

21 July 2017

Dear Sir/Madam

**Central and Eastern Berkshire Authorities - Joint Minerals and Waste Plan
Regulation 18 Issues and Options consultation**

Thank you for consulting us on the Joint Minerals and Waste Plan and associated documents. We have the following comments to make.

Plan Period

Question 1. We do agree with the proposed plan period as we are expecting a loss of waste management capacity in 2026 and the period allows enough time to resolve capacity issues.

Vision for Central and Eastern Berkshire

Questions 3 and 4. We recommend that the aim should include 'to minimise impacts on the natural environment and ensure environmental enhancement. Additionally, we would suggest the inclusion of recycled/secondary aggregate as part of a minerals hierarchy, i.e. recycle or reuse prior to using new aggregate.

We also recommend that there should be a recognition of the closeness to London and London's ability to treat waste. There should also be a recognition of the impact of nearby nationally important infrastructure projects.

Strategic Plan Objectives

Questions 5 and 6. We welcome objective 3 with the intention to make a positive contribution to the local environment and biodiversity. We suggest that the protection and enhancement of rivers and their associated corridors should be included. We also suggest that the positive contribution include additional flood storage if appropriate to reduce the risk of flooding elsewhere.

We recommend that Objective 7, which refers to 'appropriately located and environmentally acceptable sources', should be further up the list of objectives, under objective 3.

Spatial Strategy

Questions 7 and 8. Paragraph 8.12 refers to the Spatial Strategy being based on a number of principles. However, there is no mention of the production and use of recycled and secondary aggregates and the promotion of those in advance of new aggregate. We recommend that this must be included. Secondly, the protection and enhancement of watercourses and their associated corridors should be also included. These are key to Green Infrastructure and to protecting and enhancing

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ecological networks through the landscape, allowing wildlife to move and adapt to climate change.

Minerals issues

Question 16. With regard to paragraph 9.22, it is important to ensure that recycled and secondary aggregate figures are captured going forward. The use of these materials should be promoted so that the use of these is considered first over the use of new aggregate.

Recycled and secondary aggregate

Question 21. Information on Construction Demolition Waste (secondary aggregate) should be available from the quarterly tonnage returns for each environmental permit. Data for mining waste and quarry byproducts should be reported via the Extractive Material Management System (EMMS) produced by quarry operators.

Question 22. This could be confirmed from the quarterly tonnage returns for environmental permits in West Berkshire.

Extraction locations

Question 34. The total reserve will be reduced by environmental factors including biodiversity issues, groundwater and flooding and surface water recharge issues.

Waste data

General comments:

For data used we would like to see a consistent methodology with limitations of the data sets highlighted.

Question 71. Yes we do agree that the Environment Agency's Waste and Hazardous Waste Data Interrogators are main, most up to date and most robust sources of waste data available in England. However additional local information may be available to enhance this (such as new quarries which have not yet started to accept waste).

Question 72. Yes we do agree that the figures in Table 4 give an approximate idea of the level of both waste arisings and waste managed in Central and Eastern Berkshire.

Question 73. Yes we do agree with the use of waste data, where the source is a Central and Eastern Berkshire Authority, as a proxy for waste arisings in Central and Eastern Berkshire.

Question 74. Yes we do agree with the use of waste received at facilities in Central and Eastern Berkshire as a proxy for the waste data sources within in Central and Eastern Berkshire.

Questions 75 and 77. We would like to see greater recognition of the small number of facilities in the UK for some of the specialist hazardous waste, for example low level radioactive waste. Waste being missdescribed and deposited under the Definition of Waste Code of Practice (DoWCoP) scheme will not be identified, this is not regulated by the Environment Agency so we have no precise data. The quantities may be up to an addition 33% on top of the volume identified in the Waste Data Interrogators. Additionally the Deposit of Waste for Recovery (DfR) Environmental Permits (not Landfills) will be depositing waste for restoration purposes. This will have a significant "permitted void" for the deposit of suitable wastes. Data regarding these sites is available from the Environment Agency.

Non-hazardous waste management

Question 83. Yes we agree that the Colnbrook Energy from waste facilities is a vital strategic waste management facility for Central and Eastern Berkshire and Slough. We would encourage treatment at the highest possibility level of the waste hierarchy.

Question 85. Option D - make greater provision for facilities higher up the waste hierarchy and provide for net self-sufficiency for waste.

Inert waste data

Question 86. Option C - Complement Environment Agency Waste Data Interrogator and aggregate recycling data with estimates based on construction activity, as construction industry are trying to find new ways to reclassify waste to minimise disposal costs.

Inert waste management

Question 87. Poorly operated Inert landfill can pose a very similar if not greater level or risk to compliant Non-Hazardous landfill. The environmental protection and auditing inert sites is less than a non-hazardous site, so the overall risk may be similar.

Specialist waste

Question 92. Yes we do agree that we need to consider the above specialist waste streams.

Future waste capacity

Question 106. With regard to waste, the improvement of recycling with better options for separation at source of domestic waste should be promoted, including food waste, greater number of types of plastics accepted etc.

Locational requirements for waste facilities

Questions 107 and 108. 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.

Question 109. Should avoid locating any site within a Source Protection Zone (SPZ) 1 for public drinking water supplies as it is likely the Environment Agency would refuse to issue an environmental permit for this activity.

Waste Background Study

Question 116. We recommend that reference is made to The Environment Agency's approach to groundwater protection. March 2017 Version 1.0. This is available on the .gov.uk website. In particular, the Environment Agency is likely to object to any new landfills within the Inner Source Protection Zone of a potable abstraction. The Environment Agency is likely to request suitable mitigation measures for any non landfilled waste activities within an Inner Source Protection Zone.

Site Assessment Methodology

Question 117. 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 too that watercourses should not be included in the extraction areas, but instead should have buffer zones free from any activity/operation associated with development/extraction. This should be applied to all watercourses.

Glossary

There is an issue with the definitions in the glossary of this document. The definition for secondary aggregate is not in line with current waste legislation. Secondary aggregate does not include Mining waste i.e. byproducts from quarrying and speculating for minerals. This would be regarded as mining waste in line with the Mining Waste Directive and should be referred to as such. Secondary aggregates are a construction and demolition waste derived product which has been produced to a specification in line with a detailed protocol. The glossary has this referenced as “Recycled Aggregate” which is misleading. This may be critical as this could have a bearing on some of the policies regarding the provision and use of secondary aggregates.

Sustainability Appraisal (incorporating Strategic Environmental Assessment): Revised Baseline Report

In section 3. Biodiversity (Flora and Fauna), watercourses are not mentioned specifically, but should be. More emphasis should be put on the potential for impacts on ecological networks (of which watercourses and their associated corridors are key components) and Green Infrastructure. Additionally, there are opportunities to carry out ecological enhancement to these watercourses and corridors.

In section 5. Water, under ‘Surface Water’, paragraphs 5.5 to 5.8 mention various rivers, but reference should be made to their tributaries also as these are all a key part of the watercourse network.

Figure 5.4 (Plan Area River Catchments) shows very general catchment areas, but would benefit from indicating the network of watercourses, more like the flood zones shown in Figure 5.5.

Generally more emphasis needs to be put on protecting watercourses and their associated corridors and enhancing their ecological value.

In section 5.19 reference should be made to the potential cumulative effect of mineral development on the aquifers. Gradual and extensive removal of the aquifer can have long term impacts on water resources which will not be captured within environmental assessment for specific sites. These can include:

- Increase in evaporative losses from the aquifer from the creation of lakes reducing the water that flows through the aquifer
- Reduction of the area of aquifer available to convey groundwater flow due to infilling activities
- Diversion of groundwater flow around areas of low permeability infill away from where it would naturally discharge such as local watercourses, thus depleting flows

- Lowering of groundwater levels on the down gradient side of the infilling, thus reducing water available for local abstractors or groundwater dependent water features

We hope that find these comments useful and if you wish to discuss these further do not hesitate to contact our team on planning_THM@environment-agency.gov.uk.

Yours faithfully

Mrs Cathy Harrison
Planning Advisor
Sustainable Places