☒ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:
1) Appendix 1 of the Strategic Flood Risk Assessment (SFRA) date July 2020 refers to the sequential test but there is not enough evidence to demonstrate other sites at a lower risk of flooding have been considered and discounted. Therefore this evidence base is not justified.

Its also not clear whether the 'proposals for new sites' have been sequentially tested or not.

2) The SFRA needs to consider the impact of climate change, and should include the new climate change allowances as part of the SFRA assessment in order to be compliant with NPPF, which states that you should have an up-to-date and proportionate evidence base. By not including this evidence it could have an impact on the deliverability of some of your minerals and waste site allocations.

Are you seeking a change to the policy?

☒ Yes ❑ No

If you are seeking a change, please indicate the issue(s) under which you are seeking this change (*Please select all that apply):*

	Landscape	Habitats and species	Transport	Green Belt	Flooding	Amenity impacts (noise, dust etc)
Extraction of remaining reserves at Horton Brook Quarry, Horton	❑	❑	❑	❑	☒	❑
Extraction of remaining reserves at Riding Court	❑	❑	❑	❑	☒	❑

Farm, Datchet						
Extraction of remaining reserves at Sheephouse Farm, Maidenhead	❑	❑	❑	❑	☒	❑
Extraction of remaining reserves at Poyle Quarry, Horton	❑	❑	❑	❑	☒	❑
Extraction of remaining reserves at Water Oakley, Holyport	❑	❑	❑	❑	☒	❑
Extension to (existing sites) Horton Brook & Poyle Quarry, Horton (MA1)	❑	❑	❑	❑	☒	❑
Extension to (existing site) Poyle Quarry, Horton (MA2)	❑	❑	❑	❑	☒	❑
New sites where they are situated within the Area of Search (as shown on the Policies Map)	❑	❑	❑	❑	☒	❑
New sites where needed to maintain the landbank	❑	❑	❑	❑	☒	❑
New sites to maximise opportunities provided by existing	❑	❑	❑	❑	☒	❑

infrastructure and available minerals resources						
New sites where the site contains soft sand	❑	❑	❑	❑	☒	❑
New sites where resources would otherwise be sterilised	❑	❑	❑	❑	☒	❑
New sites where the proposal is for a specific local requirement	❑	❑	❑	❑	☒	❑

If you are seeking a change, please elaborate further on the change(s) you are seeking:
1) There needs to be more information about how the sequential test has been carried out and what the justification of the selected sites for minerals extraction is. There is not enough evidence to demonstrate other sites at a lower risk of flooding have been considered and discounted.

We need clarity on whether the ‘proposals for new sites’ have been sequentially tested or not.

2) The SFRA needs to consider the impact of climate change, and should include the new climate change allowances as part of the SFRA assessment.

Are you seeking a change to the ‘supporting text’?

❑ Yes ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Poyle Quarry (extensions), Horton (MA 2)

In the 'Flood risk and Water Resources' section on the proposed submission plan, it states that there needs to be consideration of the River Colne and its river corridor. The river adjacent to the site is actually the Colne Brook, so this should be amended.

Area between Horton Brook and Poyle Quarry

Just to highlight an addition that may need to be made:

Water Resources Site Considerations: Near-by private and licenced abstraction licences; Site located within a principal aquifer.

Poyle Quarry extension

As this site neighbours the Area between Horton Brook and Poyle Quarry and therefore likely to have the same environmental risks.

Additions that may need including:

Water Resources Site Considerations: Near-by private and licenced abstraction licences; Site located within a principal aquifer.

Policy M5 – Supply of Recycled and Secondary Aggregates

This policy is described on page 90, with the 'supporting text' detailed on pages 89 to 90 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy M6 – Chalk and Clay

This policy is described on page 94, with the 'supporting text' detailed on pages 93 to 95 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ☒ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Regarding paragraph 6.126, while it is true that the River Thames upstream of Teddington Lock is less influenced by the tides, we are unsure as to what this has to do with navigation of freight. This needs clarification.

Policy M7 – Aggregate Wharves and Rail Depots

This policy is described on page 97, with the 'supporting text' detailed on pages 96 to 97 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall regarding **proposed aggregate wharves or rail depots**?

	Support	No view either way	Objection
At Monkey Island Wharf, Bray (TA1)	❑	❑	☒
In appropriate locations with good connectivity to the Strategic Road Network	❑	❑	❑
In appropriate locations with good connectivity to the rail network	❑	❑	❑
In appropriate locations with good connectivity to minerals infrastructure	❑	❑	❑

If you have supported one or more of the aggregate wharves or rail depot proposals, please explain your reasons for supporting it / them:

An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ☒ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ☒ The justification test
- ☒ The effectiveness test
- ☒ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

1) Appendix 1 of the Strategic Flood Risk Assessment (SFRA) date July 2020 refers to the sequential test but there is not enough evidence to demonstrate other sites at a lower risk of flooding have been considered and discounted. Therefore this evidence base is not justified.

2) The SFRA needs to consider the impact of climate change, and should include the new climate change allowances as part of the SFRA assessment in order to be compliant with NPPF, which states that you should have an up-to-date and proportionate evidence base. By not including this evidence it could have an impact on the deliverability of some of your minerals and waste site allocations.

3) The River Cut is not a navigable waterway and there is no current use of the channel for any type of powered vessel. The ecological assessment summary states that 'vegetation clearance would be required for construction of a wharf, and for navigational purposes'. In reality, a lot of physical intervention would be required to make this river navigable, such as extensive dredging. This would have large scale and damaging ecological and morphological impacts. This type of physical modification of the river would be in breach of Policies DM11 and DM3, as well as statutory legislation such as the NPPF and Article 10 of the Habitats Directive. The River Cut is also designated a Local Wildlife Site called Greenway Corridor, which recognises its diverse ecological importance. This proposal will secure more sustainable transport of quarried material but this should not be at the cost, and to the detriment of, an important habitat that supports a range of wildlife.

Are you seeking a change to the policy?

- ☒ Yes
- ❑ No

If you are seeking a change, please indicate the issue(s) under which you are seeking a change on the proposed aggregate wharves or rail depots (*Please select all that apply):*

	Landscape	Habitats and species	Transport	Green Belt	Flooding	Amenity impacts (noise, dust etc)
At Monkey Island Wharf, Bray (TA1)	❑	☒	❑	❑	☒	❑
In appropriate locations with good connectivity to the Strategic Road Network	❑	❑	❑	❑	❑	❑
In appropriate locations with good connectivity to the rail network	❑	❑	❑	❑	❑	❑
In appropriate locations with good connectivity to minerals infrastructure	❑	❑	❑	❑	❑	❑

If you are seeking a change, please elaborate further on the change(s) that you are seeking:

1

1) There needs to be more information about how the sequential test has been carried out and what the justification of the selected sites for minerals extraction is. There is not enough evidence to demonstrate other sites at a lower risk of flooding have been considered and discounted.

2) The SFRA needs to consider the impact of climate change, and should include the new climate change allowances as part of the SFRA assessment.

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

1) Water Framework Directive (WFD)

This proposal would put the current 'Moderate' WFD status at risk and would make meeting Good Ecological Status much harder to achieve. One of the reasons for this waterbody failing to achieve good ecological status is because of past physical modification to the river. Such proposals outlined in this Minerals and Waste Plan will exacerbate this issue. This type of physical modification to rivers also directly goes against the Government's environmental objectives, set out in the 25 Year Environment Plan. This proposal does not meet the 'tests of soundness' outlined in the NPPF it is not based on proportionate evidence and is not consistent with national policy.

2) Waterways and Navigation of the River Thames

Section 60 Accommodations Licence

The Environment Agency is the navigation authority for the River Thames, a public river regulated by statute. Successive Thames Conservancy Acts have declared it unlawful for any person to install an accommodation in or over the public river without a licence from us. This licence is called an Accommodation Licence and is issued under Section 60 of the Thames Conservancy Act 1932.

The term ‘accommodation’ applies to mooring piles, slipways, landing stages and other private structural encroachments in the public river. Any accommodation in or over the River Thames can affect the public right of access over public river space and may impact on normal river flow, flooding, the fishery and ecology of the river.

Please consider this when allocating sites as this may affect the viability of some sites. We you advise to seek early consultation with us on any proposals that may affect the River Thames as set out above.

Policy M8 – Safeguarding Minerals Infrastructure

This policy is described on page 99, with the 'supporting text' detailed on pages 98 to 100 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy W1 – Sustainable Waste Development Strategy

This policy is described on page 104, with the 'supporting text' detailed on pages 103 to 105 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy W2 – Safeguarding of Waste Management Facilities

This policy is described on page 106, with the 'supporting text' detailed on pages 106 to 109 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy W3 – Waste Capacity Requirements

This policy is described on page 115, with the 'supporting text' detailed on pages 110 to 117 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy W4 – Locations and Sites for Waste Management

This policy is described on page 121, with the 'supporting text' detailed on pages 118 to 124 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall regarding the **preferred waste areas (**Appendix C) of the Proposed Submission Plan document?

	Support	No view either way	Objection
Western Employment Area (parts), Bracknell	❑	❑	❑
Longshot Industrial Estate (within Western Employment Area), Binfield	❑	❑	❑
Eastern Employment Area, Bracknell	❑	❑	❑
Vulcan Way Employment Area, Sandhurst	❑	❑	❑
Bennett Road Area, Reading	❑	❑	❑
North of Basingstoke Road, Reading	❑	❑	❑
Elgar Road, Reading	❑	❑	❑
Portman Road / Deacon Way Area, Reading	❑	❑	❑
Richfield Avenue / Tessa Road Area, Reading	❑	❑	❑
Paddock Road Industrial Estate, Reading	❑	❑	❑
South of Basingstoke Road, Whitley	❑	❑	❑
Wigmore Lane, Reading	❑	❑	❑
Bridgewater Close, Reading	❑	❑	❑
Island Road Major Opportunity Area, Reading	❑	❑	❑
Newlands Farm, Crowthorne	❑	❑	❑
Toutley Road Depot, Emmbrook	❑	❑	❑
Molly Millars Lane Area (parts), Wokingham	❑	❑	❑

Suttons Industrial Park, Earley	❑	❑	❑
Hogwood Lane Business Area (parts), Wokingham	❑	❑	❑
Headley Road Industrial Estate, Wokingham	❑	❑	❑
Headley Park, Wokingham	❑	❑	❑
Ruscombe Business Park (parts), Ruscombe	❑	❑	❑
Nine Mile Ride Industrial Park, Wokingham	❑	❑	❑
Brookside Business Park, Swallowfield	❑	❑	❑
Cutbush Lane Business Area, Wokingham	❑	❑	❑

Into which of the following categories does your representation fall regarding **proposed allocated sites** of the Proposed Submission Plan document?

	Support	No view either way	Objection
Berkyn Manor Farm, Horton (WA1)	❑	❑	☒
Horton Brook Quarry, Horton (WA2)	☒	❑	❑
The Compound, Stubbings, Maidenhead (WA3)	☒	❑	❑

Into which of the following categories does your representation fall regarding **proposals for supported appropriate locations, where the site has good connectivity to the strategic road network; and:**

	Support	No view either way	Objection
Areas of major new development; or	❑	❑	❑
Sources of waste; or	❑	❑	❑
Markets for the types of waste to be managed; and one or more of the following features:	❑	❑	❑
Is existing or planned industrial or	❑	❑	❑

employment land; or			
Is a suitable reuse of previously developed land; or	❑	❑	❑
Is within redundant farm or forestry buildings and their curtilages or hard standings; or	❑	❑	❑
Is part of an active quarry or landfill operation; or	❑	❑	❑
Is within or adjoins sewage treatment works and the development enables the co-treatment of sewage sludge with other wastes; or	❑	❑	❑
There is a clear proven and overriding need for the proposed facility to be sited in the proposed location	❑	❑	❑

If you have supported one or more of the proposals for preferred areas, proposed allocated sites and appropriate locations for waste management, please explain your reasons for this support:

Horton Brook Quarry and the Compound, Maidenhead lie within Flood Zone 1 and therefore don't need to be sequentially tested.

An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ☒ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ☒ The justification test
- ☒ The effectiveness test
- ☒ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:
1) Appendix 1 of the Strategic Flood Risk Assessment (SFRA) date July 2020 refers to the sequential test but there is not enough evidence to demonstrate other sites at a lower risk of flooding have been considered and discounted. Therefore this evidence base is not justified.

2) Another point of soundness for this policy is that The SFRA needs to consider the impact of climate change, and should include the new climate change allowances as part of the SFRA assessment in order to be compliant with NPPF, which states that you should have an up-to-date and proportionate evidence base. By not including this evidence it could have an impact on the deliverability of some of your minerals and waste site allocations.

Are you seeking a change to the policy?

- ❑ Yes
- ☒ No

If you are seeking a change of policy, please indicate the issues under which you are seeking this or these change(s) (*Please select all that apply):*

	Landscape	Habitats and species	Transport	Green Belt	Flooding	Amenity impacts (noise, dust etc)
Western Employment Area (parts), Bracknell	❑	❑	❑	❑	❑	❑
Longshot Industrial Estate (within Western Employment Area), Binfield	❑	❑	❑	❑	❑	❑
Eastern Employment Area, Bracknell	❑	❑	❑	❑	❑	❑
Vulcan Way Employment Area, Sandhurst	❑	❑	❑	❑	❑	❑
Bennett Road Area, Reading	❑	❑	❑	❑	❑	❑
North of Basingstoke Road, Reading	❑	❑	❑	❑	❑	❑
Elgar Road, Reading	❑	❑	❑	❑	❑	❑
Portman Road / Deacon Way Area, Reading	❑	❑	❑	❑	❑	❑
Richfield Avenue / Tessa Road Area, Reading	❑	❑	❑	❑	❑	❑
Paddock Road Industrial Estate, Reading	❑	❑	❑	❑	❑	❑
South of Basingstoke Road,	❑	❑	❑	❑	❑	❑

Whitley Wigmore Lane, Reading	❑	❑	❑	❑	❑	❑
Bridgewater Close, Reading	❑	❑	❑	❑	❑	❑
Island Road Major Opportunity Area, Reading	❑	❑	❑	❑	❑	❑
Newlands Farm, Crowthorne	❑	❑	❑	❑	❑	❑
Toutley Road Depot, Emmbrook	❑	❑	❑	❑	❑	❑
Molly Millars Lane Area (parts), Wokingham	❑	❑	❑	❑	❑	❑
Suttons Industrial Park, Earley	❑	❑	❑	❑	❑	❑
Hogwood Lane Business Area (parts), Wokingham	❑	❑	❑	❑	❑	❑
Headley Road Industrial Estate, Wokingham	❑	❑	❑	❑	❑	❑
Headley Park, Wokingham	❑	❑	❑	❑	❑	❑
Ruscombe Business Park (parts), Ruscombe	❑	❑	❑	❑	❑	❑
Nine Mile Ride Industrial Park, Wokingham	❑	❑	❑	❑	❑	❑
Brookside Business Park, Swallowfield	❑	❑	❑	❑	❑	❑
Cutbush Lane	❑	❑	❑	❑	❑	❑

Business Area, Wokingham						
The proposed allocated site at Berkyn Manor Farm, Horton (WA1)	❑	❑	❑	❑	☒	❑
The proposed allocated site at Horton Brook Quarry, Horton (WA2)	❑	❑	❑	❑	❑	❑
The proposed allocated site at The Compound, Stubbings, Maidenhead (WA3)	❑	❑	❑	❑	❑	❑
Appropriate locations, where the site has good connectivity to the strategic road network and areas of major new development	❑	❑	❑	❑	❑	❑
Appropriate locations, where the site has good connectivity to the strategic road network and sources of waste	❑	❑	❑	❑	❑	❑
Appropriate locations, where the site has good connectivity to the	❑	❑	❑	❑	❑	❑

strategic road network and is existing or planned industrial or employment land						
Appropriate locations, where the site has good connectivity to the strategic road network and is a suitable reuse of previously developed land	❑	❑	❑	❑	❑	❑
Appropriate locations, where the site has good connectivity to the strategic road network and is within redundant farm or forestry buildings, and their curtilages or hard standings	❑	❑	❑	❑	❑	❑
Appropriate locations, where the site has good connectivity to the strategic road network and is part of an active quarry or landfill operation	❑	❑	❑	❑	❑	❑
Appropriate locations, where the site has good	❑	❑	❑	❑	❑	❑

connectivity to the strategic road network and is within or adjoins sewage treatment works and the development enables the co-treatment of sewage sludge with other wastes						
Appropriate locations, where the site has good connectivity to the strategic road network and there is a clear proven and overriding need for the proposed facility to be sited in the proposed location	❑	❑	❑	❑	❑	❑

If you are seeking a change, please elaborate further on the change(s) that you are seeking:

1) There needs to be more information about how the sequential test has been carried out and what the justification of the selected sites for minerals extraction is. There is not enough evidence to demonstrate other sites at a lower risk of flooding have been considered and discounted.

2) The SFRA needs to consider the impact of climate change, and should include the new climate change allowances as part of the SFRA assessment.

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Policy W5 – Reworking Landfills

This policy is described on page 125, with the 'supporting text' detailed on pages 125 to 126 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support the policy, please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the policy on the grounds that it does not meet the Test of Soundness, please include below your comments on how the policy does not meet the Test of Soundness:

Are you seeking a change to the policy?

- ❑ Yes
- ❑ No

If you are seeking a change to the policy, what change are you seeking and why?

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on either the policy or the ‘supporting text’?

Energy Minerals

Additionally, there is some 'supporting text' on 'Energy minerals' in the Proposed Submission Plan document. This chapter can be found in pages 91 to 92 of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult Please note the section on 'Energy minerals' is 'supporting text' only and is **not a policy**.

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support this 'supporting text', please explain your reasons for this:

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An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to the 'supporting text' on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to the ‘supporting text’ on the grounds that it does not meet the Test of Soundness, please include below your comments on how the ‘supporting text’ does not meet the Test of Soundness:

Are you seeking a change to the ‘supporting text’?

- ❑ Yes
- ❑ No

If you are seeking a change to the ‘supporting text’, what change are you seeking and why?

Do you have any further comments on the ‘supporting text’?

Section three – waste facility categories (Appendix B) in the Joint Minerals and Waste Plan Proposed Submission Plan document

There are seven waste facility categories listed in Appendix B (pages 141 to 154) of the Proposed Submission Plan document at www.hants.gov.uk/berksconsult. When providing details in this section in the free text 'space', if relevant, please be sure to specify which waste facility category you are referring to.

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support this principle, please explain your reasons for this:

An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to this principle on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to this principle on the grounds that it does not meet the Test of Soundness, please include below your comments on how the proposal does not meet the Test of Soundness:

Are you seeking a change to the principle?

- ❑ Yes
- ❑ No

If you are seeking a change, what change are you seeking and why?

Do you have any further comments on Appendix B (waste facility categories)?

Section four – the evidence base (Appendix D) can be found in the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult

There are 15 documents included in the Plan's evidence base, as well as a Policies Map, all of which can be found listed in Appendix D (page 185) of the Proposed Submission Plan document. This document, along with all evidence base documents and the Policies Map can be accessed via www.hants.gov.uk/berksconsult A list of all documents included in Appendix D are as follows: (*You can comment on as many of the following documents as you wish)*

- Minerals: Background Study
- Waste: Background Study
- Sustainability Appraisal (incorporating Strategic Environmental Assessment) Environmental Report
- Habitats Regulations Assessment: Screening & Appropriate Assessment
- Strategic Flood Risk Assessment
- Strategic Traffic and Transport Assessment
- Landscape & Visual Impact Assessment
- Heritage Statement
- Restoration Study
- Minerals & Waste Safeguarding Study
- Minerals: Proposal Study
- Waste: Proposal Study
- Equalities Impact Assessment
- Duty to Cooperate Statement
- Climate Change Topic Paper
- Policies Map

What are your comments on the **Minerals: Background Study?**

What are your comments on the **Waste: Background Study?**

What are your comments on the **Sustainability Appraisal (incorporating Strategic Environmental Assessment) Environmental Report?**

What are your comments on the **Habitats Regulations Assessment: Screening & Appropriate Assessment?**

What are your comments on the **Strategic Flood Risk Assessment?**

As well as the soundness points we have already made we have the following comments to make.

1) The Strategic Flood Risk Assessment (SFRA) defines Flood Zones 1, 2 and 3 and differentiates between FZ3a and FZ3b. The SFRA describes 3b as land where water has to flow or be stored in times of flood but does not provide probability e.g. land with 5% or greater AEP. This will need to be included in the SFRA.

2) Paragraph 3.5 - table in 3.2 refers to FRAs being necessary for Flood Zone 1 >1ha, Flood Zone 2 and 3 but does not refer to Flood Zone 1<1 ha and more vulnerable use where they could be affected by sources of flooding other than rivers and the sea and Flood Zone 1 if it falls into critical drainage area.

3) Site analysis section

Poyle Quarry & extensions - flooding history has not been changed to red

Horton Brook - flooding history has not been changed to red. Has not included that any works will need to demonstrate they do not impact the structural stability of the embankment.

Riding Court Farm permitted but not included in sites analysis.

What are your comments on the **Strategic Traffic and Transport Assessment?**

What are your comments on the **Landscape & Visual Impact Assessment?**

What are your comments on the **Heritage Statement?**

What are your comments on the **Restoration Study?**

What are your comments on the **Minerals & Waste Safeguarding Study?**

What are your comments on the **Minerals: Proposal Study?**

What are your comments on the **Waste: Proposal Study?**

What are your comments on the **Equalities Impact Assessment?**

What are your comments on the **Duty to Cooperate Statement?**

What are your comments on the **Climate Change Topic Paper?**

What are your comments on the **Policies Map?**

Section five – safeguarded sites (Appendix E) in the Joint Minerals and Waste Plan Proposed Submission Plan document

There are 52 safeguarded sites listed in Appendix E (pages 186 to 190) of the Joint Minerals and Waste Plan Proposed Submission Plan document at www.hants.gov.uk/berksconsult. Additionally, paragraph 7.25 of the Proposed Submission Plan document should be considered since this highlights why there is a need to protect sites in the Plan area. When providing details in this section in the free text 'space', if relevant, please be sure to specify which of the proposed safeguarded site(s) you are referring to.

Into which of the following categories does your representation fall?

- ❑ Support
- ❑ No view either way
- ❑ Objection

If you support this principle, please explain your reasons for this:

An objection must relate either to the Local Plan not complying with legal requirements, or it not being sound in relation of at least one of the Tests of Soundness. If you are objecting, under which criteria is this objection? For definitions of the Tests of Soundness, please refer to Q18 & Q19 of the FAQs, which can be found at www.hants.gov.uk/berksconsult *Please select all that apply*

- ❑ Not complying with legal requirements / the duty to co-operate
- ❑ Not meeting the Test of Soundness

If you are objecting to this principle on the grounds that it does not meet the Test of Soundness, what Test(s) of Soundness do you consider that it fails? *Please select all that apply*

- ❑ The positively prepared test
- ❑ The justification test
- ❑ The effectiveness test
- ❑ The test of consistency with national policy

If you are objecting to this principle on the grounds that it does not meet the Test of Soundness, please include below your comments on how the proposal does not meet the Test of Soundness:

Are you seeking a change to the principle?

- ❑ Yes
- ❑ No

If you are seeking a change, what change are you seeking and why?

Do you have any further comments on Appendix E (safeguarded sites list)?

Section six – glossary & acronyms in the Joint Minerals and Waste Plan Proposed Submission Plan document

The glossary & acronyms are listed from page 191 to 209 of the Proposed Submission Plan document www.hants.gov.uk/berksconsult

Please detail any comments you have on the glossary & acronyms below:

Section seven – further comments

If you have any further comments about the Joint Minerals and Waste Plan Proposed Submission Plan document for Central and Eastern Berkshire, please include them here:

1

1) Waterways and Navigation of the River Thames

Section 60 Accommodations Licence

The Environment Agency is the navigation authority for the River Thames, a public river regulated by statute. Successive Thames Conservancy Acts have declared it unlawful for any person to install an accommodation in or over the public river without a licence from us. This licence is called an Accommodation Licence and is issued under Section 60 of the Thames Conservancy Act 1932.

The term 'accommodation' applies to mooring piles, slipways, landing stages and other private structural encroachments in the public river. Any accommodation in or over the River Thames can affect the public right of access over public river space and may impact on normal river flow, flooding, the fishery and ecology of the river.

Please consider this when allocating sites as this may affect the viability of some sites. We you advise to seek early consultation with us on any proposals that may affect the River Thames as set out above.

2) Environmental Permit

Either the SFRA or the main Minerals & Waste Plan document should include an informative about sites which are adjacent to, or include, a main river needing an environmental permit. Currently environmental permits are only mentioned in the glossary of the Plan.

Suggested wording: "Developments may require an Environmental Permit from the Environment Agency under the terms of the Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations 2016 for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of designated 'main rivers'. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. An environmental permit is in addition to and a separate process from obtaining planning permission. Further details and guidance are available on the GOV.UK website: https://www.gov.uk/guidance/flood-risk-activities-environmental-permits."

Section eight – about you

Is this your own personal response, or are you responding on behalf of an organisation or group?

- ❑ This is a personal response
- ❑☒ This response is on behalf of an organisation or group

If this is a personal response, please now go to page 126.

If this response is on behalf of an organisation or group, please answer the rest of the questions on this page.

If this response is on behalf of an organisation or group, please tell us a little more about yourself and the organisation you are responding on behalf of:

Please note: **anonymous or confidential** representations **cannot** be accepted.

The full name of your organisation or group (***required***)	**The Environment Agency……**
The full address of your organisation or group (***required***)	[redacted]**……**
Your full name (***required***)	**Michelle Kidd……**
Your position in the organisation or group (***required***)	**Planning Advisor……**
Contact email address (***optional***)	[redacted]**……**

Do you request to appear before the Independent Examiner (Planning Inspector) as per Section 20(6) of the Planning and Compulsory Purchase Act 2004? (***required***)

❑☒ Yes
❑ No

Please confirm whether you would like to be notified of the following (*please tick all that apply*):

☒❑ When the Joint Minerals and Waste Plan is submitted for independent examination
☒❑ When the Inspector's report is published
☒❑ When the Joint Minerals and Waste Plan is adopted

Please now go to the final page of this form, titled '*End of questionnaire'* (page 127).

Section eight: about you (continued)

If this is a personal response, your name and postal address must be provided for your comments to be accepted. Please include these below.

Please note: **anonymous or confidential** representations **cannot** be accepted.

Your full name (***required***) ……
……

Your full postal address (***required***) ……
……

Your full postcode (***required***) ……
……

Your email address (***optional***) ……
……

Do you request to appear before the Independent Examiner (Planning Inspector) as per Section 20(6) of the Planning and Compulsory Purchase Act 2004? (***required***)

- ❑ Yes
- ❑ No

Please confirm whether you would like to be notified of the following (*please tick all that apply*):

- ❑ When the Joint Minerals and Waste Plan is submitted for independent examination
- ❑ When the Inspector's report is published
- ❑ When the Joint Minerals and Waste Plan is adopted

We would like to know a bit more about you to help us understand the views of different groups. You do not need to answer these questions if you do not wish to.

What was your age on your last birthday?

- ❑ Under 16
- ❑ 16 to 24
- ❑ 25 to 34
- ❑ 35 to 44
- ❑ 45 to 54
- ❑ 55 to 64
- ❑ 65 to 74
- ❑ 75 to 84
- ❑ 85 or over
- ❑ Prefer not to say

How would you describe your gender?

- ❑ Female
- ❑ Male
- ❑ Other
- ❑ Prefer not to say

For 'other', please describe: _____
_____

End of questionnaire

Thank you for taking the time to complete this questionnaire.

This consultation will be open until **15 October 2020**. Following the closure of the consultation, representations will be collated and submitted to the Secretary of State for independent examination. Additionally, representations will be published alongside respondents' names (but no other personal details) in a summary report.

- ❑ **If you would like the Central & Eastern Berkshire Authorities to contact you with further information on planning matters in your area then please tick here.**

Please return this response form by post to:

Central and Eastern Berkshire JMWP
[redacted]

Or by email to [redacted]