



Gladman House, Alexandria Way  
Congleton Business Park  
Congleton, Cheshire  
CW12 1LB

**T: 01260 288800**

**F: 01260 288801**

**[www.gladman.co.uk](http://www.gladman.co.uk)**

Hampshire Services  
c/o Strategic Planning, Economy, Transport and Environment Department  
Hampshire County Council  
The Castle  
Winchester  
Hampshire  
SO23 8UD

21 July 2017

By email to: [Berks.Consult@hants.gov.uk](mailto:Berks.Consult@hants.gov.uk)

Dear Sir or Madam,

**RE: Central and Eastern Berkshire Authorities Joint Minerals & Waste Local Plan Issues and Options Consultation 2017**

This letter provides the response of Gladman Developments Limited to the Central and Eastern Berkshire Authorities Joint Minerals & Waste Local Plan Issues and Options Consultation 2017 (The Plan), which is the subject of consultation from 9<sup>th</sup> June 2017 until 21<sup>st</sup> July 2017.

Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure. We understand that the intention of the Plan is to provide new minerals and waste planning policies for the period to 2036 for the following local authorities:

- Bracknell Forest
- Reading Borough
- The Royal Borough of Windsor & Maidenhead
- Wokingham Borough

The National Planning Policy Framework (the Framework) sets out four tests that Local Plans must meet to be considered sound at Examination. These tests should be considered through each stage of the Plan's preparation to help refine the policies that are being considered so that they are in accordance with national planning policy and guidance. The four tests of soundness are outlined as follows:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

### **Sustainability Appraisal**

In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA regulations).

The SA/SEA is a systematic process that should be undertaken at each stage of the Plans preparation, assessing the effects of the emerging Minerals Local Plan proposals on sustainable development when judged against all reasonable alternatives. The Council should ensure that the future results of the SA clearly justify any policy choices. It should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for the chosen and rejected alternatives. The Council's decision making and scoring should be robust, justified and transparent.

### **Issues & Options Consultation Paper**

#### Mineral Safeguarding

It is noted that there is an intention to safeguard proven mineral deposits of sharp sand and gravel; and, soft sand to prevent sterilisation and retain resources to meet longer term need. In this regard, the Consultation Paper, June 2017 makes reference to a number of additional evidence base documents that will be prepared in advance of a 'Preferred Options' consultation, including a "*Minerals & Waste Safeguarding Study*". This evidence will be vitally important in defining the extent of any mineral resources and the economic importance of them.

Paragraph 143 of the National Planning Policy Framework states that in preparing local plans, local planning authorities should set out policies to encourage the prior extraction of minerals, where practicable and feasible, if it is necessary for non-mineral development to take place. Gladman acknowledges the need for some level of protection of mineral assets, but is of the view that the local policy framework that relates to this must clearly set out that this will be suitably balanced against competing development needs. A positively framed mineral safeguarding policy will therefore be required that enables the local planning authorities to make suitably balanced judgements on the positive or negative effects of a non-minerals development proposal.

I trust the above comments are of constructive and assist in the Council further developing a sound plan for consultation at the pre-submission stage. I would be grateful if you could add me to your contact database in order that Gladman can be kept informed as the draft plan develops.

Yours faithfully,

Richard Crosthwaite

Planning Policy Manager

Gladman Developments Ltd.