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

Our ref: WA/2017/123840/CS-
05/PO1-L01

Date: 06 September 2021

Dear ██████████

**Central and Eastern Berkshire Authorities – Joint Minerals and Waste Plan
Additional Regulation 19 Consultation on the Potential Allocation of the Bray
Quarry Extension Site.**

Thank you for your email dated 17 March 2021 regarding the Bray Quarry extension site.

Your email contained a proposal from BCL Hydro dated 10 October 2020 to reduce the size of the proposed extension to Bray Quarry. This means that the quarry will only extract sands and gravels from the area outside the inner source protection zone (SPZ1) for the South East Water abstraction at Bray.

We no longer have soundness points to the site allocation at Bray Quarry for groundwater quality and water supply.

Groundwater quality and water resources

We raised points of soundness in our responses 16 August 2019 and 22 January 2020 to the proposed extension because some of the site was within SPZ1 which was in contravention of our guidance and there was not enough evidence for us to be satisfied that the groundwater quality and supply at this site will not be impacted upon.

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 we will normally object in principle to any planning application for a development that may physically disturb an aquifer. We now accept that now the development no longer impinges on SPZ1 this position statement can no longer be applied.

Source Protection Zone one is based on a 50 day travel time. The main purpose of this zone is to reduce the risk of pollution from rapidly degrading chemicals and some

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pathogens. By shifting the boundary of the site outside SPZ1 it effectively doubles the distance to the nearest public abstraction well. This will mean the likelihood of significant impact from these chemicals, pathogens and even turbidity will be reduced.

However by removing the soundness point based on N8 means our advice is now based on position statement N7 which states:

“Developers proposing schemes that present a hazard to groundwater resources, quality or abstractions must provide an acceptable hydrogeological risk assessment (HRA) to the Environment Agency and the planning authority. Any activities that can adversely affect groundwater must be considered, including physical disturbance of the aquifer. If the HRA identifies unacceptable risks then the developer must provide appropriate mitigation.”

Please note that our change in position that we no longer have soundness points in relation to this site in terms of groundwater quality and supply does not mean that we won't object in the future if the HRA is not satisfactory. However this change to our position means that site can be treated like other potential minerals sites and we would not now oppose the sites inclusion in the minerals plan as long as the sequential test has been passed.

The Environment Agency Guidance 'The Environment Agency's approach to groundwater protection' dated February 2018 can be found on GOV.UK by using this link. <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Sequential Test

In our letter dated 16 August 2019 we also had soundness points as the Bray Quarry extension site allocation had not been sequentially tested. The Bray Quarry site has now been included in the Strategic Flood Risk Assessment (SFRA), revised April 2021, prepared by Hampshire Council. The Bray Quarry site lies within Flood Zones 2 and 3. Therefore you will need to be clear about why other sites at lower risk of flooding were discarded.

Other comments for Bray Quarry

Please also be aware of the other comments we made in our letter about the Bray Quarry site allocation dated 16 August 2019. These are about fluvial flood risk, water resources licensing, biodiversity and the main rivers and pollution prevention.

Final Comments

Once again, thank you for contacting us. 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

Direct dial [REDACTED]

E-mail [REDACTED]