



MATTER 5 EXAMINATION STATEMENT

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

**PROTECTING MINERAL RESOURCES,
INFRASTRUCTURE & FACILITIES**

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



This Statement for Matter 5 – Protecting Mineral Resources, Infrastructure & Facilities will seek to address the Inspector’s Questions identified below:

Issue: Whether the plan adequately balances the needs of competing development?

- 5.4. Is an appropriate balance struck between the needs of competing development with the need to protect and conserve the mineral resource?
- 5.7. Paragraph 6.40 to Policy M2 refers to a site size threshold, above which prior extraction is to be considered. How has this threshold been derived? Is this threshold justified? Should it be included within the policy? How would it address potential piecemeal development and unnecessary sterilisation?



Matter 5 – Protecting Mineral Resources, Infrastructure & Facilities

- 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 plan adequately balances the needs of competing development?

- 5.4. *Is an appropriate balance struck between the needs of competing development with the need to protect and conserve the mineral resource?*
- 1.2 The Plan as a whole and in particular Policy M2, recognises that minerals are a finite resource that can only be extracted where they naturally occur. In addition, the Plan has not identified sufficient sites or an adequate supply of minerals development within the Plan area, resulting in a shortfall in respect of sand and gravel supply. As a result, it is important that where development proposals will sterilise mineral resources, safeguards are in place to appropriately assess and secure prior extraction where feasible. It will also be important for the Plan to maximise opportunities for prior extraction when other types of development come forward within the Plan area on sites that contain resources.
- 1.3 However, it should be recognised that there will be circumstances where non-minerals development is proposed where prior extraction is not feasible or viable due to site-specific constraints or market factors. In such cases, this will need to be balanced against the need for the proposed development, recognising that there may be more immediate needs to deliver housing or other forms of development on the site. It is important that the MWP recognises this, and ensures that failure to deliver prior extraction is not used as justification for refusing alternative development proposals.
- 1.4 The policy should be modified to ensure that it is consistent with Paragraph 210 of the Framework, in particular criteria (d) which requires policies to '*encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place*'. The wording of Policy M2 is currently more restrictive than, and therefore inconsistent with, national policy and should be modified in order for the Plan to be sound.
- 5.7. *Paragraph 6.40 to Policy M2 refers to a site size threshold, above which prior extraction is to be considered. How has this threshold been derived? Is this threshold justified? Should it be included within the policy? How would it address potential piecemeal development and unnecessary sterilisation?*
- 1.5 The site threshold of 3ha is considered reasonable in order to ensure that the focus is on developments where extraction will be feasible and viable, rather than seeking to monitor every application just in case it could provide an appropriate location for minerals development. The threshold has been set at this level based on existing guidance in Hampshire, a neighbouring authority area, which provides some consistency in approach in this part of the country.



- 1.6 However, it is considered that this threshold should be identified within policy, as well as the need to ensure proposals are appropriately assessed to ensure that developments don't propose a piecemeal approach in order to avoid being caught by this requirement. Whilst this may be challenging to monitor, including this within policy will provide more of a basis for monitoring.

Word Count: 555 words