

Central & Eastern Berkshire Authorities

Joint Minerals & Waste Plan

Consultation Statement: Post Regulation 18 – Issues and Options

September 2017

(Issues and Options)



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Summary

Hampshire Services¹ (part of Hampshire County Council) is working in collaboration with Bracknell Forest Council, Reading Borough Council, The Royal Borough of Windsor & Maidenhead and Wokingham Borough Council (collectively known as the Central & Eastern Berkshire Authorities) to produce a Joint Minerals and Waste Plan. The first consultation on plan preparation (the 'Issues and Options Consultation') ran from June to July 2017.

This report provides an overview of the general themes and key issues from the responses and comments received to the Issues and Options Consultation. The report seeks to detail who responded, the key issues raised and how the authorities intend to respond to those issues.

In total, 45 people and organisations responded to the 119 consultation questions or made general comments regarding the consultation.

- 27 responded to the Vision and Strategy totalling 148 comments
- 23 responded to the Minerals section totalling 711 comments
- 23 responded to the Waste section totalling 413 comments
- 12 responded to the Supporting documents section totalling 22 comments
- 12 respondents made general comments to the consultation

There was overall support for the Plan period, proposed Vision and objectives, whereas there was a greater difference in opinion regarding the Spatial Strategy content. Half of the respondents were in agreement with the proposed content, whereas the other half sought edits to the principles and requested that the content to be stronger in some areas. Particular issues raised included protecting the natural and historic environment, reducing traffic miles, safeguarding mineral resources and planning for the waste hierarchy.

All those who responded to the minerals section understood the current and potential increase in demand for aggregates over the upcoming years, especially with the forecast demand for housing and other infrastructure projects. One of the main issues was the movement of minerals and there was strong support for the allocation of a rail depot within the Plan area. This was influenced by the potential expansion of Heathrow Airport and the impacts this may have upon the depot at Colnbrook, Slough. Whilst many agreed that the Plan area relied on imports of crushed rock, marine won sand and gravel, and soft sand there was encouragement for not sole reliance on imports and to safeguard local mineral resources.

The majority agreed that the Environment Agency's Waste Data Interrogator (WDI) was the appropriate source of waste data, albeit its limitations are recognised and

¹ <http://www3.hants.gov.uk/sharedexpertise>

respondents were mainly in favour of methodologies combining both the WDI and other sources to estimate non-hazardous, inert, and hazardous waste arisings.

In terms of managing waste, net self-sufficiency was encouraged, as was diverting waste from landfill, although some respondents were keen for some provision for those materials not suitable for other methods, and the benefits of inert landfill were promoted. A key issue for waste planning was the potential removal of the Lakeside waste facility in Slough and the affect this would have on the Plan area with some keen to facilitate the lost capacity within the plan area. Additionally, the role that Slough has to play in the Plan was raised.

Lastly, transport mitigation and impacts, housing demand, the expansion at Heathrow, the role of Slough and site selections negatively impacting local communities were further issues raised throughout the consultation not relating to one particular section.

This Summary of Responses report is a guide for stakeholders and the Central & Eastern Berkshire Authorities to review the responses received on the suggested approach and will be used, together with the full responses and any further information collected or received, to prepare for the next consultation (the 'Preferred Options Consultation') which is scheduled to be carried out in early 2018.

1. Introduction

Hampshire Services² (part of Hampshire County Council) is working in collaboration with Bracknell Forest Council, Reading Borough Council, The Royal Borough of Windsor & Maidenhead and Wokingham Borough Council (collectively known as the Central & Eastern Berkshire Authorities) to produce a Joint Minerals & Waste Plan. The Plan will guide minerals and waste decision making in the Plan area up until 2036.

The Issues and Options Consultation (hereafter the consultation) was commenced on 9 June and ran until 21 July 2017, and was undertaken in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012³ and the Planning and Compulsory Act 2004 (as Amended)⁴.

The purpose of the consultation was to engage the community in discussion on the issues for managing minerals and waste for the next 20 years. It was also an opportunity to gather more evidence to inform the options for the Plan policies and site allocations.

The consultation was split into three main sections: the Vision and Spatial Strategy of the Plan; a minerals section and a waste section. Following this, there were five extra questions relating to general comments on the supporting documents. The current minerals and waste baseline situation was set out as well as the possible future minerals and waste issues that may impact minerals and waste planning decision by the Central & Eastern Berkshire Authorities. Suggestions were made at various stages throughout the consultation and the opinions of local people and industry were sought. There were also opportunities for people to provide more in depth opinions on the overall direction of the Plan.

This summary document provides an overview on the general themes and key issues that were most prevalent in the responses received, and how the Central & Eastern Berkshire Authorities will address the comments. These will be used to update the evidence base, support and direct the preparation of the Plan as well as inform and shape the later stages of the Plan making process. The document allows anyone with an interest in the Plan to identify which issues have already been raised.

Some responses to the consultation were received after the close of the consultation (post 21 July 2017). These have been included in this summary report and will be used to inform the preparation of the Plan in the same way as the responses received before the official closure. However, the later responses can be identified if this information is required at a later stage of the Plan-making process.

² <http://www3.hants.gov.uk/sharedexpertise>

³ <http://www.legislation.gov.uk/uksi/2012/767/contents/made>

⁴ <http://www.legislation.gov.uk/ukpga/2004/5/contents>

Further evidence that could help to inform the Plan making is welcomed, including comments on omissions or amendments needed to the evidence base. The evidence base to date is available to view online via the dedicated consultation webpage: <https://www.hants.gov.uk/berksconsult>.

Individual comments can be viewed by appointment at the Hampshire County Council offices in Winchester, Hampshire. To schedule an appointment, please contact the Planning Policy Team at planning.policy@hants.gov.uk. Alternatively, by calling 01962 845785.

2. Methodology

The responses and comments in this Summary were received by interested parties to the consultation (such as neighbouring authorities, residents, statutory consultees, parish councils). The consultation was advertised on each of the Central & Eastern Berkshire Authorities websites, as well as documents hosted at their offices and public libraries.

Responses to the consultation were received via online response forms, emails and letters. The consulted included 119 specific questions split over four main sections:

- Vision
- Minerals
- Waste
- Background documents

Where possible, answers have been assigned to one of the 119 specific questions in order to make the analysis simpler, but if this has not been possible, additional comments have been grouped together into 'general comments'. General comments have been grouped together into their theme following the same four sections as the consultation questions. The document has additionally been grouped into the four main sections in order to organise the findings.

At the beginning of each section, the responses have been summarised and key issues from the comments received identified. The question analysis then looks at the number of respondents who were in agreement with the proposed approaches within each question, vs the total number of respondents to that particular question. This then provided the percentage of respondents that were in agreement. For example, '10/20 agreed - 50%', demonstrates that 10 out of 20 responses to a particular question agreed with the proposed approach. That constitutes 50% of the total responses to that question.

There were instances whereby a respondent had submitted more than one response i.e. they had completed an online questionnaire, but had also emailed separately about a different matter. In these cases, these double responses have been counted as one if they have come from the same person. However, all applicable comments have been taken into consideration.

Please note the following when looking over this summary document:

- Not every comment is mentioned in this analysis
- Comments are not written in full
- Comments have been summarised or combined where possible
- Comments that apply to a number of related questions are sometimes only listed under the relevant question(/s)

- Comments which were noted as confidential have not been included
- Comments may appear contradictory as opposing views have been given equal treatment
- Comments with a high level of detail relating to particular documents, for example technical comments related to data, methodologies or presentation have not been detailed in full but have been taken into account and actioned

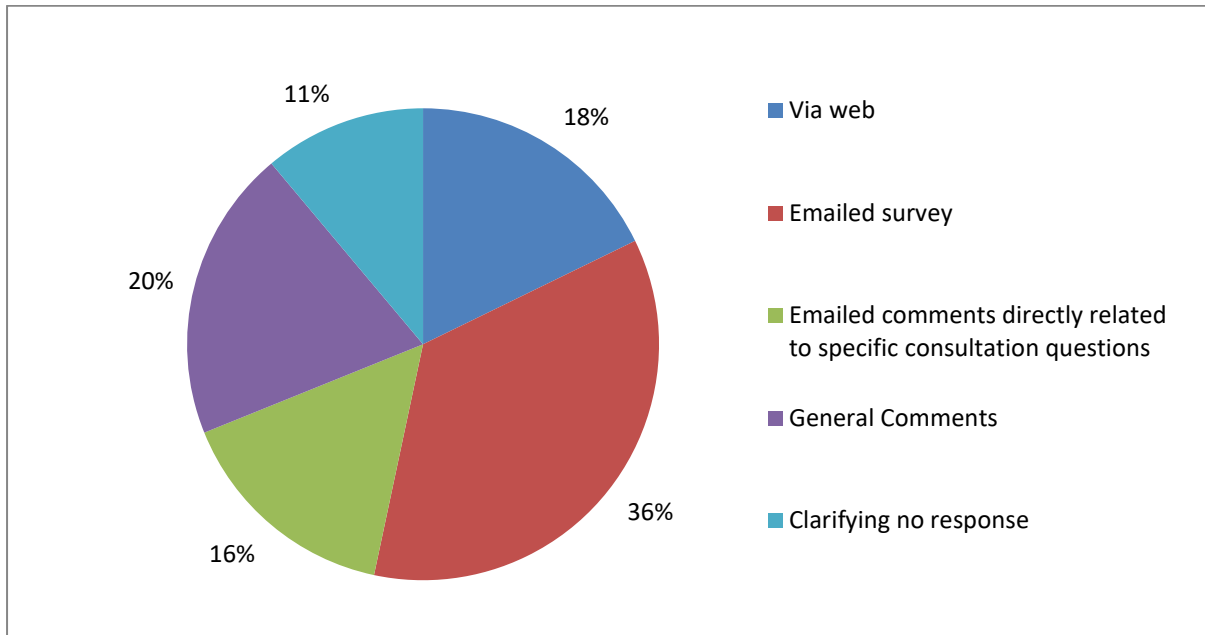
This report will seek to respond to points made, including what action (if applicable) will be taken to address the point. If the same issue has been raised by numerous respondents, these will be grouped and the authorities will provide one, single response.

The analysis and outcomes of this summary have been used to inform the preparation for future stages of the Plan.

3. Overview of responses and respondents

A total of 45 responses were received to the consultation. Figure 1 outlines how consultation responses were submitted. The majority of responses (37 or 82%) were received via email, and these included a combination of completed response forms, as well as general comments. Five of the 45 respondents confirmed they had no comments to make on the consultation.

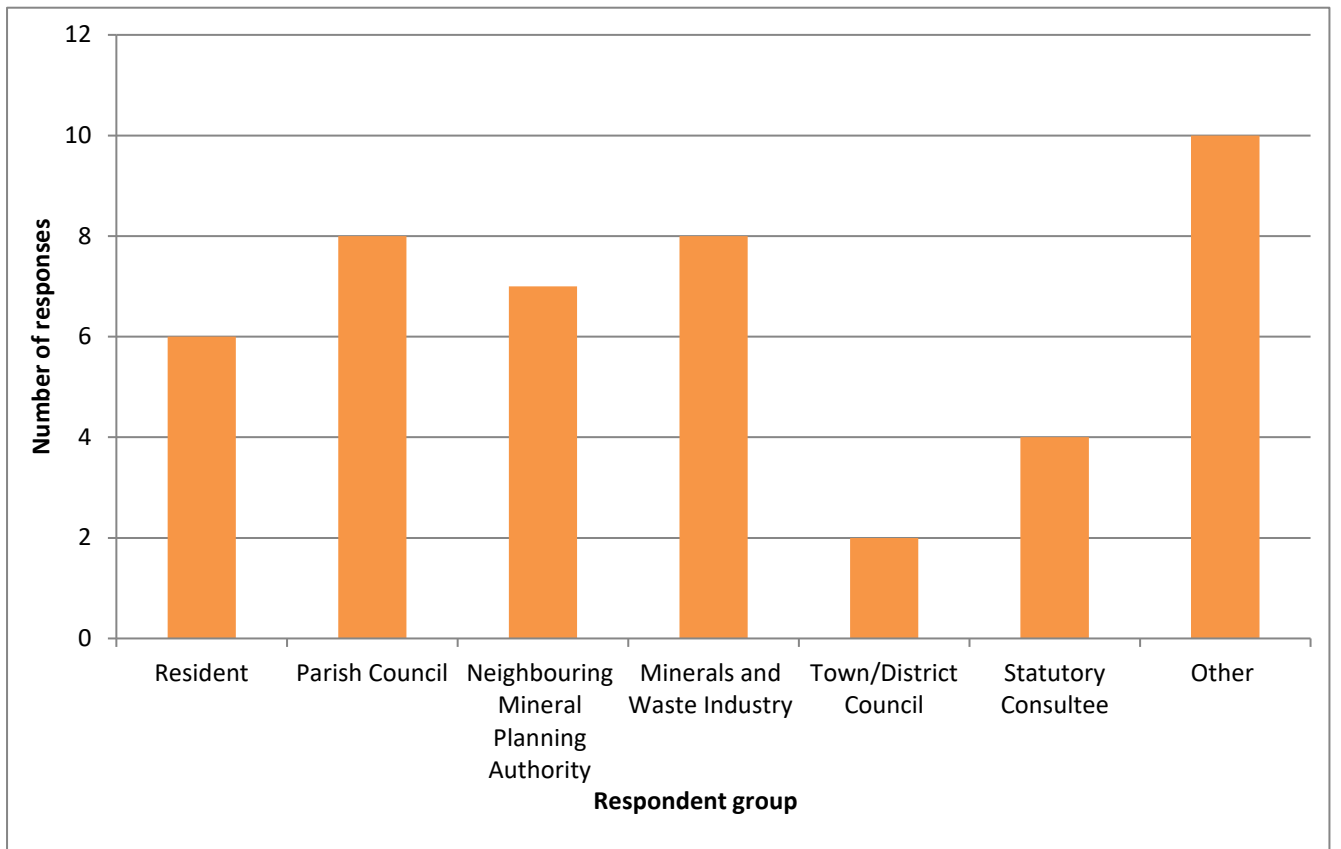
Figure 1: Method of submitting a consultation response



Respondents were clustered into groups in order to gain a better understanding of who responded to the consultation (see Figure 2).

Additionally, a number of queries were received relating to the consultation, which were not counted as responses. These queries were mostly regarding the recent call for the sites and the outcomes which will not be released until the Preferred Options stage of Plan making.

Figure 2: Number of responses received from respondent group



4. Response analysis

4.1 Vision and strategy (questions 1 to 8):

The majority of respondents agreed with the Vision, Plan Objectives and Spatial Strategy, and a number of issues were highlighted to be included or expanded upon within the Vision. These comments generally related, but not limited, to the following issues:

- Bio-diversity enhancement/protection
- Transport links
- Waste Management capacity – following Heathrow expansion and potential removal of Colnbrook facility
- Historic environment
- Safeguarding mineral resources/sites

Whilst 80% of respondents agreed with the Plan period, a number of comments were received relating to when the 20 year period began, and the suggestion to shorten the Plan period to 10 years. Additionally a third of the comments, from both those in support and against, related to the need for regular Plan reviews.

The Vision and Spatial Strategy generated a total of 148 comments from 27 respondents, with a breakdown of the number of responses to each question as follows:

Q1 – Do you agree with the proposed Plan period up to 2036?
20/25 respondents agreed – 80%

Q2 – If not, what period do you suggest and why?

9 comments were received relating in both support and against the suggest Plan period. Comments included:

Support:

- Expecting a loss of waste management capacity in 2026 and the period allows enough time to resolve capacity issues.
- Support inclusion of scheduled formal review every 3-5 years.

Against:

- Due to uncertainties around waste management, specifically the removal of Colnbrook site, a shorter time period would be best suited.
- Time period of 10 years, or 5-10 years.
- From date of adoption the plan is nearer 15 years rather than suggested 20 year Plan period. Advise for 20 years from the date of adoption.
- Plan needs frequent reviewing, suggested every 5 years.

Q3 – Do you agree with the proposed Vision?

16/22 agreed – 73%

Q4 – If not, what changes would you suggest?

13 comments were received. Comments included:

- Need for the Vision to be more spatial
- The Vision must focus on ‘ensuring the maintenance of a steady and adequate supply of minerals’ while aiming to maximise the contribution that minerals development can bring to local communities, the economy and the natural environment’.
- Reference should be made to the historic environment
- Reference to recycled/secondary aggregate should be included
- Reference should be made to the closeness to London and London’s ability to treat waste
- Reference to infrastructure projects and their requirements
- Suggested amendment: “Recognising the importance of the area as a source of minerals and a through route and destination for minerals coming from outside the area, Central & Eastern Berkshire....”
- Support for references to the natural environment, but must be supported by sufficiently strong worded policy within final Plan
- Further emphasis on protection of existing biodiversity and enhancement in net-gain through habitat restoration
- The Vision must be broad and not limited to positive outcomes of minerals and waste
- Reference should be made to providing a steady and adequate supply of minerals, and sufficient production capacity
- Contradictions between waste management of landfill within vision and Plan document (local vs regional management)
- Explanation of ‘maximise the contribution that minerals development can bring to local communities’.
- Explanation of how the Plan area aims to be self-sufficient and parameters applying to this.

Q5 – Do you agree with the proposed Strategic Plan Objectives?

16/23 agreed – 70%

Q6 – If not, what changes would you suggest?

17 comments were received regarding the objectives. Comments included:

- Objective 2 – there was confusion over the methods of ensuring ‘sensitive design and sustainable construction methods’.
- Objective 3 – General support. Include reference to flood storage. Objectives should include site’s impact on wider area biodiversity/establishing a coherent and resilient ecological networks. Support for Objective 3, and further

information on enhancing biodiversity at the Preferred Options stage was provided.

- Objective 6 – reference to environmental sustainability. Include ‘...from appropriately located and environmentally acceptable sources’. Amendment to include ‘steady and adequate supply of minerals’ with sufficient production capacity. Suggestion to add that the objective will be achieved via safeguarding mineral resources and site allocations.
- Objective 7 – Replace ‘demand for’ with ‘supply of’. Suggestion to move objective placement under objective 3.
- Objective 9 – Support for reducing mineral miles. Difficulties of rail movement were highlighted.
- Objective 11 – Support for the principle of the objective. Suggestion to ensure no conflict between Objective 11 and 12. Suggestion that Objective does not recognise the need for certain materials (inert material) which must be deposited in landfill. E.g. excavation arising’s which cannot be recycled. Availability of void space during Plan period is fundamental. Net self-sufficiency was supported in the right type of waste capacity. How will parameters of net self-sufficiency be defined?
- Objective 12 – Support for the Plan area being ‘self-sufficient’. Inclusion of the phrase ‘...unless there is a conflict with other objectives such as quality of life or zero waste economy’.
- Reference should be made to the need for increased recycling provision to achieve target rates that are being promoted through Circular Economy Package.
- Suggestion objectives do not meet requirements of National Planning Policy Framework (paragraph 17 and 110). Therefore have recommended a specific objective which refers directly to allocating sites on land of least environmental value allowing net gain for nature and creating links for natural environment.

Q7 – Do you agree with the proposed Spatial Strategy Content?

11/22 agreed – 50%

Q8 – If not, what changes would you suggest?

17 comments were received, comments included:

- Principles:
 - General support for principles
 - Principle vii: should be ‘in locations that are acceptable’
 - Principle viii: high emphasis to be placed on this principle. Change the word ‘limit’ in order to strengthen the principle.
 - Principle ix: suggestion to remove the word ‘most’, as all sites should be protected. Include the word ‘unacceptable’ prior to ‘development’
- Unclear exactly what the spatial strategy is.

- Recommended reference to recycled/secondary aggregates and promotion of such.
- Recommend reference to protecting/enhancing ecological networks through the landscape, wildlife and adaptation to climate change.
- Reference should be made to the Colne Valley Regional Park in the Royal Borough of Windsor and Maidenhead.
- The inclusion of a criteria which seeks to minimise road miles.
- The strategy must recognise the role of waste management to achieve sustainable development in line with para 14 of National Planning Policy Framework. The Plan must plan for all levels of the waste hierarchy, and meet ambitions of the Circular Economy.
- Recommendation to include specific points requiring sites to be located in areas of least environmental value, avoid impacts of re-location/re-design, mitigate unavoidable impacts, achieve measureable net gain, enhance links between natural habitats, timely restoration/aftercare allowing long term net gains.
- Reference should be made to safeguarding future mineral resources and areas of future workable reserves.
- Spatial strategy must reflect objective 12. Reduce waste miles.

Comments were received regarding typos, and these have now been rectified.

In addition to directly answering questions about the Vision and Strategy section of the consultation, 10 additional responses were received via email whose content related to the Vision of the Plan. These will be explored further in Section 7.

5.1 Minerals (questions 9 to 70):

No new sources of data were highlighted that the authorities did not previously know of and 85% of respondents agreed there is sufficient information to support a minerals plan.

100% of respondents agreed that there was a continued and potentially increased demand for aggregate over the Plan period, and the dependence on rail depots for importing marine won sand and gravel, and crushed rock was vital. Whilst the majority of respondents were in support of identifying practical rail and water sites within the Plan area to allow the continued relied on imports of aggregate, especially with the Heathrow expansion threatening the Colnbrook Rail depot; no rail depot sites were identified within the Plan area. Additionally, it was mentioned that the Plan area should not fully rely on imports and focus should still be placed on locating sites for land-won sand and gravel.

In terms of land-won soft sand resources, 87% agreed that soft sand was sourced from outside the Plan area. Whilst some respondents stated there were no geological resources of soft sand within the Plan area and had to be imported, others suggested that imports should not be relied on, and if possible, provisions should be made within the Plan to safeguard any remaining resource.

The majority of respondents (73%) agreed that the main markets of sand and gravel were within the Plan area and neighbouring areas of the Thames Valley, and only 6% of respondents could find any factors which could affect the estimated 7 million tonnes of sharp sand and gravel remaining reserves. There was no consensus as to whether the Preferred Areas in Slough should be taken in account in terms of remaining reserves. 62% agreed that the 8.8yr landbank is a true reflection of supply, with factors such as reliance on imports, limited number of operational sites, and a higher demand than supply being factors which influenced the landbank.

With an increasing demand of aggregate, 67% agreed that an additional reserve of 9 million tonnes of sand and gravel should be planned for over the Plan period. In order to meet this demand, a small number of sites were proposed, the majority of respondents agreed that the remaining Preferred Areas should be reconsidered and mineral deposits of sand and gravel should be safeguarded within Minerals Safeguarding Areas. Lastly, less than 50% agreed that it wasn't necessary to safeguard clay; its uses of lining waste pits was highlighted and the potential of increased demand.

Key issues included:

- Transportation of minerals and the inadequate road network
- The need to not solely rely on imports of aggregate
- Expansion of Heathrow Airport jeopardising Colnbrook rail depot and the means to safeguard a site within Plan area
- Safeguarding clay
- Potential of soft sand resources
- Inclusion of all Preferred Areas to be reconsidered
- Demand for mineral will grow and infrastructure for imports, and safeguarded land-won sites are necessary to meet demand

The minerals section was split into 20 issues and the analysis of answers to the questions are below. A total of 711 (direct) comments were made from 23 respondents to questions within the Minerals section with a breakdown of the number of responses to each question as follows:

Issue: Minerals data

Q9 – Can you suggest any other sources of minerals data for the Central & Eastern Berkshire area?

7 responses were received. Suggestions included Aggregate Monitoring (AM) survey, British Geological Survey AM2014 national collation, planning applications and mineral operator surveys.

Q10 – Do you agree that the general trends for the Berkshire wide level of mineral demand are also likely to apply in Central & Eastern Berkshire?

9/12 agreed – 75% Comments included:

- Mineral type is different to West Berkshire thereby serving a different market.
- Higher economic activity in Central & Eastern Berkshire than West Berkshire meaning higher demand.

Q11 – Do you agree that there is sufficient information to support a minerals plan for Central & Eastern Berkshire?

11/13 agreed with the question – 85%

Issue: Transportation of minerals

Q12 – Do you have any information that could help to inform the understanding on mineral movements within Central & Eastern Berkshire, as well as imports / exports of minerals, into and outside of the Plan area?

9 responses were received. Comments included:

- Industry knowledge was offered relating to sand and gravels travelling east towards London.
- Operator figures were offered if required

Q13 – Do you think potential and practicable rail and water connected sites should be identified within Central & Eastern Berkshire?

14/16 agreed with the question – 88%, 1 didn't know. Comments included:

- Generally respondents were in favour of this type of transport due to a current inadequate road network and the need for importing certain aggregates such as crushed rock.
- With the uncertainty over Colnbrook due to the Heathrow expansion it would be sensible to safeguard potential rail sites.

Q14 – Do you know of any such sites within Central & Eastern Berkshire?

4 responses, comments included:

- No specific sites were identified.
- Opportunities from the current rail and river network were encouraged to be investigated.
- The importance of the rail depot and Colnbrook was mentioned and the impacts of its closure following Heathrow expansion.
- The issue of rail movements due to busy rail lines planning restrictions, e.g. no night movements.

Q15 – If existing rail depots in neighbouring authorities cannot be retained, should the Plan encourage their replacement?

100% of the 15 responses agreed.

- There was support for a rail depot within the Plan area
- Concerns over potential removal of Colnbrook depot following Heathrow expansion.
- Recognition of importance of the site for importing minerals.
- There was a request for the Plan to explain how this would be delivered.

Issue: Aggregate demand

Q16 – Do you know of any other local data that should be used to forecast local demand for aggregate?

8 responses were received. Comments included:

- Housing and population projections
- Planning permission development numbers
- Borough Local Plans
- Mineral Products Association forecast/scenarios of aggregate demand
- Understanding of recycled/secondary aggregate to understand uses and means to reduce primary aggregate

Q17 – Do you agree that the demand information suggests that there will be a continued and possible increase in minerals demand in the near future or later in the Plan period?

100% of the 15 responses agreed. Comments included:

- Local developments are considering reducing imports of bulk material to the site by reusing/recycling materials from demolition and other means. There is an aim to maximise uses of material on site reducing reliance on imports

Issue: Aggregate supply

Q18 – Do you think it is fair to assume that the trends of increasing dependence of imported aggregate in Berkshire is reflected in Central & Eastern Berkshire?

12/16 agreed – 75%, 1 did not know.

One comment was received relating to the question wording.

Q19 – If not, what information do you have that would support this?

4 responses were received. Comments included:

- There was a warning that if the Plan had a dependence on imports that this would be self-fulfilling if land-won sources are reduced
- Plan should not rely solely on imports, as this increases transportation and subsequent environmental impacts.

Q20 – Do you agree that the trend for increasing consumption of crushed rock and marine sand and gravel, heighten the dependence of Central & Eastern Berkshire on the rail depots in neighbouring authorities?

13/15 agreed - 87%, 1 did not know. One response stated they agreed unless a rail depot could be found within the Plan area.

Issue: Recycled and secondary aggregate

Q21 – Are you aware of any other sources of information on aggregate recycled or secondary aggregate data which can be reported on?

5 responses were received. Comments included:

- Possible expansion at Heathrow
- Environment Agency Waste Data Interrogator
- Offers from local operators to provide figures

Q22 – Do you agree with the assumption that Central & Eastern Berkshire is exporting some of its construction and demolition waste outside of the Plan area, potentially to West Berkshire, for processing?

12/16 agreed – 75%, 3 did not know.

- One respondent suggested the information could be found from Environment Agency permit quarterly returns.

Q23 – Do you agree that Central & Eastern Berkshire should be more self sufficient in its processing of construction and demolition waste within the Plan area?

9/15 agreed - 60 %.

- One respondent questioned the word 'more', as the area should either be self sufficient or not with no in-between state.

Issue: Crushed rock

Q24 – Do you agree with the assumption that the crushed rock supplied to Central & Eastern Berkshire is sourced from Somerset via the rail depots at Theale?

10/14 agreed - 71%, 3 did not know.

- One comment highlighted that some material will be transported by road.

Q25 – Do you agree that the consumption of crushed rock within the Berkshire area demonstrates the dependence of Central & Eastern Berkshire on the rail depots in neighbouring areas as sources of supply?

13/15 agreed - 87%, 2 did not know.

- One respondent suggested that Central & Eastern Berkshire should seek to find their own rail depot.

Issue: Marine won sand and gravel

Q26 – Do you agree with the assumption that the marine won sand and gravel forms a small but important part of the aggregate supply to Central & Eastern Berkshire?

8/14 agreed – 57%, 5 did not know.

Q27 – Do you agree with the assumption that marine won sand and gravel from Hampshire is being transported by road, and via rail from London's wharves?

7/13 agreed – 54%, 5 did not know.

- One respondent suggested that it is also transported via Theale and Woking rail depots.

Q28 – Do you agree that the import of marine aggregates to Central & Eastern Berkshire justifies support for safeguarding wharves in supply locations such as Hampshire and London?

9/14 agreed – 64%, 4 did not know.

Issue: sand and gravel markets

Q29 – Do you agree that the main markets for sand and gravel are within Central & Eastern Berkshire and neighbouring areas of the Thames Valley?

11/15 agreed – 73%.

Issue: Extraction locations

Q30 – Do you agree that the supply of soft sand to Central & Eastern Berkshire is being sourced from outside the Plan area?

13/15 agreed – 87%, 1 did not know

- An attempt should be made to quantify the need, and identify the source of supply to ensure steady and adequate provision.

Q31 – Are you aware of any reasons for soft sand proposals not coming forward?

3/16 – 19% of respondents were aware why soft sand proposals are not coming forward. 6 did not know.

- One respondent stated the geological resource is constrained within Central & Eastern Berkshire.

Q32 – Are you aware of any potential soft sand sites?

There were no respondents aware of any potential sites.

Q33 – Do you agree with the assumption that Central & Eastern Berkshire is likely to be supplying Slough with aggregate?

11/16 agreed - %, 4 did not know.

- One respondent highlighted that sites outside of the Plan area, like Buckinghamshire and West Berkshire, are supplying Slough too.

Q34 – Are you aware of any factors which may affect the estimated seven million tonnes of reserves at operational sites within Central & Eastern Berkshire?

1/16 – 6% were aware of factors.

- The respondent information on non-operational sites which should not be counted within the reserve. Hampshire Services were already aware of these sites and therefore were not included within the original estimated reserve.

Issue: Sand and gravel resources

Q35 – Do you agree that potential resources of sand and gravel and soft sand remain within Windsor & Maidenhead and Wokingham boroughs?

5/14 agreed – 36%, 8 did not know.

Q36 – Do you think the resources in Preferred Areas in Slough should be taken account of when considering potential resources supply to Central & Eastern Berkshire?

8/16 agreed – 50%, 3 did not know.

Issue: Sand and gravel imports / exports

Q37 – Do you agree that the main supplies of sand and gravel used in the area are from within Berkshire and Hampshire?

5/14 agreed – 36%, 7 did not know – 50%.

- One respondent indicated the reserve may also come from West London and South Buckinghamshire.

Q38 – If not, do you have any evidence to support this?

1 respondent offered evidence. This related to market knowledge regarding substantial supplies of sand and gravel used in the area which originate from Oxfordshire, most namely South Oxfordshire near Reading.

Q39 – Do you agree with the assumption that a decline in exports reflects the development demand pressures within the area?

8/15 agreed – 53%, 5 did not know. Comments included:

- Agreement that the trend reflects that less mineral is produced within the area.
- The decline is more likely to be due to exhaustion in reserves
- One respondent queried the source of the declining trend

Q40 – Do you agree with the assumption that imports and exports of sand and gravel are transported by road?

7/13 agreed – 54%, 4 did not know.

Issue: Past sand and gravel sales

Q41 – Do you have any available data that could be used to inform the sales information for Central & Eastern Berkshire?

4 respondents from the minerals and waste industry offered up their sales information.

Q42 – Do you agree that the three year average is a true reflection of demand for Central & Eastern Berkshire?

6/15 agreed - 40%, 5 did not know.

Q43 – If not, what level of demand do you think is appropriate to forecast future demand and what evidence do you have to support this?

5 responses were received. Comments included:

- 3 year average does not account for substantial levels of imports to the area from road and rail
- 3 year average only accounts for demand, supply and demand is likely to be far higher than the figure offered
- Major infrastructure projects within the Plan area and wider Thames Valley such as Heathrow

Issue: Soft sand

Q44 – Due to the lack of soft sand sales from quarries within Central & Eastern Berkshire, what do you estimate is the level of demand for soft sand in the area and what evidence do you have to support this?

3 responses were received. Comments included:

- Soft sand is not naturally occurring in Berkshire
- The aggregate has to be imported
- Suggestion to look at other plan methods for estimating soft sand demand

Q45 – Do you think that Central & Eastern Berkshire should continue to rely solely on imports of soft sand?

1/14 agreed that the area should rely on imports - 7%, 4 did not know.

- One respondent stated that imports should not be relied on if suitable reserves can be located

Q46 – If not, what measures can be used to encourage soft sand proposals to come forward?

5 responses were received. Comments included:

- Identify Preferred Areas to allow flexibility
- Soft sand resources are constrained
- Existing reserves should be safeguarded

- One respondent questioned the reasons behind site proposals not coming forwards

Q47 – Do you agree that the landbank of 8.8 years for Central & Eastern Berkshire is a more accurate reflection of supply?

8/13 agreed - 62%, 3 did not know

Q48 – If not, what factors or information influence your position?

3 responses were received, comments included:

- Supply is constrained by availability of operational sites
- Reliance on imports
- Limited number of operational/allocated sites
- Demand may be higher than supply
- Imports by road and rail

Issue: Future sand and gravel provision

Q49 – Do you agree that the Central & Eastern Berkshire Authorities should plan for an additional requirement of nine million tonnes of sand and gravel?

10/15 – 67% agreed, 4 did not know.

Q50 – If not, what is the evidence to support this?

2 responses were received, comments included:

- Demand for sand and gravel will grow as the economy improves and sites are exhausted
- Plan should be flexibly to allow for additional resources to be developed later on in the plan period
- Future reviews should continue if sites are not forthcoming now

Q51 – Do you agree that all the remaining Preferred Areas are reconsidered for inclusion in the Joint Minerals & Waste Plan?

11/17 agreed – 65%, 3 did not know.

Q52 – Do you have any information regarding the remaining Preferred Areas which may impact their inclusion?

3 responses were received, comments included:

- No 8 is now housing, no 13 has half been lost to railway standoff
- Subject to conserving archaeological remains
- Important to include previous preferred options

Q53 – Are you aware of any sand and gravel sites that could be proposed for extraction?

5 respondents were aware of proposed sites.

Issue: Mineral safeguarding

Q54 – Do you agree that only mineral deposits of sharp sand and gravel and soft sand are safeguarded within Minerals Safeguarding Areas?

9/13 agreed – 69%, 3 did not know.

Q55 – If not, what minerals should be included and why?

1 response was received which suggested to look at other sources of sustainable material.

Issue: Clay

Q56 – Do you agree that it is not necessary to safeguard clay resources because current industrial demand by brick and tiles works is low in this area?

5/11 agreed – 45%, 5 did not know.

Q57 – If not, what evidence do you have to support this?

1 response was received, which highlighted the importance of using clay for lining waste pits. The demand for clay has the potential to rise with increased development. Whilst it is an aspiration to reduce reliance on landfill sites, it shouldn't be excluded from long term planning due to possibility of new sites.

Q58 – Do you agree that it is not necessary to allocate clay extraction sites?

5/10 agreed – 50%, 4 did not know.

Q59 If not, what evidence do you have to support this?

1 response was received which highlighted the importance of using clay for lining waste pits. The demand for clay has the potential to rise with increased development. Whilst it is an aspiration to reduce reliance on landfill sites, it shouldn't be excluded from long term planning due to possibility of new sites.

Q60 – Do you agree that future clay proposals can be judged against a criteria-based policy?

6/11 agreed – 55%, 5 did not know.

Issue: Chalk

Q61 – Do you agree that it is not necessary to safeguard chalk resources?

5/11 agreed – 45%, 5 did not know.

Q62 – If not, what evidence do you have to support this?

There were no responses regarding safeguarding chalk resources.

Q63 – Do you agree that it is not necessary to allocate chalk extraction sites?

5/9 agreed - 56%, 4 did not know.

Q64 – If not, what evidence do you have to support this?

There were no responses.

Q65 – Do you agree that future chalk proposals can be judged against a criteria-based policy?

5/9 agreed – 56%, 4 did not know.

Issue: Oil and gas

Q66 – Do you agree there are currently no known commercially viable resources of oil and gas in Central & Eastern Berkshire?

5/11 agreed – 45%, 6 did not know.

Q67 - Do you agree that the Joint Minerals & Waste Plan should contain a policy to judge future oil and gas proposals should the situation change?

10/12 agreed – 83%, 1 did not know.

Q68 – Do you agree that a criteria based policy should be used to judge any future oil and gas proposals?

7/10 agreed – 70%, 3 did not know.

Issue: Coal

Q69 – Do you agree that a criteria based policy should be used to judge any future coal proposals?

6/10 agreed – 60%, 3 did not know.

Q70 If not, what evidence do you have to support this?

There were no responses.

Aside from the 711 comments relating to the mineral questions, there were 10 further responses whose comments related to minerals. These are discussed in section 7.

5.2 Waste (questions 71 to 113):

The majority of respondents agreed that the Environment Agency Waste Data Interrogator was the most up-to-date source of data available; however its limitations were recognised. A number of other waste data methods were suggested which the authorities were mostly aware of.

In terms of waste management capacity, 54% agreed with the proposed methodology in Table 5, with only 2 respondents suggesting any other methodology types. One suggestion included using a combination of all of the methods listed, but those should be critically appraised for their robustness and therefore the weight given to each of these methods should vary.

Whilst only a small percentage of respondents were in favour of the two methodologies for estimating non-hazardous waste data (Q79 and Q80), it must be accounted for that 40% of respondents 'did not know'. A higher number of respondents (50%) agreed that the methodologies should be combined to determine arising's, with only 1 respondent specifying an alternative method. Meanwhile in terms of non-hazardous waste management, the majority of respondents were in support of a replacement facility for Colnbrook. One respondent acknowledged that its replacement was essential. With the focus of landfill as a waste management option becoming more of a regional facility, approach D (Q85) was the most favoured; continue to use the existing waste management facilities network, however seek to make greater provision for facilities higher up the waste hierarchy and provide for net self sufficiency.

As with non-hazardous waste, the most preferred option for estimating inert waste arising's was a combination of two methods, the Environment Agency Waste Data Interrogator and aggregate recycling data. The majority of respondents agreed that inert landfill was significantly different to non-hazardous and benefits were encouraged.

There was a 50/50 split in the methods to manage hazardous waste, between continuing the current patterns and providing a greater capacity of diverse hazardous waste facilities in order to be net self-sufficient. There was a high level of support for considering specialist waste streams within the Plan.

In terms of future waste arising's, the majority of respondents agreed that looking at the past was a good basis for predicting the future and a period of 10 years was appropriate, although some disagreed and thought a shorter time period would be more accurate. 100% of respondents agreed with the uses of low, medium and high waste growth scenarios.

There was a divide in responses when it came to future waste capacity with a 50/50 split agreeing that the four scenarios discussed in paragraph 10.26 covered all the options. The provision for landfill was still encouraged for those materials not accepted by other methods. In terms of their location, 68% of respondents agreed with the seven broad categories of waste as a useful way for determining location. It was acknowledged and agreed that currently the majority of waste is transported by road, and whilst it was agreed that it is unlikely to be transported by water, rail movement was encouraged.

Key issues included:

- Removal of Colnbrook waste facility
- Impacts of waste facilities
- Net self-sufficiency
- Use of Environment Agency and other means as data sources

The waste section was split into 12 issues. The analysis of responses is set out below. A total of 413 (direct) comments were made from 23 responses to questions within the Waste section, with a breakdown of the number of responses to each question as follows:

Issue: Waste data

Q71 – Do you agree that the Environment agency’s Waste and Hazardous Waste Data Interrogators are the main, most up to date and most robust sources of waste data available in England?

10/15 agreed – 67%, 4 did not know.

- One respondent noted that the addition of local information may enhance this, e.g. new quarries which have not started infilling yet.

Q72 – Do you agree that the figures in Table 4 give an approximate idea of the level of both waste arisings and waste managed in Central & Eastern Berkshire?

9/14 agreed – 64%, 5 did not know.

Q73 – Do you agree with the use of waste data, where the source is a Central & Eastern Berkshire Authority, as a proxy for waste arisings in Central & Eastern Berkshire?

9/14 agreed – 64%, 5 did not know.

Q74 – Do you agree with the use of waste received at facilities in Central & Eastern Berkshire as a proxy for the waste management capacity within Central & Eastern Berkshire?

9/15 agreed – 60%, 4 did not know. Comments included:

- The data should only be an interim position until more accurate data is obtained.

Q75 – Are there other waste streams and waste data sources not dealt with properly in this report?

7 responses were received, comments included:

- Waste Data Flow – DEFRA
- Greater recognition of smaller facilities in UK for specialist hazardous waste
- Environment Agency permitted void data
- Radioactive data
- Lack of up to date data – suggestion for annual surveys
- As per Planning practice guidance, waste planning authorities should include a general policy approach to low level radioactive, agricultural, hazardous waste and waste water.

Estimating waste management capacity

Q76 – Do you agree with the methodology for estimating capacity proposed in Table 5?

7/13 agreed - 54%, 4 did not know.

Q77 – Are there any other sources of capacity data that you would suggest?

There were no responses.

Q78 – Is there another methodology for estimating waste capacity data that could be used?

2 responses were received, comments included:

- Support for current method
- Suggestion to compare against other mineral planning authorities
- Different weight should be applied to different methods depending on their robustness

Issue: Non hazardous waste data

Q79 – Do you think that non hazardous waste arisings should be estimated using Environment Agency Waste Data Interrogator data, in combination with Waste Data Flow where required?

3/11 agreed – 27%, 5 did not know.

Q80 – Do you think that non hazardous waste arisings should be estimated using Waste Data Flow and Commercial and Industrial arisings models?

2/11 agreed – 18%, 5 did not know.

Q81 – Do you think that non hazardous waste arisings should be estimated using a combination of the above?

6/12 agreed – 50%, 5 did not know.

Q82 – Do you think that non hazardous waste arisings should be estimated using another method? If so, please specify what method and where the data should be sourced?

1 respondent said yes, whilst 6 did not know. 2 comments were received, comments included:

- DEFRA’s published data ‘UK statistics on Waste’ December 2016 and ‘Digest of Waste and Resource Statistics’ March 2017.

Issue: Non hazardous waste management

Q83 – Do you agree that the Colnbrook Energy from Waste facility is a vital strategic waste management facility for Central & Eastern Berkshire and Slough and so a replacement of the capacity within the area should be strongly supported?

12/15 agreed – 80%, 2 did not know. Comments included:

- Support for the facility in performing a important local role
- Replacement is essential

Q84 – Do you agree that landfill is becoming a regional level waste management facility and that it is not always appropriate to seek to allocate local sites?

9/12 agreed – 75%, 3 did not know.

Q85 – Which of these approaches do you consider is the most reasonable in terms of waste management?

There were 17 responses to this question.

Approach	Number of respondents	% to choose approach
A – continue to use existing waste management facilities network, even when they are in nearby counties	2	12%
B – seek to make full provision within Central & Eastern Berkshire for the waste management facilities that match the estimated waste arisings	4	24%
C – seek to make greater use of existing types capacity (e.g. of inert waste facilities, see below) and provide for net self sufficiency for waste	1	6%
D – continue to use the existing waste management facilities network, however, seek to make greater provision for facilities higher up the waste hierarchy and provide for net self sufficiency for waste	10	59%

Issue: Inert waste data

Q86 – Which of the following approaches do you think is the most reasonable to estimate arising’s of inert waste?

There were 13 responses to this question.

Approach	Number of respondents	% to choose approach
A – use Environment Agency Waste Data Interrogator data	0	0
B – complement Environment Agency Waste Data Interrogator with aggregate recycling monitoring data	3	23%
C – complement Environment Agency Waste Data Interrogator and aggregate recycling data with estimates based on construction activity	9	69%
D – other method	1	8%

The respondent who chose other did not specify a method or source of data.

Issue: Inert waste management

Q87 – Do you agree that inert landfill is significantly different to non hazardous landfill?

10/14 agreed – 71%, 3 did not know. Comments included:

- Poorly operated inert landfill can pose similar risks to non-hazardous landfill. Environmental protection of inert less is less rigorous than non-hazardous which may have an impact.

Q88 – Do you agree that there might be benefits to inert landfill beyond those operations that are classed as recovery?

10/13 agreed - 77%, 3 did not know.

The benefits of inert landfill were encouraged.

Issue: Hazardous waste data and management

Q89 – Which of the following options do you think is the most reasonable approach to managing hazardous waste?

There were a total of 10 responses.

Approach	Number of respondents	% to choose approach
A – continue the current patterns of hazardous waste management and provide a criteria based policy on which new proposals could be judged	5	50%
B – meet net self sufficiency through increased provision of waste management of other types of waste streams (non hazardous and inert)	0	0
C – seek to provide greater capacity in the hazardous waste management facility types that are currently present, aiming for net self sufficiency in the hazardous waste stream	0	0
D – seek to provide greater capacity and greater diversity of hazardous waste management facilities, aiming for net self sufficiency in the hazardous waste stream	5	50%

Q90 – Can you suggest robust sources of data on hazardous waste facilities?

1 response was received which highlighted the Environment Agency’s Waste Data Interrogator as a source of data, but recognised its limitations.

Q91 – Can you suggest stakeholders that would have a particular interest in hazardous waste?

2 responses were received, comments included:

- Motor trade, construction & demolition firms, waste firms, healthcare

Issue: Specialist waste

Q92 – Do you agree that we need to consider the specialist waste streams as listed in paragraph 10.22 of the Consultation paper?

11/14 agreed - 79%, comments included:

- Support for the Plan to cover specialist waste streams, and in particular wastewater/sewage sludge
- Many of the identified waste streams will be covered by inert, non-hazardous and hazardous waste. However agricultural waste should also be considered

Q93 – Are there any other types of hazardous or specialist waste that arise or that are managed in facilities in Central & Eastern Berkshire and Slough?

There were no responses received.

Q94 – Where else could we look for data on other types of hazardous or specialist waste?

1 response was received. The response included the following comment:

- Environment Agency, Local authorities and Government agencies

Q95 – Are there particular types of hazardous and specialist waste that we need to plan for and why?

1 response was received. The response included the following comment:

- Encouragement for the Plan to recognise importance of hazardous landfill, a resource required throughout the Plan to manage certain types of waste where landfill is most appropriate

Issue: Future waste arisings

Q96 Should we use waste management changes in the past as a basis for predicting waste arisings in the future?

8/12 agreed – 67%, 2 did not know

Q97 – If yes, are trends over the past 10 years a good period of time to use?

7/11 agreed – 64%, 2 did not know.

- One respondent stated that 3 year would be more accurate

Q98 – Should we weight waste arising predictions to take account of population and business growth predicted in the constituent authorities' emerging local plans?

12/14 agreed – 86%, 2 did not know.

Q99 – Should we use a range of scenarios including introducing a buffer of 15% above our estimates and 15% below our estimates to demonstrate the unpredictability of future waste arisings?

10/14 agreed – 71%, 3 did not know.

Q100 – Do you agree with the assumptions recommended for use in waste forecasting in the Planning Practice Guidance for Waste?

10/13 agreed – 77%, 3 did not know.

Q101 – What other assumptions do you think we should use?

4 responses were received, comments included:

- Population and industry growth
- Construction and economy activity
- Commercial & Industrial amounts are considered similar to municipal waste
- Reduction in green waste per household
- Changes in domestic 'garbage' waste from decreasing supermarket bulky packaging, and increase in packaging of bulky food

- DEFRA statistics - Forecasting 2020 waste arising's and treatment capacity 2013

Q102 – Do you agree with the use of low, medium and high waste growth scenario?
10/10 – 100% agreed

Q103 Do you have suggestions about what range of waste growth the Plan should consider, providing reasons and data sources?

3 responses were received, comments included:

- Refer to reduction in green waste as household compost and have smaller gardens
- Decrease in supermarket bulky packaging and increase in consumption of packaged cooked food
- Comparison with other local plan suggestions

Issue: Future waste capacity

Q104 – Do you agree that we should use waste scenarios to explore waste management planning options?

11/15 agreed – 73%, 3 did not know.

Q105 – Do you agree with the four scenarios discussed in paragraph 10.26 of the Consultation Paper and that they cover the majority of options?

6/12 agreed – 50%, 5 did not know. Comments included:

- The last two scenarios appear to assume there is scope for increasing the amount of waste diverted from landfill. It is not accepted that there is substantial scope for further diversion
- Landfilling of waste is a very reduced activity from materials that cannot be dealt with by other methods/uses such as non-recyclable arising's from construction and excavation projects

Q106 – If not, what scenarios would you suggest?

3 responses were received, comments included:

- Question as to whether these realistic scenarios based on current national policy - i.e. the need to drive waste management up the waste hierarchy and the objective of net-self sufficiency would seem to preclude most of these.
- Improving of recycling with better options including separation at source of domestic products - greater types of plastic accepted.
- Most likely is a combination of the 4 proposals which all provide benefit to meeting sustainable waste management. Landfill should be considered within the Plan. Especially as some material like particular hazardous material is required to be sent to landfill. Perhaps new inert landfill opportunities in coherence with new quarry sites.

Issue: Locational requirements for waste facilities

Q107 – Do you agree with the seven broad categories of waste management facilities listed in paragraph 10.28 of the Consultation Paper as a useful way of grouping them by locational requirements?

8/12 agreed – 68%, 4 did not know.

Q108 – If not, what are your suggestions and why?

One response was received, comments included:

- The first two categories should be removed as all waste operations should be undertaken within buildings to ensure the operations do not have a detrimental impact on air quality. An additional category is required for deposit of waste for recovery (DfR) operations.

Q109 – Do you have any comments on the particular planning considerations they may have?

2 responses were received, comments included:

- Avoiding Source Protection Zones
- Noise, traffic and smell

Issue: Transportation of waste

Q110 – Do you agree with the assumption that all waste is currently transported by road in Central & Eastern Berkshire?

11/16 agreed – 69%, 4 did not know.

Q111 – Do you agree that it is unlikely that waste will be transported by water during the Plan period?

12/16 agreed – 75%, 3 did not know.

Q112 – If you disagree, please state where the transfer docks should be located
1 response was received.

Q113 – Do you agree that transportation of waste by rail should be encouraged, where possible?

14/16 agreed – 88%. 1 respondent highlighted the need for this due to the inadequate road network.

Q114 – If you agree, please state where the rail depot facilities should be located
3 responses were received, comments included:

- Slough and other principle rail heads
- Reading
- Support for encouraging sites

5.3 Supporting documents (questions 115 to 119):

The five additional questions at the end of the consultation provided the opportunity to comment on the documents that supported the Consultation Paper. A total of 22 (direct) comments were made from 12 respondents to questions regarding the supporting documents.

Q115 – What comments do you have on the: Minerals Background Study?

6 responses were received, comments included:

- Encouraging the Duty to Co-operate to ensure that minerals and waste issues require cross-boundary approaches
- Information regarding preferred options sites missed from the study
- The document states there are aggregate sources within Wokingham and Royal Borough of Windsor and Maidenhead, there are also resources within Bracknell forest
- Air quality impact from transport of minerals should be a key consideration.
- Missing element is the potential of future rail depots within the Plan area
- A number of comments were receiving relating to technical points within the study such as safeguarding, data tables and methodologies.
- The need to investigate future need for soft sand and whether it can be provided in the Plan area.

Q116 – What comments do you have on the: Waste Background Study?

6 responses were received, comments included:

- Support for the positive sensible approach
- Recommendation to make reference to the Environment Agency's approach to groundwater protection, for example the Agency will object new landfills within the Inner Source Protection Zone and request suitable mitigation measures for non-landfilled waste activities within an Inner Source Protection Zone.
- Potential of missed sites
- Information regarding preferred options sites missed from the study
- A number of technical points regarding clarification of data, tables/graphs and methodologies.
- The role of Slough Unitary Authority
- The need to include waste management targets (outlined by the Waste Framework Directive)

Q117 – What comments do you have on the: Site Methodology Assessment?

5 responses were received, comments included:

- Support for the inclusion of a historic environment criteria. The weight attached to conservation of the historic environment in the assessment should be commensurate with that set out in the National Planning Policy Framework

- Suggestion to edit the Opportunity/Constraint column for Water Environment within Appendix 2, to include 'opportunities for enhancement of watercourses and their associated corridors'. It should be made clear that watercourses should not be included in extraction areas, but instead have buffer free zones from activities associated with development.
- Clarification over the Stage 1 and Stage 2 assessment process.
- Within the Traffic Light screening process there is no mention regarding sites with strong or strongest presumption against gravel should not be considered or flagged red. This should be included within the initial screening method.

Q118 – What comments do you have on the other Methodologies (Landscape, Transport and industrial Estate Review)?

3 responses were received, comments included:

- Concern over impact of development on natural habitats, green belts and flooding – adequate mitigation must be applied.
- Impact of movement of minerals on road and rail networks
- Detailed reports including forms of mitigation should be used to demonstrate the acceptance of a site
- Assessment methodologies in Appendix 2 and the Landscape/Transport methodologies need to be consistent.

Q119 – What comments do you have on the Equalities Impact Assessment?

1 comment was received, supporting the need for an Equalities Impact Assessment.

5.4 General comments

9 out of the 45 responses (20%) were received via email containing general comments not specifying or addressing individual questions. Additionally, a further 3 responses included general comments alongside direct responses to the consultation questions. In total there were 12 general responses received.

Whilst the comments were not all able to be assigned to specific questions originally included in the questionnaire, they did bear relevance to the consultation. The responses highlighted some recurrent themes, which included the following:

Vision

- Support for the Vision, Strategic Objective and Spatial Strategy proposed
- Capacity to deal with increasing demands post 2036.
- Should address impacts and opportunities for natural environment with particular emphasis on designated environmental assets, aiming for net gain for biodiversity.

Minerals

- Agree with data collection from annual monitoring reports to provide evidence
- Ensuring that Preferred Options (from the Berkshire Replacement Minerals Local Plan) are not excluded from the Minerals: Background Study.
- Understanding of the need for mineral safeguarding areas, however a suggestion for a safeguarding policy that enables local planning authorities to make suitable balanced judgements on the positive/negative effects of a non-minerals development proposal.

Waste

- Support for net self sufficiency
- Agree with data collection methods from the Environment Agency to provide evidence
- Colnbrook waste facility potential loss and the impacts this may have on the Plan area. E.g. allocating enough capacity
- Encouraging reduction of waste to be sent to landfill

General

- Housing completions and housing demands within the Plan area and the subsequent impact on traffic movements. Additionally, concern over cumulative traffic movements from minerals and waste development and the need for mitigation following such developments.
- Site selections to be made sensitively to avoid negative impact on communities.
- To be made aware of site allocations.
- References made to Slough including mineral/waste movements with the authority, and not to rule out Slough for identifying meeting future need within the Plan area.
- Potential impacts from the Heathrow Expansion (including Colnbrook facility)
- Ensuring that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations and contributions to sustainable development.

In addition to general comments, a number of queries were received about the consultation relating to question clarifications or requesting Call for Sites information which is not to be included until the Preferred Options stage. These have not been included as formal responses that would perhaps impact the outcome of the consultation, but they have been acknowledged. The number of queries received was 4.

6. Limitations of the survey

There were a number of restraints presented via the online SNAP survey programme, which will have to be considered for future consultations during the Plan making process.

Whilst a SNAP survey is live, the only information that can be determined is how many responses have been completed (fully or partially) to that date. Additional information on what questions may or may not have been answered and the answers that have been provided can only be viewed in full once the consultation has closed. This was a restriction since we were not able to look ahead and start to gain an understanding on what the common themes or issues may have been.

Once the survey had closed, the initial download of responses indicated that 36 online response forms had been completed (either partially or fully). However, upon deeper analysis of these responses, it became apparent that only eight responses could be considered for further analysis as they were the only ones that had answered questions about the Plan Vision, minerals or waste. The remaining 28 responses were discounted since they were either empty, duplicates or the respondent had only filled in the very first part of the survey (personal details section). The decision to discount these 28 responses was taken because the information supplied would not inform the consultation analysis in a constructive manner.

Transposing the information from the SNAP download to Excel was possible, but it took reasonable resource to work through the Excel spreadsheet to ensure that it was comprehensive and reflective of the actual responses received. Some information did not fully transfer across to the Excel document and as such, elements of some questions were missing. Additionally, a large resource was needed to transfer received surveys via email and the general comments into the spreadsheet correctly formatted.

Concerns were raised over the length and technicality of the consultation as it was felt this may discourage some from completing it. However, there was a need for the consultation to be pitched at a certain technical level as the desired outcomes and formulation for the future stages of Plan making were dependent on specific answers being supplied.

Recognition should be given during further stages of the Plan making process to the varying levels of knowledge possessed by the Central & Eastern Berkshire Authorities. With this in mind, Hampshire Services would perhaps be better off making recommendations to the Central & Eastern Berkshire Authorities on the preferred stance of the consultation. The Issues and Options Consultation demonstrated making assumptions based on current knowledge and understanding

was not conducive to allowing the Central & Eastern Berkshire Authorities to gain a full comprehension of the reasoning behind some decisions.

Those who completed the survey online arguably were restricted (in comparison to those who completed the Microsoft Word version of the survey), since they could only expand on their answers where the survey permitted them to. The Word version allowed further scope for discussion and or expansion of a point.

The overall analysis of the consultation proved to be more of a challenge than expected since the responses were mainly qualitative. Had the consultation been under more of a quantitative steer, the results would have been simpler to analyse. Still, the aim of the consultation was to obtain the views and opinions of those with an interest in the Plan and minerals and waste, and so obtaining qualitative responses was necessary.

7. Addressing comments received

As set out within the Consultation Strategy, at the Issues and Options consultation:

- The authorities will respond to each individual point made, including what action (if applicable) will be taken to address the point.
- If however, a significant number of responses are received, but the same issue has been raised by numerous respondents, these may be grouped and the authorities' will provide one, single response.

As a number of responses were relating to the same issue, the issues have been grouped together below allowing one single response to be provided.

Consultation Question	Issue Raised	Response from the authorities'
Vision		
Q2	<ul style="list-style-type: none"> • Expecting a loss of waste management capacity in 2026 and the period allows enough time to resolve capacity issues (Environment Agency) • A Central & Eastern Berkshire-wide Plan would of necessity require an overarching timescale in relation to unitary authority Plans. This period should give sufficient time for implementation and for monitoring to determine whether it is being applied with optimum effectiveness (Clewer Manor Area Profile) • Suggestion of shorter period before reviewing the Plan (between five and 10 years (Wraysbury Parish Council, Horton Parish Council, Egon Environmental) • A 20 year Plan would seem more appropriate (it would avoid Plan slippage issues as well as enable long term planning of issues) (Grundon) • The plan also needs to indicate a start date to show the period and years the provision of mineral is being made for (Cemex) • The Plan should be for 20 years from the date of adoption and not 20 years from the date when the 	<p>The National Planning Policy Framework recommendations a 15 year time horizon for Local Plan development. It is expected that the Joint Minerals & Waste Plan is adopted in 2020 which allows for a 16 year period.</p> <p>Both the UK leaving the European Union (“Brexit”) and the proposed expansion of Heathrow Airport create a number of uncertainties for the future demand and management of minerals and waste.</p> <p>As such, it is proposed that the Joint Minerals & Waste Plan will contain a commitment to an early review of the plan to allow for any changes arising from these issues, and any others, can be taken into account.</p>

	<p>first stages of the update/consultation commenced. Plans should aim to include over and above the anticipated increase in housing numbers. Future housing increases will need to take account of the future expansion of Heathrow airport (Parish Council)</p>	
<p>Q4</p>	<ul style="list-style-type: none"> • The vision must focus on 'ensuring the maintenance of a steady and adequate supply of minerals' while aiming to maximise the contribution that minerals development can bring to local communities, the economy and the natural environment' (Cissbury). • Reference to be made to the historic environment (Historic England) • Support for references to the natural environment. Aim to be edited to include: 'to minimise impacts on the natural environment and ensure environmental enhancement'. • Inclusion of recycled/secondary aggregate (Environment Agency) • Reference to the closeness to London and London's ability to treat waste (Environment Agency) • Reference to infrastructure projects and their requirements (Environment Agency) • Amendment: "Recognising the importance of the area as a source of minerals and a through route and destination for minerals coming from outside the area, Central & Eastern Berkshire...." (Clewer Manor Area Profile) • Support for references to the natural environment, but must be supported by sufficiently strong worded policy within final Plan (Colne Valley Park Community Interest Company) • Further emphasis on protection of existing biodiversity and enhancement in net-gain through habitat restoration (Royal Society for the Protection of Birds) 	<p>Noted – this information will be used to inform the Preferred Options.</p> <p>The Vision is intended as an overarching statement/series of statements, describing what the area will look like by the end of the Plan period in 15-20 years' time. The objectives are more specific and set out what the Plan is trying to achieve in order to help make the 'Vision' a reality. Consequently, comments referring to specific 'practical' policy are dealt with within the objectives.</p> <p>The Vision sets out the competing pressures of ensuring a necessary supply of minerals and waste resources, whilst at the same time aiming to make those developments as acceptable to local communities as possible. 'Maximising the contribution to local communities' is the vision to ensure such developments benefit communities, whether that is economically, through for example the role in local supply chains and house building industry, as well as environmental and social benefits through restoration and subsequent recreation opportunities.</p>

	<ul style="list-style-type: none"> • Vision must be broad and not limited to positive outcomes of minerals and waste (Swallowfield Parish Council) • Reference to providing a steady and adequate supply of minerals, and sufficient production capacity (Grundon) • Contradictions between waste management of landfill within vision and Plan document (local vs regional management) (Biffa) • Explanation of 'maximise the contribution that minerals development can bring to local communities' and the Vision needs to be more spatial (Cemex). • Explanation of how the Plan area aims to be self-sufficient and parameters applying to this (Oxfordshire County Council). 	
Q5	Would welcome a reference to environmental sustainability in Objective 6 such as there is in Objective 7 (Historic England)	Noted – this information will be used to inform the Preferred Options.
Q6	<ul style="list-style-type: none"> • Objective 2 – there was confusion over the methods of ensuring 'sensitive design and sustainable construction methods' (Cemex). • Objective 3 – General support. Include reference to flood storage. Objectives should include site's impact on wider area biodiversity/establishing a coherent and resilient ecological networks. Support for Objective 3, and further information on enhancing biodiversity at the Preferred Options stage was provided (Environment Agency) • Objective 6 – reference to environmental sustainability. Include '...from appropriately located and environmentally acceptable sources'. Amendment to include 'steady and adequate supply of minerals' with sufficient production capacity. Suggestion to add that the objective will be achieved via safeguarding mineral resources and site 	<p>Sensitive Design and Sustainable Construction methods are covered within the Development Management Policies of the Plan.</p> <p>Reference to flood risk included in Objective 2. Objective 3 amended to include wider impacts and resilient networks.</p> <p>Noted – this information will be used to inform the Preferred Options.</p>

	<p>allocations (Historic England, Grundon, Cemex)</p> <ul style="list-style-type: none"> • Objective 7 – Replace ‘demand for’ with ‘supply of. Suggestion to move objective placement under objective 3 (Mineral Products Association, Cissbury) Objective 9 – Support for reducing mineral miles. Difficulties of rail movement were highlighted (Clewer Manor Area Profile) • Objective 11 – Support for the principle of the objective. Suggestion to ensure no conflict between Objective 11 and 12. Suggestion that Objective does not recognise the need for certain materials (inert material) which must be deposited in landfill. E.g. excavation arising’s which cannot be recycled. Availability of void space during Plan period is fundamental. Net self-sufficiency was supported in the right type of waste capacity. How will parameters of net self-sufficiency be defined? (Clewer Manor Area Profile, Quarryplan, Oxfordshire County Council) • Objective 12 – Support for the Plan area being ‘self-sufficient’. Inclusion of the phrase ‘...unless there is a conflict with other objectives such as quality of life or zero waste economy’ (Wraysbury Parish Council) • Reference should be made to the need for increased recycling provision to achieve target rates that are being promoted through Circular Economy Package (Biffa) • Suggestion objectives do not meet requirements of National Planning Policy Framework (paragraph 17 and 110). Therefore have recommended a specific objective which refers directly to allocating sites on land of least environmental value allowing net gain for nature and creating links for natural environment (Berks, Bucks and Oxon Wildlife Trust) • Mineral extraction should plan to reduce transport 	<p>Noted – this information will be used to inform the Preferred Options.</p> <p>Noted – this information will be used to inform the Preferred Options.</p> <p>Noted – this information will be used to inform the Preferred Options.</p> <p>Noted. All objectives should be considered together as stated in introduction.</p> <p>Noted – this information will be used to inform the Preferred Options.</p> <p>Considered that Objectives meet paragraph 17 as far as practically possible. Considered that Objective 3 meets the requirements of Paragraph 110.</p> <p>Noted – this information will be used to inform the Preferred</p>
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	<p>minerals miles and encourage the use of rail and water for transport. Recognition of the environmental impact of mineral extraction – objectives should include the site’s impact on biodiversity (Swallowfield Parish Council)</p> <ul style="list-style-type: none"> • Need further emphasis on the requirement to supply the construction industry with sufficient primary aggregate. Recognition also needed for the requirement to dispose of inert waste which has no other economic value (Savills on behalf of the Rayner Family Trust) • Would anticipate seeing the following included at the Preferred Options stage of the Plan (Royal Society for the Protection of Birds): <ul style="list-style-type: none"> ○ Protection of existing biodiversity ○ Promote a restoration-led approach ○ Deliver a net-gain in biodiversity ○ Contribute to national and local targets for the creation of priority habitat ○ Create a coherent and resilient ecological network by taking a landscape-scale approach ○ Encourage a simpler approach to habitat creation ○ Secure and promote the long term management of restored mineral sites with a biodiversity after use ○ Restoration of mineral sites in airfield safeguarding zones 	<p>Options</p> <p>Noted – this information will be used to inform the Preferred Options</p> <p>Noted. Considered to be covered by the Objectives.</p>
Q7	<p>In agreement but 8.9 should read, “...building blocks in the area’s buoyant economy; they unite...” and 8.10 should read, “...wider Thames Valley region. The area’s importance is highlighted...”</p>	<p>Noted – this information will be used to inform the Preferred Options</p>
Q8	<ul style="list-style-type: none"> • General support for principles • Principle vii: should be ‘in locations that are 	<p>Noted – this information will be used to inform the Preferred</p>

	<p>acceptable' (Minerals Products Association & Cissbury)</p> <ul style="list-style-type: none"> • Principle viii: high emphasis to be placed on this principle. Change the word 'limit' in order to strengthen the principle (Horton Parish Council). • Principle ix: suggestion to remove the word 'most', as all sites should be protected. Include the word 'unacceptable' prior to 'development' (Quarryplan) • Unclear exactly what the spatial strategy is (Surrey County Council). • Recommended reference to recycled/secondary aggregates and promotion of such. The protection and enhancement of watercourses and their associated corridors should be also included. (Environment Agency) • Recommend reference to protecting/enhancing ecological networks through the landscape, wildlife and adaptation to climate change. • Reference should be made to the Colne Valley Regional Park in the Royal Borough of Windsor and Maidenhead (Colne Valley Community Interest Company) • The inclusion of a criteria which seeks to minimise road miles (Grundon). • The strategy must recognise the role of waste management to achieve sustainable development in line with para 14 of National Planning Policy Framework. The Plan must plan for all levels of the waste hierarchy, and meet ambitions of the Circular Economy (Biffa). • Recommendation to include specific points requiring sites to be located in areas of least environmental value, avoid impacts of re-location/re-design, mitigate unavoidable impacts, achieve measureable net gain, enhance links between natural habitats, timely 	<p>Options</p> <p>Noted – this information will be used to inform the Preferred Options</p> <p>Noted – this information will be used to inform the Preferred Options</p> <p>Noted – this information will be used to inform the Preferred Options</p> <p>Noted – this information will be used to inform the Preferred Options</p> <p>Specific locations will be set out in Policy and supporting text.</p> <p>Noted, but considered best covered by Objectives.</p> <p>Principles are designed to set out requirements of sustainable development, supported by the Development Management Policy. Specific points relating to Minerals and Waste policy generally covered within the objectives. The Principles are intended to act as the requirements on development, in delivering the objectives.</p>
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	<p>restoration/aftercare allowing long term net gains (Berks, Bucks and Oxon Wildlife Trust)</p> <ul style="list-style-type: none"> Reference should be made to safeguarding future mineral resources and areas of future workable reserves (Cemex) 8.9 should read, "...building blocks in the area's buoyant economy; they unite..." 8.10 should read, "...wider Thames Valley region. The area's importance is highlighted..." (Clewer Manor Area Profile) 	<p>Noted – this information will be used to inform the Preferred Options</p> <p>Noted – this information will be used to inform the Preferred Options</p>
Minerals		
Q9	Suggestions included Aggregate Monitoring survey, planning applications, mineral operator surveys (Oxfordshire County Council, Cemex, Quarryplan (GB) Ltd).	Noted – these information sources are already being taken into account.
Q10	Those who disagreed stated: the mineral type is different to West Berkshire and therefore, serves different markets (Cemex). Higher economic activity in Central & Eastern Berkshire than West Berkshire means demand will be greater (Savills on behalf of the Rayner Family Trust and Quarryplan (GB) Ltd).	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.
Q11	One response did not relate to the question asked. Projections should include sensitivity testing on underlying assumptions (Arborfield and Newland Parish Council)	It is noted that there is a degree of uncertainty within the projections as issues such as the Heathrow Expansion are likely to have impacts on the Plan Area. It is proposed that the Joint Minerals & Waste Plan will contain a commitment to an early review of the plan to allow for any changes arising from these issues, and any others, can be taken into account.
Q12	Not specific data, industry knowledge was offered, as was the offer of operator figures if helpful (Cemex, Egon Environmental, Quarryplan (GB) Ltd, Savills on behalf of the Rayner Family Trust). Issue of Colnbrook (Heathrow).	Noted.
Q13	Favour for this type of transport due to inadequate road network (anonymous Parish Council)	Noted.
Q14	No specific sites were identified; however the current rail	Noted – this information will be used to update the Minerals:

	<p>and river network was suggested for investigation (Quarryplan (GB) Ltd, Binfield Parish Council). Additionally, the importance of Colnbrook was mentioned and its future (Slough Borough Council). Also the issue with existing rail lines and planning restrictions such as night movements</p>	Background Study and inform the Preferred Options.
Q15	<p>Support for recognising the rail depot in Sough (Colnbrook) and concerns over Heathrow (Slough BC), and concern over how this could be delivered as not in plan area (Cemex).</p>	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.
Q16	<p>Suggestions included housing and population projections, planning permission development numbers, borough local plans, MPA forecasts/scenarios of aggregate demand (Slough Borough Council, Egon Environmental Ltd & Cemex) and suggestion to include recycled and secondary aggregate figures to understand uses and means to reduce primary aggregate (Environment Agency).</p>	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.
Q17	<p>Local developments are considering reducing imports of bulk material to the site by reusing/recycling materials from demolition and other means. Aim to maximise amount of material on site and reduce reliance on imports (Heathrow).</p>	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.
Q18	<p>This question relates to imported marine sand and gravel and crushed rock, both of which have increased in consumption in Berkshire. However, the way the question is worded; it could be misunderstood to also include land-won sand and gravel, which appears to be increasingly exported, rather than imported (Oxfordshire County Council).</p>	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.
Q19	<p>Warning if plan for dependence on imports that this could be self-fulfilling if provision for land-won sources is reduced (Mineral Products Association). Plan should not rely solely on imports, as increases transportation and emissions (Quarryplan GB Ltd).</p>	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.

	<p>Timeframe too short to confirm trend due to emission, advice to compare to wider South East (Grundon Waste Management).</p> <p>Heathrow expansion will impact rail depot and ability to handle same amount of aggregate.</p> <p>National Planning Policy Framework guidance stats MPA's should plan for 7 year landbank (Savills UK on behalf of the Rayner Family Trust)</p>	
Q20	Yes - unless a rail depot is found (Cemex)	Noted.
Q21	<p>Possible expansion at Heathrow (Slough Borough Council)</p> <p>Environment Agency Waste Data Interrogator</p> <p>Offers from local operators to provide figures (Environment Agency)</p>	Noted.
Q22	One respondent suggested the information could be found from quarterly returns for Environment Agency permits (Environment Agency)	Noted.
Q23	One respondent questioned the word 'more', as the area should either be self sufficient or not with no in-between state (Oxfordshire County Council).	Noted.
Q24	No - not entirely, some material will be transported by road on a back-haulage basis (Quarryplan (GB) Ltd).	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.
Q25	Central & Eastern Berkshire should seek to find their own rail depot (Cemex)	Noted.
Q26	The marine won sand and gravel is not a big market for this area (Cemex)	Noted.
Q27	Also transported via Theale and Woking rail depots (Cemex).	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.
Q30	It appears that soft sand in Berkshire is currently being supplied from outside of the Plan area. As mentioned previously, an attempt should be made to quantify this need, and identify where the supply is coming from, in order to secure the steady and adequate provision of this aggregate for the Plan period. West Berkshire has included alternative methods of calculating need for soft	Noted – this exercise is already being undertaken.

	sand due to confidentiality constraints in their recent preferred options consultation (Oxfordshire County Council).	
Q31	Geological resource is constrained within Central & Eastern Berkshire (Quarryplan (GB) Ltd)	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.
Q33	Sites in Bucks and West Berks can supply Slough too (Cemex).	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.
Q34	Information provided on sites which we are already aware of and therefore have not included within the reserves (Cemex). Environmental factors may affect the remaining reserve (Environment Agency)	Noted.
Q35	Highlighted a live planning application (Cemex)	Noted.
Q36	As mentioned previously, the role of Slough in the Plan needs to be clarified. It is not part of the Plan area, and so any account of the mineral resources available will need to be identified and secured through the Duty to Cooperate (Oxfordshire County Council). They should be taken out of this plan area. The sites at Old Slade, Colnbrook and Manor farm, Slough should be removed (Cemex).	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.
Q37	Reserve may also come from West London and South Bucks (Cemex)	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.
Q38	Market knowledge - There are substantial supplies of sand and gravel used within the area that originate from Oxfordshire, south close to Reading (Quarryplan (GB) Ltd)	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.
Q39	One view - yes as reflects the fact that less mineral is produced in the area (Quarryplan (GB) Ltd) No - more likely to be exhaustion of existing reserves (Savills on behalf of the Rayner Family Trust) It is queried where the assumption of a 'decline in exports' has come from. Table 2 appears to show that there has been an increase in exports of sand and gravel in Berkshire from 2009 – 2014, as consumption of sand	Noted – these conflicting responses raise the same issue and this information will be used to update the Minerals: Background Study and inform the Preferred Options. Noted – this information needs to be more clearly presented.

	and gravel has decreased, but sales have increased. This is supported by the Aggregate Monitoring 2014 data, which shows that 39% of aggregates were exported in 2009, and 72% in 2014 (Oxfordshire County Council).	
Q41	Sales data was provided from some operators (Egon Environmental and Cemex)	Noted.
Q42	Three year average does not account for substantial imports via surrounding rail depots (Quarryplan (GB) Ltd). Demand will be likely to grow (Savills on behalf of the Rayner Family Trust)	Noted.
Q43	Other relevant local information regarding future demand trends and major infrastructure projects (Surrey County Council). Uncertainty of destination from sales (Arborfield and Newland Parish Council). Not a true figure provided, plus projects such as Heathrow to create further demand (Egon Environmental).	Noted – however, there is a lack of clear data on trends associated with infrastructure projects and what the likely mineral demand will be in relation to projects.
Q44	Soft Sand not naturally occurring in Berkshire, has to be imported (Egon Environmental). Look at West Berkshire methods (Grundon).	Noted – this exercise is already being undertaken.
Q45	Not if suitable reserves can be found (Cemex). If imports of soft sand are solely to be relied upon for the Plan area over the Plan period, then this will need to be identified and secured through the Duty to Cooperate. However, Minerals Background Paper paragraph 5.105 implies that provision will be made for soft sand in the Plan (Oxfordshire County Council).	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.
Q46	Suggestions included sites put forward in Call for sites. Identify Preferred Areas to allow flexibility (Mineral Products Association). Soft Sand resources are constrained, existing reserves should be safeguarded (Surrey County Council). Are there reasons preventing sites coming forward (Cemex).	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.

	<p>Identify new areas of search for soft sand in the new mineral local plan (Savills on behalf of the Rayner Family Trust).</p> <p>Allocation of sites, policy criteria to enable sites to come forward and a recognition in policy that there is an ongoing requirement that can't be met from sand and gravel deposits (Grundon).</p>	
Q47	<p>No - supply is constrained by availability of operational sites and reliance on imports (Quarryplan (GB) Ltd). Historically, output has been constrained by limited number of sites and processing plants. Demand may be higher than supply (Savills on behalf of the Rayner Family Trust).</p>	<p>Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.</p>
Q48	<p>Reliance on imports (Quarryplan (GB) Ltd)</p> <p>A landbank of 8.8 years is a better reflection of supply but historic output has been constrained by the limited number of sites and processing plants within Central & Eastern Berkshire. Demand is likely to be considerably higher than supply (Savills on behalf of the Rayner Family Trust).</p> <p>Subject to assessment of other relevant local information (other than the 3 year average) that may influence future demand (Surrey County Council).</p>	<p>Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.</p>
Q50	<p>Demand for sand and gravel will grow as the economy improves and as sites are exhausted (Quarryplan (GB) Ltd and Savills on behalf of the Rayner Family Trust). Plan should be flexible to allow for additional resources to be developed later in the plan period. Demand will grow to meet construction needs; 9 million tonnes should be the absolute minimum Future reviews can continue if sites are not forthcoming now. (Savills on behalf of the Rayner Family Trust).</p>	<p>Noted - there is a degree of uncertainty within the projections as issues such as the Heathrow Expansion are likely to have impacts on the Plan Area. It is proposed that the Joint Minerals & Waste Plan will contain a commitment to review the plan within 5 [tbc] years to allow for any changes arising from these issues, and any others, can be taken into account.</p>
Q51	<p>Subject to the need to conserve archaeological remains (Historic England).</p> <p>Important to include previous preferred options. Identified</p>	<p>Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.</p>

	<p>a preferred area which was not identified in background papers (Quarryplan (GB) Ltd). Site 8 is housing, site 13 has lost half to railway standoff with a current Network Rail application (Grundon). Slough sites unlikely to be viable (Slough Borough Council). Not all remaining sites are available or within plan area (Cemex).</p>	
Q52	<p>Information regarding a few of the preferred areas status was submitted (Cemex, Savills on behalf of the Rayner Family Trust and Quarryplan (GB) Ltd).</p>	<p>Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.</p>
Q55	<p>Other sources of sustainable material (Datchet Parish Council)</p>	<p>Noted.</p>
Q57	<p>Comment: The use of clay for lining waste pits means a demand for this has the potential to rise with increased development. Although the aspiration of the Plan is to reduce reliance on landfill sites, it would be short sighted to exclude from long-term planning for the Central and Eastern Berkshire area the possibility of new landfill sites and other mineral needs raised by potential new development (Clewer Manor Area Profile).</p>	<p>Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.</p>
Waste		
Q71	<p>Addition of local information may enhance this. E.g. new quarries which have not accepted waste yet (Environment Agency)</p>	<p>The Environment Agency Waste Data Interrogator will continue to be the main source of information as local surveys will only identify tonnages processed within the planning area and will not account for processing outside of Central & Eastern Berkshire.</p> <p>Local information where possible however will be sought. For example a capacity survey is currently being undertaken and is due to close on the 4th September.</p>
Q74	<p>Highlighted transfer sites do not manage waste, only transfer. This was taken into account in figures (Grundon).</p>	<p>Transfer tonnes for Non-hazardous, Inert and Hazardous waste are specifically identified in Tables 8, 10 and 12 respectively.</p>

	The use of waste received as a proxy for waste management capacity should only be an interim position until more accurate data is obtained (Oxfordshire County Council)	Agreed, please also see response to Q.71 above. In addition a number of sources for waste capacity will be explored with reference to different confidence levels.
Q75	<p>Waste Data Flow – Department for Environment, Food and Rural Affairs (DEFRA) (should be included in Environment Agency Waste Data Interrogator) (Royal Borough of Windsor and Maidenhead)</p> <p>Greater recognition of smaller facilities in UK for specialist hazardous waste. Some sites are not regulated by Environment Agency so have no precise data. Environment Agency permitted void data (Environment Agency).</p> <p>Radioactive data (Grundon).</p> <p>Lack of up to date data. Suggestion of annual surveys (Biffa)</p>	<p>Waste Data Flow will be used to provide accurate arising figures for LACW, as a component within the Household Industrial and Commercial waste stream.</p> <p>Noted, to be considered for the Preferred Options consultation.</p> <p>As above.</p> <p>As per response to Q.71 above.</p>
Q78	<p>Support for method. Offer from other Mineral Planning Authority to compare if necessary (Surrey County Council).</p> <p>Differing weight should be applied to different methods depending on their robustness (Biffa).</p>	<p>Noted.</p> <p>Noted. Weighting of capacity estimates will be explored as other Waste Planning Authorities have done. Please also refer to Q.74 comment above.</p>
Q82	<p>DEFRA’s published data “UK Statistics on Waste” (December 2016) and “Digest of Waste and Resource Statistics” (March 2017) (Biffa)</p> <p>Various Commercial & Industrial surveys have been undertaken each producing different results due to differing criteria and survey samples. There is only a need to separate the two if differing growth rates are being applied. If this is required subtracting household</p>	<p>Other methodologies will be explored in the Preferred Options consultation.</p> <p>Different growth rates will be applied. Household Municipal Waste from Waste Data Flow will be subtracted from Household Industrial and Commercial Environment Agency Waste Data Interrogator to give Commercial & Industrial.</p>

	from Waste Data Interrogator data would give Commercial & Industrial (Grundon)	
Q83	Support for the facility in performing an important local role. Treatment of waste is encouraged in terms of the waste hierarchy. Replacement is essential as no other alternatives, and currently deals with 50% of tonnage in Table 6 (Heathrow, Grundon).	Noted.
Q84	The phrasing of the question is unclear (Clewer Manor Area Profile)	Noted.
Q85	If it is not possible to cater for the disposal needs of the Plan area over the Plan period, then provision from other areas should be secured through the duty to cooperate. The Plan could also include general landfill policy, should there be potential to meet disposal needs within the Plan area at some stage (Oxfordshire County Council)	'Duty to Cooperate' meetings are forthcoming.
Q87	Highlights poorly operated inert landfill which can pose similar risks to non-hazardous landfill. Any protection of inert sites is less than non-hazardous - may impact (Environment Agency)	Noted.
Q88	Benefits were encouraged (Quarryplan)	Noted.
Q89	Environment Agency Waste Data Interrogator, but recognises its limitations (Grundon)	Noted. Environment Agency Waste Data Interrogator limitations included with the report.
Q91	Motor trade, construction & demolition firms, waste firms, healthcare (Grundon)	Noted.
Q92	Support from Thames Water. Many of the identified wastes will be covered by inert, non-hazardous, or hazardous waste streams already identified. Agricultural waste should be considered, as identified in planning practice guidance (Oxfordshire County Council)	Noted, to be considered for the Preferred Options consultation.
Q94	Environment Agency, Local authorities, Government agencies (Binfield Parish Council)	Noted, these are all sources considered.
Q95	Comment encouraging the Plan to recognise importance of hazardous landfill, a resource required throughout the	As per response to Q.92

	Plan to manage certain types of waste where landfill is most appropriate (e.g. asbestos) (Biffa)	
Q96	Predicted economic/development growth should be factored into the assessment (Quarryplan)	A range of growth estimates will be applied to satisfy a number of the comments received. An average would be considered if practical for the Preferred Options Consultation.
Q97	Three years would be more accurate (Savills on behalf of the Rayner Family Trust)	As per response to Q.96
Q101	Population and Industry Growth (Egon Environmental) Construction and Economy activity. Commercial and Industrial amounts are considered similar to municipal waste (Grundon) Reduction in green waste per household. Changes in domestic 'garbage' waste from decreasing supermarket bulky packaging, and increase in packaging of pre-cooked food (Member of Green Party and Friends of the Earth). DEFRA stats – Forecasting 2020 waste arisings and treatment capacity 2013 (Biffa)	As per response to Q.96
Q103	Refer to reduction in green waste as household compost more with smaller gardens. Decrease in supermarket bulky packaging and increase in consumption of packaged cooked food. Comparison with other local plan suggestions.	As per response to Q.96
Q104	Scenario 3 – 'Recovery Improvement' is contrary to the waste hierarchy. It may impede the flow of waste to recycling facilities if recovery capacity is maximised (Oxfordshire County Council)	Scenario is 'what could happen if we plan to divert as much as possible from landfill, including through the provision of more Energy from Waste facilities'. This scenario focuses on diverting waste from landfill to recovery.
Q105	It is suggested that the last two scenarios appear to assume that there is scope for increasing the amount of	Noted.

	waste diverted from landfill. It is not accepted that there is substantial scope for further diversion from landfill. Landfilling of wastes is a reduced activity apart from materials that cannot be dealt with by other methods/uses such as non-recyclable arisings from construction and excavation projects (Quarryplan).	
Q106	<p>Question as to whether these realistic scenarios based on current national policy - i.e. the need to drive waste management up the waste hierarchy and the objective of net-self sufficiency would seem to preclude most of these (Surrey County Council).</p> <p>Improving of recycling with better options including separation at source of domestic products - greater types of plastic accepted (Environment Agency).</p> <p>Most likely is a combination of the 4 proposals which all provide benefits to meeting sustainable waste management. Landfill should be considered within the Plan. Especially as some material like particular hazardous material is required to be sent to landfill. Perhaps new inert landfill opportunities in coherence with new quarry sites (Biffa).</p>	<p>Noted. The need to drive waste management up the waste hierarchy and the objective of net-self sufficiency are included within the options.</p> <p>Noted, aligns with Recycling improvement scenario.</p> <p>Noted.</p>
Q108	The first two categories should be removed as all waste operations should be undertaken within buildings to ensure the operations do not have a detrimental impact on air quality. An additional category is required for deposit of waste for recovery (Deposit for Recovery) operations (Environment Agency).	<p>Design measures and location criteria would be used to mitigate impact on air quality; bioaerosol emissions, dust and other environmental planning issues are discussed within the first two categories of Annex 3.</p> <p>Deposit of waste for recovery (Deposit for Recovery) would be included in Categories Five and Six.</p>
Q109	Avoiding Source Protection Zone's, and noise/traffic/smell (Environment Agency).	Noted.
Q113	Inadequate road network (Parish Council)	Noted.
Q114	Slough and other principal rail heads (Resident).	Noted.

	Reading (Binfield Parish Council). Support to encourage sites (Biffa).	
Accompanying Documents		
Final section Q115	<p>A preferred area was not included in the background study (<i>not referenced the site as unsure if it is confidential</i>). (Quarryplan)</p> <p>The document assumes there are only aggregate sources within Wokingham and Royal Borough of Windsor and Maidenhead, there are also resources within Bracknell. (Grundon)</p> <p>The air quality impact with regards to the transport of minerals is also a key consideration in the south east region. In the past air quality issues have focused on dust from mineral sites. A missing element of the background study is the potential to have future rail depots within the plan area. (Cemex)</p>	Noted – this information will be used to update the Minerals: Background Study and inform the Preferred Options.
Q116	<p>The only other answer, which in our opinion is unacceptable, is to continue with a fractured disjointed approach that leads to dumping it on someone else. (Datchet Parish Council)</p> <p>Recommended to reference The Environment Agency's approach to groundwater protection. The Environment Agency is likely to object to any new landfills within the Inner Source Protection Zone of a potable abstraction. (Environment Agency)</p> <p>It seems to miss out a complete category of Waste Management sites, namely those defining themselves as waste recycling centres such as Fowles in Hythe End, Wraysbury (Wraysbury Parish Council)</p>	<p>Noted – this information will be used to update the Waste: Background Study and inform the Preferred Options.</p> <p>Wraysbury Parish Council – The authorities have investigated the site mentioned and it is not within the Plan area.</p>

	<p>Preferred area 25 (North of Horton) is a saved policy from the waste local plan for Berkshire 1998. The site continues to enjoy the status of preferred area for inert waste disposal (Savills on behalf of the Rayner Family Trust).</p> <p>General comments made by Oxfordshire County Council on the following: Transfer Facilities Net Self-sufficiency Waste Management Targets The Role of Slough Unitary Authority</p> <p>Specific comments made by Oxfordshire County Council.</p>	
Q117	<p>Where archaeological remains are known to exist, or there is a high potential for such remains, further investigation should be undertaken prior to a site being considered suitable for allocation. (Historic England)</p> <p>The historic environment should include designated heritage assets, assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments and other non-designated assets such as historic landscapes. The other assessments referred to in paragraph 4.27 should include specific archaeological studies e.g. of Palaeolithic remains (Historic England).</p> <p>Within Appendix 2 – Traffic Light Scoring Criteria, in the Opportunity/Constraint column for Water Environment, the opportunities for enhancement of watercourses and their associated corridors should be included. It should be made clear that watercourses should not be included in the extraction areas, but instead should have buffer zones free from any activity/operation associated with</p>	Noted – this information will be used to update the Sites Assessment Methodology and inform the Preferred Options.

	<p>development/extraction. This should be applied to all watercourses. (Environment Agency)</p> <p>Stage 1 Assessment is to be undertaken using a GIS layer but using Table 1, paragraph 4.17 and Appendix 2 – seem to imply greater knowledge of the sites and more detailed assessment work.</p> <p>These criteria and assessment methodology appear more appropriate to Stage 2. A desk based assessment is unlikely to be able to include such value judgments unless a site visit has been made? (Cemex)</p> <p>In the Site Assessment Methodology Traffic Light screening process there is no mention that sites with strong or the strongest presumption against gravel should NOT be considered or should be flagged Red. We put it to the assessment team that this should be included in the initial screening method i.e. to eliminate or flag sites that have the strongest or strong presumption against gravel extraction. (Resident)</p>	<p>The reference to sites with ‘strong or the strongest presumption against gravel extraction’ refers to existing Policy set out in the Berkshire Replacement Minerals Local Plan. These areas were established as there were allocations set out in the Plan which were required to meet mineral demand established at that time. As the Joint Minerals & Waste Plan is being prepared 16 years after the Replacement Plan was updated, mineral demand is being reassessed and all site allocations and options are being re-examined and therefore, it is not practicable to rule out sites other than the remaining allocations in the 2001 Plan.</p>
Q118	<p>The South East Plan deals with the Thames Basin Heaths special protection area. Our concern is this has a chipping away effect on natural habitats, the Green Belt, and an unknown effect on flooding, this type of land can store copious amounts of water. The sites referred to must be protected as such within the Thames basin. (Datchet Parish Council)</p> <p>Detailed but generic document, explaining how the listed criteria will be assessed. Each site will obviously have its own unique constraints and detailed reports including forms of mitigation should be used to demonstrate the</p>	<p>Noted – the assessments will be reviewed and updated where necessary.</p>

	<p>acceptance of a site. (Egon Environmental)</p> <p>The Sites Assessments methodology in Appendix 2 and the Landscape and Transport methodologies need to be consistent. (Cemex)</p>	
Q119	<p>This is essential, wherever it is relevant to the issues. (Resident and member of the Green Party and Friends of the Earth)</p>	Noted.
General Comments		
General Comments	<p>Historic England commented on the following paragraphs of the Issues & Options consultation paper: Paragraphs 2.3 and 2.6 Paragraph 3.4 Paragraphs 5.1 – 5.3</p> <p>The Environment Agency commented on the following sections of the Issues & Options consultation paper: Glossary Section 3. Biodiversity (Flora and Fauna) Section 5. Water, under 'Surface Water', paragraphs 5.5 to 5.8 Figure 5.4 (Plan Area River Catchments) section 5.19</p> <p>Savills on behalf of the Rayner Family Trust provided the following comments on the Issues & Options consultation paper: Preferred Area 12 retains its status in the Saved Replacement Mineral Local Plan and Preferred Area 25 in the Waste Local Plan and as such should be referred to in the Minerals Background Paper.</p>	Noted – this information will be used to update the evidence base and inform the Preferred Options.

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