

The Berkshire Unitary Authorities
Joint Strategic Planning Unit
Town Hall
St. Ives Road
Maidenhead
Berkshire
SL6 1RF

Our ref: WA/2017/123840/SL-
01/PO1-L02

Your ref:

Date: 22 January 2020

Dear Sir/Madam

**Central and Eastern Berkshire Authorities – Joint Minerals and Waste Plan
Additional Regulation 18 Consultation on the Potential Allocation of the Bray
Quarry Extension Site.**

Thank you for meeting with us on 19 December 2019 regarding the Bray Quarry potential site allocation. I also refer to our response dated 16 August 2019 to the Regulation 18 consultation. We have additional comments to make about this proposal.

Whilst Sand and Gravel (S & G) extraction has historically taken place within the current Source Protection Zone (SPZ) for the public water supply at Bray, this is likely to have been before the SPZ was in place and before the current limits on water quality were set.

Roughly a quarter of the proposed S & G extraction site is within a SPZ1. In Environment Agency Guidance 'The Environment Agency's approach to groundwater protection' dated February 2018 Position Statement N8 – 'Physical disturbance of aquifers in SPZ1' states that Within SPZ1 the EA will normally object in principle to any planning application for a development that may physically disturb an aquifer. Physical disturbance, in this particular instance, means removal of the drift geology and hence the aquifer. The proposed restoration is to leave small lakes.

These lakes will be fed by groundwater and there could be problems with water quality at the abstraction due to bird fouling and issues with microorganisms and bacteria (Salmonella, E Coli, Camplobacter, Cryptosporidium and Guardia) in these open water bodies. If the final use of these lakes is for amenity then there may be the need to use pesticides to control weeds or algae and this may impact on the abstraction. An open body of water is also subject to evaporation which would concentrate any pollution and would also result in a loss of volume of water. Since climate change and the potential for increased temperature will exacerbate this effect, this risk should be factored into the assessment.

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We need to know if the proposed S&G extraction will be wet or dry? If wet then there could be fine clay particles in suspension that would be difficult and costly to remove by the water company. If dry then this is likely to impact on the volume of water extracted at the Pumping Station since the water in the gravel aquifer will be drawn down. The loss of volume of water available to South East Water to abstract should be considered in the risk assessment.

In conclusion and as set out in our response dated 16 August 2019, the Bray Quarry site allocation is unsound as there is not enough evidence for us to be satisfied that the groundwater quality and supply at this site will not be impacted upon. Therefore the proposed site allocation is not consistent with national policy (NPPF paragraphs 20 and 170), justified or effective.

Final comments

Our comments are based on our available records and the information as submitted to us.

Please quote our reference number in any future correspondence.

If you have any queries please contact me.

Yours faithfully

Miss Michelle Kidd
Planning Advisor

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