



**MATTER 3 EXAMINATION STATEMENT**

**CLAREMONT PLANNING ON BEHALF OF  
EUROPEAN PROPERTY VENTURES**

**SUPPLY OF MINERALS**

**CENTRAL & EASTERN BERKSHIRE  
JOINT MINERALS AND WASTE LOCAL  
PLAN**



**This Statement for Matter 3 – Supply of Minerals will seek to address the Inspector’s Questions identified below:**

**Issue: Whether the approach made in the Plan for the future supply of minerals would deliver a steady and adequate supply and is therefore positively prepared?**

- 3.1. Is Policy M1 sufficiently clear as to how the overall minerals development strategy is to be applied, in particular, does the strategy provide clarity as to the supply of aggregates?
- 3.3. Is Policy M3 sufficiently flexible to enable the provision of sand and gravel to meet the potential demands of large-scale unforeseen or currently noncommitted future development projects?
- 3.6. Is the identification of an Area of Search a justified approach to maintain a steady and adequate supply of minerals given the context of the shortfall?
- 3.10. Is criterion 3 of Policy M4 justified to allow suitable sites to come forward in order to meet the shortfall? Is the use of the term “appropriate locations” sufficiently clear?



### **Matter 3 – Supply of Minerals**

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- 1.1 Claremont Planning Consultancy Ltd (Claremont Planning) represents European Property Ventures (EPV) Limited in respect of Land to the North of Churchmead School, Riding Court Road, Datchet. Representations were submitted previously confirming EPV's support of the emerging Central and East Berkshire Minerals & Waste Plan ('MWP') and promoting their site as available for sand and gravel extraction.

*Issue: Whether the approach made in the Plan for the future supply of minerals would deliver a steady and adequate supply and is therefore positively prepared?*

- 3.1. *Is Policy M1 sufficiently clear as to how the overall minerals development strategy is to be applied, in particular, does the strategy provide clarity as to the supply of aggregates?*
- 1.2 Whilst Policy M1 is clear in respect of the MWP's intentions and objectives in that it seeks to facilitate a steady and adequate supply of minerals, the policy is lacking in detail as to how the strategy is to be achieved. This is particularly the case in respect of sand and gravel as the Plan identifies that there is likely to be a shortfall in supply during the plan period.
- 1.3 As such, the Plan relies on contingencies or windfall opportunities as set out in Policy M4(3), which is not considered a robust or sound approach, as it is not positively prepared and thus not consistent with national policy. Whilst additional sites may come forward through prior extraction ahead of other development schemes or through new opportunities, the timescale of such opportunities is not ensured and it is not anticipated that these will be sufficient or provide aggregates soon enough to sustain supply as it arises, particularly over the early years of the plan period. The shortfall and supply issues could be further exacerbated if additional demands arise from unforeseen infrastructure projects for example, and cross boundary resource pressures which further highlight the importance of addressing the need in full through this emerging Plan.
- 1.4 As such, in order to ensure that the Plan is positively prepared, and provide a suitable framework for delivering the supply of minerals that is required, further modifications to the Plan are necessary in order to identify additional sites to contribute toward supply. One such instances is the land promoted by EPV at Datchet for sand and gravel extraction, which has an opportunity to be worked as an extension to an existing quarry and would be able to therefore meet some of the supply in the early years of the plan period. Without identifying further sites, it is considered that Policy M1 is not deliverable, and there will be fundamental issues with the Plan as a whole thereby suggesting that it is not sound as currently drafted.
- 3.3. *Is Policy M3 sufficiently flexible to enable the provision of sand and gravel to meet the potential demands of large-scale unforeseen or currently noncommitted future development projects?*
- 1.5 Policy M3 as currently drafted, seeks to restrict the supply of sand and gravel to the market. It suggests that this will be subject to the impact of local circumstances on demand, but



the policy appears to lack appropriate wording to facilitate this flexibility. Furthermore, given the shortfall identified in the Plan and supporting evidence base in respect of sand and gravel sites, this could also result in competing demands between facilitating the supply of materials to support construction and ensuring that sufficient sites remain that can ensure the steady delivery of materials in later years of the plan period.

- 1.6 These factors together add weight to the need to identify additional sites for sand and gravel extraction through this Plan, such as land promoted by EPV at Datchet, which provides an opportunity to secure sand and gravel early in the plan period to address the anticipated shortfall when it arises.
- 3.6 *Is the identification of an Area of Search a justified approach to maintain a steady and adequate supply of minerals given the context of the shortfall?*
- 1.7 It is considered that given the level of the shortfall identified in the Plan, particularly in regard to sand and gravel, an Area of Search is not sufficient on its own to address this undersupply. Whilst it may identify additional sites and opportunities that could come forward through the development management process for other proposals, alongside the possibility for prior extraction ahead of development, this is reliant on such developments occurring where minerals are located, and on a scale where extraction is feasible and viable. Relying upon delivery through development to meet the anticipated shortfall is not a robust approach and provides no certainty, particularly as developers are much more likely to seek to avoid prior-extraction due to the potential delay it causes to development delivery. As such, there is a higher potential of site constraints and viability being used to negate the delivery of prior- extraction.
- 1.8 By its very nature, windfall opportunities are unlikely to be identified at the exact time in the plan period when they will be needed, and it is unlikely that such developments will help to facilitate a steady and adequate supply of materials throughout the plan period. In order for this to be the case, it is highly preferable for sufficient sites to be identified through the plan-making process. Opportunities of mineral extraction within safeguarded areas that are supported by landowners and are logistically deliverable must be supported, such an example is the identified Datchet site. Modifications are encouraged to be made to the plan to identify the EPV site at Datchet as a site of mineral extraction and not merely safeguarded land. Such an allocation would contribute positively to delivery of the minerals required and ensure that the Plan is positively prepared.



- 3.10. *Is criterion 3 of Policy M4 justified to allow suitable sites to come forward in order to meet the shortfall? Is the use of the term “appropriate locations” sufficiently clear?*
- 1.9 In principle, the provisions of Policy M4 are supported, as they enable additional sites to come forward to meet the need for resources in the Plan area. However, it is considered that the policy criteria are more restrictive than national policy suggests is necessary. The Framework provides that policies should set out criteria or requirements to ensure that permitted and proposed operations don't have unacceptable adverse impacts on natural and historic environments or human health, and it should be against such considerations that additional sites are assessed.
- 1.10 The use of the phrase 'appropriate locations' is considered to be imprecise, and does not accord with the Framework's requirements for policies set out in Paragraph 16, which states that policies should be '*clearly written and unambiguous*'. As the Plan does not define what an appropriate location is, it is not considered that the use of this phrase is helpful or clear in respect of Policy M4.
- 1.11 This is essential in order to facilitate the development of sites that are not allocated in the Plan, such as the site owned by EPV that has been promoted to this Plan. The site is located in close proximity to CEMEX's existing quarry at Datchet and therefore provides the opportunity to extract additional resources to meet the shortfall, without having any impact on the highway network in Datchet and without the need for new significant infrastructure requirements on site. This will contribute to addressing the shortfall in respect of sand and gravel supply, and assist the authorities in maintaining the steady supply across the plan period.

**Word Count: 1,433 words**