

Central and Eastern Berkshire

Joint Minerals and Waste Plan

Issues and Options Consultation - Response Form

The Central and Eastern Berkshire Authorities (Bracknell Forest Council, Reading Borough Council, The Royal Borough of Windsor & Maidenhead and Wokingham Borough Council) are working in partnership to produce a Joint Minerals and Waste Plan which will guide minerals and waste decision making in the Plan area up until 2036.

The Joint Minerals & Waste Plan will build upon the formerly adopted minerals and waste plans for the Berkshire area, and improve, update and strengthen the policies and provide details of strategic sites that are proposed to deliver the vision.

The first stage in plan-preparation is known as the 'Issues and Options' Consultation and runs between 9 June 2017 and 21 July 2017. The purpose of this consultation is to engage the community in discussion on the **Issues** for managing minerals and waste for the next 20 years. It is also an opportunity to gather more evidence to inform the **Options** for the plan policies and site allocations.

The questions in this response form refer to the Issues and Options document. Further information, details and other documents related to the Issues and Options Consultation can be found via www.hants.gov.uk/berksconsult, where you can also find the on-line version of this survey.



www.rbwm.gov.uk



This document is split into several sections. Please answer as many questions as you can. You can answer questions on just one section or all of them, and you may wish to miss out any questions you feel unable to answer.

The sections are as follows:

The sections are as follows:

- Personal details (page 3)
- Plan direction (page 5)
- Minerals (page 6)
- Waste 0028page 18)
- Equalities information (page 27)

Once completed, please return copies of this response form by **5pm on 21 July 2017** to:

Hampshire Services
Strategic Planning
Elizabeth II Court West
The Castle
Winchester
SO23 8UD

Or via email to Berks.Consult@hants.gov.uk

Personal details

First name (<i>required field</i>)	Chloe
Surname (<i>required field</i>)	Rose
Your address	1 st Floor, Pavilion View, 19 New Road, Brighton, East Sussex, BN1 1UF.
Your email address	
Your organisation (if applicable)	RSPB

Respondent capacity (please tick as appropriate)

Resident	
Local Business	
Minerals and Waste Industry	
Parish Council	
District Council	
County or Parish Councillor	
Other (please specify in the right hand column)	

Are you happy for us to contact you following this survey, with updates on Central and Eastern Berkshire minerals and waste work? (please tick as appropriate) (*required field*)

Yes	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Data Protection Statement

This survey is being carried out by Hampshire Services on behalf of Bracknell Forest Council, Reading Borough Council, the Royal Borough of Windsor & Maidenhead and Wokingham Borough Council (collectively referred to as the 'Central & Eastern Berkshire Authorities'). All of these individual authorities are registered with the Information Commissioner's Office.

The information you have provided in this questionnaire will be used for the purposes of the consultation and will not be used for any other purpose. All individuals' responses will be kept confidential and will only be shared with the Central & Eastern Berkshire Authorities.

All documents and redacted representations can be viewed by appointment or may be published online and will be handled in accordance with the Data Protection Act 1998.

Multiple Recipients Guidance

If you are a consultee for one or more of the Central & Eastern Berkshire Authorities you may have received multiple invitations to respond to the consultation. Please note that only one response from each organisation is necessary unless different parts of the organisation wish to respond on different matters.

Alternative Format Statement

A summary of this document can be made available in large print, in Braille or audio cassette. Copies in other languages may also be obtained. Please contact Hampshire Services by email berks.consult@hants.gov.uk or by calling 01962 845785.

Section 1 - Plan Direction

The Vision and strategy for the Central and Eastern Berkshire Authorities Joint Minerals & Waste Plan ('The Plan')

Q1 Do you agree with the proposed Plan period up to 2036?

Yes	X
No	
Don't Know	

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

The RSPB agrees with the proposed Plan to manage minerals and waste for the next 20 years. This will help to provide options on site allocations, details of which we will access when they come forward in the preferred options stage.

Q3 Do you agree with the proposed Vision?

Yes	x
No	
Don't Know	

Q4 If not, what changes would you suggest?

The RSPB agree with the Vision statement provides a clear indication of the over-arching aspirations and priorities of the partnership and sets the context for the objectives and policies that follow on from it. We would however like to see more emphasis on the protection of the existing biodiversity and enhancement in net-gain in biodiversity through habitat restoration. (Please see the RSPB's response to Question 6).

Q5 Do you agree with the proposed Strategic Plan Objectives?

Yes	X
No	
Don't Know	

Q6 If not, what changes would you suggest?

The RSPB agree with the proposed Strategic Plan Objectives and welcomes the detail around making a positive contribution to the local environment and biodiversity, through the protection and creation of high quality habitats and landscapes.

Further detail on enhancing biodiversity could, however, be included around the opportunities through the significant contributions that minerals development can make to delivering a net-gain in biodiversity and establishing a coherent and resilient ecological network.

We would anticipate to see at the next stage the following preferred options stage the following level of detail to be included:

Protect the biodiversity that is already there

The first principle when addressing biodiversity should be to protect the biodiversity that is already there. For example, there should be:

- no adverse effects on statutory protected sites, designated for their habitats and populations of species of international and national importance for nature conservation including Special Protection Areas (SPAs), Special Areas of Nature Conservation (SACs) and Sites of Special Scientific Interest (SSSIs), (in line with NPPF paras. 118 and 119);
- no loss or deterioration of irreplaceable habitats (in line with NPPF para. 118) including ancient woodland and other habitats that are not technically feasible to re-create and / or that take a long period of time to become well established (e.g. limestone grasslands);
- no significant adverse effects on local nature conservation designations and on priority habitats outside of designated sites (in line with NPPF para 113).

Within the framework of the above bullet points, the 'mitigation hierarchy' should be applied such that any adverse effects are:

1. avoided;
2. mitigated (where adverse effects are unavoidable);
3. compensated (where there will be residual adverse effects that mitigation cannot reduce further).

It is worth emphasising here that Paragraph 118 of the NPPF clearly states that '*if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused*'.

It is critically important that potential biodiversity gain and enhancement potential from restoration are not confused with mitigation. Where potential impacts on protected sites or priority habitat and species require mitigation it is essential that these issues are clearly identified, assessed and fully addressed **before** potential restoration benefits are considered (in line with the hierarchy above). In order to avoid real time losses to biodiversity, mitigation needs to be delivered up front or at least in parallel with development. A restoration plan which delivers priority habitat 15 years down the line, of a type of habitat that may take another 15 years to fully establish is not interchangeable with or acceptable as mitigation. Confusion of these issues could result in actual biodiversity loss and degradation of priority habitat for a 30 year period.

Promote a restoration-led approach

In order for biodiversity opportunities on mineral sites to be maximised, biodiversity needs to be addressed at the earliest stages of a mineral development proposal, particularly the creation of priority habitat during the restoration and after-use of the mineral site. In other words, there needs to be a **restoration-led approach** to all minerals development proposals.

Surrey County Council's Site Restoration Supplementary Planning Document (SPD)¹ provides an excellent explanation of this approach⁸, stating:

¹ Surrey County Council (2011) Surrey Minerals Plan Site Restoration Supplementary Planning Document (SPD)
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- *It is seen as vital that the restoration and future use of the land is addressed at the outset ... By targeting the end use of the site from the very beginning of the planning process, the scheme is more likely to be successful and to a higher standard ... It also means that the end restoration uses are likely to be sustained and more successful over the longer term.*

Deliver a net-gain in biodiversity

All minerals development should be required to deliver a net-gain in biodiversity, in line with the NPPF (paras. 9 and 109). For example, the mineral development should result in a larger area of priority habitat - and priority habitat in a better condition - following site restoration than was present before mineral extraction took place. This approach should then lay the foundation for all biodiversity-related policies in the Plan.

Contribute to national and local targets for the creation of priority habitat

Mineral site restoration on its own has the potential to achieve the national habitat creation targets for nine priority habitats, as well as a making significant to many other priority habitat targets. All minerals development should be required to demonstrate the contribution that they will make to national and local biodiversity targets for the creation of priority habitat.

Where ‘areas of search’ or ‘preferred areas’ are being considered, the most appropriate priority habitats should be identified for these areas (depending on factors such as hydrology, hydrogeology and soil type). At the Site Allocations stage, the specific type and area of priority habitat that will be created through mineral site restoration should be identified. For example, Essex County Council has identified that of its 700ha of site allocations, 200ha will be restored to specific priority habitats².

Create a coherent and resilient ecological network by taking a landscape-scale approach

The NPPF promotes **the establishment of ‘coherent ecological networks that are more resilient to current and future pressures’** (para. 109). This approach is supported by the England Biodiversity Strategy and the Lawton Review, which sets out four principles for wildlife sites:

- **Better** – improve the quality of current sites by better habitat management;
- **Bigger** – increase the size of current wildlife sites;
- **Connected** – enhance connections between, or join up, sites, either through physical corridors, or through ‘stepping stones’;
- **More** – create new sites.

The England Biodiversity Strategy highlights the fact that “*effectively establishing coherent and resilient ecological networks requires a shift in emphasis, away from piecemeal conservation actions and towards a more effective, more integrated, **landscape-scale approach***”.

Mineral sites provide a unique opportunity to support the creation of this coherent and resilient ecological network through a landscape-scale approach, primarily through the creation of priority habitat on restored mineral sites. The Worcestershire Minerals Local Plan³ specifies 200ha to be the minimum area at which a landscape-scale approach to restoration can be developed and at which:

² Essex County Council (2010) Minerals Development Document – Preferred Approach – Appendices Volumes (A-F)

³ Worcestershire County Council (2013) Worcestershire Minerals Local Plan - Second Consultation
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- there is realistic potential to deliver strategic restoration benefits; and
- the buffering, expansion or creation of habitats is considered to become most beneficial.

In order to fulfil this potential, Minerals Plans should:

- identify and map the overlap between the mineral resource and the current ecological network (e.g. priority habitats, designated sites, nature reserves, etc);
- identify where the creation of priority habitat on restored mineral sites could best contribute to making the ecological network more coherent and resilient.

This information should be used to guide the identification of priority areas for biodiversity-led restoration of mineral sites, especially where mineral extraction overlaps with landscape-scale conservation initiatives and / or identified biodiversity opportunity areas. Taken a step further, this information could be used to actually help guide where mineral extraction should take place (i.e. pro-actively locating 'areas of search' and mineral sites in areas where mineral site restoration could provide the greatest biodiversity benefits). This approach is being developed in the Worcestershire Minerals Local Plan, referred to above.

At the Site Allocations stage, each site allocation should:

- provide a map that shows how the site links in with the current ecological network;
- identify how the operation and restoration of the site will help to establish a coherent and resilient ecological network through the creation of priority habitat.

Northamptonshire County Council has produced a very good example of assessing the opportunities for habitat creation through the restoration of allocated mineral sites⁴. However, the site allocations should, ideally, also identify how the site will work with nearby mineral sites to take a strategic, landscape-scale approach towards the creation of a coherent and resilient ecological network.

Encourage a simpler approach to habitat creation

Larger blocks of a smaller range of habitats on any one site tend to perform better ecologically and are often simpler and less expensive (per hectare) to manage in the long term, than an over-complex mosaic of many different habitats. In order to maximise the biodiversity benefits of habitat creation on restored mineral sites, 'the Plan' should promote this simpler approach.

Equally, in order to deliver genuine biodiversity gains 'the Plan' should recognise and promote habitat creation as a 'stand-alone' objective for mineral site restoration, rather than being grouped under broader headings such as 'green infrastructure' or 'amenity use' or being combined with a wide range of after-uses on individual sites which may be inappropriate, conflict with or prevent successful restoration for some species and habitats (parallel targets can then also be set for other categories such as recreation, where appropriate, to ensure that multiple benefits are effectively delivered where desired).

⁴ Northamptonshire Minerals & Waste Development Framework Partial Review – Restoration of allocated sites in Northamptonshire: An assessment of the opportunities for habitat creation, Northamptonshire County Council, January 2013
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Where mineral sites are in close proximity and a strategic approach is taken towards their restoration, it should be possible to prioritise different habitats on different sites (i.e. one site within the 'cluster' focuses on a particular habitat whilst another site within the 'cluster' focuses on another habitat).

Secure and promote the long term management of restored mineral sites with a biodiversity after use

Many priority habitats take considerably longer than the statutory five year after-care period to become well established. Also, where priority habitats have been created as part of a mineral site restoration scheme, there is a significant risk that these habitats could be destroyed or degraded after this five year period if the landowner wants to return the land to a different land use, such as agriculture. This would diminish or negate any biodiversity gain achieved and may lead to further associated biodiversity losses through habitat fragmentation. It may also render the proposal in conflict with national and local policies aimed at restoring and protecting biodiversity and priority habitats and species.

In order to ensure the long-term biodiversity benefits of habitat creation, 'the Plan' should follow the example of the Oxfordshire Minerals and Waste Core Strategy⁵, which states:

- *Where appropriate, **aftercare schemes and long-term management and maintenance agreements will need to be secured**. In these cases operators and landowners will normally be expected to provide for a further period of aftercare and management – usually 20 years – beyond the 5 year statutory aftercare period, including appropriate financial contributions.*

Facilitating the biodiversity-led restoration of mineral sites on land that was previously Best and Most Versatile (BMV) agricultural land

Many mineral developments take place on Best and Most Versatile (BMV) agricultural land. Historically, such land has normally been returned to an agricultural after-use. However, this greatly limits the potential for biodiversity-led restoration and the creation of coherent and resilient ecological networks. Fortunately, at a national level, there is a change in approach towards the restoration of BMV agricultural land, as stated in the Bedfordshire Minerals & Waste Core Strategy⁶:

- *Government guidance no longer precludes the development of Best and Most Versatile Agricultural Land (grade 1, 2 and 3a).*

The Surrey Minerals Plan⁷ expands on this point, stating:

- *The MPA will not always expect agriculture to be the main after-use on this [BMV] land, but will expect it to be restored to a condition and quality such that if required the land and soil would be in a state capable of supporting agriculture, i.e. Standard 3(2) set out in Schedule 5 of the Town & Country Planning 1990 Act.*

⁵ Oxfordshire Minerals and Waste Core Strategy Submission Document, Oxfordshire County Council, October 2012 (para. 4.47)

⁶ Bedfordshire Minerals & Waste Core Strategy Plan for Submission with Main Modifications and Additional Comments, May 2012 (para. 5.14)

⁷ Surrey Minerals Plan 2011 – Minerals Site Restoration Supplementary Planning Document, Surrey County Council, 2010 (para. 5.32)

There are many examples of where biodiversity-led restoration has kept the land and soil in a state capable of supporting agriculture if required, for example, by storing the soils underneath newly created wetland habitat. In some cases, biodiversity-led restoration can be a more sustainable option for BMV soils, compared to agricultural restoration, by reducing erosion.

In addition the potential gains for biodiversity resulting from biodiversity-led restoration of mineral sites on BMV agricultural land far outweigh the potential losses for agriculture on terms of the total area of the biodiversity / agriculture resource. For example, in Essex, it has been calculated that the 700ha of mineral site allocations could potentially represent a 6% increase in the area of land managed primarily for wildlife in the county, if restored to priority habitat, but just a 0.2% loss of the area of agricultural land in the county².

‘The Plan’ should reflect this changing approach to the restoration of BMV soils and follow the lead of the Essex Replacement Minerals Plan in setting an objective which states:

- ***The focus of after-use will shift from purely agricultural uses, important though they remain, towards enhancement of the local environment by means of increased provision for biodiversity, geodiversity, climate change adaptation and outdoor recreation, including Public Rights of Way.***

Restoration of mineral sites in airfield safeguarding zones

Many mineral sites are located within airfield safeguarding zones (ASZ). Where mineral extraction and restoration is below the water table, resulting in open water bodies, there is a potential increase in the risk of bird strike (i.e. damage being caused to aircraft as a result of colliding with flocks of birds) as a result of birds being attracted to this type of open water habitat. However, **it is possible for this risk of bird strike to be minimised whilst still providing wetland habitat** that provides a significant biodiversity resource. ‘The Plan’ should follow the example of the Oxfordshire Minerals and Waste Core Strategy¹⁵, which states:

careful use of inert fill and other engineering techniques can lead to creation of wetland habitats that offer lower bird strike risk and are also of greater value for biodiversity.

Q7 Do you agree with the proposed Spatial Strategy Content?

Yes	X
No	
Don't Know	

Q8 If not, what changes would you suggest?

We agree with the proposed Spatial Strategy content and welcome principle 8.12 ix. However, we would strongly recommend including further detail on the designated sites as well as well as including plans around protecting the biodiversity that is already there and objectives around enhancing it.

Section 2 – Minerals

There are 20 identified issues to the minerals chapter of this survey. You can answer all questions or you can select particular issues to answer. The issues are as follows:

- Minerals data
- Transportation of minerals
- Aggregate demand
- Aggregate supply
- Recycled and secondary aggregate
- Crushed rock
- Marine won sand and gravel
- Sand and gravel markets
- Extraction locations
- Sand and gravel resources
- Sand and gravel imports / exports
- Past sand and gravel sales
- Soft sand
- Landbank
- Future sand and gravel provision
- Mineral safeguarding
- Clay
- Chalk
- Oil and gas
- Coal

Minerals Data

Issue: Historic minerals data has, hitherto, been largely collected and published on a Berkshire wide scale. This has necessitated interpretation and judgement of the information to reach an understanding of the Central and Eastern Berkshire mineral situation.

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

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

Yes	
No	

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

Yes	
No	

Transportation of minerals

Issue: the lack of rail depot and water freight capabilities means that all mineral movements within Central and Eastern Berkshire are by road. This also creates a dependency on rail depots in neighbouring authorities.

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

--

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

Yes	
No	
Don't Know	

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

--

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

Yes	
No	
Don't Know	

Aggregate demand

Issue: there are a significant number of national and locally significant construction projects within and in proximity to Central and Eastern Berkshire which will require a steady and adequate supply of aggregate over and beyond The Plan period. Redevelopment projects will provide a source of recycled aggregate through construction and demolition material.

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

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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?

Yes	
No	
Don't Know	

Aggregate supply

Issue: both marine won sand and gravel and crushed rock, which are both imported into Berkshire, are likely to continue to increase in importance in aggregate supply for Central and Eastern Berkshire.

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

Yes	
No	
Don't Know	

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

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

Yes	
No	
Don't Know	

Recycled and secondary aggregate

Issue: the use of recycled and secondary aggregate is increasing nationally. There is a significant amount of development and redevelopment planned within The Plan area which can be both a source and a market for the material.

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

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

Crushed rock

Issue: Central and Eastern Berkshire is reliant on the importation of crushed rock from Somerset via the rail depots in West Berkshire and Slough.

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

Marine-won sand and gravel

Issue: marine sand and gravel forms part of the aggregate supply provision for Central and Eastern Berkshire. It is likely that this material is being supplied by road from Hampshire's wharves and via the rail depots in West Berkshire and Slough from London's wharves.

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 and Eastern Berkshire?

Yes	
No	
Don't 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?

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

Sand and gravel markets

Issue: the principle market for sand and gravel produced in Central and Eastern Berkshire is likely its urban areas and those in neighbouring parts of the Thames Valley.

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

Yes	
No	
Don't Know	

Extraction locations

Issue: there is only one permitted soft sand site within Central and Eastern Berkshire and this is currently inactive so this material is likely to be sourced elsewhere.

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

Q32 Are you aware of any potential soft sand sites?

Yes	
No	
Don't Know	

Issue: there are approximately seven million tonnes of permitted reserves within Central and Eastern Berkshire. There have been no operational sites within the Borough of Slough for 10 years which means they have been dependent on alternative sources of supply.

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

Sand and gravel resources

Issue: there are approximately seven million tonnes of permitted reserves within Central and Eastern Berkshire. Other potential reserves are likely to be identified within Wokingham and Windsor & Maidenhead Boroughs. There are also reserves in Preferred Areas but some of these are located within Slough Borough Council's administrative area.

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

Sand and gravel imports / exports

Issue: approximately half of the land won sand and gravel consumed within Berkshire is sourced from within Berkshire and imports by road from Hampshire are an important alternative source.

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

Past sand and gravel sales

Issue: West Berkshire has collated the most reliable source of data on sales figures and contribution to the Berkshire total sales figures and therefore, Central and Eastern Berkshire will also use these figures

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

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Issue: based on the future aggregate demand information, the three year average figure of 752,765 tonnes per annum is likely to reflect the future aggregate demand for Central and Eastern Berkshire as well as the wider Thames Valley.

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

Yes	
No	
Don't 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?

Soft sand

Issue: there is currently no soft sand produced in Central and Eastern Berkshire and soft sand is being imported.

Q44 Due to the lack of soft sand sales from quarries within Central and 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?

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

Yes	
No	
Don't Know	

Q 46 If not, what measures can be used to encourage soft sand proposals to come forward?

Landbank

Issue: the landbank based on three year sales for sand and gravel in Central and Eastern Berkshire is 8.8 years.

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

Yes	
No	
Don't Know	

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

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Future sand and gravel provision

Issue: there is a requirement for additional reserves of between 4,267,981 and 9,140,065 tonnes of sand and gravel during The Plan period.

Q49 Do you agree that the Central and Eastern Berkshire Authorities should plan for an additional requirement of 9 million tonnes of sand and gravel?

Yes	
No	
Don't Know	

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

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Issue: the existing Preferred Areas from the saved Replacement Minerals Local Plan do not fully meet the future demand and some of the sites are located outside The Plan area.

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

Mineral safeguarding

Issue: it is considered necessary to safeguard proven mineral deposits of sharp sand and gravel and soft sand to prevent sterilisation and retain resources to meet longer term need.

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

Yes	
No	
Don't Know	

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

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Clay

Issue: there is no current industrial demand for clay in the area and other demands are low.

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?

Yes	
No	
Don't Know	

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

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

Yes	
No	
Don't Know	

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

--

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

Yes	
No	
Don't Know	

Chalk

Issue: there is a low level of demand for chalk in Central and Eastern Berkshire.

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

Yes	
No	
Don't Know	

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

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

Yes	
No	
Don't Know	

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

--

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

Yes	
No	
Don't Know	

Oil and gas

Issue: there are currently no known commercially viable resources of oil and gas in Central and Eastern Berkshire and no existing licence areas.

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

Coal

Issue: coal has not been addressed in minerals and waste planning policy previously

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

Yes	
No	
Don't Know	

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

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Section 2 - Waste Issues

There are 12 identified issues to the waste chapter of this survey. You can answer all the questions or you can select particular issues to answer. The issues are as follows:

- Waste data
- Estimating waste management capacity
- Non hazardous waste data
- Non hazardous waste management
- Inert waste data
- Inert waste management
- Hazardous waste data and management
- Specialist waste
- Future waste arisings
- Future waste capacity
- Locational requirements for waste facilities
- Transportation of waste

Waste Data

Issue: waste arisings data is difficult to source, but the Environment Agency Waste Data Interrogator provides a relatively comprehensive and consistent source of 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?

Yes	
No	
Don't Know	

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 and Eastern Berkshire?

Yes	
No	
Don't Know	

Q73 Do you 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?

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

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

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Estimating waste management capacity

Issue: there is no comprehensive source of data on waste capacity.

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

Yes	
No	
Don't Know	

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

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

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Non-hazardous waste data

Issue: non hazardous waste arisings data can be sourced from different places, with different caveats and levels of reliability.

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?

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

Q82 Do you think that non hazardous waste arisings should be estimated using another method?

Yes	
No	
Don't Know	

If so, please specify what method and where the data should be sourced

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Non-hazardous waste management

Issue: non hazardous waste is managed at a regional level and there is no self sufficiency within Central and Eastern Berkshire, particularly in terms of Energy from Waste and non hazardous landfill facilities.

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

Yes	
No	
Don't Know	

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?

Yes	
No	
Don't Know	

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

A – continue to use existing waste management facilities network, even when they are in nearby counties	
B – seek to make full provision within Central and Eastern Berkshire for the waste management facilities that match the estimated waste arisings	
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	
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	

Inert waste data

Issue: Environment Agency Waste Data Interrogator data on inert waste is less robust than the non hazardous, but other sources of data may not necessarily be more comprehensive or robust.

Q86 Which of the following approaches do you think is the most reasonable to estimate arisings of inert waste?

A - use Environment Agency Waste Data Interrogator data	
B - complement Environment Agency Waste Data Interrogator with aggregate recycling monitoring data	
C - complement Environment Agency Waste Data Interrogator and aggregate recycling data with estimates based on construction activity	
D - other method	

For other, please specify what method and where the data should be sourced

Inert waste management

Issue: inert landfill has different characteristics than non hazardous landfill so it may be useful to treat it differently.

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

Hazardous waste data and management

Issue: hazardous waste is a highly specialist area and it is unlikely that The Plan will be able to provide all the facilities required for all the hazardous waste streams arising in The Plan area.

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

A – continue the current patterns of hazardous waste management and provide a criteria based policy on which new proposals could be judged	
B – meet net self sufficiency through increased provision of waste management of other types of waste streams (non hazardous and inert)	
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	
D – seek to provide greater capacity and greater diversity of hazardous waste management facilities, aiming for net self sufficiency in the hazardous waste stream	

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

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

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Specialist waste

Issue: there are many types of hazardous and specialist waste and data can often be hard to obtain.

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

Yes	
No	
Don't Know	

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

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

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

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Future waste arisings

Issue: there are a number of national and local development projects which will impact waste growth in Central and Eastern Berkshire.

Issue: waste arisings growth estimates need to work with a set of reasonable assumptions.

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't 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?

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

Q101 What other assumptions do you think we should use?

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Q102 Do you agree with the use of low, medium and high waste growth scenario?

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

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Future waste capacity

Issue: waste scenarios offer a way of comparing different waste management planning options, but there are many possible scenarios not all of which can be explored.

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

Yes	
No	
Don't 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?

Yes	
No	
Don't Know	

Q106 If not, what scenarios would you suggest?

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Locational requirements for waste facilities

Issue: there are many types of waste management facilities, with differing locational requirements

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?

Yes	
No	
Don't Know	

Q108 If not, what are your suggestions and why?

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

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Transportation of waste

Issue: Central and Eastern Berkshire is well connected by road and rail. It is assumed that all waste movements are undertaken by road due to the lack of any rail depot or wharf within The Plan area.

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

Yes	
No	
Don't Know	

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

Yes	
No	
Don't Know	

Q112 If you disagree, please state where the transfer docks should be located

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

Yes	
No	
Don't Know	

Q114 If you agree, please state where the rail depot facilities should be located

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

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

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

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

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