

**Central and Eastern Berkshire**

**Joint Minerals & Waste Plan**

**Consultation Summary Report: Post  
Regulation 18 – Draft Plan**

April 2019



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Royal Borough  
of Windsor &  
Maidenhead



**WOKINGHAM  
BOROUGH COUNCIL**

## Summary

Hampshire Services (part of Hampshire County Council) is working in collaboration with Bracknell Forest, 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 second consultation on plan preparation; The Draft Plan (previously known as Preferred Options) ran from 6 August to 12 October 2018.

This report provides an overview of the general themes and key issues from the responses and comments received to the Draft Plan Consultation. The report will include who has responded and the issues the respondents have raised.

In total, 348 people and organisations responded to the five sections, (including background information on respondents) and / or made general comments regarding the consultation.

Although the majority of the responses were clustered around the Policy Proposals, nearly every section of the Draft Plan received a consultation response.

The 26 Policy Proposals (the Policies) generated a total of 747 comments, and although each policy proposal received at least one comment, most of the comments focussed on:

- Policy M4 – Locations for sand and gravel extraction – 85 comments
- Policy W1 – Sustainable waste development – 57 comments
- Policy W2 – Safeguarding of waste management facilities – 54 comments
- Policy W4 – Locations and sites for waste management – 227 comments
- Policy DM11 – Sustainable transport movements – 53 comments

The 27 delivery strategies (supporting text) generated a total of 272 comments. The majority of the received comments focussed on:

- Waste Capacity Requirements – 227 comments
- Locations for Sand and Gravel – 85 comments
- Safeguarding other minerals development infrastructure – 57 comments

The 13 documents making up the Evidence Base in Appendix C generated a total of 41 comments, with the majority of the comments being focussed on:

- Strategic Traffic and Transport Assessment – 25 comments
- Landscape and Visual Impact Assessment – 13 comments
- Waste: Proposal Study – 12 comments

Additionally, responses were made under *section four: further comments*. The issues brought to attention within this part of the Draft Plan consultation varied since the section provided a free text box for responders to add anything else they felt necessary to the consultation. They ranged from reinforcing points that had been made previously in a response, to providing general feedback on the Draft Plan Consultation process.

The outcome of the Draft Plan Consultation has provided a different picture to the initial *Issues and Options Consultation* (summer 2017), since there has been a higher response rate, with more comments stemming from residents and local organisations located within the Plan area. The Draft Plan provided further detail on proposed site allocations and it was this information that most of the highlighted concerns centred around. Although a large proportion of responses raised concerns about certain elements of the Draft Plan, some representations supported specific policies and proposals.

This summary of responses report will work as a guide, highlighting the possible issues and challenges that may be faced as the Plan progresses. It will be used to help inform the preparation of the Proposed Submission version of the Plan. A further report will later be prepared that sets out the responses to the issues raised and how these have been addressed. This report will be available during the consultation on the Proposed Submission version of the Plan.

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## 1.0 Introduction

- 1.1 Hampshire Services<sup>1</sup> (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'). The Plan will guide minerals and waste decision making in the Plan area up until 2036.
- 1.2 The 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.
- 1.3 The currently adopted minerals and waste plans for the Berkshire area are the Replacement Minerals Local Plan for Berkshire, adopted in 1995 and subsequently adopted alterations in 1997 and 2001<sup>2</sup> (including Appendices<sup>3</sup> and saved policies<sup>4</sup>) and the Waste Local Plan for Berkshire adopted in 1998<sup>5</sup> (including saved policies). The Minerals Local Plan and Waste Local Plan cover the administrative areas of the Central & Eastern Berkshire Authorities, as well as Slough Borough Council and West Berkshire Council. While these plans cover the period until 2006, the Secretary of State has directed that a number of policies in them should be saved indefinitely until replaced by national, regional or local minerals and waste policies. For the Central & Eastern Berkshire Authorities, these saved policies will be replaced by the Central and Eastern Berkshire Joint Minerals & Waste Plan, when it is adopted.
- 1.4 A review of the Replacement Minerals Local Plan for Berkshire and the Waste Local Plan for Berkshire was previously being undertaken on behalf of the six Berkshire Unitary Authorities by the Joint Strategic Planning Unit (JSPU). During the Examination of the Core Strategy in 2008, concerns were raised and subsequently, the Secretary of State formally requested the withdrawal of the Core Strategy in January 2010. The JSPU was subsequently disbanded.
- 1.5 After a review of minerals and waste planning, the Central & Eastern Berkshire Authorities decided to progress with a Joint Minerals & Waste Plan. While the Joint Minerals & Waste Plan does not cover Slough Borough Council<sup>6</sup> or West

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

<sup>2</sup> <https://www.bracknell-forest.gov.uk/sites/default/files/documents/replacement-minerals-local-plan-for-berkshire-2001.pdf>

<sup>3</sup> <https://www.bracknell-forest.gov.uk/sites/default/files/documents/replacement-minerals-local-plan-for-berkshire-2001-appendices.pdf>

<sup>4</sup> <https://www.bracknell-forest.gov.uk/sites/default/files/documents/mineral-local-plan-saved-policies-schedule.pdf>

<sup>5</sup> <https://www.bracknell-forest.gov.uk/sites/default/files/documents/waste-local-plan-for-berkshire.pdf>

<sup>6</sup> <http://www.slough.gov.uk/council/strategies-plans-and-policies/minerals-and-waste.aspx>

Berkshire Council<sup>7</sup>, close coordination of the work between the Berkshire authorities will continue in order to plan for minerals and waste strategically and address any cross-border issues that may arise.

- 1.6 This report sets out how Hampshire Services (on behalf of the Central and Eastern Berkshire Authorities) has involved the public in the preparation of the Plan. The purpose of the consultation was to engage the local communities in discussion on proposed options for managing minerals and waste through to 2036. Additionally, it provided an opportunity to gather further evidence on the Plan policies and site allocations detailed in the Draft Plan Consultation.
- 1.7 All stages of consultation have been carried out in accordance with each of the four Central and Eastern Berkshire Authorities' Statement of Community Involvement (SCI). SCI documents inform each authority how engagement with local communities should be undertaken when preparing a plan (or working on planning applications).
- 1.8 Each of the Central & Eastern Berkshire Authorities has adopted its own Statement of Community Involvement. The following SCIs were used for this consultation:
  - Bracknell Forest SCI (adopted 2014)<sup>8</sup>;
  - Reading SCI (adopted 2014)<sup>9</sup>;
  - Windsor and Maidenhead SCI (adopted 2016)<sup>10</sup>; and
  - Wokingham SCI (adopted 2019)<sup>11</sup>.
- 1.9 This summary document provides an overview on the (general) themes and key issues that were most prevalent in the responses received to the Draft Plan Consultation. These will be used to update the evidence base, continue to support and direct the preparation of the Plan as well as inform and shape the later stages of the Plan making process.
- 1.10 23 responses were received after the closure of the Draft Plan Consultation (i.e. after 12 October 2018). It was agreed extensions could be granted to 19 October 2018, if a respondent contacted Hampshire Services to request this, whilst also submitting a holding response. Of the late responses, seven had requested

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<sup>7</sup> <https://info.westberks.gov.uk/mwlp>

<sup>8</sup> <https://www.bracknell-forest.gov.uk/sites/default/files/documents/statement-of-community-involvement-2014.pdf>

<sup>9</sup> <http://www.reading.gov.uk/media/1051/Statement-of-Community-Involvement-Adopted-March-2014/pdf/Statement-Of-Community-Involvement-Mar14.pdf>

<sup>10</sup> [https://www3.rbwm.gov.uk/info/201039/non-development\\_plan/460/statement\\_of\\_community\\_involvement](https://www3.rbwm.gov.uk/info/201039/non-development_plan/460/statement_of_community_involvement)

<sup>11</sup> <file:///Q:/Documents/Downloads/FINAL%20SCI%202019%20ADOPTION%20VERSION%20March%2019.pdf>

extensions and/or submitted a holding response beforehand. The remaining 16 had not notified Hampshire Services that a late response would be provided and four of these responses were received after the extended deadline. Nonetheless, all responses have been used in this summary report and will be used to inform the preparation of the Plan.

- 1.11 Additionally, a petition was received in response to the Draft Plan Consultation and this included the names, addresses and signatures of 61 residents opposing 'The Compound' site as a waste recycling facility.
- 1.12 Both the Regulation 18 consultations; *Issues and Options* – summer 2017 and *Draft Plan* (previously Preferred Options) – summer / autumn 2018 have informed the preparation of The Pre-Submission Plan and are detailed as appropriate in this report.



## 2.0 Regulation 18

### Stage 1 - Regulation 18 Consultation: Issues and Options (summer 2017)

- 2.1 The Issues and Options consultation was the first stage Regulation 18<sup>12</sup> consultation and was undertaken during summer 2017. The purpose of the Issues and Options consultation was to predominantly engage the minerals and waste industry in discussion on the *issues* for managing minerals and waste for the next 20 years. It also provided an opportunity to obtain more evidence to inform the *options* for The Plan's policies and site allocations.
- 2.2 The consultation lasted for a period of six weeks from 9 June to 21 July 2017.

#### Who was consulted?

- 2.3 At the Issues and Options stage, Hampshire Services was required to consult with statutory consultees. These included the Environment Agency, Historic England and Natural England. Other interested parties such as industry and neighbouring district, borough and city councils were also consulted. The public were not directly consulted at this stage of The Plan. However, all information consulted on during this time was made publicly available on the Central & Eastern Berkshire Authorities' website<sup>13</sup> (hosted by Hampshire Services), and responses from the public could be submitted either by post or online.

#### Method of consultation

- 2.4 A consultation document was produced to support the Issues and Options consultation, and this was sent to all statutory consultees and other interested parties for comment. An associated response form was also created so that consultees could complete responses online if this was their preferred response method. Hard copies of the response form were also made available for those, upon request.
- 2.5 All information regarding the Issues and Options Consultation was contained on the dedicated Central and Eastern Berkshire Authorities website (hosted by Hampshire Services). Hard copies of all related consultation documentation were made available for inspection at the offices of each of the Central & Eastern Berkshire Authorities, as well as local libraries.

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<sup>12</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012. Available from [http://www.legislation.gov.uk/ukxi/2012/767/pdfs/ukxi\\_20120767\\_en.pdf](http://www.legislation.gov.uk/ukxi/2012/767/pdfs/ukxi_20120767_en.pdf)

<sup>13</sup> [www.hants.gov.uk/berksconsult](http://www.hants.gov.uk/berksconsult)

## How was the consultation followed up?

- 2.6 A Consultation Summary was provided with an overview of the general themes and key issues highlighted in the Consultation. The report sought to detail who had responded, the key issues raised and how the issues would be addressed. The comments received were used to update the evidence base, support and direct the preparation of the Draft Plan as well as inform and shape the later stages of the Plan making process. The Consultation Summary was made available on the dedicated Central & Eastern Berkshire Authorities' website<sup>14</sup>.

## Stage 2 - Regulation 18 Consultation: Draft Plan (summer / autumn 2018)

- 2.7 The second stage Regulation 18 Draft Plan (formerly referred to as 'Preferred Options') consultation ran for 10 weeks, taking place between 6 August and 12 October 2018. The purpose of the consultation was to engage the community in discussions on managing minerals and waste for the next 20 years. It also provided an opportunity to gather additional local evidence to help determine the Plan's policies and site allocations.
- 2.8 A Draft Plan Consultation Paper was made available in support of the consultation. It followed the 'Issues and Options' Consultation which was carried out during the summer of 2017. The feedback received from the 'Issues and Options' Consultation helped to shape the following stages of the Plan, namely the Draft Plan Consultation. Additionally, it has been prepared in cooperation with neighbouring authorities and other minerals and waste planning authorities that may be affected by the policies and outcomes in the Plan.

## Who was consulted?

- 2.9 Statutory and non-statutory bodies were consulted as part of the Draft Plan Regulation 18 consultation including:
- Natural England, Historic England and the Environment Agency
  - Parish / Town Councils located within and adjoining Central and Eastern Berkshire
  - District Councils adjoining Central and Eastern Berkshire
  - County Councils adjoining Central and Eastern Berkshire
  - Members within Central and Eastern Berkshire, MPs and MEPs
  - All contacts on the relevant Local Plan databases for each of the Central & Eastern Berkshire Authorities (all those who have requested to remain informed)

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<sup>14</sup> <https://www.hants.gov.uk/landplanningandenvironment/berksconsult/berksconsult-io>

- Highways England
- Public utilities such as South East Water and National Grid
- Other bodies outlined in the relevant Statements of Community Involvement.

### How were they consulted?

2.10 Notice of the Draft Plan consultation was provided in a number of ways:

- Emails were sent to the statutory consultees.
- The consultation was advertised on the Central and Eastern Berkshire consultation website
- An advert informing people about the Consultation was placed in the following relevant newspapers in Central and Eastern Berkshire:
  - Bracknell News (01 August 2018)
  - Maidenhead Advertiser (02 August 2018)
  - Windsor and Slough Express (03 August 2018)
  - London Gazette (03 August 2018); and
  - The Wokingham Paper (09 August 2018)

2.11 The consultation documents were made available in the following locations:

- Central & Eastern Berkshire Authorities' Council offices
- Public libraries throughout the administrative areas of Central and Eastern Berkshire
- Online via the dedicated Central & Eastern Berkshire Authorities website (hosted by Hampshire Services)

2.12 Public exhibitions were arranged so members of the public could attend to learn more about The Plan and address any concerns or queries directly with council officers. The events took place on the following dates, in the following places.

<b>Location</b>	<b>Date</b>	<b>Event type</b>	<b>Attendees (Approx.)</b>
Arborfield Green Leisure Centre	18 July 2018	Minerals & Waste Plan Public Meeting	30
Knowl Hill Village Hall	24 July 2018	Minerals & Waste Plan Public Meeting	60
Wraysbury Village Hall	20 August 2018	Parish council meeting	20
Datchet Village Hall, Datchet	04 September 2018	Drop in	70

St Peter's Church, Knowl Hill	04 September 2018	Drop in	40
Desborough Theatre (Town Hall), Maidenhead	06 September 2018	Drop in	12
Reading Civic Offices, Reading	06 September 2018	Drop in	2
Three Mile Cross Church Theatre, Three Mile Cross, Reading	10 September 2018	Drop in	13
St Mary's, Winkfield	11 September 2018	Drop in	70
Arborfield Green Community Centre, Arborfield	19 September 2018	Drop in	25

2.13 Responses could be submitted by post, email and via the Central & Eastern Berkshire Authorities website, where a response form to the consultation had been created. Questions posed in response form encouraged comments on the policy proposals, the delivery strategies and the evidence base of the Draft Plan (including the SA/SEA)

### Methodology

2.14 Responses to the consultation were received via online response forms, emails and letters.

2.15 The Draft Plan Consultation was separated into four sections, as follows –

#### 26 Policy Proposals:

- Policy M1 – Sustainable minerals development strategy
- Policy M2 – Safeguarding sand and gravel resources
- Policy M3 – Sand and gravel supply
- Policy M4 – Locations for sand and gravel extraction
- Policy M5 – Supply of recycled and secondary aggregates
- Policy M6 – Chalk and clay
- Policy M7 – Aggregate wharves and rail depots
- Policy M8 – Safeguarding minerals infrastructure
- Policy W1 – Sustainable waste development strategy
- Policy W2 – Safeguarding of waste management facilities

- Policy W3 – Waste capacity requirements
- Policy W4 – Locations and sites for waste management
- Policy W5 – Reworking landfills
- Policy DM1 – Sustainable development
- Policy DM2 – Climate change – mitigation and adaptation
- Policy DM3 – Protection of habitats and species
- Policy DM4 – Protection of designated landscape
- Policy DM5 – Protection of the countryside
- Policy DM6 – Green Belt
- Policy DM7 – Conserving the historic environment
- Policy DM8 – Restoration of minerals and waste developments
- Policy DM9 – Protecting public health, safety and amenity
- Policy DM10 – Water environment and flood risk
- Policy DM11 – Sustainable transport movements
- Policy DM12 – High quality design of minerals and waste development
- Policy DM13 – Ancillary development

27 chapters on the delivery strategy (supporting text):

- Sustainable mineral strategy
- Safeguarding minerals resources
- Managing the supply of aggregate
- Locations for sand and gravel extraction
- Supply of recycled and secondary aggregates
- Energy minerals
- Other non-aggregates
- Aggregates wharves and rail depots
- Safeguarding other minerals development infrastructure
- Sustainable waste development strategy
- Safeguarding of waste management facilities
- Waste capacity requirements
- Locations and sites for waste management
- Re working landfills
- Sustainable development
- Climate change – mitigation and adaptation
- Protection of habitats and species
- Protection of designated landscape
- Protection of the countryside
- Green belt
- Conserving the historic environment
- Restoration of minerals and waste developments
- Protecting public health, safety and amenity
- Water environment and flood risk

- Sustainable transport movements
- High quality design of minerals and waste development
- Ancillary development

13 Documents forming the evidence base:

- Minerals: Background Study
- Waste: Background Study
- Sustainability Appraisal (incorporating Strategic Environmental Assessment) interim report
- Habitats Regulations Assessment: Screening Report
- Strategic Flood Risk Assessment Statement
- Strategic Traffic and Transport Assessment
- Landscape and Visual Impact Assessment
- Restoration Study
- Minerals and Waste Safeguarding Study
- Minerals: Proposal Study
- Waste: Proposal Study
- Equalities Impact Assessment
- Duty to Cooperate Statement

A free text box for 'further comments' was also supplied.

2.16 A number of responses received via email and post were not necessarily specific to a policy proposal or delivery strategy. In order to easily compare the responses, they have been assigned to one of the policy proposals, delivery strategies or supporting evidence. Where this has not been possible, additional comments have been grouped together into further comments.

2.17 To organise the results this summary report has been grouped into three main sections, in addition to a brief summary on sections four and five of the response forms. A short summary of all policy proposals includes example comments received both in support and in opposition to the proposal. The policy proposals which received the highest number of responses have been assessed in more detail.

2.18 Where duplicate responses have been identified – for example, an organisation submitting an identical response more than once, this has just been counted as one response.

2.19 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 because they originated from the same person. However, all applicable comments have been taken into consideration.

2.20 The full list of responses, once they have been redacted to comply with General Data Protection Regulation (GDPR), will be made public.

2.21 The analysis and outcomes of this summary will be used to inform the preparation for future stages of the Plan.

### **Limitations encountered**

#### *The consultation process*

2.22 One of the prevalent themes that arose from the public engagement exercises and the consultation responses was the complexity of the consultation process for the general public, in terms of the length and jargon used in the consultation documents and response forms. The accessibility of the consultation process to laypersons could therefore be considered as a limitation.

2.23 Despite this, a balance has to be struck between meeting the requirements for a robust evidence base and a sound Plan whilst ensuring the general public understand what is being proposed.

2.24 A potential solution could be to produce alternative materials and specialist workshops that explain the consultation process and what is being proposed in layman's terms. However, this must be balanced against the costs of putting on such extra events.

2.25 Ultimately, the insight that has been received from the general public about sites during the Preferred Options consultation has been invaluable and will be used to inform the final version of the Plan.

#### *The analysis stage*

2.26 During the analysis, we established it would have been helpful to request further information from respondents. This would have assisted with providing a more in-depth perspective on those who responded to the consultation and possibly helped to identify trends in the responses received.

2.27 The percentages provided in the datasets are only of the respondent groups who made an explicit representation i.e. they ticked 'support', 'object'. But this does not necessarily include all the respondents as some people may have chosen to go straight to a free text box.

2.28 Please also note the following when looking over this summary document:

- Not every comment is mentioned in this analysis (though every issue raised has been taken into consideration)
- 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 that 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
- Any inaccuracies within comments are those of respondents, not the Central and Eastern Berkshire Authorities. A document outlining how the issues were considered and acted upon will be available at the next stage of Plan preparation (Proposed Submission).

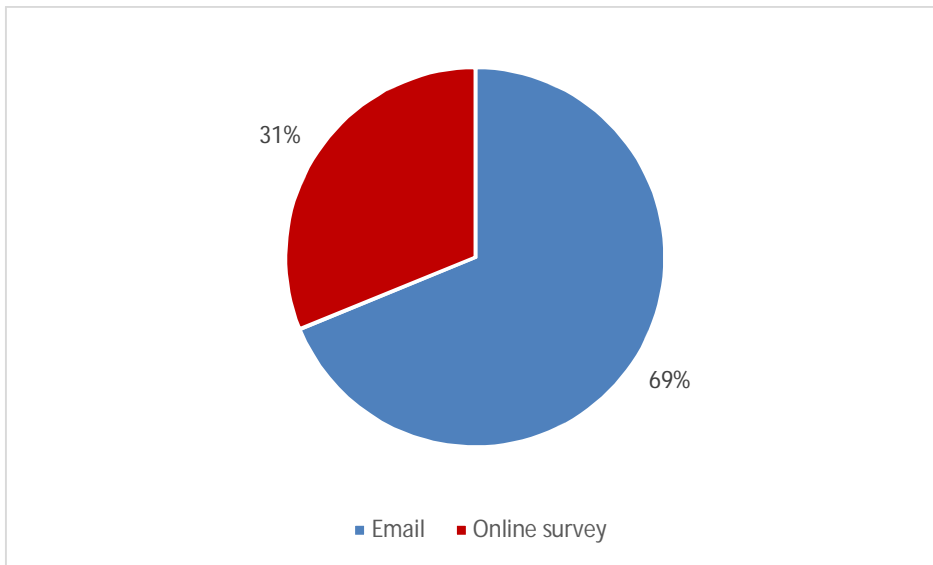


## 3.0 Consultation Results

### Overview of responses and respondents

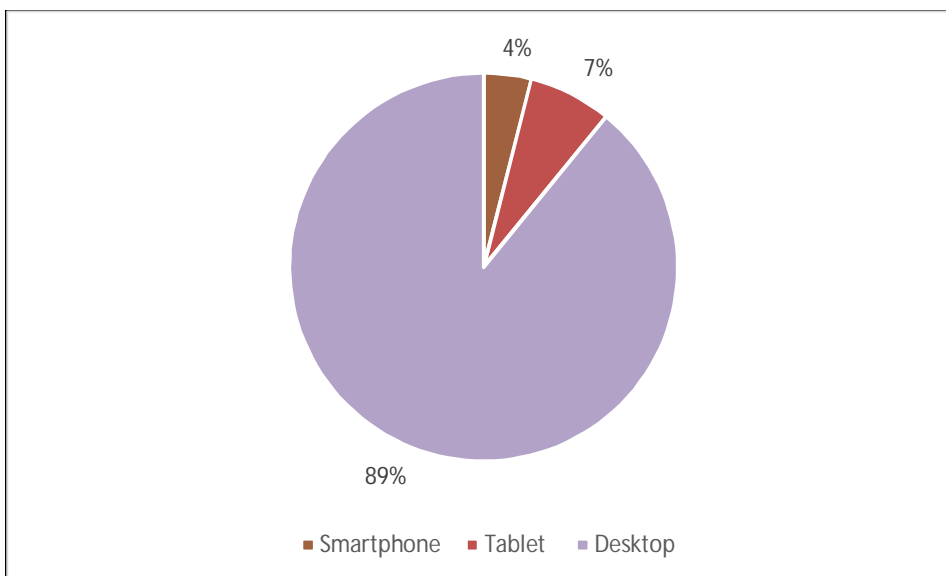
- 3.1 A total of 348 responses were received to the consultation. Figure 1 outlines how consultation responses were submitted. 93% of responses were received electronically. Figure 1 shows the method through which people submitted their response electronically:

Figure 1: Method of submitting an electronic consultation response



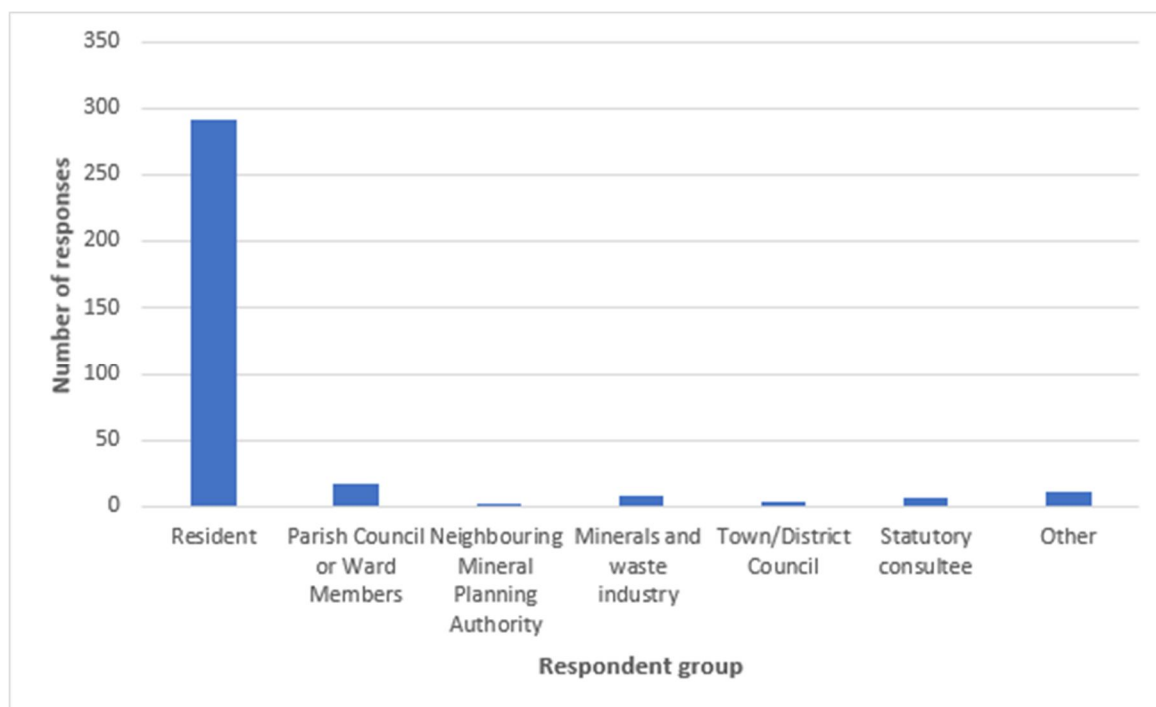
- 3.2 Furthermore, of those who submitted their response through the online survey, the following figure shows the technology used to do so:

Figure 2: Technology used to complete online survey



3.3 Respondents were categorised into groups to gain a better understanding of who responded to the consultation (see Figures 3).

Figure 3: Number of responses received by respondent group



3.4 To gain a better understanding of who responded to the consultation, respondents were clustered into groups.

3.5 As can be seen by Figure 3, the majority of responses (291 or 85%) were made by, or on behalf of residents. 5% (or 18) were made by parish councils or ward members. Neighbouring Mineral Planning Authorities, minerals and waste industry, statutory consultees and town and district councils made up 7% (or 23) of the responses. Lastly, 3% of respondents (or 12) were classed as 'Other'.

3.6 It is worth noting the residents' category also consisted of village associations, as these groups made representations on behalf of residents. These were counted as one response. The residents' category also included the petition signed by 61 residents opposing 'The Compound' site as a waste recycling facility

3.7 The 'Other' category included several developers, planning and design consultancies, other advice services, two charities, a community interest company, a local business and a local school.

## Section one – policy proposals

3.8 The policy proposals section generated a total of 313 comments consisting of 269 resident responses and 44 responses from organisations / groups.

3.9 Respondents could choose to provide a response to every policy proposal or they could select individual policies. Responses were received to each of the 26 policy proposals although the depth of the responses varied. Whilst a brief summary on responses for each policy proposal has been provided, the greatest emphasis has been focussed on the proposals that generated most interest and the highest numbers of comments. These policies were:

- Policy M4 – Locations for sand and gravel extraction
- Policy W1 – Sustainable waste development
- Policy W2 – Safeguarding of waste management facilities
- Policy W4 – Locations and sites for waste management
- Policy DM11 – Sustainable transport movements

### Policy M1 Sustainable minerals development strategy

3.10 This policy is about providing and/or facilitating a sustainable supply of minerals to meet the needs of Central and Eastern Berkshire, by; delivering the identified aggregate and mineral demand, working with other authorities and being compliant with the spatial strategy for minerals development (Policy M4).

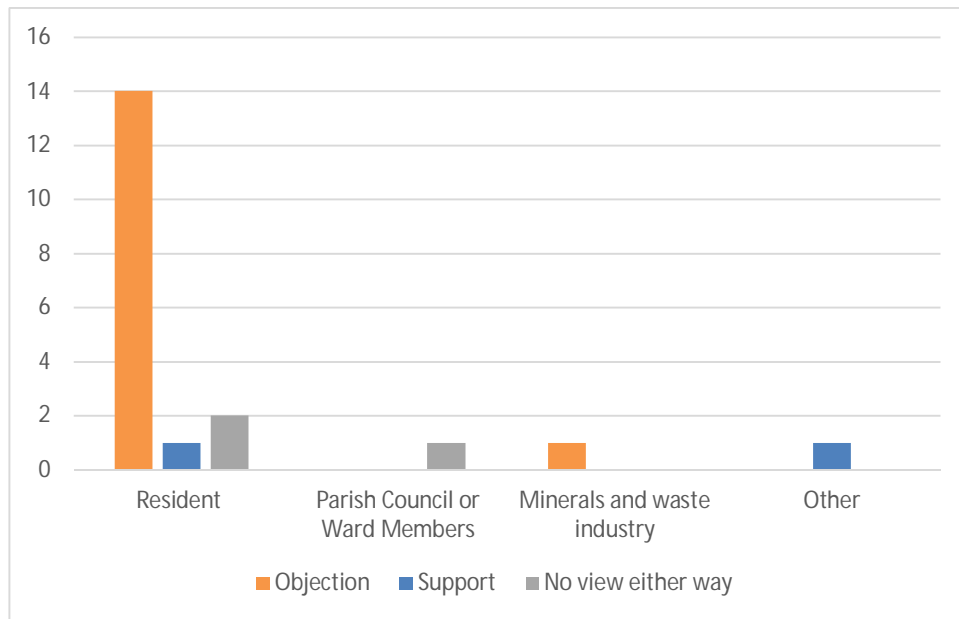
3.11 This proposal was generally not supported with 75% respondents objecting (see Figure 4). The main reasons for this objection were because:

- The policy is deemed to be inconsistent with national policy (in particular the National Planning Policy Framework (NPPF))
- The wording of the policy is contrary to the wording of the Plan's Vision
- Detrimental impacts proposed sites could have upon the local area with loss of countryside, additional traffic on the roads, contributing to poor air quality, destruction of habitats and wildlife and the quality of life for local people.
- Specifically, Historic England highlighted concerns with this policy for failing to reference and/or work to safeguard the natural, built and historic environment.

3.12 However, 10% of those who responded did support the policy proposal, with the reasons being:

- support was given to the overall intent of the policy (but some modifications were needed)
- the policy would work to protect the local area and environment, but the proposed site allocations (along with the local residential developments) would contravene the policy

Figure 4: Responses on Policy M1 by respondent group



3.13 The remaining 15% of respondents gave no view either way towards Policy M1.

### Policy M2 Safeguarding sand and gravel resources

3.14 This policy is about safeguarding sharp sand and gravel and soft sand resources of economic importance and around active mineral workings, through the Minerals and Waste Safeguarding Area, a list of safeguarded sites, and under which circumstances non-minerals development may be permitted in the Minerals and Waste Safeguarding Area.

3.15 This proposal was generally opposed with 64% of responders objecting, mainly under the proposal not meeting the Test of Soundness<sup>15</sup>. The main reasons for this objection are:

- The policy proposal contradicts national policy (NPPF)
- Additional or separate criterion is needed in addition to Policy M2 that would permit a positive approach by allowing non-minerals development to be granted if the planning benefits of the non-mineral development would be greater than the need for the mineral resource
- Concerns in relation to proposed site allocations (particularly Bridge Farm as it is not a preferred minerals area and the extraction of minerals from the site is considered to have detrimental impacts upon the local community in several ways)

<sup>15</sup> Paragraph 35 of the NPPF sets out four 'tests' of soundness: positively prepared, justified, effective and consistent with national policy.

- Incomplete documentation since Policy M2 refers to a policies map but this has not been provided as part of the consultation process
- Concern that supporting Policy M2 could suggest a site may be used for extraction, just because it is not being used for development purposes

3.16 21% of responders demonstrated support for policy M2. However, West Berkshire commented that there was confusion over soft sand safeguarding as the Draft Plan Consultation Paper and the Minerals Background Study reference the lack of reliable information about the distribution of commercial reserves of soft sand being readily available.

### **Policy M3 Sand and gravel supply**

3.17 This policy is about the provision of the release of land to allow a steady and adequate supply of sand and gravel for aggregate purposes in Central and Eastern Berkshire up until 2036.

3.18 This proposal was generally opposed with 73% of responders objecting, with the main reasons for this objection being:

- Neighbouring local planning authority, West Berkshire Council feel policy M3 does not meet the test of soundness, specifically the test of consistency with national policy. West Berkshire Council highlight the policy does not provide a level of requirement for sharp sand and gravel and soft sand. Instead it identifies a yearly production rate, so it is not clear how the policy and the proposed site allocations of Policy M4 will achieve an adequate supply of aggregate minerals during the Plan period. Therefore, West Berkshire Council suggest the policy is changed so that it falls in line with the requirements set out in national policy.
- The policy should be re-worded to show the annual rate of provision might need updating on an annual basis to reflect the latest Local Aggregate Assessment.

3.19 Support for the policy was based on support for the proposed site allocations (namely Poyle Quarry and Poyle Quarry extension, Water Oakley and Monkey Island Wharf) since they would help to meet the current shortfall of mineral resources. However, only 7% of responses supported this policy proposal.

### **Policy M4 Locations for sand and gravel extraction**

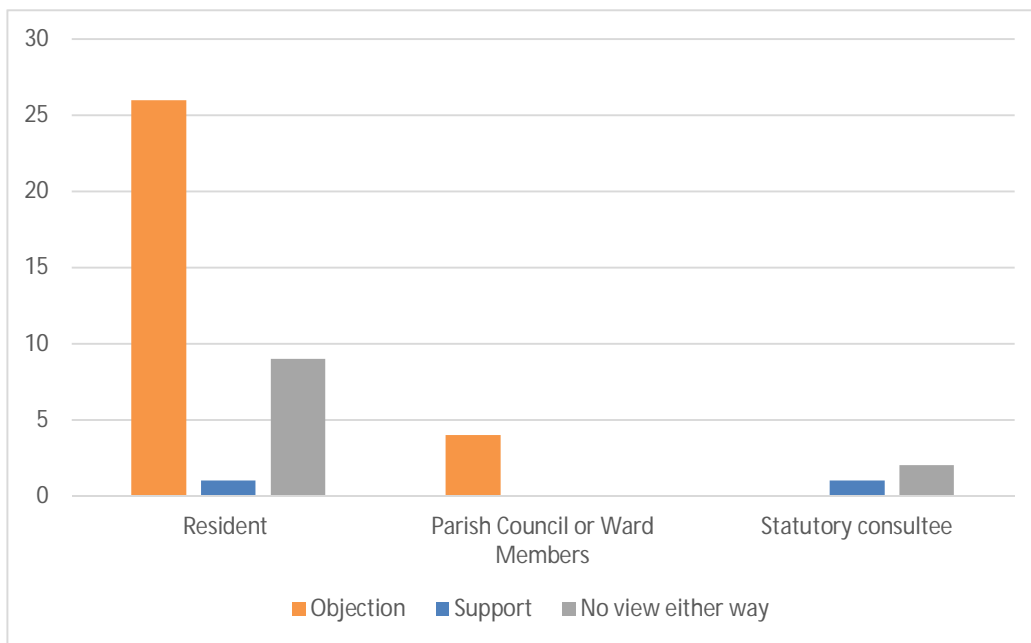
3.20 This policy states how a steady and adequate supply of locally extracted sand and gravel will be provided, through; extraction of remaining reserves at permitted sites, extensions to sites, allocation of sites and proposals for new sites.

3.21 This policy proposal generated a higher response from both individuals and organisations compared to earlier proposals. Out of 85 responses in total made to the proposal, 62 came from individuals and 23 came from organisations.

3.22 The most contentious issues under this policy proposal were in regard to the proposed site allocations of Bridge Farm and Ham Island. Most of the objections fell under the proposals 'not meeting the test of soundness', with 71 respondents selecting this as the reason for their opposition. The figures below demonstrate the opposition to both sites from individuals and organisations:

### ***Ham Island, Old Windsor***

Figure 5: Representations on Ham Island by respondent group

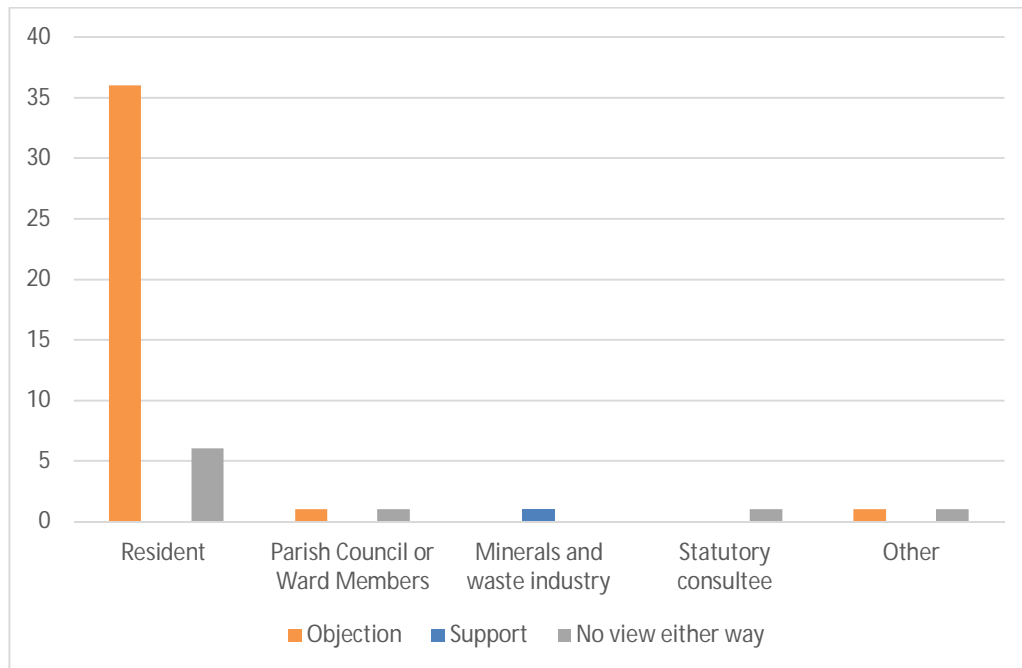


3.23 Some of the reasons for objecting to Ham Island under this policy proposal are:

- Flooding
- Destruction of habitats, wildlife and damage to historical assets
- Pollution (noise, dust and barge)
- Traffic implications (including HGVs using the surrounding roads which some saw as inappropriate for larger vehicles)
- Nearby sewage treatment works have not been considered in full

## Bridge Farm, Arborfield

Figure 6: Representations on Bridge Farm by respondent group



3.24 Some of the reasons for objecting to Bridge Farm under this policy proposal are:

- Traffic implications (including HGVs using the surrounding roads which some saw as inappropriate for larger vehicles), particularly in combination with the traffic from proposed other developments
- Concern about the detrimental impacts the site would have upon local wildlife and habitats, the health and wellbeing of local residents, visual impacts and pollution (noise, dust, air quality)
- Specific concern regarding impacts on local school and cumulative impact of the developments in the wider area.
- Bridge Farm is not listed as a preferred area in the Replacement Minerals Local Plan, and was previously rejected as a suitable area for gravel extraction in 1992
- Authorities are not complying with their duty of care responsibilities by putting Bridge Farm forward as a proposed site allocation despite its significant impacts.

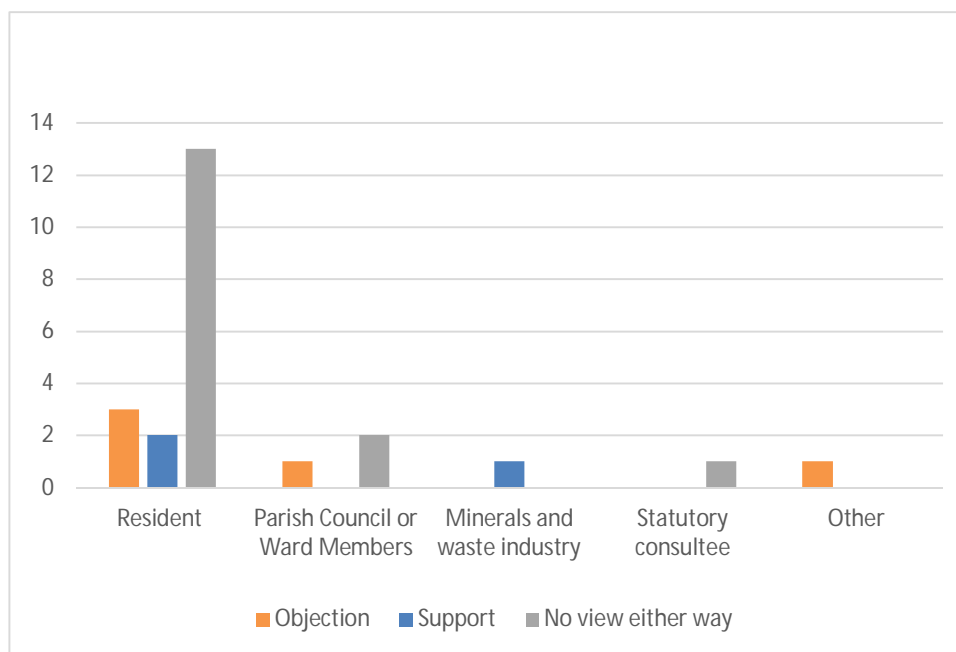
## Bridge Farm planning application

3.25 A number of queries were received about a planning application at Bridge Farm (ref 170433)<sup>16</sup> which falls under the remit of Wokingham Borough Council. Although Bridge Farm is also one of the proposed site allocations within the Draft Plan, this is and will remain separate to the Bridge Farm planning application. The application of the Bridge Farm site is being determined based on the adopted Berkshire Minerals Plan. As the Joint Minerals and Waste Plan progresses it will be a material consideration in decision making.

3.26 Whilst there was some support for policy proposal M4 in regard to the proposed extraction of remaining reserves at the following permitted sites, in all cases but one, there were more objections than supporting comments.

## Horton Brook Quarry, Horton

Figure 7: Representations on Horton Brook Quarry by respondent group



3.27 The opposition to Horton Brook Quarry centred on the traffic and particularly HGV impacts that could result if the site were to be permitted.

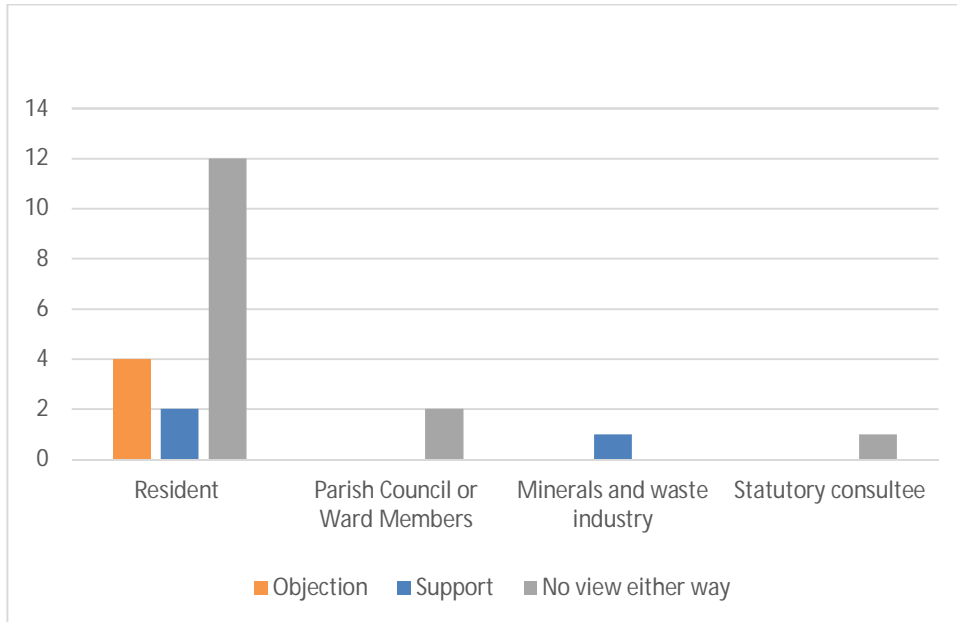
<sup>16</sup>

<http://planning.wokingham.gov.uk/FastWebPL/detail.asp?AltRef=170433&ApplicationNumber=170433&AddressPrefix=&Postcode=&KeywordSearch=&Submit=Search>



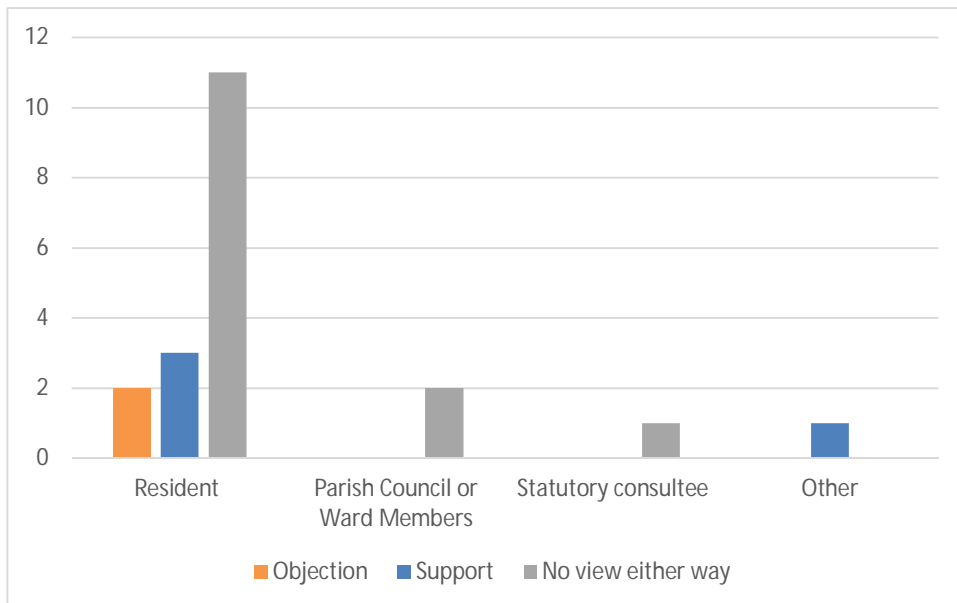
**Datchet Quarry / Riding Court Farm, Datchet**

Figure 8: Representations on Datchet Quarry / Riding Court Farm by respondent group



**Sheephouse Farm, Maidenhead**

Figure 9: Representations on Sheephouse Farm by respondent group



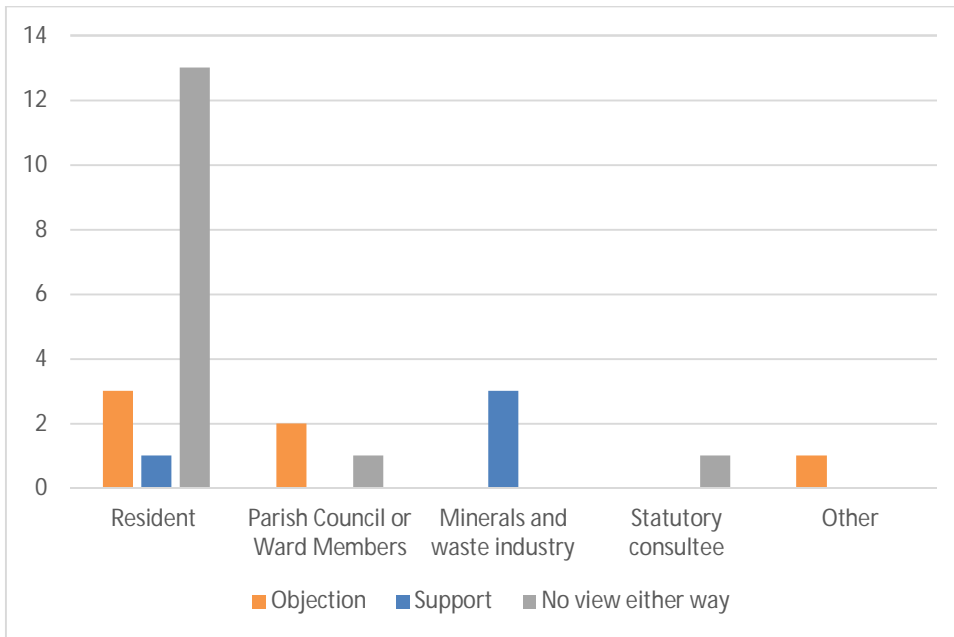
3.28 Contrary to all the other sites that fall under the remit of proposed policy M4, the Sheephouse Farm site received more support than opposition with four representations (20%) supporting the existing site, compared to two (10%)

objections. It is acknowledged this site received a lower number of responses than many other proposed sites. Support for this site has come from both individuals and organisations.

3.29 Representations made on the remaining sites can be seen in the figures below.

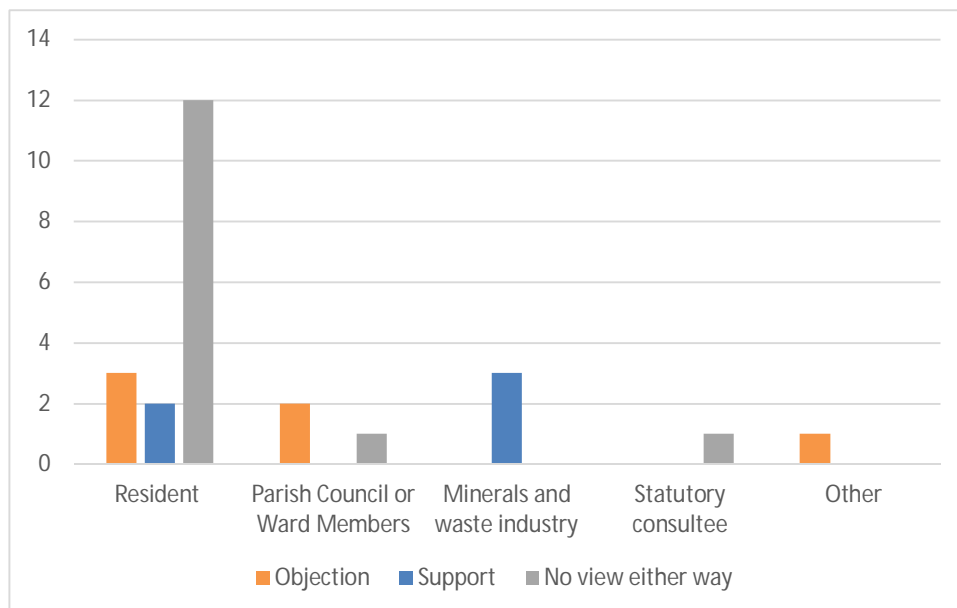
***Poyle Quarry, Horton***

Figure 10: Representations on Poyle Quarry by respondent group



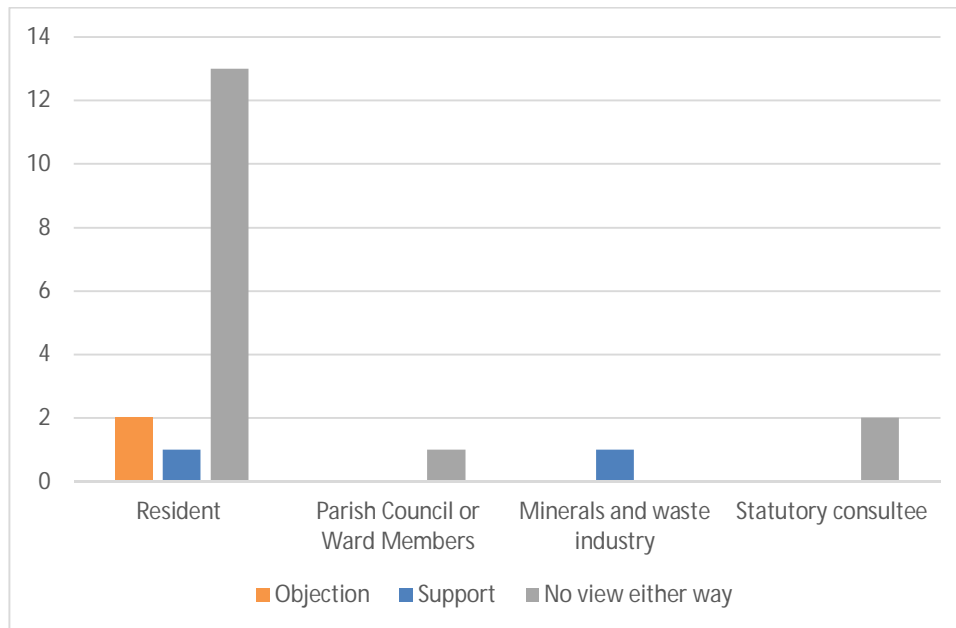
***Poyle Quarry extension, Horton***

Figure 11: Representations on Poyle Quarry extension by respondent group



## **Water Oakley, Holyport**

Figure 12: Representations on Water Oakley by respondent group



### **Summary of responses to sites under Policy M4**

#### *Minerals and waste industry*

3.30 Of all the sites under Policy M4, Poyle Quarry and Poyle Quarry extension received the most support from minerals and waste industry.

3.31 Meanwhile, no explicit representation was made on Ham Island and Sheephouse Farm from minerals and waste industry.

#### *Residents*

3.32 Of all the sites under M4, residents were most opposed to Bridge Farm (86%), followed by Ham Island (72%). Similarly, Parish councils submitted the most objections to Ham Island, over any other site proposed under Policy M4.

#### *Statutory consultees*

3.33 Statutory consultees' representations fell under 'no view either way' on most of the sites under Policy M4. This likely reflects the fact that their suitability depends on policy wording amendments / further testing or mitigation, in order to ensure sites do not negatively affect the relevant sensitive receptors.

- 3.34 The Environment Agency (EA) stated that some of the proposed site allocations need to be sequentially tested as they are located within flood zones two and three. As the EA deemed this information to be missing from the Draft Plan, they considered it unsound at this stage because it was not consistent with paragraphs 157 and 158 of the NPPF<sup>1</sup>.
- 3.35 Historic England (HE) raised concerns that policy M4 fails to reference and / or work to safeguard the natural, built and historic environment. HE also suggested Policy M4 should include the need for development proposals (for the proposed allocated sites) to take into account the site-specific considerations listed in Appendix A.
- 3.36 Ham Island was the only site to receive some explicit support (33%) from a statutory consultee (Thames Water). However, this comment was subject to the proposal not negatively impacting the operation of the Sewage Treatment Works or the archaeological interest of the site.
- 3.37 Additionally, West Berkshire Council stated their objections and raised concerns in general regarding some of the proposed sand and gravel sites in the draft Plan since they have also been proposed as possible borrow pits for the expansion of Heathrow Airport. As a result, West Berkshire Council question whether the sites will be available to meet the total mineral requirement in Central and Eastern Berkshire during the Plan period.
- 3.38 Of all the organisations under 'other', only Sheephouse Farm was explicitly supported. However, this is an existing site rather than a new proposal.

#### **Policy M5 Supply of recycled and secondary aggregates**

- 3.39 This policy is about supporting the production of recycled and secondary aggregates in appropriate locations in order to encourage investment and infrastructure to maximise the availability of alternatives to local land-won sand and gravel.
- 3.40 11 responses were received for this proposal. Over half (six responses or 60%) opposed it, with one response (10%) of support and three responses (30%) stating no view either way. The majority of the objections were lodged under the proposal not meeting the Tests of Soundness, with five individuals and one organisation selecting this option, compared with just two individuals deeming the proposal to be non-compliant with legal requirements / duty to cooperate.

3.41 The main reasons for this objection are:

- The Plan states Central and Eastern Berkshire does not produce recycled and secondary aggregate, but Annex two includes aggregate recovery sites – this has caused some confusion
- Uncertainty about how current site capacities relate to the activity of a site

3.42 However, support of the proposal was also provided. One respondent stated the approach in the policy was a sustainable one in terms of sand and gravel workings. The recycling of aggregate(s) at quarry sites enables recycled and primary aggregates to be blended which allows the primary resource to be retained for higher end use such as construction.

### **Policy M6 Chalk and clay**

3.43 This policy details the circumstances under which proposals for extraction of chalk and clay to meet local demand will be supported.

3.44 Exactly half the number of responses (six) to this policy proposal were in opposition to it, with four responses supporting the policy and two responses stating no view either way.

3.45 There was an even split as to whether respondents considered policy changes would be required, with five stating yes and five stating no. A selection of proposed changes to the policy are detailed below:

- In addition to the requirements set out in the policy, the upper and lower ground pathways from sites to the river would need to be assessed to make sure there are appropriate mitigation measures in place. This information would help in ensuring an application is compliant with the waste framework directive objectives to avoid deterioration in status
- Site drainage strategies would help to classify what is proposed for foul, trade and surface water and should be included in any application

### **Policy M7 Aggregate wharves and rail depots**

3.46 This policy details the circumstances under which proposals for aggregate wharves or rail depots will be supported.

3.47 The questions in the consultation for this policy proposal were split to capture opinions on specific elements of the proposal, from the proposed site allocation to the connectivity options available for the site. The proposal generated 13 responses in total: seven responses from individuals and six coming from organisations.

3.48 Monkey Island Wharf, Bray, is the only site that falls within this policy. There was no support for this proposed site from residents – most responses stated they had no view either way, and a small percentage (25%) of individuals objected to the proposal. Organisational responses presented a different pattern with 40% of responses offering support of the policy and 20% objecting. Limited additional (relevant) information was provided when asked to elaborate on reasons for objecting to policy M7.

3.49 The next section of the policy asked whether respondents would like to see changes made to the policy. This generated responses from both individuals and organisations. Only organisations set out suggested changes to the policy, including:

- Further information should be included, detailing what will feature in the hydrogeological studies and copies of these reports once completed for any sites where planning is submitted
- The sequential test needs to be applied to development within Flood zones two and three
- The River Cut needs to be added to the text in the ecology and water environment sections
- Definition of appropriate needs to be applied and further recognition of the DM policies should be included, for example policy DM11 is referenced, but DM10 has been missed out and should be added

### **Policy M8 Safeguarding minerals infrastructure**

3.50 This policy details the types of minerals infrastructure that will be safeguarded for their on-going use and safeguarded against development that would prejudice its operation. It also states the circumstances under which non-minerals development that might result in the permanent loss of a facility may be permitted.

3.51 This proposal did not generate a high response, since it had just seven responses submitted. Over half the respondents (four) objected to the policy and the remaining three responses stated no view either way. Of the responses received, 100% of the organisations who responded stated they had no view either way, compared with 67% of the individual responses objecting. There were very few objections where further detail was provided, but a sample is:

- It is inappropriate that mineral rights granted decades ago are exploited now for commercial reasons.

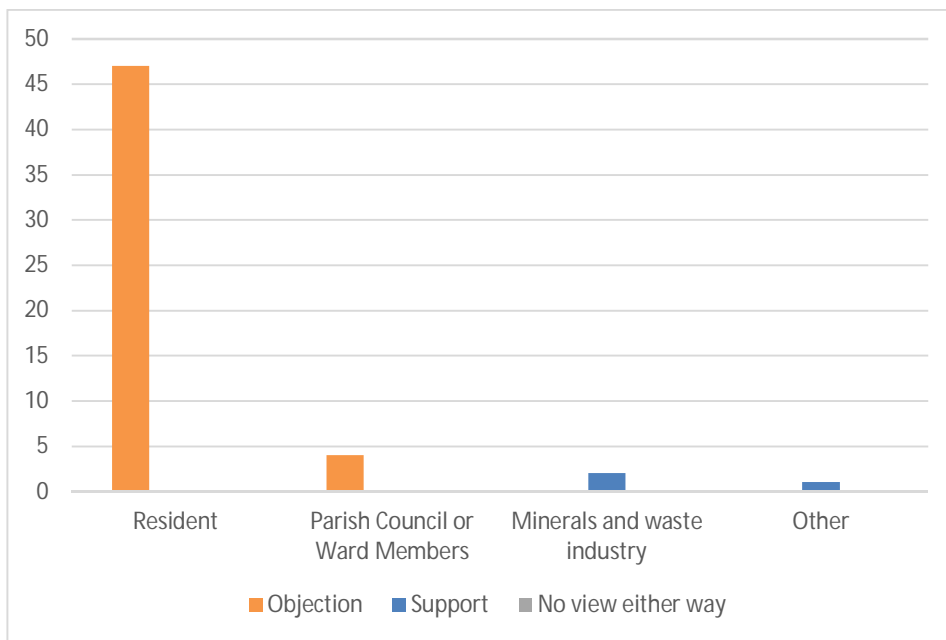
### **Policy W1 Sustainable waste development**

3.52 This policy is about providing and / or facilitating sustainable management of waste for Central and Eastern Berkshire, through: delivering the identified waste management capacity requirement, adhering to the waste hierarchy, locating sites

close to the sources or markets for waste, sharing infrastructure, working with other authorities and being compliant with the spatial strategy for waste development (Policy W4).

3.53 This policy proposal generated a higher response from both individuals and organisations compared to earlier proposals. Out of 57 responses in total made to this proposal, 48 (84%) came from individuals and 9 (16%) came from organisations.

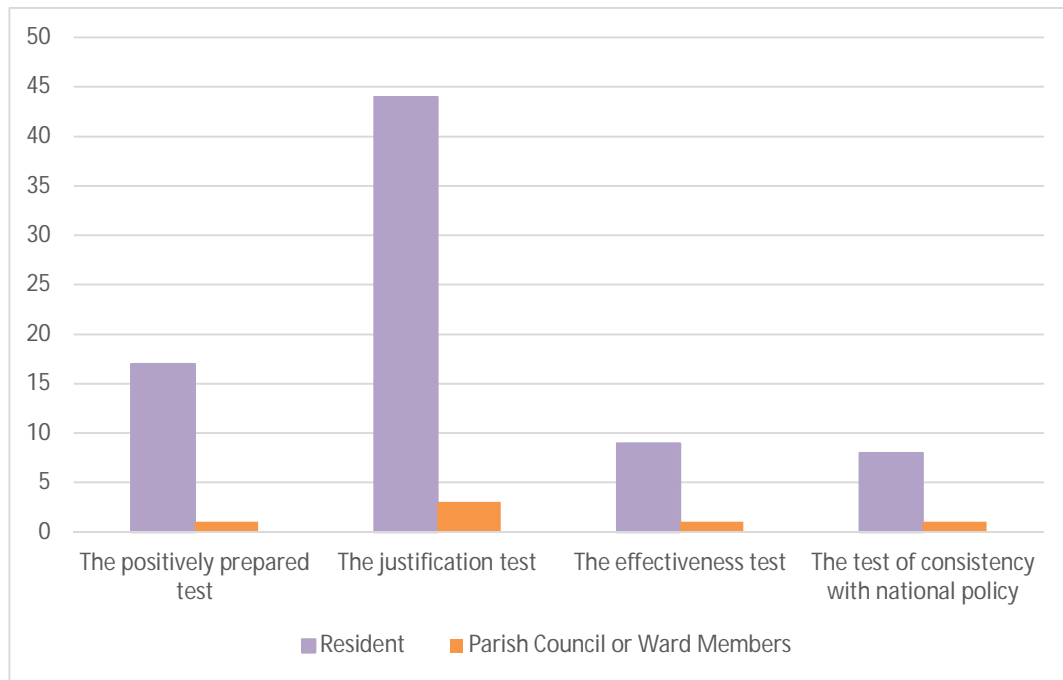
Figure 13: Representations on Policy W1 by respondent group



3.54 The majority of the responses were opposed to the policy with 100% of individual responses objecting, and 63% of organisations objecting. Eight Individual responses stated the policy was not complying with legal requirements / duty to cooperate, whilst 46 individuals and five organisations claimed the policy was not meeting the test of soundness.

3.55 Respondents were further asked (if they had selected the Policy as not meeting the test of soundness), what aspect(s) did they feel it failed. The following chart displays the responses (it should be noted, respondents could select up to four options). The figures denote the number of responses (and are not percentages):

Figure 14: How Policy W1 failed to meet the test of soundness



3.56 The most contentious issues under this policy proposal were in regard to the proposed site allocation of Star Works at Knowl Hill. A large number of the concerns related to the pollution, noise, pests, health & safety and vehicles movements generated as a result of the Star Works site and the continued (negative) effect it could have on the local community should the site continue to operate. Responses stated that due to the aforementioned issues, the allocation of Star Works was contrary to Policy W1 as it was not sustainable, though the principles of Policy W1 themselves were supported.

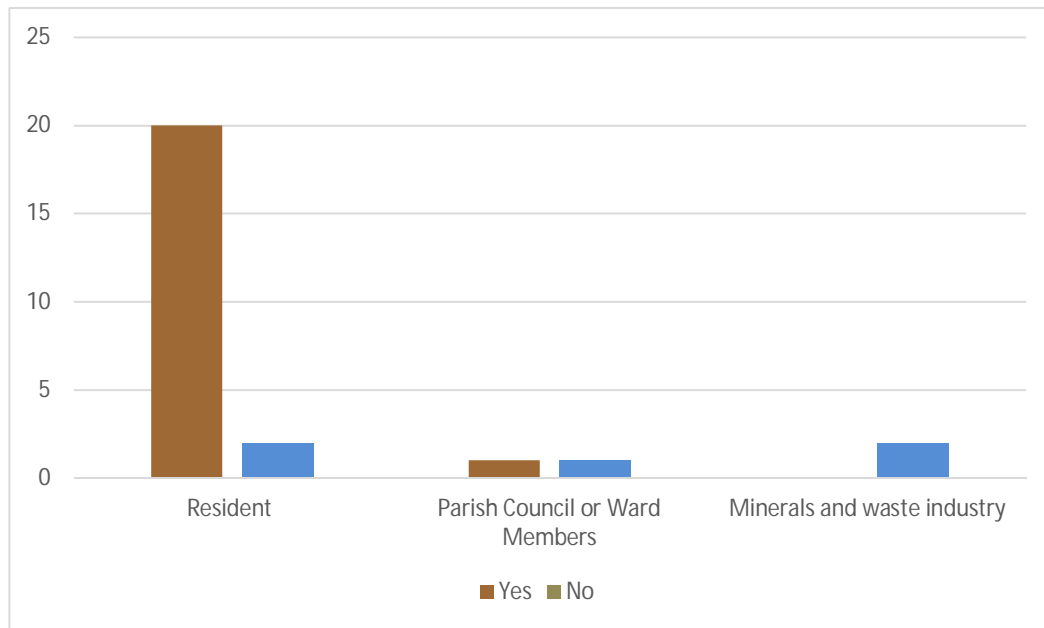
3.57 The policy did receive some support since it was believed it had been written in line with national guidance, particularly the National Planning Policy for Waste (NPPW)<sup>17</sup>.

3.58 The following chart illustrates how many respondents wanted to see a change(s) made to Policy W1:

<sup>17</sup> <https://www.gov.uk/government/publications/national-planning-policy-for-waste>



Figure 15: Respondents seeking changes to Policy W1



3.59 A selection of the proposed changes to Policy W1 are as follows:

- Removal of Star Works as a proposed site allocation; an alternative location sought.
- The Draft Plan states the Central & Eastern Berkshire Authorities will plan to provide for new waste management facilities. However, the word 'provide' could be misleading as the Plan fails to identify all sites needed to meet the waste management facility needs...another word needs to replace 'provide'.
- Waste should not be buried – there is a need for more incineration and better recycling facilities.

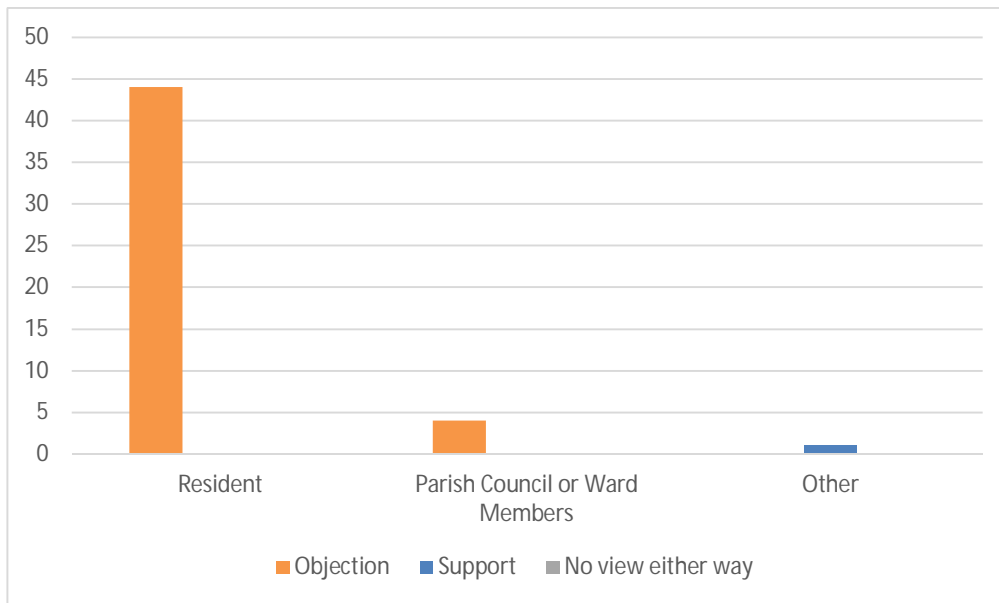
### Policy W2 Safeguarding of waste management facilities

3.60 This policy states that all waste management facilities and those that provide a temporary specialist function will be safeguarded, as well as automatically safeguarding new sites. It also outlines the circumstances under which non-waste development that might result in the loss of waste management capacity may be permitted.

3.61 This policy proposal was another popular area of the consultation because it generated 54 responses, with 46 (85%) of those coming from individuals and eight (15%) coming from organisations.

3.62 The following figure demonstrates respondents had strong views about this policy as residents and parish councils wholly objected to the policy. Only one organisation supported it.

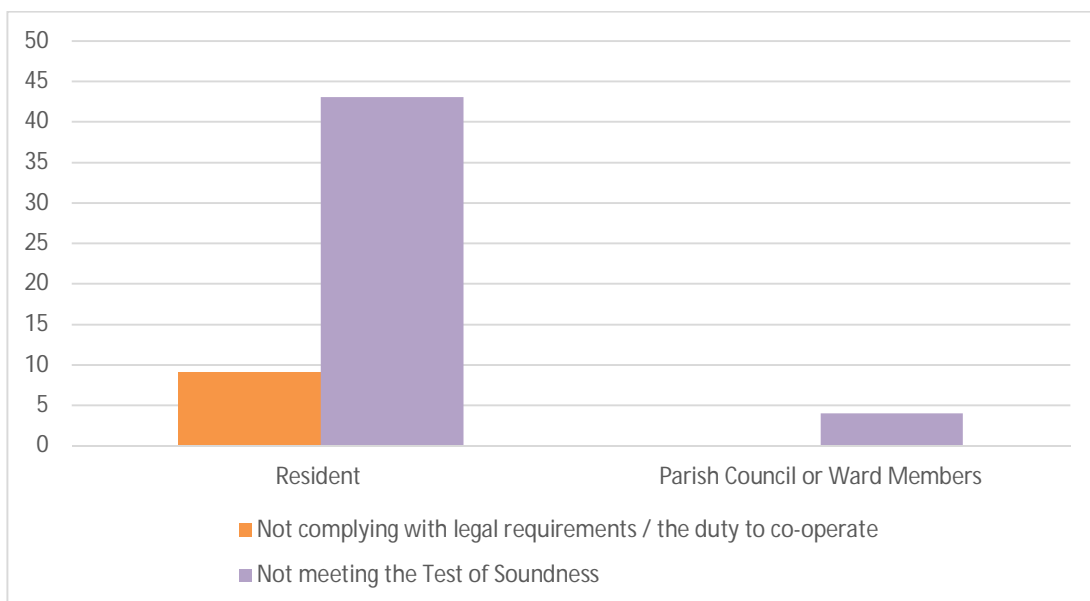
Figure 16: Representations made on Policy W2 by respondent group



3.63 Under this policy proposal, the proposed site allocation of Star Works was frequently referenced. Statements of support agreed with the principles of the proposed policy but stated it was a contradiction that Star Works would then fall under the remit of the policy proposal and be safeguarded. Instead, comments stated the restoration of Star Works should be honoured. If it were to be proposed as a site allocation, it should be approached as a new site and not benefit from safeguarding under proposed policy W2.

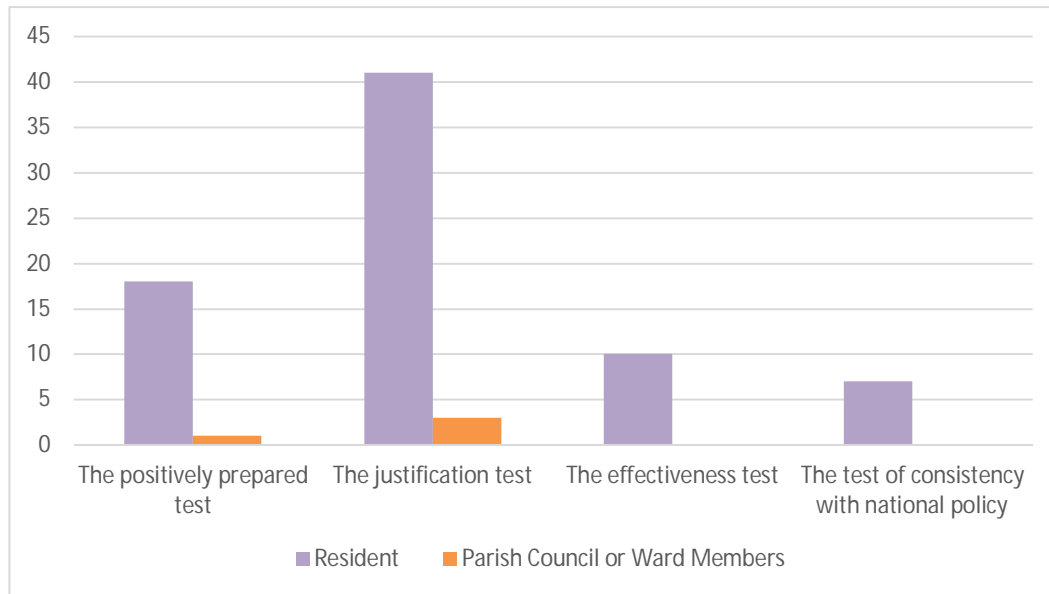
3.64 The following figure demonstrates how residents and organisations categorised their objection(s) to the policy proposal.

Figure 17: How individuals and organisations categorised their objections



3.65 Further to the above figure, those who had selected the policy as not meeting the test of soundness were asked what Tests of Soundness they thought the policy failed. The following figure demonstrates how responses were categorised under this question.

Figure 18: Policy 2: Failing which aspect of the Tests of Soundness



3.66 Regular opposition: a number of comments regarding this policy proposal highlighted opposition to the allocation of Star Works at Knowl Hill. Some responded it was not justified for the site to be ‘automatically safeguarded’ through policy W2 due to the pressure that would be placed on the surrounding area. Many residents voiced concerns that that safeguarding of waste facilities could encourage landfill or other waste development in one place. Specifically, for Star Works, there was concern that safeguarding waste development would have a detrimental impact on nearby recreational activities, including local walking routes.

3.67 A large proportion of respondents stated they would like to see changes to policy proposal W2: 21 individuals and four organisations requested changes, compared with only one individual and one organisation recording they would not like to see changes made to the policy.

3.68 The main proposed changes to Policy W2 are as follows:

- The policy should allow the removal of waste management facilities when environmental impacts are at unacceptable levels. The following change was recommended for the initial paragraph of the policy: *“All waste management facilities and those which provide a temporary specialist function shall be safeguarded from encroachment or loss to other forms of development, except where there would be environmental benefits from the loss of such a facility,*

*including the alleviation of undesirable impacts on residential amenity such as those arising from noise, odour, pests/vermin and vehicle movements.”*

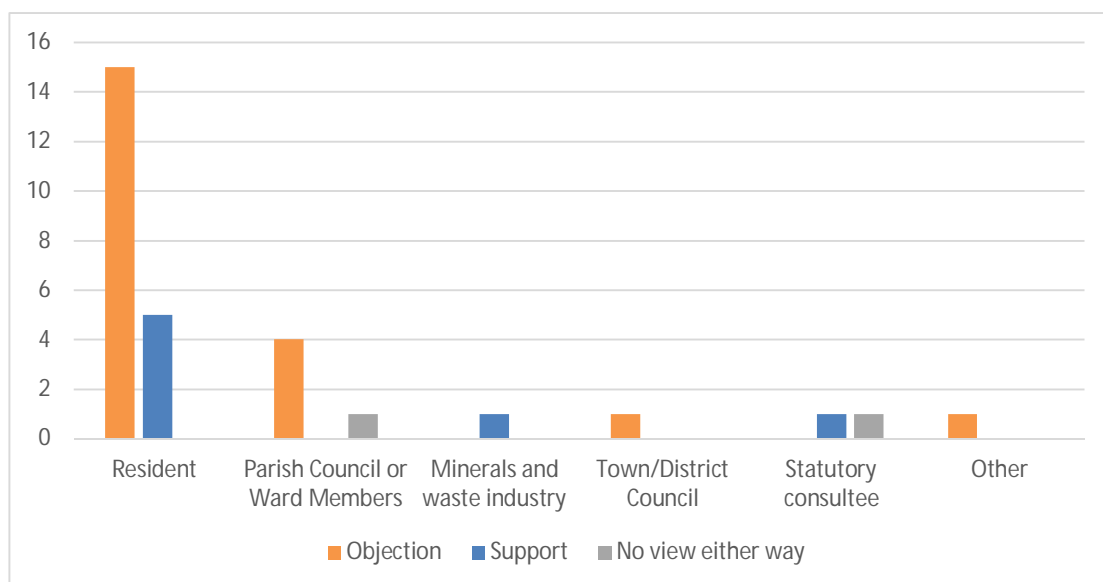
- Individual sites should not be safeguarded. Instead, the suitability of a site should be judged against the ‘Site Assessment Criteria’ and these assessments should apply to both proposed and existing sites
- Further clarity required of the term “*specialist temporary facilities*” – how is “*specialist*” determined?
- Existing waste sites should not automatically be safeguarded from other development
- Further detail is needed on what makes up the capacity requirements. The policy does not provide information on how the capacity of an existing site is to be calculated or how this capacity could be redistributed within the Plan area. This additional information, if added to the policy, would make it more effective

### Policy W3 Waste capacity requirements

3.69 This policy sets out the waste capacity requirements within the Plan area for each waste stream.

3.70 This policy proposal generated reasonable interest as 33 responses were received in total. 22 of those responses came from individuals and 11 came from organisations. Just under three quarters of the responses objected to the policy, and almost a quarter supported it. The remaining responses were logged under no view either way.

Figure 19: Representations made on Policy W3 by respondent group



3.71 A higher percentage of the individual responses (75%) objected to the policy compared with the objections from organisations (which came in at 60%). Similar to other policy proposals, the majority of the objections were categorised under not

meeting the Tests of Soundness. A selection of the comments received under the objection category are as follows:

- If the requirements for inert recycling is combined with recovery capacity, it may not be promoting the management of waste in line with the waste hierarchy
- Concern raised that there will be an increase in the material to be handled at Planners Farm. Therefore, assurance is sought that there will be no further increase in current licence conditions regarding the tonnage handled, without a full public consultation on the issue
- The policy is expressed as a minimum requirement since the capacity requirements provided assume the continuation of existing recovery capacity after 2030. However, there are discrepancies with the identified 278,000 tonnes per annum (tpa) of non-hazardous waste management capacity as it does not meet the capacity need of -291,881 tpa for non-hazardous waste (as set out in the Waste Background Study). If 278,000 tpa were the minimum capacity requirement, then a gap of 13,881 tpa could still exist

3.72 Examples of the comments received in support of the policy are as follows:

- The policy is supported in principle because it recognises and supports the provision of additional sewage sludge treatment capacity. However, for clarity it is considered that Policy W3 should specifically refer to “sewage” sludge
- The Draft Plan refers to infill of material being used in restoration. This is an acceptable form, in which to meet waste capacity requirements and there are numerous sites within the Plan area that could provide suitable locations for new waste facilities requiring restoration which could be facilitated by landfill

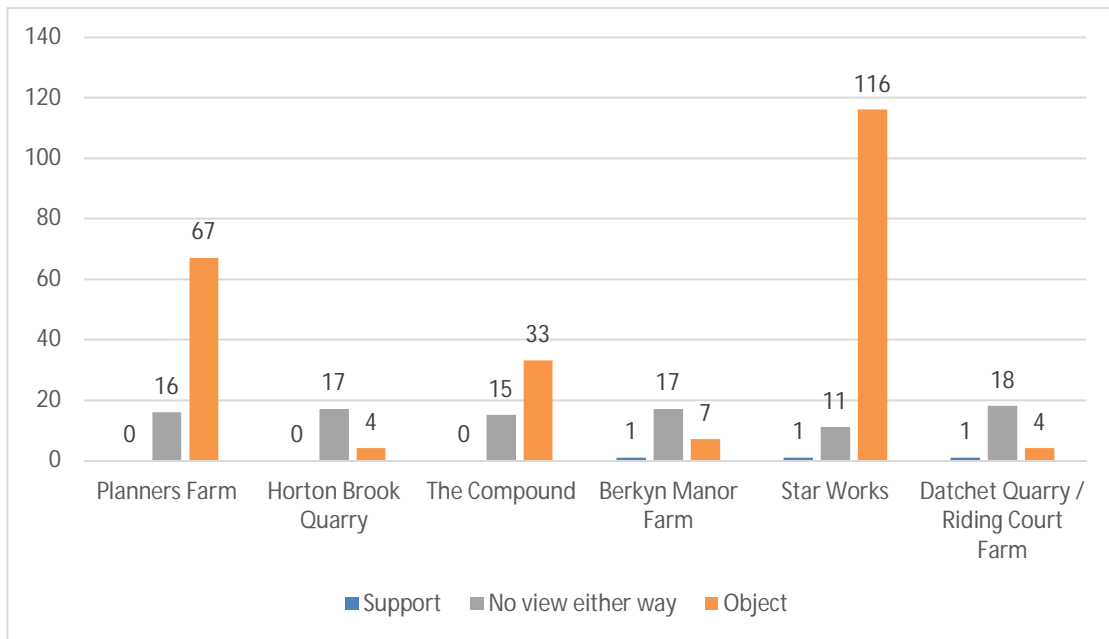
#### **Policy W4 Locations and sites for waste management**

3.73 This policy states the delivery of waste management infrastructure will be supported within the proposed allocated sites. The policy also describes the criteria that would constitute other appropriate locations where waste management infrastructure will be supported.

3.74 This policy received the highest number of responses for section one of the consultation. It generated 227 responses (or 73% of respondents commenting on this policy), with 196 responses from individuals and 31 responses from organisations. Responses were submitted in relation to the six proposed waste sites: Planners Farm, Horton Brook Quarry, The Compound, Berkyn Manor Farm, Star Works and Datchet Quarry / Riding Court Farm.

3.75 The following chart demonstrates how opinions were skewed towards ‘object’ on the six proposed site allocations:

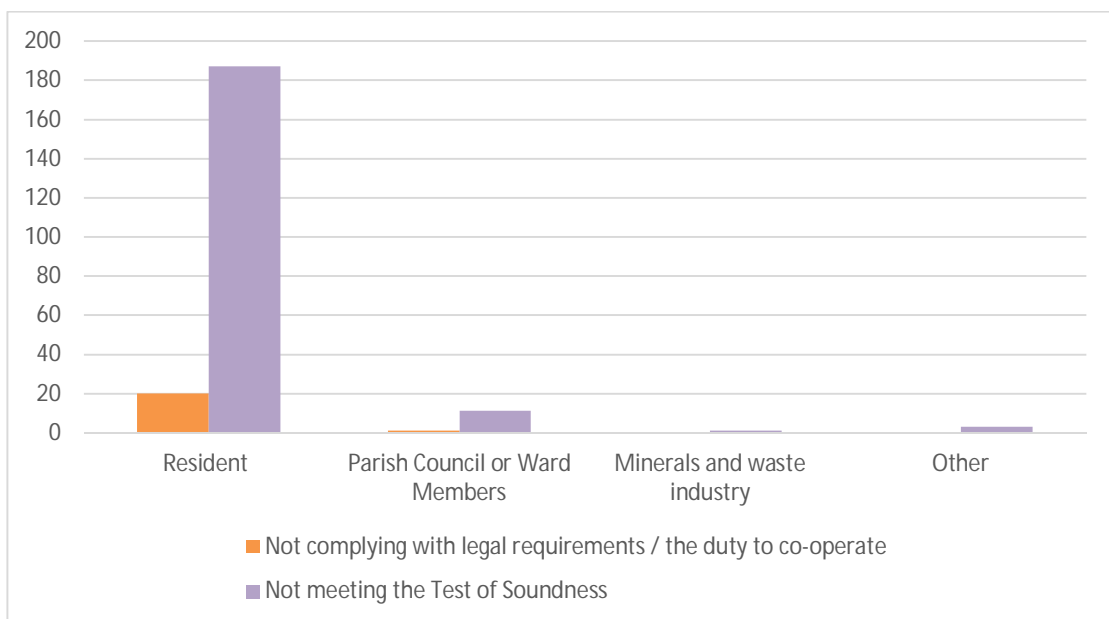
Figure 20: Representations made on each waste site under Policy W4.



3.76 The chart shows the level of opposition for Star Works, Planners Farm and The Compound. Whereas, Horton Brook Quarry, Berkyn Manor Farm and Datchet Quarry / Riding Court received more responses under ‘no view either way.’

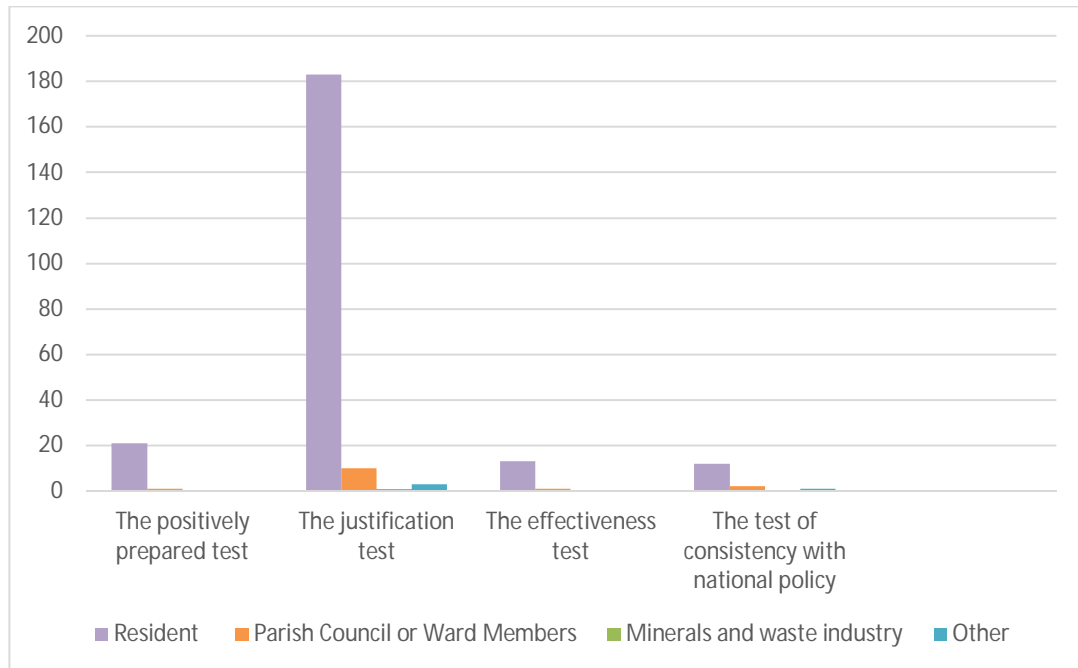
3.77 The following chart demonstrates how respondents categorised their objection(s) to the policy proposal.

Figure 21: How respondents categorised their objections



3.78 Figure 21 shows that a large proportion of those who answered this question considered that the policy does not meet the Tests of Soundness. The respondents who selected this as their reason for objecting were then asked to describe how the policy failed to meet the Tests of Soundness. The following graph displays the results:

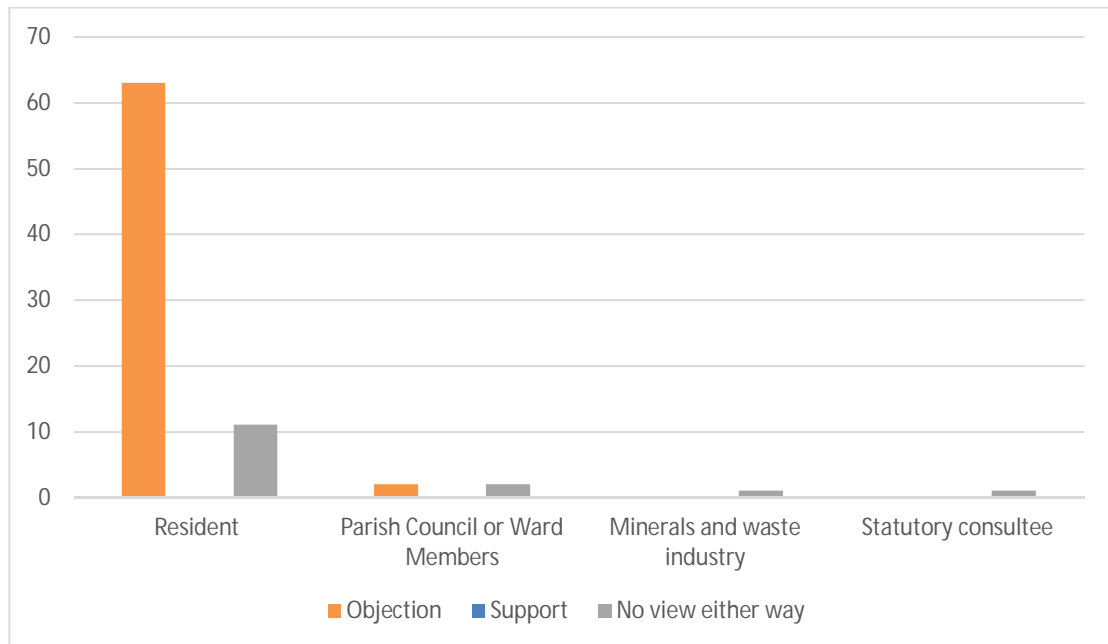
Figure 22: Policy W4: How the Tests of Soundness had not been met



3.79 A large number of comments explaining how and why the policy failed to meet the Tests of Soundness were site specific. Therefore, a selection of comments (detailed below) have been set out under the relevant proposed sites.

## Planners Farm, Brock Hill

Figure 23: Representations on Planners Farm by respondent group



### Respondent differences:

- For Planners Farm, parish councils or ward members were split 50/50 between objection and 'no view either way'. Whereas, the residents' views were significantly opposed.

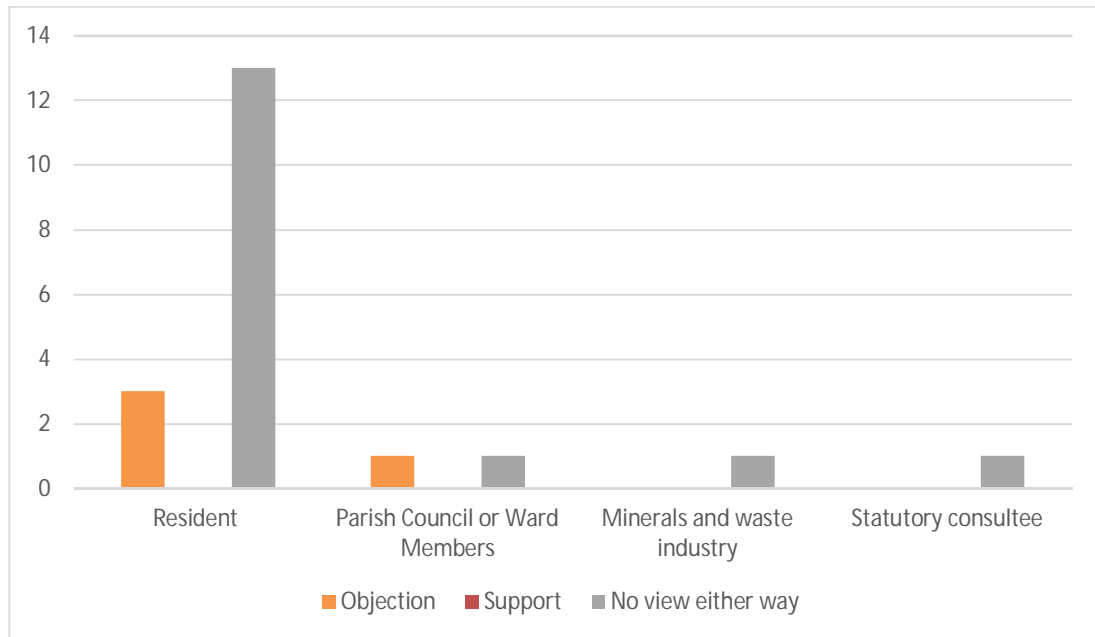
### Comments:

- The preferred entry route for site traffic has been identified as via Braziers Lane. However, existing road signs already dictate this road as being 'Unsuitable for HGVs'.
- Further concerns about the increase in HGV traffic to the wider local area since the existing roads get very busy and cannot cope with the existing volumes of traffic. Concerns about safety (in regard to increased road usage), drivers exceeding speed limits and continued damage to the local road surface were highlighted too
- The site is located close to Conservation Areas which would be detrimentally affected by the potential use of the site and any associated vehicular movements
- Pollution emitted from the site (noise and offensive odours in particular) is unacceptable



### **Horton Brook Quarry, Horton**

Figure 24: Representations made on Horton Brook Quarry (as a waste site) by respondent group



#### **Respondent differences:**

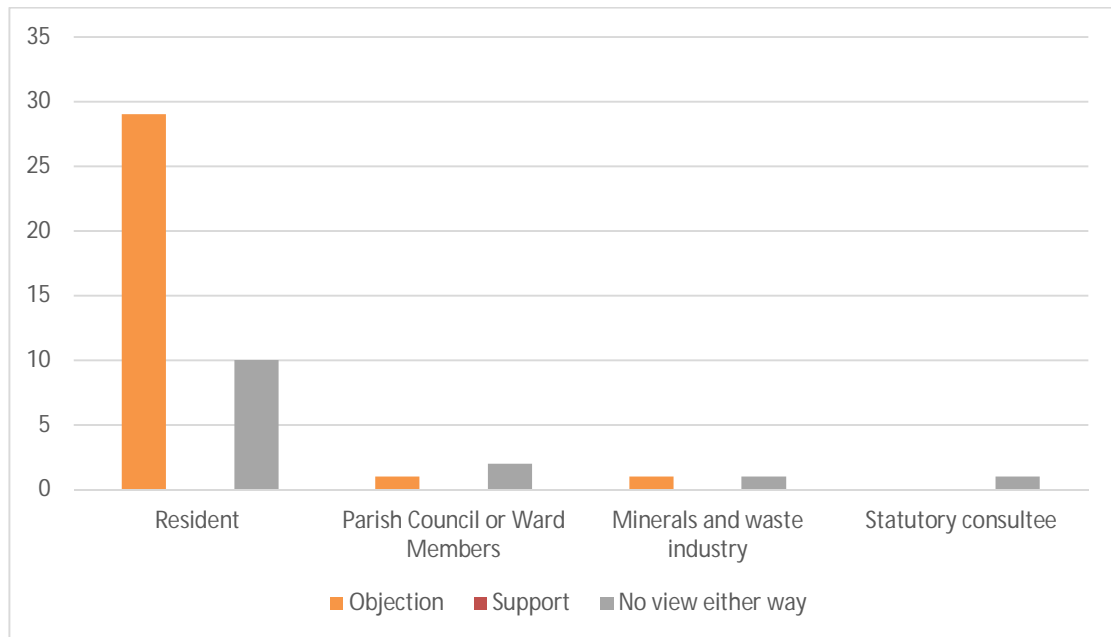
- For Horton Brook Quarry, parish council or ward members were split 50/50 between objection and 'no view either way'. Whereas, the residents' views were largely of 'no view either way'.

#### **Comments:**

- The site was granted permission under agreement that the land would be worked for a limited time and would then be restored to agriculture as soon as the mineral extraction ceased. However, the proposal in the Draft Plan to infill with waste following extraction violates this condition
- Concerns about the increase in HGV traffic generated from this site and the new quarry in Richings Park, and the possible effects on Colnbrook and Brands Hill
- Associated pollution from the site and the general increase in local traffic as a result of the site – air pollution levels have already exceeded legal limits

## The Compound, Pinkneys Green

Figure 25: Representations on The Compound by respondent group



### Respondent differences:

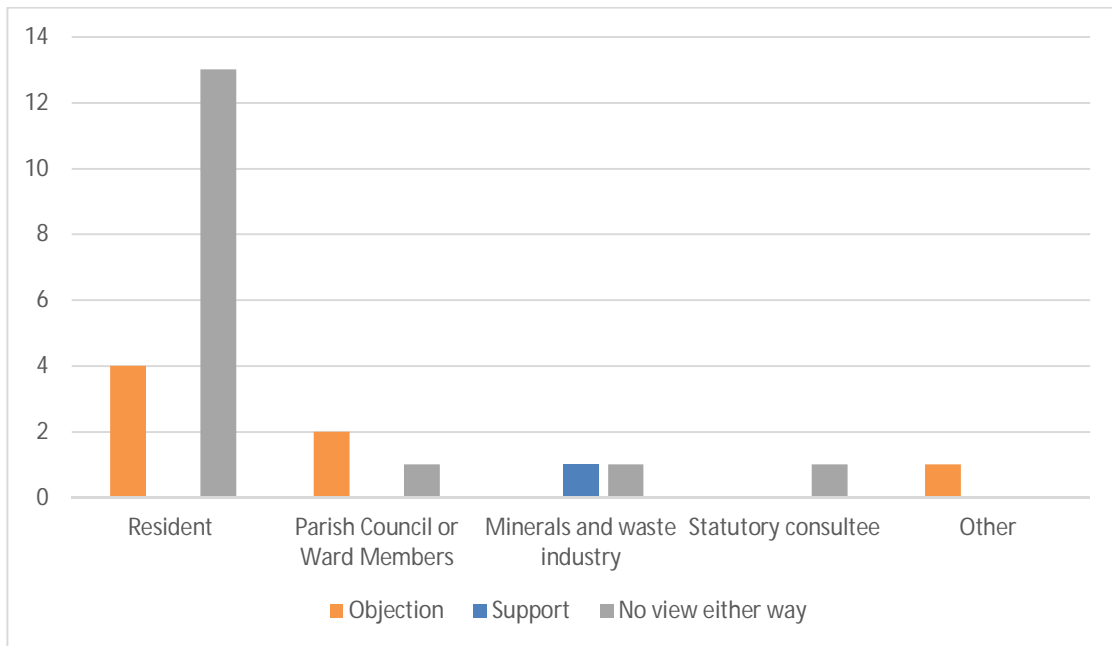
- The Compound, received representations contrary to the general trend and only one third of the parish council or ward members who made a representation on this site objected, the remaining had no view either way.
- 29 individual residents marked they object to the site

### Comments:

- The area is designated as Green Belt
- Traffic and transport concerns related to the increase in HGV movements to and from the site, as well as perceived congestion increases and safety issues
- Pollution emitted from the site (noise, light and odours) having detrimental impacts on residents and the local area
- The site is in close proximity to numerous local wildlife sites which would all be compromised, put under threat and unnecessary pressure should the site progress to development
- There was also a petition submitted, which comprised of a letter detailing the names of 61 local residents objecting to the site. The reasons for objection were the similar to the other respondents who had objected to the site. These included: its location in the green belt, increased traffic and congestion to and from the site and surrounding area, and environmental issues, such as noise, odour and light pollution,

## ***Berkyn Manor Farm, Horton***

Figure 26: Representations on Berkyn Manor Farm by respondent group



### **Respondent differences:**

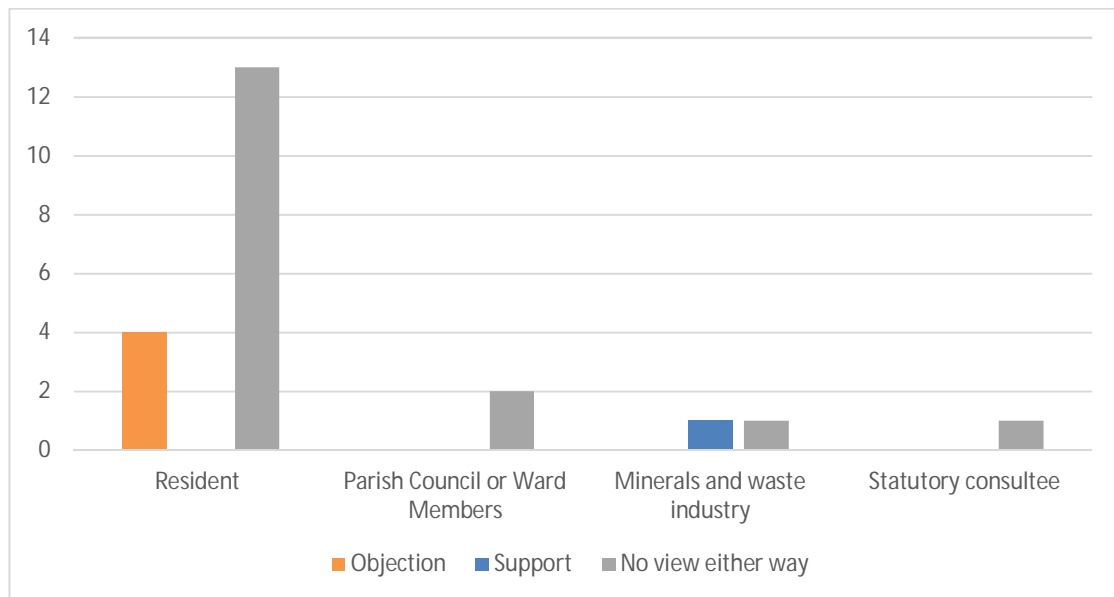
- For Berkyn Manor Farm, contrary to the overall trend, two thirds of the parish councils or ward members who made a representation on this site objected, while residents largely had 'no view either way'.
- Minerals and waste industry were split 50/50 between support and 'no view either way'

### **Comments:**

- Suggested haul routes to the site would increase the traffic passing through the Parish of Colnbrook with Poyle
- Object to the increase in air pollution since the local areas are already subject to poor air quality (levels falling below EU Directive minimum standards)
- The site is in the Colne Valley Regional Park and will cause loss of amenity and openness, which in turn would have detrimental impacts on the quality of life and the local landscapes
- The site would industrialise an area which needs to be enhanced as part of the wider green resource

### **Datchet Quarry / Riding Court Farm, Datchet**

Figure 27: Representations on Datchet Quarry / Riding Court Farm by respondent group



#### **Respondent differences:**

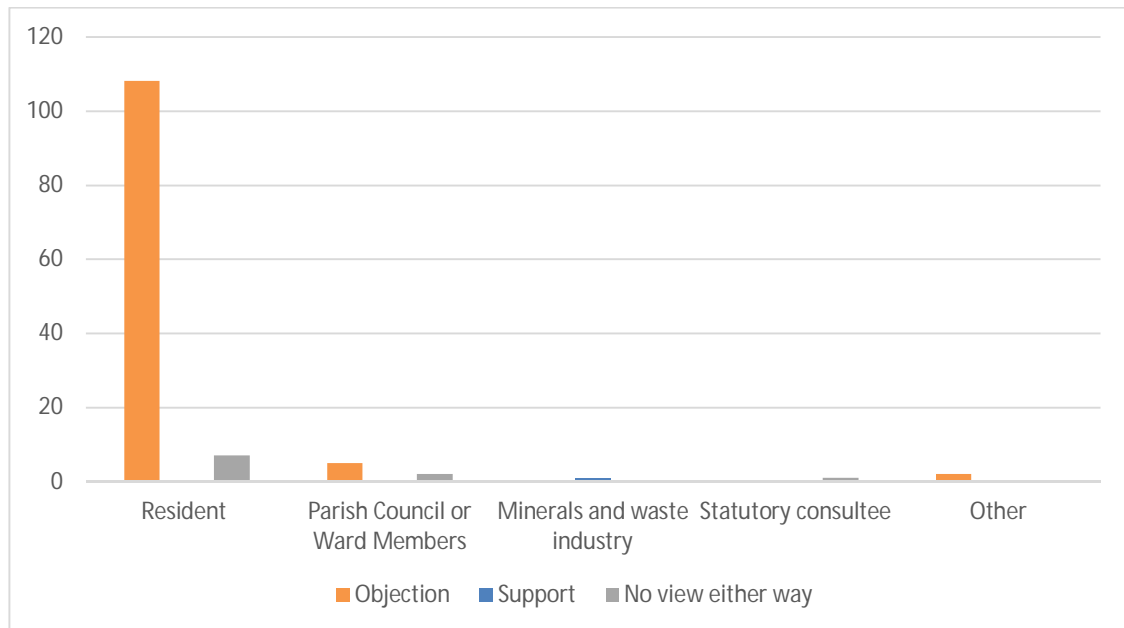
- For Datchet Quarry/Riding Court Farm, the representations of each respondent group mirrored that of the overall trend, except for minerals and waste industry, who were split 50/50 between support and 'no view either way'.

#### **Comments:**

- None provided specifically in relation to this site

## Star Works, Knowl Hill

Figure 28: Representations on Star Works by respondent group



### Respondent differences:

- Star Works received the most objections of any of the proposed sites under the Draft Plan. A number of objections were also made on other sections of the Plan such as delivery strategies, that could have been considered to support the exclusion of the site. For example, several residents commented that the inclusion of Star Works would not contribute positively to the Sustainable Waste Development Strategy or the Protection of Designated Landscape.
- For Star Works, the representations of each respondent group mirrored that of the overall trend, except for:
  - Minerals and waste industry, who were supportive
  - 'Other' organisations, who wholly objected

### Comments:

- A number of comments raised concerns about the proximity of the site to residential properties and the negative impacts that would be caused as a result of continued operations at the site (noise, dust, light and odour pollution)
- Concern raised about the prolonged negative impacts the site would have on protected habitats & species, and designated landscapes located within the area surrounding the site
- Transport concerns raised both in relation to the access road being of inadequate size, causing danger to other motorists and pedestrians; and the wider transport links in the area (particularly the A4) are not sustainable

- 3.80 The following operational points were raised during the consultation:
- An Interim Development Order (IDO) was granted in July 1947 for mineral extraction on land to the north of Star Works subject to conditions.
  - In November 1967, 5 acres of the extracted area was used for waste disposal with the IDO permission area and was accepted and classified as an active site in January 1993.
  - In 1994, planning permission was given for the restoration of the majority of the IDO permission area and Grundon's acquired Star Works and the Quarry, with tile production ceasing.
- 3.81 Residents consider that the historical operation of the site has been below par in terms of working conditions and protecting local amenity and the environment. While the IDO Review (1991) was thought of as an opportunity by residents to impose modern working conditions to protect local amenity and the environment to a far greater degree, the UK Government's view was that the development consent had been the original planning permission and not the review.
- 3.82 There has been a lot of public interest in the above issues over the years and during the Draft Plan consultation, residents heavily commented on their past experiences with the operations at the Star Works site and how their quality of life has been affected.
- 3.83 Specifically, comments strongly focussed on the potential traffic impacts, the current amenity issues caused by the site and the relationship between the site and the adjacent landfill. A sample of the comments is as follows:
- Proximity of the site to residential properties
  - Current planning permission dictates the restoration of the landfill would be complete by 2021 and all site operations would cease at this point
  - Pollution emitted from the site (noise, light, smells, pests) is unacceptable and poorly managed by the site owners. Inadequate site access and surrounding roads for the HGVs entering and leaving the site. Larger roads already at capacity and would not cope with more traffic which would be generated as a result of the site continuing to operate.

## **Summary of responses to sites under Policy W4**

### *Minerals and waste industry*

- 3.84 Of all the sites under Policy W4, Berkyn Manor Farm and Datchet Quarry / Riding Court Farm received the most support from minerals and waste industry. Meanwhile, The Compound was the only site to receive an objection from minerals and waste industry. For all other sites under Policy W4, no explicit representation was made from minerals and waste industry.

### *Residents*

3.85 Residents heavily objected to Planners Farm, The Compound and Star Works, while no explicit representation was made on the remaining sites by this group.

### *Statutory consultees*

3.86 Statutory consultees had no strong views on any of the sites under Policy W4. As with Policy M4, this likely reflects the fact that their suitability depends on policy wording amendments and / or mitigation to ensure sites do not negatively affect the relevant sensitive receptors, as opposed to having no view on the site.

3.87 Nonetheless, Historic England raised concerns that policy W4 does not reference and / or work to safeguard the natural, built and historic environment.

### **Comments of support for Policy W4:**

3.88 There were some comments of support submitted in relation to W4. A selection of these are detailed below:

- Support (in principle) part 2(e) of the policy which identifies land at or adjoining to sewage treatment works to be suitable for waste development enabling the co treatment of sewage sludge along with other wastes
- Support the allocation of Datchet Quarry, Star Works and Berkyn Manor Farm to aid with the delivery of waste management infrastructure across the Plan area
- Support the policy in its aims to ensure sites have adequate transport links and exclude routes that are already dealing with high volumes of traffic and / or are unsuitable for HGVs

### **Request for changes to Policy W4:**

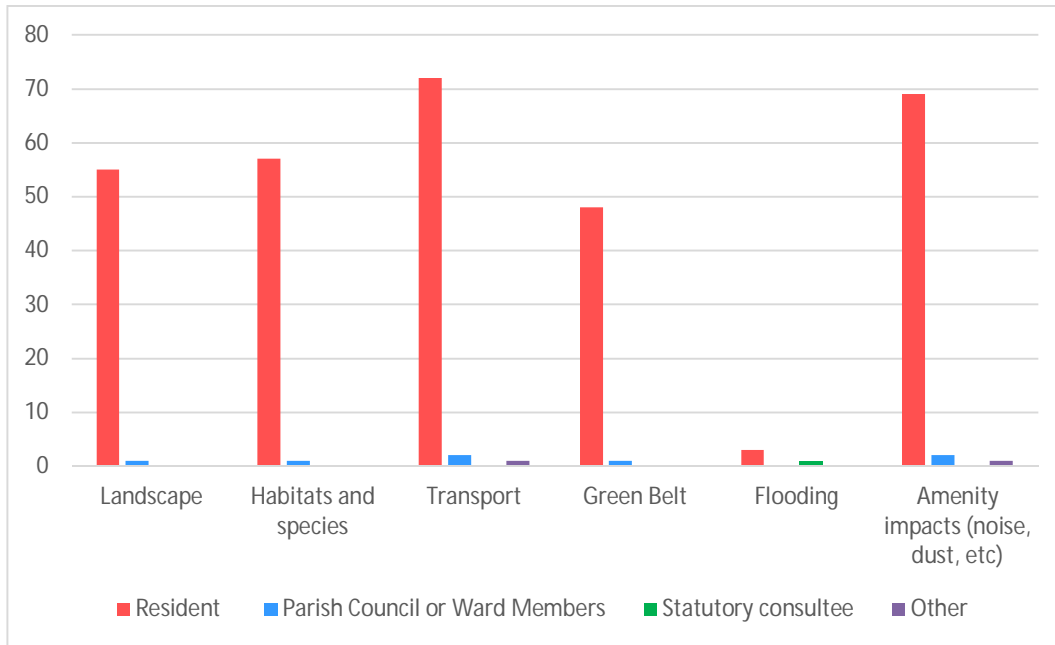
3.89 A large number of respondents indicated they would like to see a change / changes made to policy W4: 132 individuals and 17 organisations responded positively. Compared with 10 individuals and three organisations responding they would not like to see changes made to the policy.

3.90 The consultation went on to ask respondents to identify the issues under which they were seeking a change(s). Figures 29, 30 and 31 indicate responses to this question for the three sites that generated most responses: Star Works, Planners Farm and The Compound. The three other sites have not been included below since they all received very low response rates to this question – a maximum of two responses were received seeking changes and these were from

organisations. Datchet Quarry / Riding Court Farm received no comments to proposed changes to policy W4.

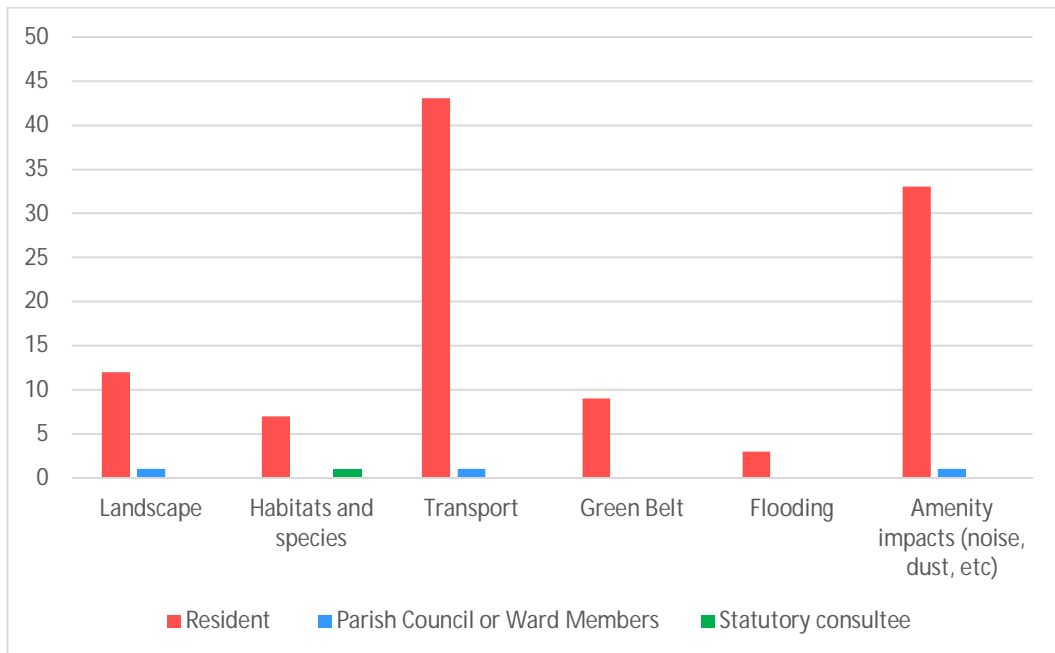
### Star Works, Knowl Hill

Figure 29: Changes sought to Policy W4 (Star Works)



### Planners Farm, Brock Hill

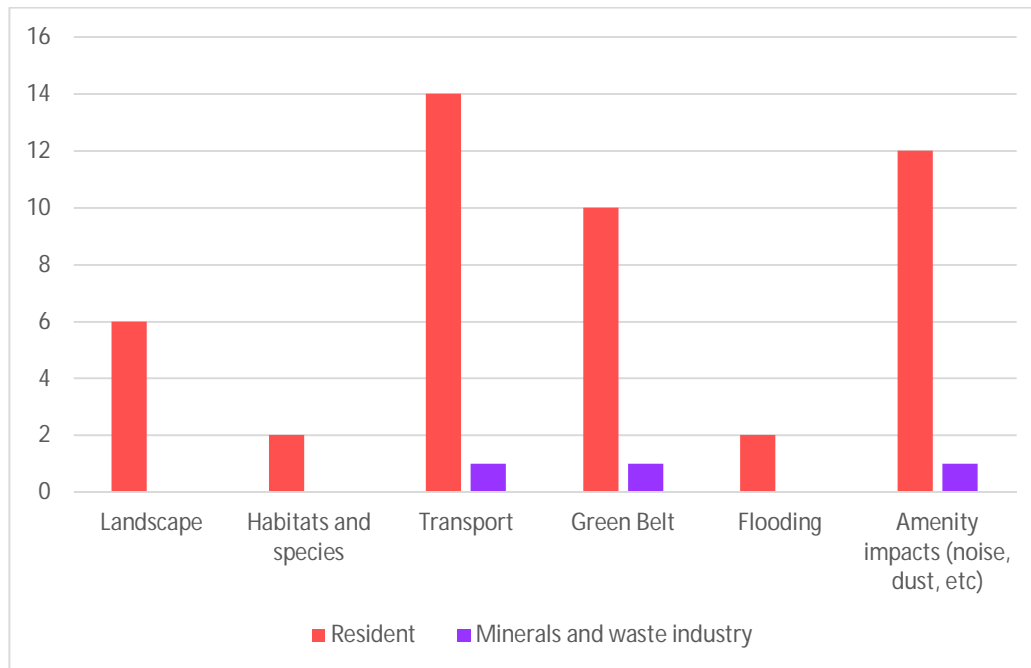
Figure 30: Changes sought to Policy W4 (Planners Farm)





## The Compound, Pinkneys Green

Figure 31: Changes sought to Policy W4 (The Compound)



3.91 These three graphs illustrate that the most popular changes (regardless of the site) sought from both individuals and organisations relate to transport and amenity impacts. Generally, the concerns related to transport were about the roads surrounding the sites. Respondents considered that roads are not of an adequate size particularly for HGVs; are not well maintained; are already struggling to cope with the large volumes of traffic and present a number of safety concerns and health risks. The concerns related to amenity impacts were specifically related to the detrimental impacts on leisure and recreational activities located in close proximity to the sites, as well as the adverse health impacts on local residents (particularly those who suffer from compromised immune systems or have underlying health issues).

3.92 Below outlines the main comments on the proposed / suggested changes to Policy W4:

- West Berkshire Council has suggested further clarity is required on how the proposed site allocations listed in the policy will meet the identified needs for waste management capacity during the Plan period. Associated capacity tonnages have not been included in this policy nor the Waste Background Study (Star Works and Berkyn Manor are exceptions here). This has a knock-on effect of not providing clear information as to what extent the Plan will rely on 'windfall' sites to deliver the waste management capacity needs.
- Further clarity needed on which waste stream(s) the proposed site allocations will manage

- The term ‘active quarry or landfill operation’ needs further clarification – uncertainty as to whether it includes instances where there is active consent but the site has been mothballed. Does it also include the period where restoration soils are being placed and the site is being actively restored or only where the void is being filled and capped?
- Waste management facilities should be located in industrial or brownfield locations in order to minimise the disruption caused by HGVs and increased volumes of traffic on small roads – there is no sustainable vision for increasing the burden on local transport links
- The Government is committed to eliminating landfill, therefore this should be enough of a reason to avoid increasing waste sites which promote landfill
- Recommendation to add the following to the end of paragraph two of draft Policy W4: “*f) would not cause unacceptable levels of impact on the environment as a result of noise, odour, pests/vermin, dust, traffic, pollution, visual impact, or general impacts upon residential amenity.*” Without this sentence, it was argued the Plan would be ineffective in restricting proposed waste management facilities to appropriate locations
- The Environment Agency suggested that an additional sentence to be added to part two of the policy that should say “*The type of waste operation should be appropriate to the sensitivity of the underlying aquifers especially when the site is within a SPZ1 (see position statement F1 of GP3)*”.
- Concerns the existing proposed site allocations identified within the policy would cause (or continue to negatively contribute to) increased pollution (noise, light, odours), unacceptable impacts upon health and safety for local communities and detrimental impacts to the recreational activities located in close proximity to some of the proposed sites. Therefore, suggestions to remove sites (particularly Star Works and Planners Farm) have been put forward

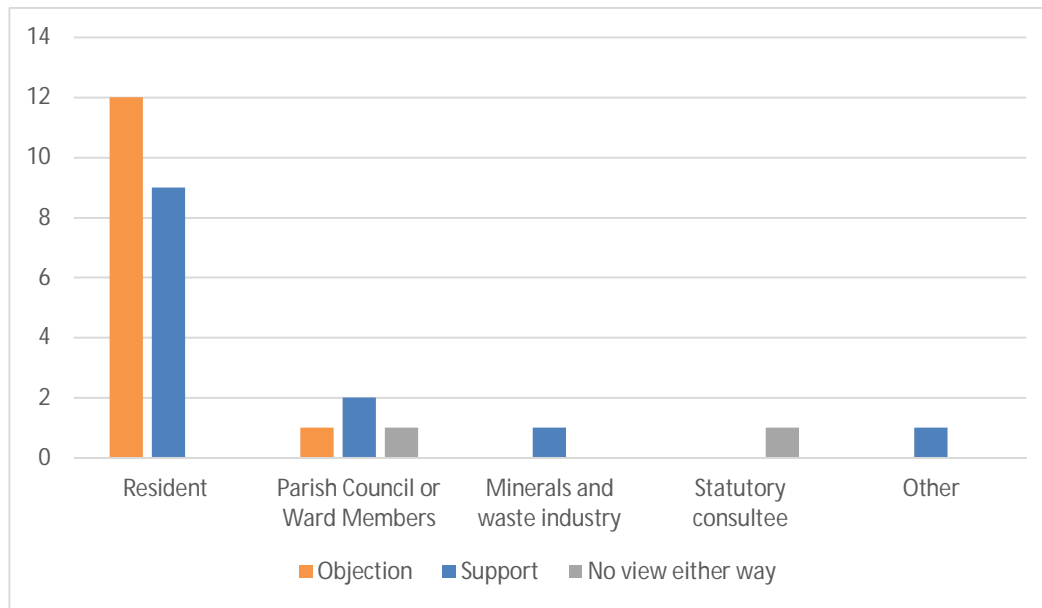
### Policy W5 Reworking Landfills

3.93 This policy details the four principals under which proposals for the re-working of landfill sites will be permitted.

3.94 A total of 30 responses were received regarding this policy; 22 individuals and eight organisations. Support and opposition for this policy was split evenly with identical percentages of 45% resulting for each opinion. A further 10% of those who responded to the policy stated they did not have a view either way.

3.95 The following graph details how different respondent groups based their initial opinions:

Figure 32: Representations made on Policy W5 by respondent group



3.96 Most of the objections received for this proposal fell under the policy failing to meet the Tests of Soundness. The main objection comments received are as follows:

- Although the reworking of landfill sites allows the recovery of valuable material, the cumulative impact (noise, odour, dust, pests and environmental pollution) upon nearby residential communities is unacceptable
- There should be enforcement and control measures to prevent vehicles from 'stacking' in roads around the curtilages of the sites prior to the operational hours
- The principles within the policy claim to consider human health and the environment. Therefore, clear evidence is needed to demonstrate pollution control for air quality, noise and disturbance have been taken into account
- The Environment Agency stated that in the circumstance where a landfill is planned to be re worked and it is located within a Source Protection Zone (SPZ) 1, then a risk assessment should be undertaken and this information should be included within the main text of policy W5.

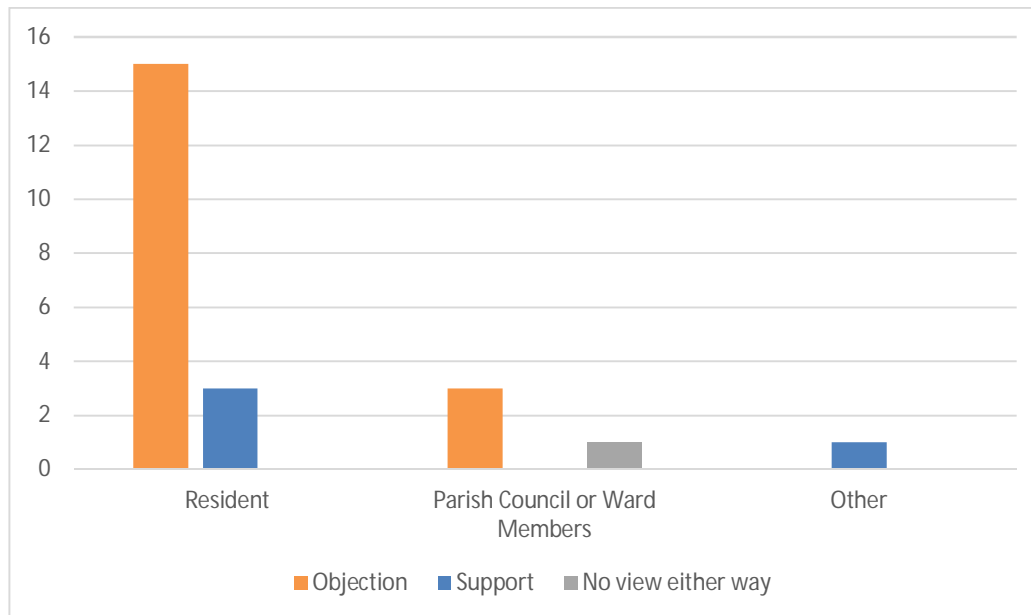
3.97 A number of those who supported the policy welcomed its inclusion in the draft Plan as it was considered the principles would work to prevent the inclusion of Star Works as a proposed allocated site within the Plan.

### Policy DM1 Sustainable Development

3.98 This policy is about the Central and Eastern Berkshire Authorities taking a positive approach to minerals and waste development and specifically, securing development that improves the economic, social and environmental conditions of the Plan area.

3.99 There were 25 responses received in response to this policy proposal. The opposition to the policy outweighed the support for it, with more than three quarters of individual respondents and over two thirds of organisations raising their objections to it. The following graph details how different groups responded:

Figure 33: Representations made on Policy DM1 by respondent group



3.100 Most of those who had objected to the policy said it failed to meet the Tests of Soundness, by not being either justified or effective. The most common reasons for opposing the proposal are as follows:

- Failure to meet the test of soundness as there should be a presumption away from development in Central and Eastern Berkshire
- Concerns some of the proposed site allocations are undeliverable and there is no proof they would deliver sustainable development. Instead, they would have negative impacts upon the countryside, landscape, wildlife, air quality and local amenity

3.101 On the other hand, there was some support for this policy proposal as it shows the Central & Eastern Berkshire Authorities would take a positive approach to minerals and waste development that reflected the presumption in favour of sustainable development as per national guidance. In addition, it was suggested the proposal could be extended so that non-minerals development within mineral safeguarding areas are considered as per the advice included in the minerals and waste safeguarding study (recommendation nine).

3.102 Other respondents stated that whilst they supported the principles of the policy, the organisations involved in producing the Joint Minerals and Waste Plan had failed to put the policy proposal into practice, particularly in regard to the earlier stages of the Plan making process.

## Policy DM2 Climate Change Mitigation and Adaption

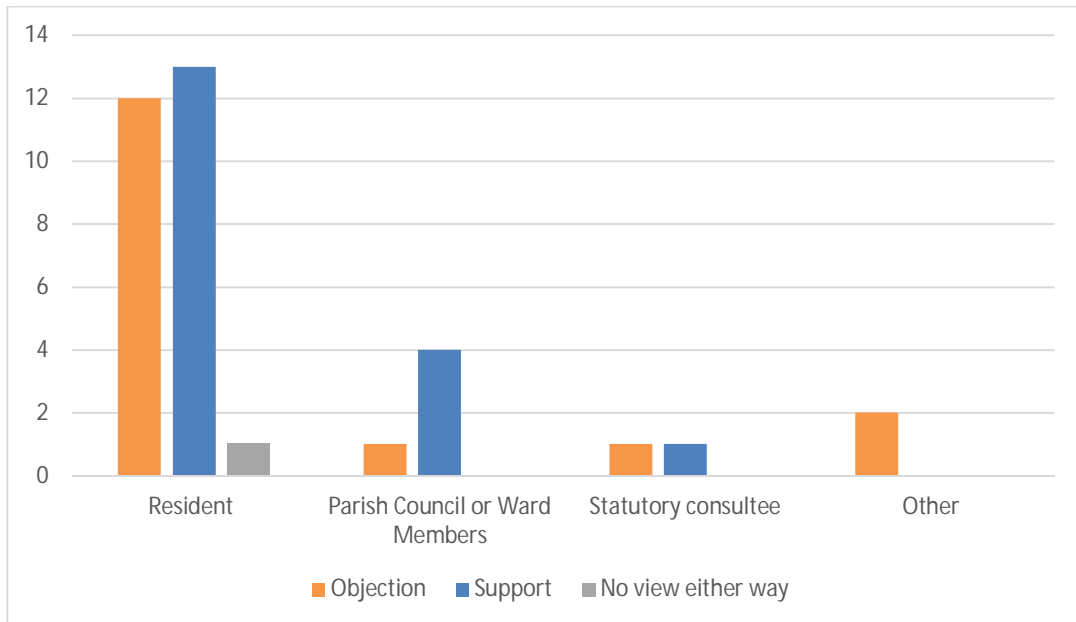
- 3.103 This policy is about reducing vulnerability and provide resilience to the impacts of climate change and details the standards through how this should occur.
- 3.104 This proposal received 12 responses in total: nine from individuals and three from organisations. Of those who answered the question, five respondents objected, four respondents supported, and three respondents had no view either way.
- 3.105 Resident objections to this policy were mainly on the grounds of it failing to meet the Tests of Soundness. Concerns (from individual responses) were expressed regarding Ham Island since the Environment Agency is yet to publish the climate change adjustment figures, but it has been acknowledged that planning applications for this area should take increased flooding (owing to climate change) into account.
- 3.106 Four respondents stated they would like to see changes made to the policy. An example of a suggested change was to record the carbon cost / emissions of the transport and handling of minerals and waste by category. It was suggested this information should be considered as part of the site assessment work as the traffic associated with a site would impact this.
- 3.107 Those who supported the policy agreed (appropriate) restoration of quarries and landfill sites offers benefits to local habitats. However, the impacts these processes would have on nearby residential areas, habitats and the surrounding environment should not be underestimated. All minerals and waste facilities should be designed to reduce greenhouse gas emissions and encourage the sustainable use of resources throughout the time they are operational. All environmental impacts should be mitigated against and if this is not possible, the operations of a site should be reassessed.

## Policy DM3 Protection of Habitats and Species

- 3.108 This policy is about contributing to the conservation, restoration or enhancement of biodiversity. The policy lists the sites, habitats and species that will be protected and specifies the circumstances under which minerals and waste development likely to result in the loss, harm or deterioration of these sites will be permitted.
- 3.109 This policy proposal generated a total of 36 responses; 26 from individuals and 10 from organisations. Responses were almost split exactly down the middle since 50% of those who responded (or 18 people) supported the policy, and 47% of those who responded (or 17 people) objected to the policy. The following graph

demonstrates how the opinions on the policy were split between the different respondent groups:

Figure 34: Representations made on Policy DM3 by respondent group



3.110 Some of the reasons for objecting to the policy proposal are as follows:

- Star Works – the site has been left out of the Habitats Regulations Assessment and Screening Report, therefore mitigation measures to demonstrate how the environmental impacts that could be caused by the proposed expansion to the site, have not been considered
- The Environment Agency raised concerns that policy DM3 does not specifically mention watercourses and the important habitats lists does not include rivers.
- Concerns expressed regarding the protection and enhancement of river corridors. Some considered the draft Plan could be more effective in this sense and work harder to reflect national policy. The Environment Agency suggested a specific ‘river habitat policy’ would be required to make sure the best possible outcomes for watercourses impacted by minerals and waste development are met
- General concerns about the potential destruction the proposed sites could cause to local habitats, wildlife (including endangered species) countryside and other nearby sensitive receptors
- Natural England supported this policy, for setting out the criteria that developments will be judged against. NE also stated this policy and the Draft Plan as a whole provided sound policies that work to ensure the habitats, wildlife and (endangered) species should be protected by the principles of the policy. Despite this, NE also raised concerns that if these sites are not identified at the Plan stage, criteria should be included setting out whether a habitat or area of land fulfils this function, and as such, can receive protection.

Natural England also showed specific support for an element of DM3 – “features of the landscape that function as stepping stones or form part of a wider network of sites”.

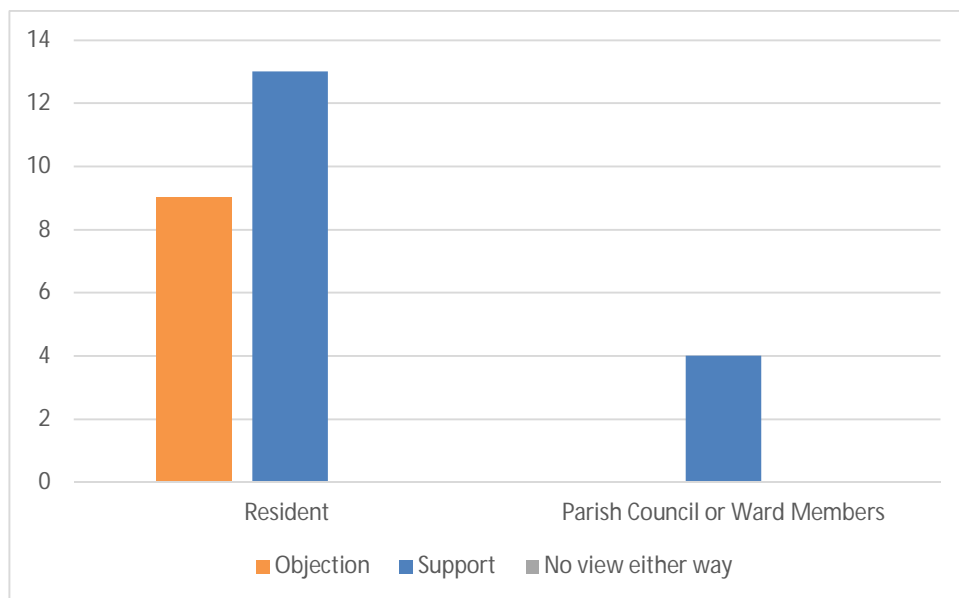
3.111 In addition concerns were raised regarding the proposed site allocations failing to meet the principles set out in the policy.

#### Policy DM4 Protection of Designated Landscape

3.112 This policy details the considerations of applications for major minerals and waste development proposals adjacent, and within the North Wessex Downs Area of Outstanding Natural Beauty (AONB) and Chilterns AONB.

3.113 29 responses were received for this policy proposal: 24 from individuals and five from organisations.

Figure 35: Representations made on Policy DM4 by respondent group



3.114 Two thirds of those who responded to this proposal highlighted their support for it, and the remaining third of respondents objected to it. Every organisation that responded showed support for the policy, and more than half of the individuals who responded also supported the policy.

3.115 The majority of those who supported the policy were pleased to see designated landscapes (AONBs) gaining protection under the policy principles. Yet, coupled with this support, there was concern that some of the proposed site allocations were contrary to the policy. This latter observation was also expressed through the comments received under policy objections.

3.116 Almost a quarter of those responding to the proposal suggested changes were needed. A common suggested change was protection should not be limited to just one ‘type’ of landscape designation. Instead, the policy should be extended to include and work to protect Green Belt, Sites of Special Scientific Interest (SSSI) and Ancient Woodland. Additionally, areas of landscape that have been subject to restoration by earlier permission(s) should be protected.

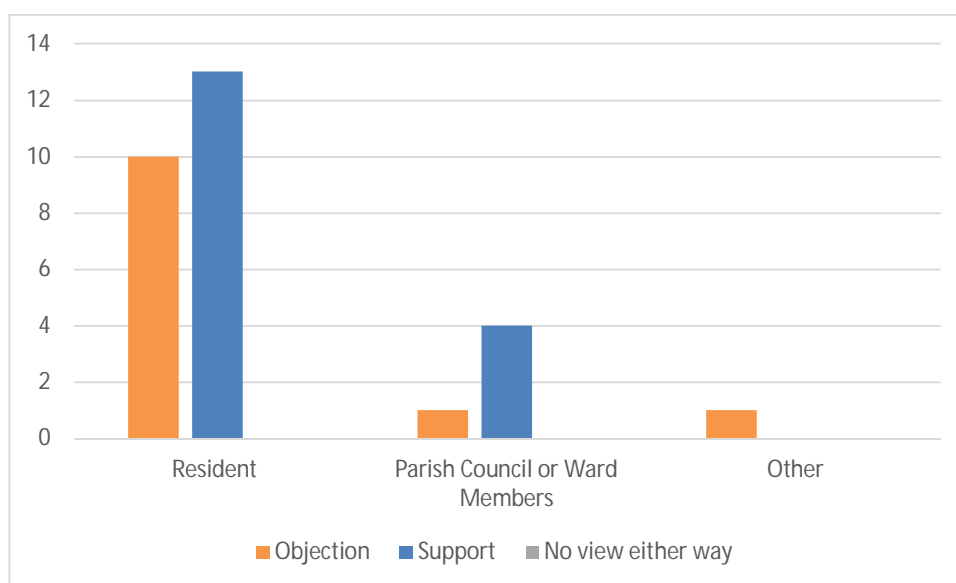
3.117 Furthermore, Historic England supported policy DM4 in principle but stated that applying the criteria for the assessment of proposals for major development within areas of outstanding natural beauty (AONB) to land outside the designated landscape does not sit within NPPF paragraph 172<sup>18</sup>.

### Policy DM5 Protection of the Countryside

3.118 This policy details the circumstances and standards under which minerals and waste development in the open countryside will be permitted.

3.119 There were 31 responses received for this policy proposal: 24 from individuals and seven from organisations.

Figure 36: Representations made on Policy DM5 by respondent group



3.120 There was a higher proportion of respondents supporting the policy (60% or 18 respondents) compared with those objecting to it (40% or 12 respondents). It is assumed that one respondent must have opted not to answer this question. There

<sup>18</sup> NPPF para 172 (page 49)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779764/NPPF\\_Feb\\_2019\\_web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779764/NPPF_Feb_2019_web.pdf)



was greater support for the policy from organisations (71%) compared to 57% from individuals.

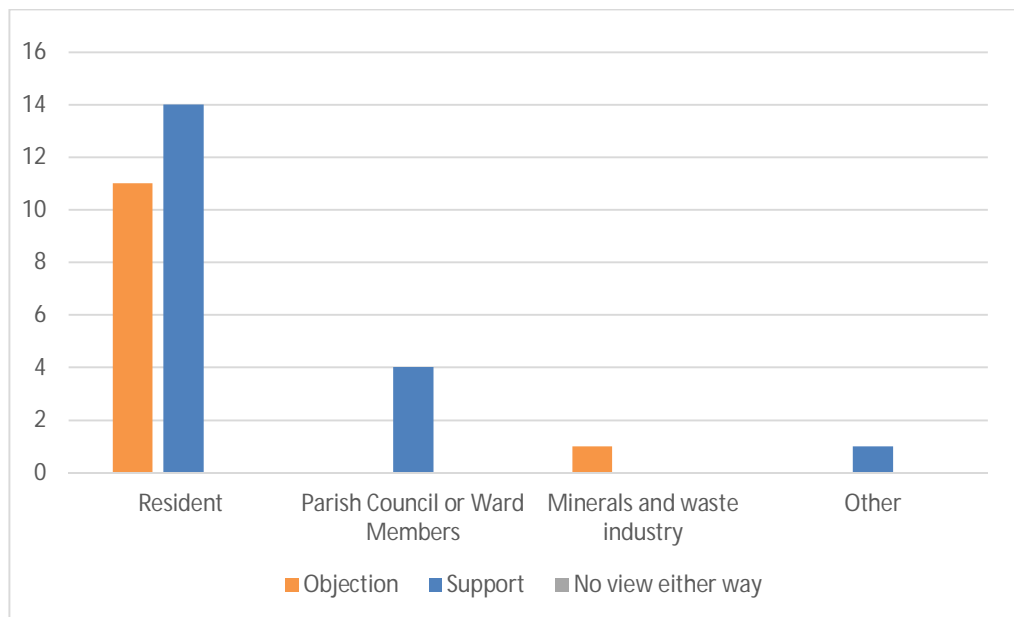
3.121 Upon review, it would appear most respondents supported policy DM5 and acknowledged it provided adequate protection of the countryside. However, there was concern the proposed site allocations contravened the principles of the policy and if implemented, they would have detrimental impacts upon local wildlife, habitats, amenity and recreational activities (bridleways, footpaths, cycle routes), countryside (including the ‘setting’ of an area) and local communities.

### Policy DM6 Green Belt

3.122 This policy details the circumstances under which proposals for minerals and waste development within the Green Belt will be permitted, emphasising that high priority will be given to the preservation of the openness of the Green Belt.

3.123 33 responses were received for this policy proposal: 26 responses from individuals and seven responses from organisations.

Figure 37: Representations made on Policy DM5 by respondent group



3.124 There was a higher proportion of those who responded in support of the policy (nearly two thirds or 20 respondents) compared with those objecting to it (just over a third or 12 respondents). More than three quarters of organisations and over half of the responding individuals supported the policy.

3.125 As was the case with earlier policy proposals, it would appear most respondents support policy DM6 as they consider it to provide adequate protection of the Green Belt. However, there was concern the proposed site allocations contravened the

principles of DM6 and if implemented, they would have detrimental impacts upon the Green Belt. Responses of support made clear the importance of protecting and retaining the Green Belt for the benefit of future generations, the wellbeing of local people and retaining the openness of an area.

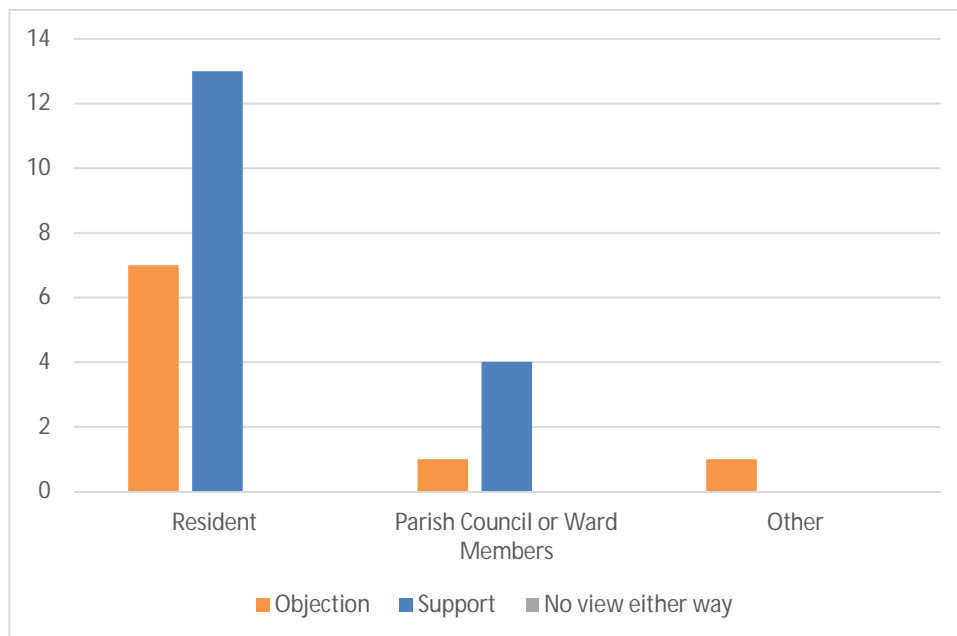
3.126 A few respondents acknowledged that proposed minerals and waste development in the Green Belt would only be granted under very special circumstances. It was also recognised that it would not be possible to meet the estimated waste management needs of the Plan area without considering potential development of waste management facilities on Green Belt land and this could contribute to ‘special circumstances’ under Policy DM6. However, it was emphasised this should be balanced against any adverse impact from the operations of a site.

### Policy DM7 Conserving the Historic Environment

3.127 This policy lists the designated and non-designated heritage assets of the Central and Eastern Berkshire Authorities. The policy also states that minerals and waste development should preserve and enhance historical assets or mitigate impacts when the benefits of the development outweigh the historic interests.

3.128 A total of 28 responses were received for this policy proposal: 21 responses from individuals and seven responses from organisations.

Figure 38: Representations made on Policy DM7 by respondent group



3.129 Almost two thirds (or 63%) of the received responses supported the policy and the remaining third (or 37%) of responses opposed it. Nearly two thirds of individuals and over half of the responding organisations supported the policy.

- 3.130 Following a review of the responses received in regard to this proposal, it would seem under both 'support' and 'object', respondents were broadly supportive of policy DM7, but there was widespread concern the policy principles had not been applied to the proposed site allocations of the draft Plan. Specifically, respondents raised concerns that the protection and preservation of the historic environment, heritage assets and points of interest and importance would be under threat should future permission be granted for the operation(s) of the proposed site allocations of the draft Plan.
- 3.131 Furthermore, Historic England supported policy DM7 in principle, however they had the following concerns, including (but not limited to):
- Duplication and contradiction of the policy content, including contradiction with the content of the Draft Plan Consultation Paper
  - Non-compliance with national policy (in parts)
  - A suggestion to re word the policy and include paragraph 7.53 of the Draft Plan Consultation Paper<sup>19</sup>

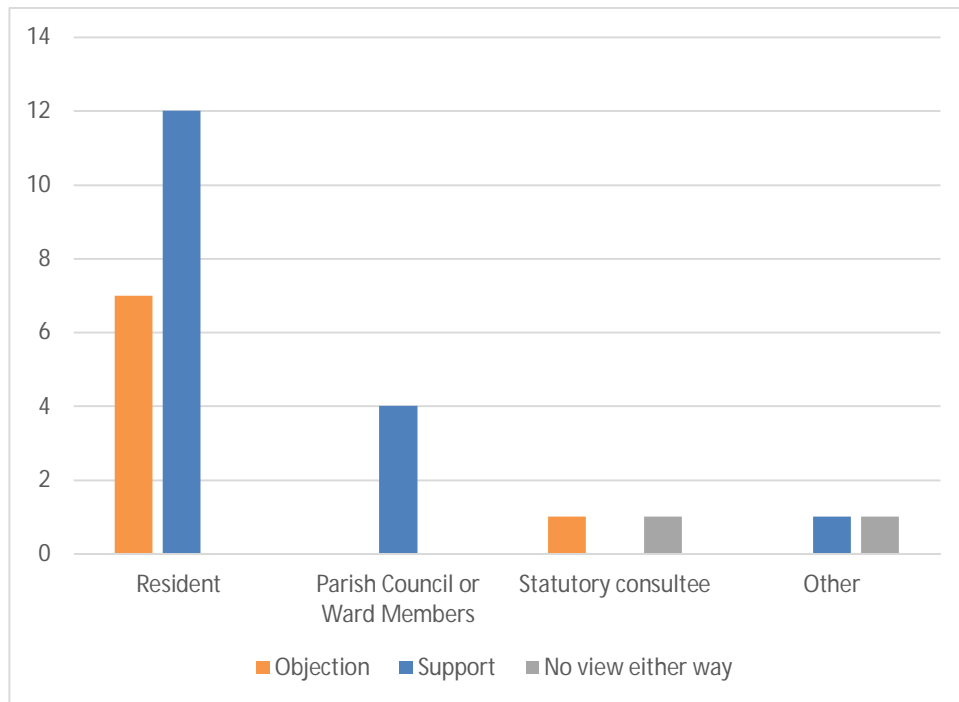
### **Policy DM8 Restoration of Minerals and Waste Developments**

- 3.132 This policy advocates high standards of restoration and aftercare that should reinforce or enhance the character and setting of the local area and contribute to the delivery of local objectives for biodiversity, landscape character, historic environment or community use.
- 3.133 There were a total of 29 responses received for this policy proposal: 20 responses from individuals and nine responses from organisations.

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<sup>19</sup> Draft Plan paper para 7.53 (page 90)  
<http://documents.hants.gov.uk/environment/JCEBREG18DraftPlanConsultationDocumentVersion6June2018.pdf>

Figure 39: Representations on Policy DM8 by respondent group



3.134 17 respondents (or 63%) supported the policy, eight respondents (or 30%) opposed it and two respondents (7%) stated they had no view either way. Nearly two thirds of individuals and organisations supported the policy. However, 37% of individuals and 13% of organisations were opposed to the policy, and finally 25% of organisations stated they had no view either way.

3.135 A selection of supporting comments, from both individuals and organisations, are as follows:

- Support, in general, for the policy was provided but the policy lacks the required depth to make sure its principles are implemented effectively.
- The policy is supported, but to make it more robust, clarification on how DM8 would be put into practice whilst taking into consideration policy proposals *M2 safeguarding sand and gravel resources* and *W2 – safeguarding of waste sites*
- Support given to the policy, but after earlier experience of restoration schemes being mismanaged, there was a concern and emphasis on the requirement to manage future schemes intensively
- Historic England stated they supported this policy but that further clarification on the phrase “setting of the local area” was needed.

3.136 A selection of the comments, from both individuals and organisations, were made as part of objections to the policy are as follows:

- The policy needs broader protections for the local community and environment. These could be in the form of contingency / insurance funds (paid into by the developer) so in the event of the developer going into administration, there

would still be the capital available to fund the restoration project as originally planned. Such detailed contractual indicators should be developed for inclusion with any final plan

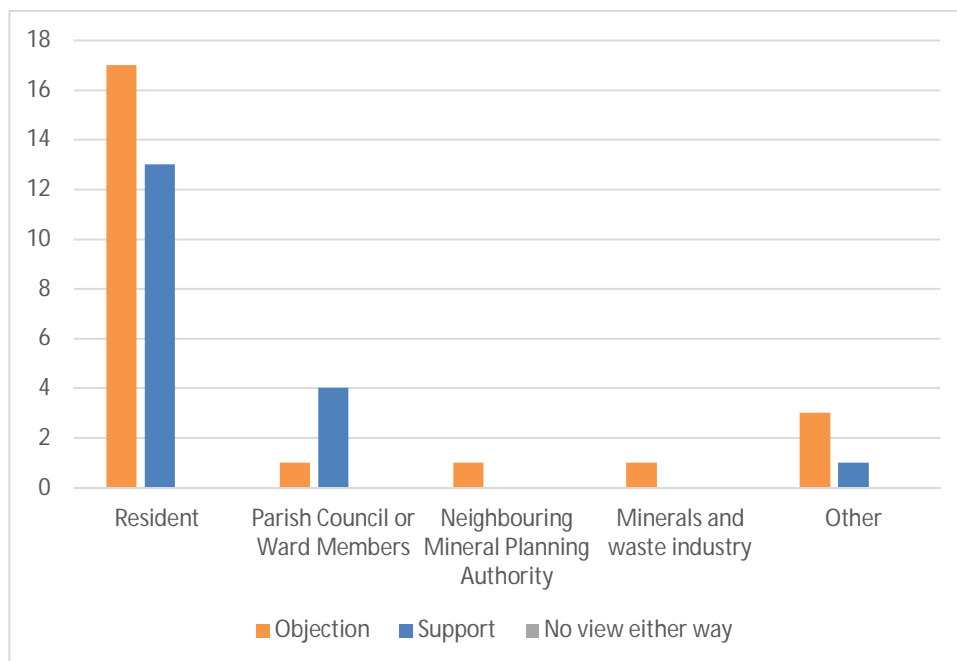
- Natural England highlighted the difference in tone between the Restoration Study document and Policy DM8. The Restoration Study is aspirational and includes principles which would ensure high quality restoration, whereas Policy DM8 does not seek any assurance that high quality restoration would be implemented. NE therefore suggested that the wording of policy DM8 is strengthened so that planning authorities can ensure restoration plans are of the required higher quality.

### Policy DM9 Protecting Public Health, Safety and Amenity

3.137 This policy lists impacts from minerals and waste development that are deemed unacceptable for the public health, safety and amenity of local communities and the environment. It states that such impacts would arise from minerals and waste development then mitigation measures must be implemented.

3.138 This policy proposal generated a reasonably high response, with a total of 44 responses being received: 31 responses were from individuals and 13 responses were from organisations.

Figure 40: Representations made on Policy DM9 by respondent group



3.139 More than half of the received responses (56% or 24 responses) objected to the policy, with the remaining proportion of responses (44% or 19 responses) supporting the policy. The split between how the different response groups replied to the policy was close: 57% of individuals and 54% of organisations objected,

43% of individuals and 46% of organisations were in support. Of the objections, a total of 21 respondents stated the policy did not meet the Tests of soundness – two thirds of those respondents were individuals and the remaining third were organisations.

3.140 A selection of opposing comments received regarding DM9 are as follows:

- Objection to the policy using the term ‘public health’ since it can be difficult to assess in relation to land use and development proposals. A request to rephrase the policy was made so that it reflects the health of individuals and communities within the vicinity of a development
- Neighbouring local planning authority Slough Borough Council raised concerns of the lack of reference the policy makes to air quality. Therefore, Slough Borough Council object to the policy since it fails to include an appropriate policy framework for considering the impact proposed development could have upon air quality and ensuring necessary mitigation measures are implemented. They suggest the wording of the policy should be altered so that it makes a specific reference to air quality
- Concerns raised in relation to a number of the proposed site allocations, particularly regarding the potential impact of pollution (noise, air quality, light, dust) and increased traffic (including HGVs) on nearby sensitive receptors (residents, schools, wildlife and habitats, and recreational facilities)

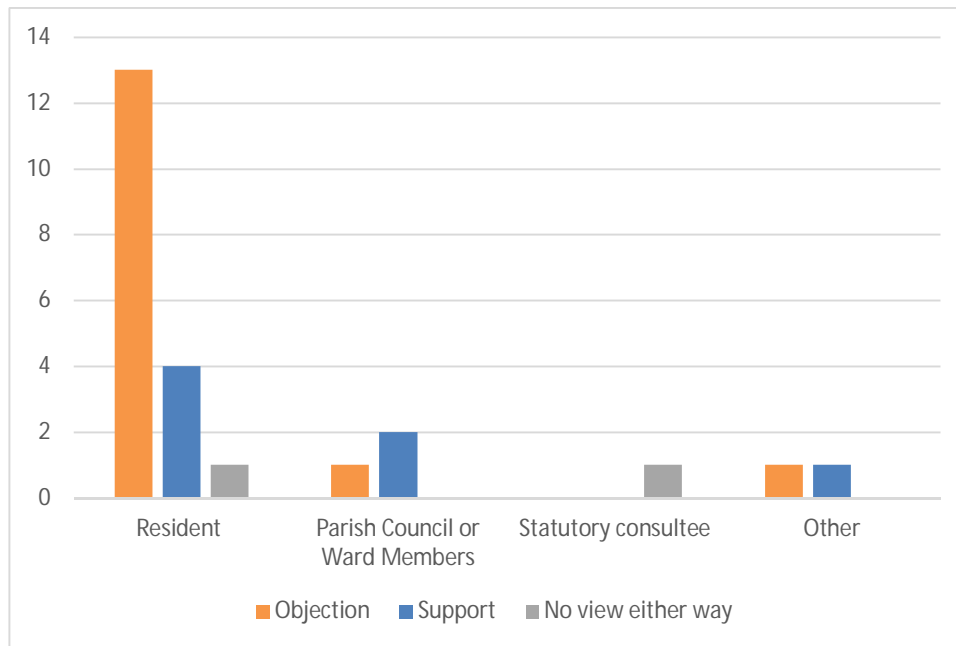
3.141 A selection of supporting comments received regarding DM9 are as follows:

- The requirements of the policy are endorsed, but it has been suggested the proposal includes a requirement of minerals and waste developments would demonstrate how they would prevent nuisance stemming from the attractions of pests and vermin
- The policy is supported, but to make it more robust, clarification on how DM9 would be put into practice whilst taking into consideration policy proposals *M2 safeguarding sand and gravel resources* and *W2 – safeguarding of waste sites*
- The proposal presents a good strategy

### **Policy DM10 Water Environment and Flood Risk**

3.142 This policy describes the conditions under which minerals and waste development will be permitted with regards to limiting their impact on the water environment. It also lists the impacts on areas at risk of flooding that are deemed unacceptable where minerals and waste development are proposed in such areas.

Figure 41: Representations made on Policy DM10 by respondent group



3.143 A total of 27 responses were received to this policy: 19 responses from individuals and eight responses from organisations.

3.144 Nearly two thirds (62%) of the received responses objected to the policy, almost a third (31%) of the responses supported the policy and the remaining responses (8%) stated they had no view either way. The majority of the individual responses were in opposition to the policy proposal (72%) in comparison with 38% of organisations stating their objections. Most of the objections were placed under the proposal failing to meet the Tests of Soundness – 14 responses selected this as their reason for objecting, whereas there were just three responses which stated the policy failed to comply with legal requirements / duty to cooperate.

3.145 A selection of the objections received are as follows. (It should be noted nearly all objection comments were made in relation to the proposed site allocations of the draft Plan):

- proposed site at Ham Island – the proposed extraction of sand and gravel would increase the risk of flooding in Wraysbury and surrounding areas due to the loss of an important flood plain.
- proposed site at Ham Island – polluted water from the proposed extraction of sand and gravel and associated workings would drain straight into the river, thus having a negative impact upon river ecosystems, local bird species and humans who use the river for recreational purposes
- proposed site at Star Works – assessments made on the potential impacts to the local water systems are inappropriate for the proposed allocation and expansion of the site

- proposed sites at Horton Brook – Horton is likely to flood and some of the proposed sites of the draft Plan sit within the flood zone three. Proposals for infill need to be assessed and closely controlled, especially for infill of green waste. Apprehension at the lack of detail in the draft Plan on this proposal

3.146 A selection of the supporting comments received are as follows. (It should be noted nearly all supporting comments were made in relation to the proposed site allocations of the draft Plan):

- proposed site at Star Works – the policy is supported, but to make it more robust, clarification on how DM10 would be put into practice whilst taking into consideration policy proposals *M2 safeguarding sand and gravel resources* and *W2 – safeguarding of waste sites*
- proposed site at Bridge Farm – the policy is supported however, the proposed site of Bridge Farm is deemed to be contrary to the principles of the proposal. Furthermore, the allocation should be assessed in light of the need for the sand and gravel deposits in this location at this time, as well as bearing in mind the lack of available information that would assist with deciding the impacts of the proposed site
- proposed site at Star Works – the policy is supported however, the proposed allocation of Star Works is deemed to be contrary to the principles of the proposal.

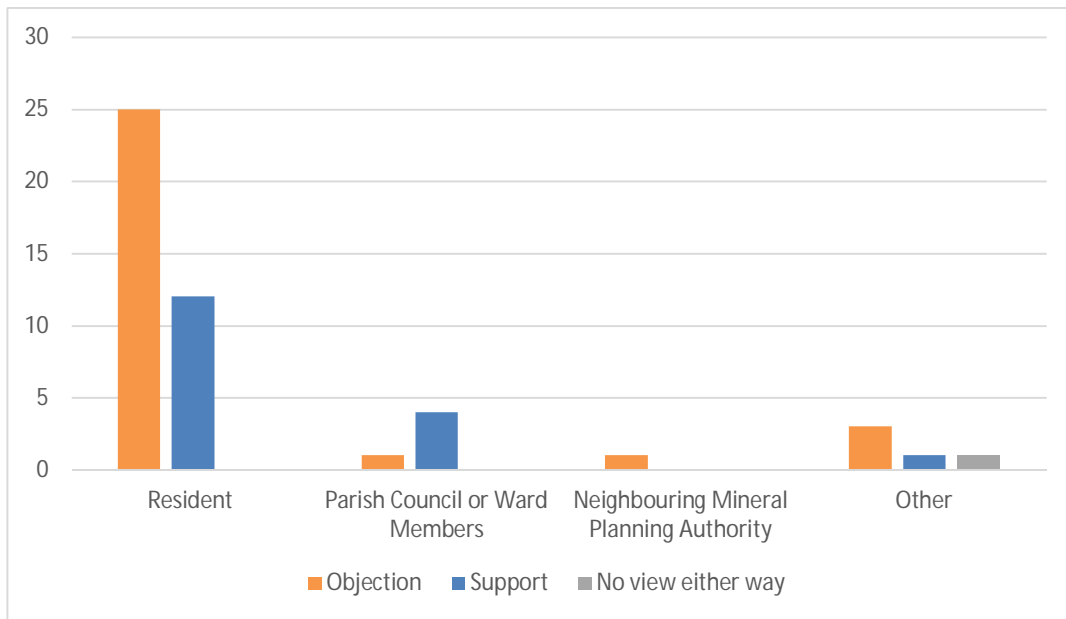
### **Policy DM11 Sustainable Transport Movements**

3.147 This policy explains that for minerals and waste development, a Transport Assessment is required to demonstrate good connectivity for the movement of minerals and that their movement will not be detrimental to road safety, the environment or the local community. The policy also advocates for alternatives to road-based methods of transportation.

3.148 This policy received one of the highest number of responses for section one of the consultation. It generated 53 responses (17% of respondents commented on this policy), with 39 responses from individuals and 14 responses from organisations.



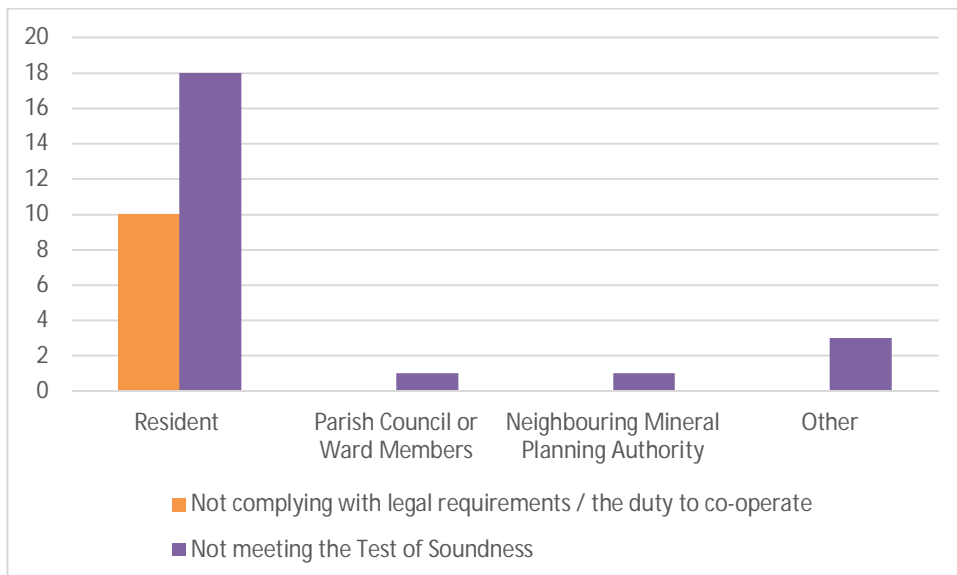
Figure 42: Representations made on Policy DM11 by respondent group



3.149 The policy received almost double the number of objections to support with 33 responses (65%) objecting, 17 responses (33%) supporting and one (2%) response stating no view either way.

3.150 The following chart demonstrates how respondents categorised their objection(s) to the policy proposal:

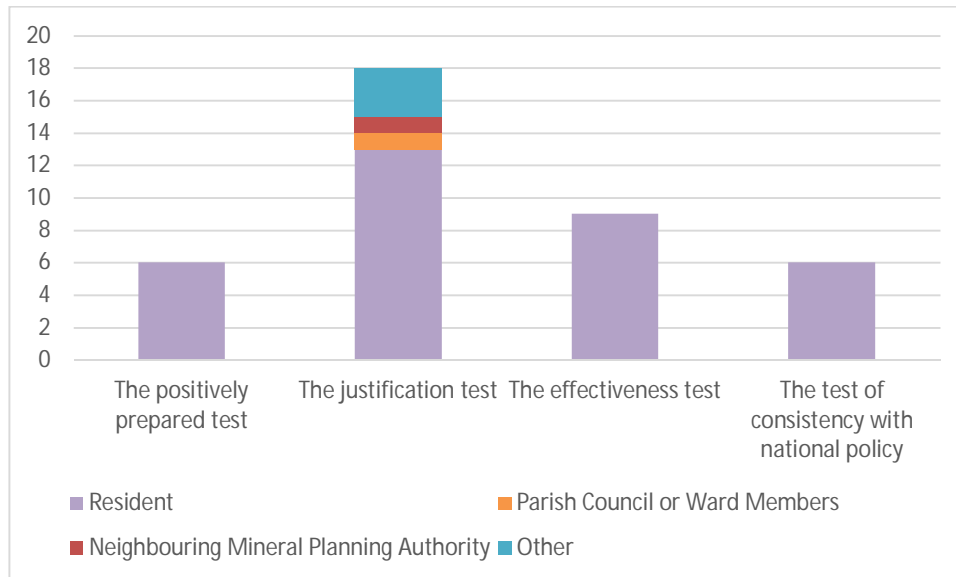
Figure 43: How respondents categorised their objection to Policy DM11



3.151 The above shows that a large proportion of those who answered this question considered that the policy does not meet the Tests of Soundness. The respondents who had selected this as their reason for objecting were then asked

how the policy failed to meet the Tests of Soundness. The following graph displays the results:

Figure 44: How Policy DM11 failed the test of soundness



3.152 Respondents were then asked to elaborate on how the policy did not meet the test of soundness. It should be noted as transport and traffic issues are relevant for all proposed site allocations, the issues raised under this policy related to most or all of the sites. For example, the issue of an increase in HGV movements was expressed by those responding to Star Works, Planners Farm, Ham Island etc. A selection of the various responses has been detailed below:

- Concerns raised about the increase in HGV movements (entering and leaving the proposed sites) would not be sustainable since traffic on roads has increased, across the plan area
- Concerns about HGVs travelling to and from the proposed sites would contribute to the already rising pollution levels and would pose further health risks to the local population
- The surrounding roads and proposed routes to some of the sites (for example, Star Works, Planners Farm and Ham Island) are only suitable for smaller vehicles, with one proposed route stating ‘Unsuitable for HGVs’
- The validity of the transport assessment produced as part of the draft Plan process has been questioned. Respondents argued the assessment is not based on current traffic movements and is not site specific. Therefore, some respondents feel some site allocations are contrary to the policy
- Neighbouring local planning authority, Slough Borough Council stated the policy has been poorly drafted since it does not deal with a number of prevalent issues (air quality, mitigation measure and routing). The policy should also include the wording “*proposals will only be permitted where...*” which is a

statement that has been included in many other policies within the Plan, but it is unknown as to why it is absent from DM11. It was stated the policy needs this additional sentence as it currently does not set out the basis upon how applications will be approved or refused

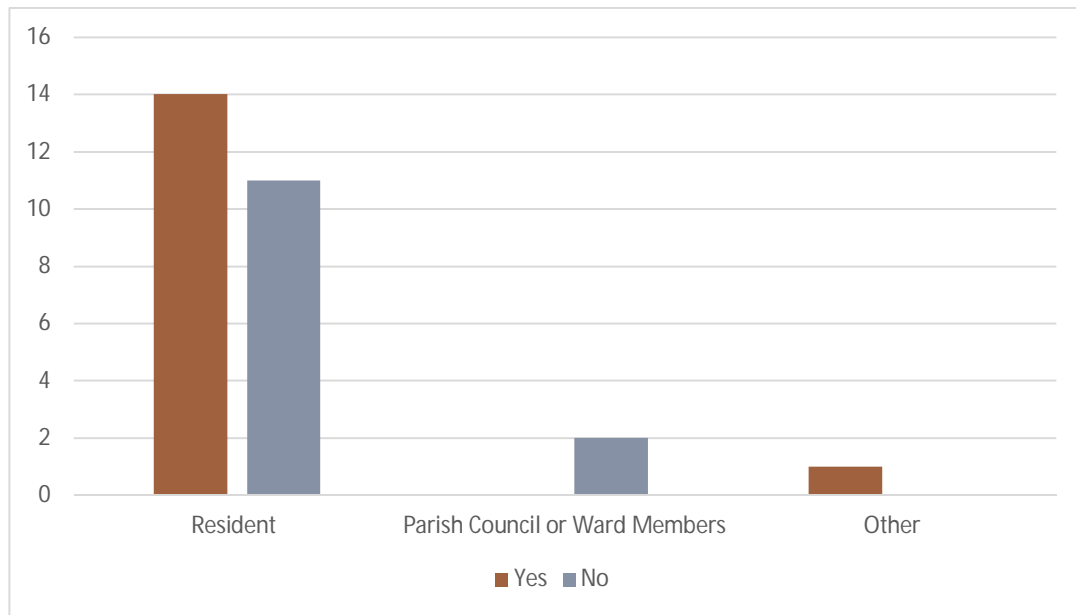
- The current policy does not place enough emphasis upon air quality management areas (AQMAs) – the only reference included relates to the impact from the use of field conveyors
- The current policy does not consider all mitigation for increased vehicle movements; it only mentions the need for highways improvements being an option. There are however a range of other environmental measures that could be used to minimise and mitigate the impacts associated with increased vehicle movements. For example, there is no reference to perhaps needing to control the type of vehicle used to reduce the impact upon air quality
- No reference made in the policy to the requirement to agree HGV routes, which are important when trying to establish ways of mitigating negative impacts upon the environment and local communities
- Concern raised about the damage the HGVs could have on homes due to vibration when they are travelling to and from the proposed sites

3.153 In addition to the opposing responses for this policy proposal, there were some comments of support provided. A selection of these are detailed below:

- The principles of the policy were supported, but it the proposed site allocations of the draft Plan were contrary to Policy DM11
- The policy would help to protect village environments in the future

3.154 In comparison to the other policy proposals, DM11 did not generate as much support for requiring change(s) to the policy. See the following graph for information:

Figure 45: Respondents seeking changes to Policy DM11



3.155 Only three more individuals responded saying they would like to see change(s) made to the policy (14 individuals) compared with 11 individuals responding they would not like to see change(s) made to the policy. In regard to organisations, there were three which responded ‘yes’ to change(s) and three which responded ‘no’ to change(s).

3.156 A selection of the suggested changes are as follows:

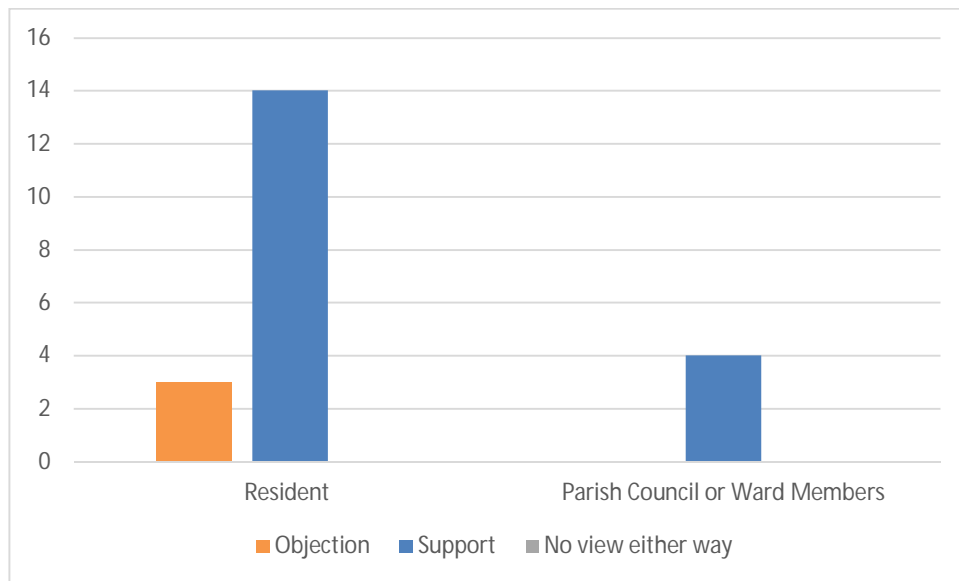
- The wording of the second paragraph of the policy should be changed to read “*Specifically, the assessment should explore how the movement of minerals and/or waste within and outside the site will not be detrimental to road safety and would not have an unacceptable impact on the environment -of the local community, or the highway network and determine whether highway improvements may-be-required are necessary to mitigate impacts associated with increased vehicle movements.*”
- Slough Borough Council raise concerns that waste capacity requirements for the recycling and recovery of non-hazardous waste during the Plan period does not consider the possible loss of capacity should the Colnbrook waste management complex (in Slough) not be relocated as part of Heathrow airport expansion and proposed additional runway. Slough Borough Council feel there is no alternative option identified within the draft Plan to accommodate for this eventuality. Slough Borough Council feel the sites currently allocated in the draft Plan should be safeguarded, and the Plan should be monitored and reviewed in the event that the Colnbrook complex (Colnbrook Material Recycling Facility and Lakeside Energy from Waste plant) is lost and fails to be replaced.

- There need to be restrictions implemented on traffic movements on the roads and routes near to the sites for example, restrict the hours to certain times of the day when HGVs and vans can use the roads
- No additional HGV trips to Planners Farm should be permitted
- Review the transport options and overall strategy
- The policy should include additional information such as police accident reports
- To grant the policy ratification, alternative HGV routes must be identified since the current proposals violate environmental regulations
- Views of residents should be put into effect; not the views of large businesses and organisations
- The policy wording should be changed to read “*Proposals will not be permitted where there is adverse impacts on highway safety, congestion and air quality (taking into account cumulative effects and where located in an Air quality Management Area should sustain and contribute towards compliance with relevant limit values) which cannot be mitigated*”
- A transport assessment or statement of potential impacts on highway safety, congestion and demand management will be required
- A reassessment of the traffic and transport implications is needed to consider the pollution and noise impacts, as well as the potential conflict with other non-minerals and waste development in the Plan area

### **Policy DM12 High quality design of minerals and waste development**

- 3.157 This policy states that minerals and waste development should make a positive contribution to the visual environment and character of the area and lists the ways in which this can be achieved.
- 3.158 This policy proposal generated a total of 23 responses; 18 from individuals and five from organisations.

Figure 46: Representations made on Policy DM12 by respondent group



3.159 A large proportion of those who responded to the policy, 86% or 19 respondents, supported it. This support was made up of 82% of individuals and 100% of organisations. By comparison, just 14% or three respondents objected to the policy.

3.160 Following a review of the responses received in regard to this proposal, it would seem under 'support', respondents were generally in favour of policy DM12. Yet, there was concern the policy principles had not been applied to the proposed site allocations of the draft Plan. Respondents highlighted the purpose of policy DM12 was to protect and enhance the character and quality of a site's setting but there were concerns that the proposed sites would fail to comply with these guidelines and negative impacts would occur. Those who had expanded their opinions under 'object', broadly shared the same views as those who had supported the policy, particularly in relation to the resulting negative implications during the operation of a site.

### Policy DM13 Ancillary development

3.161 This policy explains the circumstances under which proposals for buildings and/or structures ancillary to the existing minerals or waste operation will be accepted. In particular, they should benefit the site and ensure a sustainable operation.

3.162 This policy proposal did not receive as many responses compared with earlier proposals. A total of 12 responses were received: nine from individuals and three from organisations.

3.163 Opinions on this proposal were nearly split equally since six responses (55%) of support and five responses (46%) objecting were received. The majority of

organisations who responded to this proposal supported it (67%), whilst individual opinions were split 50/50 between support and object. There were no responses of no view either way.

3.164 Those who supported the policy agreed with its principles, however, there was concern specifically in relation to the proposed site of Star Works since as it was considered that there had been breaches to ancillary development rights in the past.

3.165 For those objecting to the policy DM13, it was seen as lacking precision and definition. Without clear guidelines, respondents raised concern there could be difficulties controlling some developments (under this policy), especially those located in higher risk areas.

## Section two: The delivery strategies

- 3.166 The delivery strategies (supporting text) section generated a total of 312 comments. Most comments received on this chapter focused on **Waste capacity requirements (227 comments)**, irrespective of whether the response was personal (196 comments) or on behalf of an organisation or group (31 comments).
- 3.167 A selection of the comments received on the waste capacity requirements delivery strategy are as follows (please note these are a mix of individual and organisational comments):
- There is no justification or explanation for the estimated waste arisings as detailed in paragraph 6.41 of the consultation paper
  - The waste capacity requirements for the recycling and recovery of non-hazardous waste throughout the Plan period do not consider the possible capacity reduction if the Colnbrook waste management site cannot be relocated as part of the proposed Heathrow Airport expansion and additional runway. It was therefore, suggested the proposed site allocations in the Draft Plan should be safeguarded, alongside considering a Plan review should the Colnbrook site be lost.
  - In relation to the proposed site of Star Works comments were made raising concerns about - the current level of activity undertaken at the site, and that this activity negatively impacts the local environment 24 hours a day, seven days a week. Continuation of waste management operations at the site would be intolerable for the local community and would label the village of Knowl Hill as 'toxic'
- 3.168 After waste capacity requirements, the delivery strategies that generated the highest numbers of responses are as follows:
- **Locations for sand and gravel** – 85 responses in total made up of 62 personal responses and 23 organisational or group responses
  - **Safeguarding other minerals development infrastructure** – 57 responses in total made up of 48 personal responses and nine organisational or group responses
- 3.169 A breakdown of the responses received to the delivery strategies chapter can be seen in Appendix A.
- 3.170 A selection of the common themes identified throughout the delivery strategies chapter are as follows:
- Engagement in the consultation was challenging and complicated as well as being difficult (at times) to understand
  - General opposition to the proposed mineral sites identified in the draft Plan (mainly stemming from individual responses)



- General opposition to the proposed waste sites identified in the draft Plan (mainly stemming from individuals)
- Confusion over the Bridge Farm planning application, and the representations submitted as part of the application process not being considered by the minerals and waste planning team when producing the draft Plan
- Concern and frustration over Star Works breaching a number of planning conditions over a number of years
- Flooding concern, especially in relation to the proposed site of Ham Island
- Traffic and transport concerns in relation to health and safety, impacts of larger vehicles frequently using smaller routing roads and a general increase in traffic
- General amenity and environmental concerns that could become a reality should the proposed sites receive permission

## Evidence Base

- 3.171 The evidence base section generated a total of 41 comments. The majority of the comments received on this chapter focussed on **Strategic Traffic and Transport Assessment** (25 comments), irrespective of whether the response was individual (21 comments) or on behalf of an organisation or group (four comments). Comments were submitted on almost all the evidence base documents, except for the Equalities Impact Assessment which did not receive any comments from organisations.
- 3.172 Respondents were asked what changes they would like made to the Strategic Traffic and Transport Assessment. A selection of the comments received under this section are as follows (please note these are a mix of individual and organisational comments):
- There is no robust sustainable vision for suitable transport links in the area. The A4 is a dangerous road with multiple accidents (including fatalities) over the last 10 years. An increase in HGVs would increase the unacceptable health and safety risks already posed to the community
  - The assessment is commercially driven and doesn't take into account the concerns and priorities of local residents
  - The traffic assessment is ineffective since it was not undertaken at peak times. It fails to consider the increased local traffic and population as a result of local housing development projects, as well as the ongoing M4 smart motorway development scheme which are due to impact the area for up to six years
- 3.173 After the Strategic Traffic and Transport Assessment, the evidence base documents that generated the highest numbers of responses are as follows:
- **Landscape and Visual Impact Assessment** – 13 responses in total consisting of 11 individual responses and two organisational or group responses

- **Waste: Proposal Study** – 12 responses in total made consisting of 10 individual responses and two organisational or group responses

3.174 A breakdown of the responses received to the evidence base chapter can be seen in Appendix B.

3.175 A selection of the common themes identified throughout the evidence base chapter are as follows:

- Minerals Background Study – No definitive map of minerals resources has been provided for review
- Waste Background Study - The requirements for waste streams such as inert and hazardous wastes have not been included in the Executive Summary. It would be useful to include this in order to clarify the future management requirements for these waste streams
- Sustainability Appraisal - It is the planning authority that carries out the sequential test and exception test, not the Environment Agency. This needs amending in the glossary text
- Habitats Regulations Assessment – The wording around invasive non-native species needs to be strengthened since the current wording states “effective management” of a site is assumed, but this does not provide adequate precaution
- Strategic Flood Risk Assessment – This should include a section which defines Flood Zones 1, 2 and 3, with further emphasis and definition on Flood Zones 3a and 3b
- Landscape and Visual Impact Assessment – This has been produced by people who do not live in the area, therefore they cannot obtain a view of reality after undertaking just a short site visit
- Waste Proposal Study – It is unclear from the site summaries what the additional capacity of each site proposal will be and consequently, what they will contribute to the relevant waste stream capacity gap

## Section four – further comments

3.176 This penultimate section of the consultation allowed respondents to provide additional thoughts or comments on the draft Plan proposals. A variety of comments were received, with most reiterating points that had been made in earlier stages of the consultation or using the opportunity to highlight specific concerns that could not be addressed during earlier stages of the consultation.

3.177 A selection of some of the main points raised are as follows (please note these have been received by individuals and organisations):

- Historic England (HE) provided responses, highlighting concerns where they felt it necessary, on most of the proposed site allocations included within the

draft Plan. The only proposed sites they did not specifically comment on were Monkey Island Wharf and Poyle Quarry

- HE highlight the draft Plan fails to include any evidence base for the historic environment, nor does Appendix C or the Joint Local Plan webpage reference any archaeological studies or historic impact assessments. HE go on to say, as a minimum, they would have expected the Berkshire Historic Environment Record and East Berkshire Historic Landscape Character Assessment to have been used in the Plan preparation, and then identified accordingly. Additionally, HE was disappointed the Vision and the Plan's strategic objectives fail to reference the historic environment or heritage assets
- Natural England (NE) provided further comments on an array of issues related to draft Plan, either providing further advice or suggesting signposting for important further information that would be needed for the Plan making process
- NE stated, at this stage of the Plan making process, they were unable to provide detailed comments regarding the proposed site allocations and the possible impacts due to a lack of detail. However, they strongly encouraged early engagement with them at application stage since it would be beneficial to all involved parties
- The Environment Agency (EA) reiterate the importance of a sequential test being carried out, otherwise they would have reason to deem policies three policies (listed as M4, W4 and W7) as being unsound at Regulation 19. Subsequently, this would impact a number of other policies
- The EA suggest the Strategic Flood Risk Assessment (SFRA) should include a section which defines Flood Zones 1, 2 and 3, as well as going into greater detail on Flood Zones 3a and 3b. The EA highlight this as being important as national policy (specifically the Planning Practice Guidance (PPG)) identify 'less vulnerable' developments (for example, the majority of waste sites) should not be permitted in Flood Zone 3b. The EA acknowledge the Central and Eastern Berkshire Authorities have defined this in their individual SFRAs, it is important the Joint Minerals and Waste Plan has one, consistent definition
- Statutory consultees reiterated the importance of them being kept informed of all stages of the Plan making process
- The consultation (especially the response form) was over complicated, too technical and difficult, in parts, to understand. Some saw this as a deliberate approach to prevent too many responses being received
- Continued concern regarding the proposed allocated sites and the impact they would have on residents (health and safety), wildlife and habitats, roads and general amenity impacts
- The documents of the draft Plan do not consider other pending proposals included in draft local plans such as housing developments and new schools
- Confusion and frustration as to why comments made on current planning applications have not been taken into consideration by the draft Plan

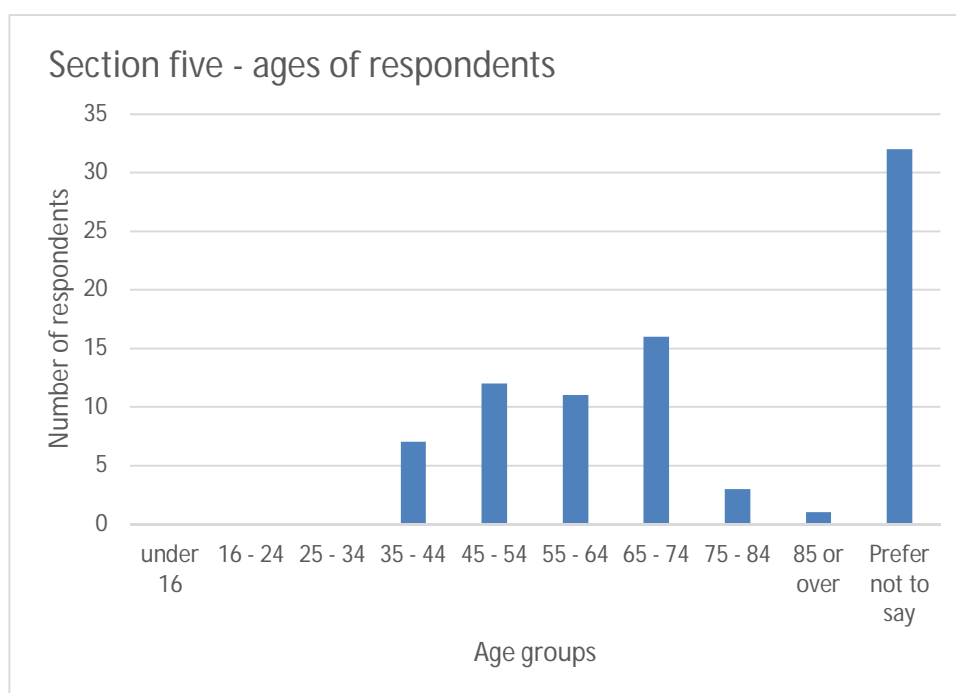
particularly when a site features as a proposed site allocation in the minerals and waste Plan

- Frustration regarding the Issues and Options consultation of summer 2017 as some people said they were not informed of it, but would have liked an opportunity to comment on the draft Plan at that earlier stage

## Section five – about you

3.178 A total of 348 responses were received to this consultation, with 66 responses coming from organisations and 282 responses coming from individuals.

3.179 The following chart demonstrates the ages of those who responded to the consultation:



3.180 Clearly, not every respondent answered this question (as it was not compulsory) and it is also apparent a reasonable number (32 respondents or 39%) chose the 'prefer not to say' option.

3.181 Respondents were also asked to describe their gender. Following on from this question, a total of 84 responses were received, which is around 24% of the total number of respondents to the whole consultation. 15 respondents identified as being female, 43 respondents identified as being male, there were no responses to the 'other' category in this question and 26 respondents stated they did not wish to answer this question.

3.182 Of the information available, it would seem further work in future stages of the Plan making process might need to be done in terms of engaging the younger age groups.

## Next Steps

3.183 Following this preferred options consultation, Hampshire Services in conjunction with the Central and Eastern Berkshire Authorities have carefully reviewed all comments received from statutory and non-statutory consultees and the local community. The key issues that have arisen will be assessed and an officer response will be provided at the next stage of the consultation, ensuring that the issues raised continue to inform the development of the final plan.

## Appendix A – Breakdown of responses to the policy proposals

Breakdown of responses received to the policy proposals chapter:

	Total	Type of response	
		Personal responses	Responses on behalf of organisations or groups
<b>Base</b>	<b>313</b>	259	54
M1 - Sustainable minerals development strategy	<b>22</b>	18	4
M2 - Safeguarding sand and gravel resources	<b>16</b>	8	8
M3 - Sand and gravel supply	<b>17</b>	9	8
M4 - Locations for sand and gravel extraction	<b>85</b>	62	23
M5 - Supply of recycled and secondary aggregates	<b>11</b>	7	4
M6 - Chalk and clay	<b>12</b>	8	4
M7 - Aggregate wharves and rail depots	<b>13</b>	7	6
M8 - Safeguarding minerals infrastructure	<b>9</b>	7	2
W1 - Sustainable waste development strategy	<b>57</b>	48	9
W2 - Safeguarding of waste management facilities	<b>54</b>	46	8
W3 - Waste capacity requirements	<b>33</b>	22	11
W4 - Locations and sites for waste management	<b>227</b>	196	31
W5 - Reworking landfills	<b>30</b>	22	8
DM1 - Sustainable Development	<b>25</b>	19	6
DM2 - Climate Change – Mitigation and Adaptation	<b>13</b>	10	3
DM3 - Protection of Habitats and Species	<b>36</b>	26	10
DM4 - Protection of Designated Landscape	<b>29</b>	24	5
DM5 - Protection of the Countryside	<b>31</b>	24	7
DM6 - Green Belt	<b>33</b>	26	7
DM7 - Conserving the Historic Environment	<b>28</b>	21	7
DM8 – Restoration of Minerals and Waste Developments	<b>29</b>	20	9
DM9 – Protecting Public Health, Safety and Amenity	<b>44</b>	31	13
DM10 - Water Environment and Flood Risk	<b>27</b>	19	8

DM11 - Sustainable Transport Movements	<b>53</b>	39	14
DM12 - High Quality Design of Minerals and Waste Development	<b>23</b>	18	5
DM13 - Ancillary development	<b>12</b>	9	3



## Appendix B – Breakdown of responses to the delivery strategies.

Breakdown of responses received to the delivery strategy chapter:

	Total	Type of response	
		Individual responses	Other (organisations or groups)
<b>Base</b>	<b>312</b>	258	54
Sustainable mineral strategy	4	4	0
Safeguarding mineral resources	16	8	8
Managing the supply of aggregate	17	9	8
Locations for sand and gravel extraction	85	62	23
Supply of recycled and secondary aggregates	11	7	4
Energy minerals	12	8	4
Other non aggregates	13	7	6
Aggregate wharves and rail depots	9	7	2
Safeguarding other minerals development infrastructure	57	48	9
Sustainable waste development strategy	54	46	8
Safeguarding waste management facilities	33	22	11
Waste capacity requirements	227	196	31
Locations and sites for waste management	30	22	8
Re working landfills	25	19	6
Sustainable development	13	10	3
Climate change – mitigation and adaptation	36	26	10
Protection of habitats and species	29	24	5
Protection of designated landscape	31	24	7
Protection of the countryside	33	26	7
Green Belt	28	21	7
Conserving the historic environment	29	20	9
Restoration of minerals and waste developments	44	31	13
Protecting public health, safety and amenity	27	19	8
Water environment and flood risk	53	39	14
Sustainable transport movements	23	18	5
High quality designs of minerals and waste development	12	9	3
Ancillary development	8	7	1

## Appendix C – Breakdown of responses to the evidence base

Breakdown of responses received to the evidence base chapter:

	Total	Type of response	
		Individual responses	Other (organisations or groups)
<b>Base</b>	41	30	11
Minerals: Background Study	10	7	3
Waste: Background Study	7	6	1
Sustainability Appraisal (incorporating Strategic Environmental Assessment) Interim Report	10	7	3
Habitats Regulations Assessment: Screening Report	9	8	1
Strategic Flood Risk Assessment Statement	9	8	1
Strategic Traffic and Transport Assessment	25	21	4
Landscape and Visual Impact Assessment	13	11	2
Restoration Study	9	7	2
Minerals and Waste Safeguarding Study	9	7	2
Minerals: Proposal Study	9	7	2
Waste: Proposal Study	12	10	2
Equalities Impact Assessment	6	6	0
Duty to Cooperate Statement	8	6	2

## Appendix D – Responding organisations

Below is a list of the organisations who also responded to the Draft Plan Consultation:

- Arborfield & Newland Parish Council
- Arborfield Ward
- Barton Willmore (on behalf of an individual)
- Barton Willmore (on behalf of IM Land)
- Barton Willmore (on behalf of University of Reading)
- Barton Willmore (on behalf-Bloor Homes Southern, Bovis Homes Southern Counties & Linden Homes Chiltern)
- Basingstoke and Deane Borough Council
- Berkeley Strategic
- Berks, Bucks and Oxon Wildlife Trust (BBOWT)
- Berkshire Archaeology
- Bisham Parish Council
- Buckinghamshire County Council
- Burchetts Green Village Association
- Cayton Park Ltd
- CEMEX UK Operations Limited
- Colnbrook Community Association
- Colnbrook with Poyle Parish Council
- Colne Valley Park Community Interest Company
- Datchet Parish Council
- Gladman Developments Ltd
- Grndon Waste Management Ltd
- Highways England
- Historic England
- Horton Parish Council
- Hurley and Walthams Ward
- Hurley Parish Council
- J Rayner & Sons
- Lambrook School
- Maidenhead Constituency
- Natural England
- Nexus Planning - Thames Valley (on behalf of Farmglade Limited)
- Old Windsor Parish Council
- Old Windsor Residents Association
- Oxfordshire County Council
- Quarry plan Limited (on behalf of Summerleaze Limited)
- Remenham, Wargrave and Ruscombe Ward
- Royal Borough of Windsor and Maidenhead - Old Windsor
- Savills (on behalf of Thames Water Utilities Ltd)

- Shinfield Parish Council
- Slough Borough Council
- South East Water
- SUEZ Recycling and Recovery UK Ltd
- Sunnymeads Residents Association
- Surrey County Council, Minerals and Waste Planning
- The British Horse Society
- The Chavey Down Association
- The Environment Agency
- The Maidens Green Society
- The Rayner Family Trust
- Transport for London (TfL)
- Twyford Ward
- Wargrave Parish Council
- West Berkshire District Council
- Windsor Conservatives
- Winkfield and Cranbourne
- Winkfield Parish Council
- Wood E&I Solutions UK Ltd (on behalf of National Grid)
- Woodley Town Council
- Wraysbury Parish Council

## Appendix E – Issues raised regarding Mineral (M) Policies

<b>General</b>
Support the consideration given to Soft Sand reserves in the south east in the plan, however there is potential for supply issues in the near future.
Agree with the consideration of cross-boundary impacts and cumulative impacts of minerals development with other local developments.
The Colnbrook rail depot imports aggregates which can be used in eastern Berkshire. This is potentially under threat as a result of the proposal to build the third runway at Heathrow. There are proposals to refigure the Colnbrook rail depot so that it can continue to import materials by rail. It would be helpful if the Central and Eastern Berkshire Minerals and Waste Plan could explicitly support this and this could be included in the Statement of Common Ground between the Authorities.
We are requesting additional details showing what will go into your hydrogeological studies and copies of these reports once completed for any sites where planning is submitted. This is due to the fact that many of the sites are located within Groundwater Source Protection Zones 1, 2 and 3 (as acknowledged at each site in your draft Plan).
Sites are within close proximity of multiple of our WTW, in addition to also using waterways for transportation and constructing a new wharf next to a raw water extraction source on the Thames. Any applicant should be mindful of any works being proposed that may impact on aquifer yield or quality as well as that of surface waters in the Thames and Bray Lake in particular due to the shallow nature of the local aquifers. This should include the proposals for robust pollution protection measures and consideration of drainage design and ground disturbance to minimise potential impacts on groundwater quality and reduction in the availability of groundwater resources. Consideration should be taken of the sensitive nature of the site in the work and method statement for any development, especially in regard to any material and fuel storage on site and the movement of vehicles especially those involved in any fuelling processes for machinery, with particular reference to the proposed site at Monkey Island Lane Wharf, Bray and in transporting materials between Water Oakley Farm, Holyport to Monkey Island Lane

<b>General - Data</b>
We recognise the difficulties Central and Eastern Berkshire Authorities have in identifying consumption and movement of aggregates as data has been collected on a Berkshire wide level rather than by each mineral planning authority. However, we look forward to more accurate data collection for Central and Eastern Berkshire moving forwards.
There has been a failure to obtain sufficient data, or to undertake any meaningful analysis of basic supply and demand projections, including the marginal cost of alternative forms of aggregate, e.g. to explain the current high levels of exports, and whether any additional permissions would result in any increase in the real land bank that would benefit Central and Eastern Berkshire.
The data presented in table 1 of the Draft Plan shows that whilst the sales of land won sand and gravel have increased by over 25% in the period from 2009 to 2014, the actual consumption in Berkshire has fallen by over 25% in the same period. On the basis of this data some 450,000 tonnes of land-won gravel and sand were exported in 2014, this raises a number of points. There is clearly an absence of complete data historically and the fact that the last data presented is 4 years old underlines this deficiency. Any Final Plan that is based on such poor data will necessarily be deficient. There needs to be a much fuller understanding of the historical information of actual sales, exports and imports or all aggregates since the time of the last assessment in 1995 and then this can also serve as a basis for assessing the quality of the plans prepared as well as the period covered by any Final Plan to 2036.

There is no consideration within the plan of the revised downwards estimates for growth prepared by the IMF and also the recent stock market corrections and early signs of housing prices declines and sales that all support an assessment of slowing economic growth with the early stages of the Draft Plan period.

There is no discussion of future growth forecast as recent lowering of estimated growth for the UK in general and softening of the housing market in particular. At the time in the future when there is a need to grant additional planning permission for new sources of aggregates there should be a levy applied on any extraction to ensure that there is a fully funded independent provision of capital for any restoration work, without being reliant on the credit quality of a private sector entity some decades into the future. Recent examples of significant private company failures that have then had an impact on public sector finance serve as a timely reminder of need to address this point.

It is clear, from the 2014 data that almost half the consumption of land-won sand and gravel has been exported, whilst crushed rock imports have grown significantly, and indeed present the majority of all aggregates consumed in 2014 as they were in 2009. However, there is no discussion of why this is the case, the relative economics from a supply and demand and marginal cost to inform the future period.

### **Policy M1**

Support Policy M1 – however there should be greater coordination between the Minerals and Waste Plan and Local Plans for non-minerals development. Recommend an additional policy principle: e) Take account of plans for non-minerals development, including allocations for residential and commercial development set out in Local Plans.

Policy M1: this policy contains no reference to environment (natural, built or historic). It seems odd to say “work with relevant minerals planning authorities” when it is their Plan.

Policy M1 – Object to this policy as written as it is not consistent with national planning policy guidance as set out in the NPPF. The wording of this policy is also inconsistent with the wording of this plan’s vision too. The phrase ‘sustainable supply of minerals’ in policy M1 should be replaced by ‘a steady and adequate supply’.

For clarification and to avoid confusion with Policy M1 b), within Policy M1 c) add in the word other so that it reads “Facilitate the supply of other minerals to meet local demands”. 5.22 “Therefore, the Central and Eastern Berkshire Authorities will plan to provide for minerals of the right type, in the right place and at the right time”. The use of the word “provide” could be considered misleading as the Plan does not identify all the sites required to meet the mineral needs over the Plan period. Maybe a more appropriate word or phrase could be used, such as “maintain the supply of”.

### **Policy M2**

Policy M2 – refers on p26 to “Government Policy 32”. It is not clear which Government policy is referred to. The Planning and Minerals Planning Guide was replaced by the Planning Practice Guidance (PPG). This reference needs to be corrected and the plan checked for other references if an error or the plan updated to ensure it is based on up to date Government Guidance.

Policy M2 – refers to a Policies Map, whilst a high-level key diagram is included on p20, a policies map does not appear to have been provided as part of the consultation review. It is important stakeholders are able to review the spatial implications of the draft plan. The broad extent of mineral resources is available from other sources, an up to date Policies Map needs to show the extent of Minerals Safeguarding Areas as well as proposed allocated sites at an appropriate scale which permits analysis of the implications of the designations particularly for non-minerals development.

Policy M2 – support this policy as the opportunity to extract sand and gravel from Bridge Farm has been lost because the ongoing residential development of the surrounding area makes the site wholly inappropriate for the scale of the industrial works that are envisaged.

<p>Furthermore, the proposed Arborfield bypass will traverse the site and interfere with the extraction of minerals from the site.</p>
<p>There are significant ongoing levels of housing need in Central and Eastern Berkshire, it is important that the Waste and Minerals Plan does not as an unintended consequence delay or prevent the delivery of new development, in particular housing, where that housing is required to meet the needs of the relevant local area. This is especially important in Central and Eastern Berkshire where the spatial extent of minerals deposits affects a very broad area, including locations which are potentially suitable for future residential development.</p>
<p>Pre-extraction of the particular mineral deposit may not be viable and this should be recognised in the safeguarding policy [M2]</p>
<p>There is a need for some level of protection of mineral assets, but 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 be required to enable local planning authorities to make suitably balanced judgements on the positive or negative effects of a non-minerals development proposal as part of their wider plan making and their decision taking. There is an intention to safeguard proven mineral deposits of sharp sand and gravel; and, soft sand that are of economic importance or that are around active minerals workings to prevent sterilisation and retain resources to meet longer term need. Paragraph 5.28 of the Plan refers to this being achieved by ensuring that development is steered elsewhere, or that extraction of the underlying minerals takes place prior to development proceeding. Any local policy intention to steer development away from Minerals Safeguarding Areas is considered contrary to national policy and this assertion within paragraph 5.28 of the Plan should be deleted. National policy does not advocate an approach that seeks to steer non-minerals development away from Minerals Safeguarding Areas.</p>
<p>Soft Sand – acknowledge that Soft Sand reserves within the authorities is variable and commercial viability of the reserves is unknown, making it hard to identify possible future extraction sites. Therefore the policy to safeguard soft sand resource in M2 and the opportunity for soft sand to come forward under policy M4 is welcomed.</p>
<p>The “Minerals &amp; Waste Safeguarding Study (June 2018)’ has been published as part of this consultation exercise. This document correctly highlights the importance of remembering that safeguarding areas do not prevent development from occurring and recognises that there will be circumstances where the need for development outweighs the benefits of protecting the mineral resource and that there may be opportunities to accommodate both through the use of prior extraction. The Study highlights that safeguarding is not necessarily a barrier to non-minerals development and indicates that early consultation on non-minerals and waste development proposals will allow safeguarding to be built into the scheme. This advice will need to be borne in mind both within the policies of the Minerals and Waste Local Plan and by the local planning authorities across the area more generally, for example in relation to development management decision taking and the consideration of site suitability through their housing and economic land availability assessments.</p>
<p>The proposed wording of ‘Policy M2: Safeguarding sand and gravel resources’ is led by the advice that is set out within Recommendation 9. However, a separate criterion is required that allows a positive approach to be taken in allowing non-minerals development to be permitted if the planning benefits of the non-mineral development clearly outweigh the need for the mineral resource.</p>
<p>Policy M2 – worried that by supporting this policy the site could be used for extraction just because it was not being used for development. In a densely populated area the emphasis must be on safeguarding what parts of the environment we can.</p>
<p>M2 Safeguarding sand and gravel resources We are pleased to see a commitment to the safeguarding of sand and gravel resources. We would like to see clarification of what “special consideration” means in relation to the deposits of soft sand (5.34).</p>

<b>Policy M3</b>
Policy M3 needs more clarification, because at present, it is unclear as to why the monitoring indicators for policies M3 and M4 trigger policy review for the landbank being below 7 years after 5 consecutive years but an increase or decrease in sales would trigger a review after 3 consecutive years. Having a landbank lower than 7 years for 5 consecutive years can be particularly concerning to the industry especially with the lead in times needed for mineral extraction.
Paragraph 5.57 of the Draft Plan fails to recognise that paragraph 205 of the National Planning Policy Framework requires minerals planning authorities to “as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads, Areas of Outstanding Natural Beauty and World Heritage Sites, scheduled monuments and conservation areas”. The proposed allocation of Ham Island at Old Windsor contains the Early medieval and medieval palace and associated monuments of Kingsbury scheduled monument.
Policy M3 – given the current land bank and the very short lead times to grant planning permission and commence any shallow extraction, the policy should only release land once, based on current data the land bank has fallen below 3.9 million tonnes (being 7 years of average sales 555,163 tonnes). Any permissions granted ahead of this will only serve to increase the existing 12.1 years of land bank, which is not supported by the NPPF. Based on the current data this could suggest monitoring for the land bank falling below (say) 4.5 million tonnes as the monitoring indicator for any future change in this policy. There should be no pre-judging of any shortfall through the use of provision rates ahead of any actual shortfall as suggested in 5.60. The conclusion within 5.65 of a shortfall is difficult to support given the lack of credible long term forecasting included to support the Draft Plan, in terms of long term supply and demand and marginal cost analysis of alternative forms of aggregate or the updated forecasts for lower near term economic growth in the early stages of the plan period. In any case any shortfall will, if it occurs, not be in the short term but rather towards the middle / end of the plan period for which a monitoring indicator as suggested above would suffice. The outcome of the application for Poyle Quarry as well as sales from Riding Court Farm also contribute towards the permitted reserves and should also be considered.
Policy M3- there is an implication the at minerals should be extracted locally, it could be justified to import given population density.
Policy M3 - The difficulty in disaggregating the historic data has resulted in considerable uncertainty being attached to the data which has emerged from the process of determining past aggregate sales, the data should therefore be reflected as a range, this should also be applied to future aggregate demand.
Policy M3 - object to this policy and request that it is reworded to reflect the fact that the annual rate of provision may need to be updated on an annual basis to reflect the latest Local Aggregate Assessment (LAA). The 0.71mt average rate of provision is based on previous sales and whilst this is one indicator of future provision it is not the only consideration. The joint authorities also need to consider the productive capacity of the quarries that contribute to the landbank and ensure that the permitted reserves that are not held in a few large quarries. This sort of factor should be considered in the LAA. Would like the words “subject to the impact of local circumstances on demand” to be replaced by “subject to the latest annual Local Aggregate Assessment”.
Policy M3 - This policy does not specify a level of requirement for sharp sand and gravel and soft sand, instead identifying a yearly production rate. Therefore, it is not clear how this policy, and the site allocations in Policy M4 will achieve an adequate supply of aggregate minerals over the plan period, as required by the NPPF.
M3 Sand and gravel supply We support the commitment to maintain a landbank in accordance with the NPPF and the recognition that change in local circumstances will have an impact on demand and therefore the landbank. We acknowledge and support that the Plan has based its requirements for sharp sand and gravel on the 3-year figures rather than



the 10 year figures. Policy M3 makes no reference to soft sand and how provision is to be made for the identified 1.5million tonnes required over the Plan Period as identified within the Background Study, LAA 2017 and the Sustainable mineral strategy within the draft Local Plan. The soft sand issue should be addressed within this Policy.

5.52 - There is no proven need at this point in time, to grant any additional planning for new sources of aggregates. The assessment of 12.1 years of landbank is significantly above the 7 years required by the NPPF. Instead, the monitoring of the landbank position should continue and should there be a proven requirement, after 3 successive years of a shortfall, only then should there be a presumption for granting permission for new sources be considered.

#### **Policy M4**

M4 – Spencer’s Farm site is allocated in the draft version of the RBWM Borough Local Plan (BLP) for residential development (approximately 300 dwellings). The site is also allocated for the delivery of strategic infrastructure in the form of a 3FE primary school which RBWM intends should serve the town of Maidenhead not just the development at Spencer’s Farm. Policy 4 refers to locations for sand and gravel extraction, including a site called ‘Sheephouse Farm, Maidenhead’. Land at Spencer’s Farm forms a small part of the area covered by Sheephouse Farm. There could be chance at the outset of this project to exploit any mineral reserves that could viably removed without adverse environmental impact.

Concerns over the lack of reserve sites and all the future risks that entails.

Policy M4 Minerals Sites: concerned that clause 4 of Policy M4 has no safeguards for the natural, built or historic environment – these are relegated to a reference to development management policies in the supporting text. This is not consistent with the approach in Policy M6 which specifically includes “*The proposal not having an unacceptable impact on the environment*” within the policy and is therefore more robust. We also consider that Policy M4 should include a requirement for development proposals for any of the allocated sites to take the site-specific considerations in Appendix A into account.

Some of the proposed minerals and waste sites in policies M4 - Locations and Sites for water management and W4 Locations for sand and gravel extraction lie within Flood Zones 3 or 2 and therefore need to be sequentially tested. As this evidence has not been produced then this plan is currently unsound as it is not consistent with national plan policy NPPF paragraphs 157 and 158 or justified.

Policy M4 - Removal of Ham Island and Riding Court Farm from plan.

Policy M4 - Bridge Farm – P130 The adverse effects identified do not include the specific impact on a restored bocage and wetlands restored as part of the South of the M4 development. The Shinfield South Alternative Natural Green Space (SANG) is adjacent to the proposed site and, as it is North, downwind of prevailing weather. It will therefore be subject to degradation of amenity and environment by virtue of dust. The policy neglects completely to provide for the impact on river ecology of adjacent quarrying. Turbidity as a result of dust and silt from riparian quarrying may compromise a sensitive chalk-stream type habitat that includes native mussels. These are exceptionally vulnerable to turbidity and rely on salmonids for reproduction, which would be adversely affected by turbidity from dust. Photographs and grid reference available on request. Secondly, the impact on amenity for fishing has not been considered. Most problematically, parts of the Loddon were specifically designated and protected with regards to Salmonids, Cyprinids and water quality under the Freshwater Fish Directive and Water Framework Directive. These impacts have been arguably illegally disregarded. I therefore propose that Bridge Farm be excluded from the policy, or its inclusion deferred until the viability of less sensitive sites is confirmed. Specifically, it conflicts with the amenity of new developments, and with housing policy and planned intensive development in Shinfield West and the South of the M4. In addition, road access via the new Shinfield relief road is through an area which is planned to be completely subsumed by housing which has been already approved. Lorry access via

the Shinfield relief road and Arborfield will therefore be through housing. The consideration by the draft policy is therefore inadequate as it does not consider health and environmental impacts in both Shinfield and Arborfield's new housing developments, which were not, seemingly in existence when the policy was written.

Policy M4 – changes sought to policy - It is too late to extract sand and gravel from the Bridge Farm site given the extensive residential development that is ongoing in the surrounding villages. Apart from the noise, dust and pollution from the site itself the impact on current and predicted traffic flows will be significant. And the late inclusion of a ready-mix concrete plant will significantly increase the impact of the site on the local area with increased danger on the roads and pollution of the natural environment including the river Loddon.

Brown field sites and those where mineral rights granted decades ago are being exploited should be considered for social housing before anything else. The impact on the neighbourhood would be far less detrimental

Policy M4 – Support the policy on the supply of recycled and secondary aggregates. This is a sustainable approach to sand and gravel working. Recycling of aggregates at quarry sites can enable blending of recycled aggregates with primary aggregates and allow the primary resource to be conserved for higher end product use.

Paragraph 204 of the NPPF states that planning policies should provide for the extraction of mineral resources of local and national importance. The Draft Plan identifies draft allocations at Poyle Quarry (2 extensions), Water Oakley and Monkey Island Lane Wharf. All of the allocations are important for providing a steady and adequate supply of sand and gravel in the local area, either directly via extraction or by enabling the sustainable transport of material for processing. The most recent data available (as published within the Draft Joint Minerals and Waste Local Plan) states that reserves of sand and gravel in Central and Eastern Berkshire with planning permission for extraction (permitted reserves) at 31st December 2016 were 6,723,000 tonnes. Based on the 10-year average sales of 555,163 tonnes, the landbank for sand and gravel sites within Central and Eastern Berkshire is 12.1 years. However, based on a 3-year average this decreases to 9.4 years which is not far from the required 7-year provision set out in the NPPF. The 3-year average is also likely to reflect the increase in demand suggested by recent sales figures. Therefore, the Central and Eastern Berkshire – Local Aggregate Assessment (LAA) for the period 2016, determined the expected Provision Rate for the Plan period as 0.71 million tonnes. The proposed Plan period is up to 2036. If the LAA rate is projected forward from 2016 to 2036 a total of 14,243,380 tonnes of sharp sand and gravel would be required over the course of the Plan. Taking into account that current permitted reserves for Central and Eastern Berkshire are 6,723,000 tonnes (not including Star Works Quarry<sup>2</sup>). This means that there is a requirement of 7,520,380 tonnes of sharp sand and gravel. The draft allocations at Poyle and Water Oakley will deliver approximately 3 million tonnes of aggregate over the plan period. The draft allocation for the wharf at Monkey Island Lane will also assist in the efficient movement of raised mineral to serve the existing processing site at Monkey Island Lane. We welcome the inclusion of the draft allocations within the plan, which will contribute to addressing the current shortfall and meeting the requirement described above.

Paragraph 16 also states that plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. Draft Policies M4 and M7 clearly identify that the named sites have been identified for future development.

Managing the supply of aggregate (page 31 to 33) - \*Ref

App A Poyle Quarry, Poyle Quarry Ext, Water Oakley Paragraph 16 of the NPPF also requires that plans be prepared positively, in a way that is aspirational but deliverable. All of the sites identified above are within the control of Summerleaze, as a result, the joint authorities should be satisfied that the draft allocations are deliverable within the plan period. It is considered that the draft plan has been prepared positively with the joint

authorities identifying a need to ensure the steady supply of sand and gravel by allocating a number of sites for future sand and gravel extraction.

Locations for sand and gravel extraction (page 34 to 37) - \*Ref App A Poyle Quarry, Poyle Quarry Ext, Water Oakley The specific future development considerations and requirements for each of the sites are set out at Appendix A of the plan.

Sustainable Development (page 74 to 75) - \*Ref App A Poyle Quarry, Poyle Quarry Ext, Water Oakley Paragraph 16 of the NPPF states that plans should be prepared with the objective of contributing to the achievement of sustainable development. From the assessments provided for each of the sites as detailed in Appendix A of the draft plan, it is clear that the joint authorities have fully considered the impacts of the draft allocations and identified areas where mitigation or further information is required in order to ensure that development can proceed at the identified sites in a sustainable manner. Paragraph 204 states that policies set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health. Appendix A of the plan sets out development considerations which the developer should consider when preparing proposals for the draft allocations. The plan is therefore considered to accord with this requirement. The draft allocations are considered to accord with each of the three objectives which contribute towards the meaning of sustainable development (as defined by paragraph 8 of the NPPF).

Protecting Public Health, Safety and Amenity (page 95 to 97) - \*Ref app A Poyle Quarry, Poyle Quarry Ext, Water Oakley In terms of the environmental role, the draft allocations represent the most efficient use of natural resources with future development proposals seeking to minimise waste and pollution. Each of the draft allocations will be subject to the requirements as set out in Appendix A of the draft plan, ensuring that future development can proceed at the sites without posing an unacceptable impact upon the environment.

In terms of the social dimension, the Minerals Products Association suggests that a house requires 200 tonnes of aggregate, a school may require 15,000 tonnes of concrete and a community hospital may require 53,000 tonnes of concrete. In addition, maintaining and improving the existing built fabric of the area can also require large quantities of aggregate. One of the UK Government's key aims is to increase housebuilding with a target of delivering one million new homes by 2020 announced by Housing Minister Brandon Lewis in September 2015. The Strategic Housing Market Assessment for Eastern Berkshire has an objectively assessed need for 2,015 new dwellings per annum between 2013 and 2036. A range of transport infrastructure and commercial development are planned to take place during the plan period which will require aggregates. Crossrail, one of the largest construction projects in recent years, extends well into Central & Eastern Berkshire, with the current terminus planned to be at Reading. Town Centre developments are due to take place including areas allocated in Maidenhead Town Centre Area Action Plan comprising residential, retail (25,000 sq. m), office (79,000 sq. m), other employment (4,000 sq. m), public transport interchange, other uses including leisure and culture. Together these construction projects will require a range of aggregates amounting to on-going demand that will need to be met through the supply of sand and gravel, crushed rock and recycled aggregates in the years ahead. The supply of sand and gravel as a result of the draft allocations will be essential in meeting the needs of present and future generations in terms of the built environment, infrastructure and services.

The draft allocations will also impact waste growth in the years ahead. For example, the site at Water Oakley will provide an excellent facility for the deposition of inert material resultant from local construction projects.

The draft allocations will offer long term, stable, full-time employment prospects at a local level and will provide opportunities for promotion and advancement through training and experience. The development proposals resulting from the draft allocations will also allow

our client to continue to invest in local communities in terms of training, educating, employment contributions, economic advancement, sponsorship and charitable support.
The draft allocations appear to be based upon a robust evidence base and would allow the joint authorities to deliver a steady and adequate supply of sand and gravel in a sustainable manner. We would urge the joint authorities to continue to progress with the allocations as the emerging plan continues to proceed to examination and adoption
Policy M4 - It has already been noted in our comments on the Minerals Proposals Study that several of the sites proposed for sand and gravel extraction have been put forward as potential borrow pits for the Heathrow Airport expansion. Therefore, it is questioned whether these sites will be available to meet the total mineral requirement in Central and Eastern Berkshire over the plan period, if they are being used to meet the specific requirement for the Heathrow Expansion. It is also questioned what an 'appropriate location' would be, regarding windfall sites in paragraph 4.
Policy M4 - There are four sites in your draft plan that are either in or are adjacent to the parish of Colnbrook with Poyle – Poyle Quarry, Poyle Quarry Extension, Berkyn Manor Farm and Horton Brook Quarry. Notwithstanding the negative site specific impacts which would be clearer when more detail is available than is currently in your draft, all of these sites and their haul routes will put huge amounts of traffic onto roads going through our parish, or adjacent to it. We object to the increased traffic congestion and air pollution that this will cause in areas that are already heavily congested and suffering poor air quality well below EU Directive minimum standards. Moreover, some of the sites are very close to residential properties, and all four are in the Colne Valley Park and will cause loss of amenity and openness, negatively impacting on the quality of life and landscape. Most of the land is agricultural; the Horton Brook Quarry – currently in operation – was given permission on the express condition that the land would be worked for a limited period (already extended) and would be restored to agriculture as soon as minerals extraction ceases. The proposal in the draft plan to infill with waste after extraction violates this condition of permission and, generally, waste landfill will make return to agricultural use less viable.
Policy M4 - This policy does not include provision for suitable vehicle access. Clearly that should be a primary consideration for any mineral extraction site. Policy W4 clearly states that ....the site 'has good connectivity to the strategic road network'. a. Horton Brook Quarry access is directly from Horton Road through a dangerous junction in Colnbrook which includes passing beside a children's playground and housing estate before accessing the Bath Road. This is dangerous and disruptive to local residents. b. Berkyn Manor, Poyle Quarry, and Poyle Quarry Extensions will all be dependent on a new road which will lead onto Poyle Road in Colnbrook. This has not yet been agreed with Slough Borough Council, nor were Colnbrook Parish Council even aware of the proposed road plan. Therefore this section of the policy is clearly flawed. Change sought - We do not believe the policy can proceed until a proper road management policy has been consulted upon and agreed with all the affected parties viz Horton, Slough BC/Colnbrook PC. Horton Parish Council specifically would like to be properly consulted regarding road access to all the above sites. This should take place before any further plans are established for either mineral extraction or infill on any of the sites within our Parish.
M4 - The identified sites provide for a total of 7,330,000 tonnes of sand and gravel, which is 190,380 short of the total required over the Plan Period. We note the contingency approach within Policy M4, however it would be preferable to make full site provision for the identified need over the Plan period to provide greater certainty. We would expect to see reference to soft sand within the supporting text, as it is included within the Policy (4). We support the inclusion of M4 4ci to allow soft sand sites to come forward if possible.

**Policy M5**

Policy M5 P39 – recycled and secondary aggregates – paragraph 5.81 “there is no secondary aggregate produced within Central and eastern Berkshire”. Surely that is what the aggregate recovery sites in Annex 2 [*Waste Background Report*] are purported to be. Annex 5 [*Waste Background Report*] Current Site Capacities - Unsure what capacity is meant to be addressing believes Wraysbury sites are being double counted. Would like these secondary sites included & monitoring functions provided.

The disposal of recycled and secondary aggregates should not impact adversely on the local environment, which this plan would.

Change sought to Policy M5 - It is questioned what ‘appropriate locations’ are in relation to this policy (is this the spatial strategy for waste development in Policy W4?)

M5 Supply of recycled and secondary aggregates Should the Policy read 0.05 million tonnes per annum? Paragraph 5.19 of the Draft Plan and the Background Study, highlights that there is no reliable or comprehensive data on production or use of recycled aggregates, and that historically these have been recorded on a Berkshire County – wide level. For the County these figures show sales of recycled and secondary aggregates are increasing and 2016 saw 498,000 tonnes sold. However, the Background study report (Table 5.4) shows that there has been a steady increase in the amount of C&D waste arising and being treated within Central and Eastern Berkshire and also an increase in the amount exported out of the Plan area. The 2017 LAA also contains sales data for recycled and secondary aggregates for a three-year period which indicates an average of 105Tt per year and that capacity survey information indicates recycled and secondary aggregate sites are currently operating under capacity. In 2016 Central and Eastern Berkshire had 379,800 tonnes of recycled aggregate capacity, some of which was temporary, and the LAA reports that this could potentially be even higher. Therefore, as a minimum within this Policy, we would expect a commitment to protect the existing sites and replace the temporary sites as and when required, in order to maintain the current capacity at 380000 tpa and enable sales to continue at least at the current level. The commitment to maintain capacity of only 10-50,000 tonnes over the Plan period seems very insufficient. Rather than relying on exporting material to recycled aggregate facilities elsewhere, the Plan should look to provide facilities to deal with its own arisings. Within Table 7 of the 2017 LAA, Sales of Recycled aggregate for Central and Eastern Berkshire is given as 0.5million tonnes. Clarity is required as to where this figure comes from as this contradicts the sales figures within Table 5 of the LAA and the Local Plan/Background Study.

**Policy M6**

M6 - Proposals for the extraction of chalk and clay to meet a local demand will be supported, in appropriate locations, subject to: i. The proposal not having an unacceptable impact on the environment and communities; and ii. There being no other suitable, sustainable alternative source of mineral available.” It is expected that the above policy requirements will be demonstrated in the planning application phase through pollution management plans and planned mitigation measures to prevent water laden with suspended solids entering the watercourses. Both above and below ground pathways from site to river need to be assessed in order to ensure appropriate mitigation measures are in place. This would help to ensure the application is compliant with the WFD objectives to prevent deterioration in status and ensure the development does not prevent the future target status of the water body being achieved. Water bodies can be both surface and ground waters. Site drainage strategies would identify what is proposed for foul, trade, and surface water and should be included in the application and available at consultation.

M6 Chalk and clay - We support this Policy

<b>Policy M7</b>
Policy M7 - Fails to make environmental issues top priority
M7 - The sequential test will also need to be applied to other development within Flood Zones 2 and 3 such as Policy M7 for the Proposed Aggregate wharves and rail depots. Monkey Island lies within Flood Zone 2 and this site will need to be sequentially tested. Site allocations and river corridors - Monkey Island Lane Wharf The River Cut is not a “navigable waterway.” There may be a right of navigation but this does not mean it is navigable. There is no mention of River Cut in the ecology or water environment sections. This needs to be added to the text.
Policy M7 – definition of appropriateness needed, more recognition of DM policies needs to be included, no connectivity should be even considered if it is going to affect flooding risks for example.
There is no co-ordination between the rail plan for passengers and for the movement of aggregates. The latter will piggy back off any changes made to improve commuting without contributing to the capital cost. The commercial sector will benefit without cost to themselves.
Paragraph 16 also states that plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. Draft Policies M4 and M7 clearly identify that the named sites have been identified for future development.
The other provisions of paragraph 16 in relation to engagement; accessibility and clarity also appear to have been met within the draft plan. The proposed development is considered to accord with the requirements of Paragraph 16 of the NPPF with respect to plan-making. With regards to the economic dimension, the proposed development will generate direct employment for full and part time staff. The proposed development will also help to sustain existing employment at the Monkey Island Lane Processing site. Development of the sites will result in a significant annual expenditure of millions of pounds on the likes of purchases, transport, wages, consumables, services, and business rates. This expenditure will directly and indirectly benefit the local economy.
M7 Aggregate wharves and rail depots Support this commitment towards aggregate wharves or rail depots.

<b>Policy M8</b>
Paragraph 204 of the NPPF states that planning policies should safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material. The identification of the wharf at Monkey Island Lane directly accords with this requirement and will allow the operator to transport material via barge along the River Thames to serve the existing processing facility.

## **Minerals Background Study**

### **Sand and Gravel Data**

It is noted that Berkshire-wide data is used with regard to consumption figures, and it is acknowledged that this is the best available data, as data down to individual Mineral Planning Authority level is very poor for Berkshire.

### **Sand and Gravel Sales**

Please note that West Berkshire have revised the sand and gravel sales figures for the previous 10 years, due to being able to publish actual production figures now (whereas estimates and publicly available information were used in the past). These are included in the West Berkshire 2017 LAA due to be published shortly. The method for estimating sales in the Central and Eastern Berkshire area prior to 2016 is reliant on sales figures in West Berkshire (Table 5.13). However, it is not expected that the revisions of West Berkshire figures will affect the method for estimating sales in the Central and Eastern Berkshire area (Table 5.13). This is because the revisions to estimates would also affect total Berkshire sales to the same magnitude, as the West Berkshire figures are a component of the total Berkshire-wide sales. Therefore the difference between Berkshire-wide sales and West Berkshire sales (and therefore inferred Central and Eastern Berkshire sales) will still be the same. Please let us know if this requires any clarification.

### **Sharp Sand and Gravel Provision**

It is noted that the past three year sales average is to be used in determining the requirement for sharp sand and gravel over the plan period. Based on the trend of increasing sales over this period, it would seem appropriate to use this figure instead of the 10-year average.

### **Soft Sand Provision**

Estimates of soft sand consumption within the plan area is given in Table 5.14 and an average of approximately 0.08 million tonnes per year (or 1.5 million tonnes over the plan period) has been used as the basis on which to calculate need for this aggregate. It is noted that there are deposits of soft sand within the plan area, but that these deposits are of variable quality and it is not known the commercial viability of these deposits (paragraph 5.97). It is acknowledged that no sites have been nominated for soft sand extraction, however, planning guidance does also identify that Preferred Areas, and Areas of Search may be appropriate ways to plan for mineral extraction (NPPG Minerals Paragraph: 008 Reference ID: 27-008-20140306), and paragraph 204 of the NPPF states that planning policies should aim to source minerals supplies indigenously. Consideration of these options could be complemented by a better understanding of the soft sand resource within the plan area. Paragraph 5.57 states that the only source of soft sand is land-won. However, this does not account for marine sand, which is understood to be able to substitute in certain end uses<sup>1</sup>. Paragraph 5.100 states that the need for soft sand will have to be secured from neighbouring authorities should insufficient resources be identified within Central and Eastern Berkshire. However, it would seem that no further investigation into the ability of the plan area to meet its demand for soft sand has been undertaken, including any assessment of the resource within the plan area. West Berkshire would be concerned if reliance were placed on its supplies of soft sand, as there are very few permitted reserves remaining in the district, and further work is necessary regarding how future need will be met as the remaining deposits with operator interest are located within the North Wessex Downs Area of Outstanding Natural Beauty (AONB). This work is planned to be undertaken to support the preparation of the West Berkshire Minerals and Waste Local Plan. The authority does not anticipate being able to specifically provide for an unmet need of this aggregate in other authority areas.

#### Recycled and Secondary Aggregates

Table 5.2 – The capacity estimate for recycled aggregate capacity in this table (379,800 tpa) differs from the equivalent capacity estimate in the Waste Background Study (242,500 tpa treatment and 108,500 tpa transfer (351,000 tpa total) – Table 5). It would be useful to know the reason for the differences in this data – for example, if different data sources or parameters have been used. Table 5.3 – These figures differ from those in Table 3.14 of the Berkshire Local Aggregate Assessment. It would be useful to know the reason for the differences in this data – for example, if different data sources or parameters have been used. Table 5.4 – Please note that the format of the table in the West Berkshire LAA that this table has been based on has been updated in the West Berkshire 2017 LAA due to be published shortly. This is because it is considered that inert material that is not ‘treated’ within an authority area may also be managed in another way (landfill, recovery) within the authority, and not all of it necessarily travels outside of the authority for ‘treatment’ elsewhere. It is considered that a more accurate way to represent inert/CDE waste that travels outside of the authority for treatment, is to subtract the amount of inert/CDE waste arising and also treated within the authority from the total amount of inert/CDE waste treated within the authority (assumed exports = total C&D waste treated within authority minus C&D waste arising and treated within authority).

#### Rail Depot Safeguarding

Support for the safeguarding of rail depots within West Berkshire is noted. The rail industry at Theale is proposed to be safeguarded in the new West Berkshire Minerals and Waste Local Plan (as set out in the consultation on Preferred Options). Paragraph 4.31 states that the operators at Theale show no indication at present of seeking to increase capacity. It could also be noted that in 2016 one of the rail depots at Theale previously importing cement also started to import aggregates for concrete production and for onward transportation.

#### Non-aggregate Minerals

We note and accept the conclusions on non-aggregate minerals. Draft Local Plan Document Vision Paragraph 3.4 states that the Joint Minerals and Waste Plan will seek to (inter alia) maximise the recovery of waste. However, this would appear to be contrary to the Waste Hierarchy, which seeks to move the management of waste as high up the hierarchy as possible. Recovery falls below reuse and recycling in the hierarchy, and therefore to maximise the management of waste at this level would not push the management of waste further up the hierarchy. It is acknowledged that this sentiment is not translated into the vision of the plan, however, including it in the supporting text is at odds with the vision (and strategic objective 10), and the waste hierarchy.

**Strategic Objectives** It is noted that there is no strategic objective relating to the provision of waste management capacity requirements. Waste plans are required to identify sufficient opportunities to meet the identified needs of their area (NPPW, para 3) and therefore including a strategic objective to support this would be appropriate. Specifically, Waste Planning Authorities in the South East have signed a Memorandum of Understanding, whereby they will aim to plan for net self-sufficiency, which assumes that within each waste local plan area the planning authority will plan for the management of an amount of waste which is equivalent to the amount arising in that plan area. Therefore this sentiment could be included in a strategic objective related to planning for net self-sufficiency. This is a response at officer level and has not gone through any formal sign off procedure in West Berkshire Council.

**Minerals Proposal Study comments - Borrow Pits** It is noted that several proposed site allocations have been put forward as potential borrow pits for the Heathrow Expansion. However, borrow pits are generally classified as ‘windfall’ sites and are used to support specific developments. Therefore it is questioned whether these sites will be available to



meet the total mineral requirement in Central and Eastern Berkshire over the plan period, if they are being used to meet the specific requirement for the Heathrow Expansion.

Mineral Infrastructure Including the 1.4 million tonne reserve for the Monkey Island Lane Wharf site in Table 3 could be misleading, as this reserve will be extracted from outside the plan area, and the nomination is for mineral infrastructure only. In addition, this site appears as a reasonable option in this Table, but it has not been identified in the long list of sites in Table 2.

Mineral Safeguarding - We support the intention to safeguard deposits of sharp sand and gravel and soft sand at paragraph 2.9.

Soft Sand Provision It is noted at paragraph 4.3 that there are no proposals for soft sand extraction to consider. However, in line with previous comments, further work could be done to identify Preferred Areas, or Areas of Search for this aggregate in line with National Planning Guidance (NPPG Minerals Paragraph: 008 Reference ID: 27-008-20140306) and Revised NPPF (2018) paragraph 204, which states that planning policies should aim to source minerals supplies indigenously.

Sharp Sand and Gravel Provision It would be useful for this document to describe/quantify the extent to which the proposed allocations meet the identified requirement over the plan period, and whether any 'buffer' has been applied to take into account uncertainty or other factors influencing the deliverability of sites.

## Appendix F – Issues raised regarding Waste (W) Policies

<b>General</b>
Early closing of landfill sites means there is likely to be a move towards regionally strategic landfill sites and a need for Statements of Common Ground/ Joint Position Statements.
Agree with the consideration given to cross-boundary and cumulative impacts of waste development and other local developments.
Waste management will change significantly through technology as they have in the past twenty years. This will make existing facilities and sites redundant and inappropriate.
<b>Policy W1</b>
Support Policy W1 Sustainable Waste development strategy as it conforms with the NPPW and the Waste Management Plan for England.
Policy W1 - Any waste site should not impact upon domestic residences and in particular where the quality of life for residents is impacted adversely. Examples of where this plan cannot be justified are the impact of noise, and in particular vehicle activity, pollution of the environment, proliferation of pests and potentially dangerous levels of carbon monoxide from exhaust emissions. It should also be noted that the site is very close to Knowl Hill Academy currently increasing the number of pupils. The detrimental environmental impact upon young children can never be justified. Change sought to policy – yes, to find an alternative, more suitable site [ <i>Star Works</i> ]
W1 - Waste should not be buried, we need more incineration and power production and better recycling facilities.
W1 - We need local govt to object to plastic packaging, return to paper, metal and glass.
W1 – Concerned that locating near to the sources of waste, or markets for its use appears so high on the list of criteria. Considering the population density in some areas, this needs to be caveated. There would a benefit in a cost benefit analysis of sites. Although for example it would be better for green miles etc to have a source of extraction, or a waste disposal centre within the area, it may not necessarily be the best approach. does not think that the cost to people of close encounters with waste sites has been properly costed in. The population density of the area means that it could often be beneficial to finds sites external to the area.
Draft Policy W1 – Sustainable waste development strategy - despite not being able to accommodate all of its waste management requirements within the Plan area, the Plan must not seek to allocate waste management sites in unsuitable locations, for example those where impacts on residential amenities would reach unacceptable levels. Such impacts are already causing detriment to residents near Star Works, with continued planning permissions granted to Star Works on a reasoned weighted planning balance where decision makers have deemed the benefits of a restored former quarry void / landfill to outweigh the temporary impacts of the waste management activities required to complete that restoration objective. It would therefore conflict with the Councils’ Plan objectives and statements to support the allocation of Star Works as a waste management facility over the Plan period. In light of the above, there is support for Draft Policy W1 which, if applied to Star Works, would not support its allocation.
W1 Sustainable waste development strategy At point 6.6 it states that Central and Eastern Berkshire have 30 waste management facilities, however within Table 4, the Waste Operator survey has recorded 9 of 34 responding.
6.15 states that the Central and Eastern Berkshire Authorities will plan to provide for new waste management facilities of the right type, in the right place and at the right time”. The use of the word “provide” could be considered misleading as the Plan does not identify all the sites needed to meet the waste management facility needs over the Plan period. Maybe a more appropriate word or phrase could be used.

The current plan does not offer a sustainable solution. It merely focuses on waste disposal. More emphasis needs to be placed on recycling initiatives.

### **Policy W2**

Policy W2 - Policy is flawed when it is based on lazy construction whereby any existing waste site is automatically considered for development regardless of its suitability over actively seeking a more suitable location. An undue emphasis on one area under the waste and mineral plan is not sound. Change sought to policy – yes, to find an alternative, more suitable site [*Star Works*]

Policy W2 - Individual sites should not be safeguarded but should be judged for suitability based upon the assessment criteria already established within the basic JCEB Site Assessment criteria such as but not limited to: visual impact; geodiversity; historic environment; water environment; air quality; soil quality; public rights of way; transport; health and amenity; cumulative impact; and green belt.  
In the case of existing waste management sites the history of how the site has been run should be taken into account as this is a sure sign of how the site will be run if allowed to continue.

Policy W2 - 6.23 refers to existing waste treatment and transfer facilities, but makes no mention of the reasons why these existing sites were originally granted use within the waste plan, specifically *Star Works*.

Policy W2 – Existing waste sites should not receive any special protection or be automatically safeguarded from other development as this could encourage over landfill use or other waste development in one place.

Change sought to Policy W2 - 5.13 It would be appropriate for draft Policy W2 to permit the removal of waste management facilities in instances where environmental impacts, including those on residential amenity, are at unacceptable levels. The following change is recommended to the first paragraph: “All waste management facilities and those which provide a temporary specialist function shall be safeguarded from encroachment or loss to other forms of development., except where there would be environmental benefits from the loss of such a facility, including the alleviation of undesirable impacts on residential amenity such as those arising from noise, odour, pests/vermin and vehicle movements.”

W2 Safeguarding of waste management facilities We would appreciate clarity of what the term “specialist temporary facilities” mean – how do you determine specialist?

Change sought to Policy W2 - The policy is helpful in that it removes ambiguity around the need to provide an alternative site prior to loss of the existing site. However, it is felt that more detail on what constitutes the capacity requirements is required. No information is provided on how the capacity of the existing site is to be calculated or how this capacity can be reallocated within the plan area (for example could an uplift in capacity at an existing alternative site be appropriate)? Further detail within this policy would provide more clarify and make the policy more effective.

The Plan notes that 70,000 tonnes of household waste from Bracknell, Reading and Wokingham will continue to be sent to Grundons at Colnbrook. This waste facility will be lost if the proposed third runway at Heathrow goes ahead. There are proposals to relocate it nearby and so it would be helpful if the Central and Eastern Berkshire Minerals and Waste Plan could explicitly support this and include this in the Statement of Common Ground between the Authorities. Also support the need to retain the Colnbrook rail depot in the Statement of Common Ground.

### **Policy W3**

6.60 Please note that planning permission for Sutton Courtenay landfill expires in 2030 and that non-hazardous landfill facilities in Oxfordshire have not been safeguarded and no further provision is made for non-hazardous landfill in the Oxfordshire Minerals and Waste Local Plan: Part 1 – Core Strategy.

Policy W3 - Processing of waste from outside of the Joint Minerals and Waste Draft Plan should be discouraged. Waste facilities in the 'Joint Minerals and Waste Plan' should only receive waste from within the four council boundaries to ensure that their required needs are met before any consideration is given to other areas.

Policy W3 - The use of infill material to restore existing mineral extraction sites is a legitimate use of such material. But sites, such as Star Works, should not be used for such activity for longer than is necessary to restore the habitat. In preference, processing sites should be brown-field sites that exist at places such as Thames Valley Park and Slough Trading Estate. Processing of any waste that is not identified in the Joint Minerals and Waste plan, or from outside of the area should be discouraged as far as possible so that as few sites as possible are needed within the area covered by the Plan.

Policy W3 - The waste capacity requirements for the recycling and recovery of non-hazardous waste over the Plan period does not take into account the potential loss of capacity should the Colnbrook waste management complex (in Slough) fail to be relocated as part of Heathrow airport expansion and proposed additional runway. The waste management site currently includes an Energy from Waste facility (Lakeside EfW), as well as a recycling centre (Colnbrook Material Recovery Facility). These facilities manage a significant amount of residual waste and recyclates (non-hazardous household as well as C&I waste streams) which originate from the Central and Eastern Berkshire area (the Plan area). The draft Plan (paras. 6.52 – 6.55) and the JCEB Waste: Background Study Draft Plan, June 2018 (para. 46 onwards) intimate the issue and possible loss of the EfW facility, which would have a significant impact on waste management in the region. However the assessments and reports omit to take similar account of the potential loss of recycling capacity currently managed by the Colnbrook MRF. The minimum waste capacity requirements figures, for non-hazardous recycling and non-hazardous recovery capacities, stated in Policy W3, rely on the retention of both these EfW and MRF facilities, and also assume the continuation of existing recovery capacity throughout the Plan period to 2036. The draft Plan acknowledges that the current waste site allocations (under Policy W4) already fail to meet the future waste management requirements of Central and Eastern Berkshire. Should Heathrow airport expansion and proposed additional runway go ahead without the replacement of the Colnbrook MRF and Lakeside EfW, then this would significantly exacerbate and bring forward the existing waste capacity gap, for both non-hazardous recycling and recovery, as early as 2023, when these facilities could both be extinguished. The sites currently allocated in the draft Plan should clearly be safeguarded, as a minimum, but also that the Plan should be monitored and likely be reviewed in the event that the Colnbrook complex (Colnbrook MRF and Lakeside EfW) is lost and not replaced.

The plan acknowledges the importance of Lakeside ERF and the impact the potential loss of the facility may have on the region. Given the nature of the facility in handling the waste produced by the authorities, it is suggested that the decision on its future may trigger a plan review. At present the plan is silent on what would happen if the facility is lost or in a period while the new facility is constructed. It would be helpful to have written into the plan that while the uncertainties remain about its future than once a decision is made this may require the plan to be reviewed to address possible capacity issues in managing the authorities waste.

Policy W3 – no justification to support the capacity assertion. Many businesses are being encouraged to use less packaging and in 2036 the amount of waste produced may be substantially less. This has not been included in the plan and needs greater explanation.

W3 - support the allocation of Datchet Quarry for the delivery of waste management infrastructure. Also suggest that the former Kingsmead Quarry, Horton which is currently undergoing restoration is considered as a suitable allocation under this policy.

Policy W3 Thames Water support the policy in principle which recognises and supports the provision of additional sewage sludge treatment capacity. However, for clarity it is considered that Policy W3 should specifically refer to “sewage” sludge. In relation to

supporting paragraph 6.67, the weights listed refer to sewage sludge and not effluent/waste water which would weigh significantly more. Although Policy W3 refers to [sewage] sludge there is no reference to new infrastructure for effluent/waste water treatment i.e. the liquid element of waste water which needs to be treated at a sewage treatment works before it can be safely returned to the environment. The Minerals and Waste Plan should also specifically refer to waste water [as well as sludge] treatment, as was done in the last adopted Waste Local Plan for Berkshire 1998 (Policy WLP18) and other Waste Local Plans. For example, the emerging West Berkshire Waste Local Plan will include Policy 12 as follows: "Specialist Waste Management Facilities. Planning permission will be granted for specialist waste management facilities, including facilities to manage agricultural and hazardous wastes and waste water where: Sites are proposed within the areas identified in the location of waste management facilities policy; or There is a clear proven and overriding need for the proposed facility to be sited in the proposed location; and The proposals and any associated equipment or operations do not have an unacceptable environmental impact or unacceptable impacts on communities." The Adopted Surrey Waste Plan 2008 also has Policy WD6 on Waste Water and Sewage Treatment Plants which states: "Planning permissions will be granted for new waste water and sewage treatment plant, extensions to existing works, or facilities for the co-disposal of sewage with other wastes, where development is either needed to treat Surrey's arisings or in the case of arisings from elsewhere the need cannot practicably and reasonably be met at another site. Wherever practical and economical, biogas should be recovered for use as an energy source." A similar policy is to be included in the new Surrey Waste Local Plan due to be adopted in 2019. The submission draft version of the new Surrey Waste Local Plan dated December 2017 includes the following policy: "Policy 12 – Wastewater Treatment Works. Planning permission for the development of new Wastewater and Sewage Treatment Works or for the improvement or extension of existing Wastewater and Sewage Treatment Works will be granted where: i) Development is needed to treat wastewater or sewage arising where the need cannot be practicably and reasonably be met at another site. ii) As appropriate, biogas, for use as an energy source, will be recovered effectively using best practice techniques." The adopted Wiltshire Council Waste Core Strategy, July 2009 also identifies the central importance of the provision of waste water and sewage waste infrastructure as part of the management of growth. Policy WCS3 states: "WCS3: Preferred Locations of Waste Management Facilities by Type and the Provision of Flexibility Over the period to 2026, the Councils will seek to allocate the following types of waste management facilities in the following locations within Wiltshire and Swindon in line with Policies WCS1 and WCS2 to provide for: Waste Water Treatment Existing waste water treatment facilities or waste management facilities: New sites on brownfield or greenfield land where the proposal demonstrates that the development cannot feasibly be carried out within the capacity of existing waste water treatment sites and cannot feasibly be carried out at other waste management sites"

W3 – Waste capacity requirements. There is no justification contained in the consultation to support this assertion. It is quite possible that it will be less or materially different. Page 58 of the Consultation Paper says "6.41 By 2036, the following estimated arisings are expected within Central and Eastern Berkshire: • 725,000 tonnes per annum (tpa) non-hazardous waste; • 30,000 tpa hazardous waste; and • 680,000 tpa inert waste." There is no justification or explanation for this assertion.

Policy W3 - It is noted that the capacity requirements in Policy W3 assume the continuation of existing recovery capacity post 2030, and therefore the policy is expressed as a minimum requirement. However, the provision of 278,000 tpa of non-hazardous waste management capacity would not appear to meet the identified capacity need of - 291,881 tpa for non-hazardous waste identified in the Waste Background Study. If 278,000 tpa were the minimum capacity requirement, then a gap of 13,881 tpa could still exist. By combining the requirement for inert recycling and recovery capacity, this may not promote the management of waste in line with the waste hierarchy. This is because waste

that could be recycled may be recovered instead, and still be in accordance with this policy.
Policy W3 - Draft Policy W3 – Waste capacity requirements 5.17 The Plan states that currently around 540,000 tonnes per annum (tpa) originates from the Plan area, of which 450,000 tpa is treated outside the Plan area. The Plan, at paragraph 6.70 states that around 305,000 tpa of capacity for aggregate recycling, or recovery, would be required by 2036. 5.18 It is of concern that draft Policy W3, in stating where hazardous waste management facilities and non-hazardous landfill for residual waste will be supported, is very light in terms of environmental requirements, using the catchall phrase “in appropriate locations”.
Change sought to Policy W3 - it is important that the wording of this policy is expanded to detail that where such proposals would have unacceptable environmental impacts, including upon residential amenity, they will be refused. Given the complexity of potential environmental impacts, this policy should be expanded and required to comply with linked policies within the Plan.
Policy W3 & W4 - There are four sites in your draft plan that are either in or are adjacent to the parish of Colnbrook with Poyle – Poyle Quarry, Poyle Quarry Extension, Berkyn Manor Farm and Horton Brook Quarry. Notwithstanding the negative site specific impacts which would be clearer when more detail is available than is currently in your draft, all of these sites and their haul routes will put huge amounts of traffic onto roads going through our parish, or adjacent to it. We object to the increased traffic congestion and air pollution that this will cause in areas that are already heavily congested and suffering poor air quality well below EU Directive minimum standards. Moreover, some of the sites are very close to residential properties, and all four are in the Colne Valley Park and will cause loss of amenity and openness, negatively impacting on the quality of life and landscape.
W3 provides for non-hazardous landfill where there is a need. 6.60-6.61 clearly indicates that there will be a clear and demonstrable need, yet the requirement isn't identified within the Waste capacity requirement of Policy W3. We would like to see greater clarity of the waste arisings and projections over the plan period set out within the Plan.

<b>Policy W4</b>
Policy W4 - Contrary to; Policy EN8 of the Bracknell Forest Borough Local Plan and Policies CS1 and CS9 of the Core Strategy Development Plan Document and The National Planning Policy Framework. Policy M4 of the Bracknell Forest Local Plan and CS6 and CS24 of the Core Strategy Development Plan Document.
W4 – object to site allocation of Star Works, Knowl Hill is not a suitable site for further waste operations due to its location in a village and within 50 yards of residential properties.
W4 – The potential for further lorries already using a saturate A4 would pose unacceptable health and safety risks for users near Star Works.
Policy W4 Locations and sites for waste management: concerned that there are no safeguards for the natural, built or historic environment – these are relegated to a reference to “ <i>adverse environmental impacts</i> ” in the supporting text. This is not consistent with the approach in Policy M6 which specifically includes “ <i>The proposal not having an unacceptable impact on the environment</i> ” within the policy and is therefore more robust. Consider that Policy W4 should include a requirement for development proposals for any of the allocated sites to take the site-specific considerations in Appendix A into account.
Paragraph 6.109: the monitoring indicators shown would only enable monitoring of Policy W4, not monitoring of appropriately located waste management because Policy W4 is deficient in ensuring this, as we explain above. We therefore consider that either Policy W4 needs to be amended as we indicate or the monitoring indicators need to include compliance with Policy DM7
Some of the proposed minerals and waste sites in policies M4 - Locations and Sites for water management and W4 Locations for sand and gravel extraction lie within Flood Zones

<p>3 or 2 and therefore need to be sequentially tested. As this evidence has not been produced then this plan is currently unsound as it is not consistent with national plan policy NPPF paragraphs 157 and 158 or justified.</p>
<p>Policy W4 Locations and sites for waste management - Use of the appropriate Pollution Prevention Control (PPC) measures and regulation with an Environmental Permit will ensure the protection of groundwater for those sites listed. However, we would like to see a sentence added to part 2 of this policy that says:- "The type of waste operation should be appropriate to the sensitivity of the underlying aquifers especially when the site is within a SPZ1 (see Position Statement F1 of GP3)."</p>
<p>W4 – Does not include waste recycle centres</p>
<p>W4 – Impacts need to be considered for any new site or enhancement, there is a danger of scope creep.</p>
<p>Policy W4 Thames Water support part 2 (e) of the policy in principle which identifies land at or adjoining sewage treatment works as being suitable for waste development which enables the co-treatment of sewage sludge with other wastes. However, clearly a key consideration will be that any such proposals must not detrimentally impact upon the existing Sewage Treatment Works operations and must be subject to an appropriate odour impact assessment.</p>
<p>Change to Policy W4 sought - It is unclear to what extent the proposed site allocations in Policy W4 will meet the identified needs for waste management capacity over the plan period, as there are no associated capacity tonnages included in this policy or in the Waste Background Study (except for Star Works at 100,000 tpa and Berkyn Manor Farm at 50,000 tpa). Therefore it is not clear to what extent the plan will be relying on 'windfall' sites in order to deliver waste management capacity requirements. It is also not clear from the policy which waste stream the allocations will be managing (i.e. non-hazardous recovery/recycling or inert recovery/recycling).</p>
<p>Draft Policy W4 – Locations and sites for waste management 5.20 It is confusing how, despite the recognition that many waste management activities would not be appropriate within close proximity to residential properties due to the potential adverse impact on residential amenity, and the well documented conflicts between the Star Works operations and local residents, that the site has been listed as an allocated site for waste management under draft Policy W4. It is also of significant concern that part 2) of the policy, in stating what locations would be appropriate to accommodate waste management facilities, the Policy excludes any requirement for the location to be appropriate in environmental terms and specifically in terms of the potential for such a facility to give rise to unacceptable impacts on residential amenity. Such an exclusion would be in direct conflict with the recognition of the Plan at paragraph 6.84 (and other references) that being within close proximity to residential properties is a reason why a proposed location would be deemed inappropriate.</p>
<p>Change sought to Policy W4 - 5.21, it is recommended that the following be inserted into the end of paragraph 2 of draft Policy W4; f) would not cause unacceptable levels of impact on the environment as a result of noise, odour, pests/vermin, dust, traffic, pollution, visual impact, or general impacts upon residential amenity." 5.22 Without the insertion of the above into the Policy, the Plan will be ineffective in restricting proposed waste management facilities to appropriate locations.</p>
<p>Policy W3 &amp; W4 - There are four sites in your draft plan that are either in or are adjacent to the parish of Colnbrook with Poyle – Poyle Quarry, Poyle Quarry Extension, Berkyn Manor Farm and Horton Brook Quarry. Notwithstanding the negative site specific impacts which would be clearer when more detail is available than is currently in your draft, all of these sites and their haul routes will put huge amounts of traffic onto roads going through our parish, or adjacent to it. We object to the increased traffic congestion and air pollution that this will cause in areas that are already heavily congested and suffering poor air quality well below EU Directive minimum standards. Moreover, some of the sites are very close to</p>

residential properties, and all four are in the Colne Valley Park and will cause loss of amenity and openness, negatively impacting on the quality of life and landscape.
Policy W4 - This policy clearly states that ....the site 'has good connectivity to the strategic road network'. b. Berkyn Manor, Poyle Quarry, and Poyle Quarry Extensions will all be dependent on a new road which will lead onto Poyle Road in Colnbrook. This has not yet been agreed with Slough Borough Council, nor were Colnbrook Parish Council even aware of the proposed road plan. Therefore this section of the policy is clearly flawed. Change sought - We do not believe the policy can proceed until a proper road management policy has been consulted upon and agreed with all the affected parties viz Horton, Slough BC/Colnbrook PC. Horton Parish Council specifically would like to be properly consulted regarding road access to all the above sites. This should take place before any further plans are established for either mineral extraction or infill on any of the sites within our Parish.
Most of the land is agricultural; the Horton Brook Quarry – currently in operation – was given permission on the express condition that the land would be worked for a limited period (already extended) and would be restored to agriculture as soon as minerals extraction ceases. The proposal in the draft plan to infill with waste after extraction violates this condition of permission and, generally, waste landfill will make return to agricultural use less viable.
Policy W4 - The term 'active quarry or landfill operation' should be clarified, does this include instances where there is an active consent but the site has been mothballed? Does it include the period where restoration soils are being placed/the site is being actively restored or only where the void is being filled and capped?
Policy W4 - BFBC local plan does not include the proposed Joint Mineral & Waste Plan or any agreed transport Haul routes
W4 Locations and sites for waste management. 6.92 states that there are insufficient sites to meet the future waste management requirements of Central and Eastern Berkshire up to the end of the Plan period and this will be left to market-led delivery. This may make it harder to meet the future needs over the plan period, however we acknowledge the difficulty in identifying deliverable sites for waste management.
The identification of 'active' landfills suggests that once a landfill has been restored it no longer forms a suitable location, landfill sites can be suitable for some types of development as they provide the flexibility for activities (such as wood shredding activities) which would benefit from a more rural location. Landfill by their nature are also often well screened and located at a distance from residential dwellings so noisier activities (such as wood shredding) would be appropriate in such locations rather than on industrial or employment land. Further clarification wording would ensure that this policy is effective for its intended purpose.

<b>Policy W5</b>
Support Policy W5 Reworking landfills as it is a beneficial use of land and of recovered material.
Policy W5 – Remove Star Works from any list of waste sites considered for re working
Policy W5 - Removal of Ham Island and Riding Court Farm from policy
Policy W5 Reworking landfills If a landfill is to be re-worked within a SPZ1 a Risk Assessment should be carried out. This needs to be included within the text of this policy.
Policy W5 - The principles in this policy purport to include human health and environmental control. Change sought - Horton Parish Council want to see clear evidence of pollution control for air quality, noise and vehicle disturbance. This has to involve realistic operational hours for the plants including limiting vehicle access to sociable hours. Operational hours for plants should be 08:00 – 17:00, Monday to Friday. There should be no operations at week-ends or on Public Holidays. Provision and enforcement must be made to stop vehicles from accessing sites before or after sociable hours (we take these to be 07:00 – 18:00 Monday to Friday with no access at weekends or on public holidays. Further, there



should be absolute enforcement and controls to prevent vehicles from 'stacking' in roads around the curtilages of the sites before the operational hours.

6.70 states "Inert aggregate recycling". Should this read "inert waste recycling" The figure of 305,000tpa does not appear to correlate with Policy M5. The targets of 6.82 are not reflected within the suggested monitoring issues of 6.81 to enable future monitoring of the policy.

Reworking of landfill should only be allowed / considered where it can be shown that prior landfill operations have not blighted the site's surroundings and impacted adversely the health and lives of local residents, amenity areas, leisure routes. And they should be subject to stringent control and monitoring, should be time-limited and should only be considered for sites that have not dealt with landfill of hazardous chemicals, material and substances including, but not limited to, clinical waste.

### **Waste Background Study**

We have reviewed the Central and Eastern Berkshire Joint Minerals & Waste Plan Waste: Background Study report dated June 2018. Table 15 provides a summary of the industrial estates/areas that are considered to be potentially suitable to host waste management activities. This relates to Policy W4 and we have already stated that the waste activity should be appropriate to the sensitivity of the underlying geology. Lower Mount Farm has been identified as a suitable Category 3 site with activities requiring enclosed industrial premises (small scale). This site has been mis-identified as being within a Source Protection Zone (SPZ3). This site is in fact within a SPZ1 for the Cookham PWS that abstracts from the Chalk. The type of waste operation should be appropriate to the sensitivity of the underlying Gravel and Chalk Principal Aquifers (see Position Statement F1 of GP3). Please use the following link to this guidance

<https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Waste Background Study comments - Waste Capacity Requirements The executive summary states that the main waste treatment capacity deficit identified is for non-hazardous waste (-291,881 tonnes per annum, Table 2a). However, Table 2a also identifies a treatment capacity gap for inert waste of -287,906 tonnes per annum (tpa) in 2036, a similar capacity gap as non-hazardous waste. Table 3a identifies that 278,500 – 385,800 tpa of non-hazardous waste treatment capacity is required by 2036. The low end of this range (278,500) would not appear to meet the identified capacity need of -291,881 tpa for non-hazardous waste identified in table 2a. This figure (278,500) also differs from Table 16 and the technical working table in Annex 4. The upper end of this range (385,800) also differs from Table 16 (-399,256). The requirements for other waste streams such as inert and hazardous wastes have not been included in the Executive Summary. It may be helpful to do this in order to clarify the future management requirements for these waste streams.

### **Waste Proposal Study**

Waste Proposal Study comments - Waste Site Capacity It does not appear to be clear from the site summaries what the additional capacity each of the site proposals will be, and therefore what they will contribute to the relevant waste stream capacity gap. The justification for allocation in each site proposal does not appear to be linked to its ability to meet an identified need.

Comment on Waste Proposal Study - Page 117 relating to Site Toutley Road Depot identifies that "SITA have a waste collecting site within this industrial depot". SUEZ (Formerly SITA) wish to confirm that no waste collection activity has taken place on this site since 2015.

Waste Arisings Data It is not clear from Table 1 whether the waste arising data includes data from the Environment Agency Incinerator Returns. It is implied at paragraphs 3.16 and 3.22 that incinerator throughput data has been included, but Table 1 does not list this as a data source.

Hazardous Waste Data Regarding the sources of hazardous waste, the Environment Agency's 'Hazardous Waste Data Interrogator' is generally seen as a more accurate source of this data than the general Waste Data Interrogator.

Non-hazardous Landfill Paragraph 8.10 – It should be noted that the Statement of Common Ground on Non-Hazardous Landfill between the South East Waste Planning Authorities has now been revised as a 'Position Statement'. Therefore, existing contractual arrangements involving the management/disposal of non-hazardous waste may still need to be the subject of Statements of Common Ground with individual planning authorities.

### **Industrial Land Review**

Industrial Land Review It is unclear what the relevance of the industrial land review is, as none of the potentially suitable areas seem to have been progressed any further through the site assessment process, nor been included in the draft plan document.

## Appendix G – Issues raised regarding Development Management (DM) Policies

<b>General</b>
The Policies need to be tightly worded to prevent a spread of development beyond that which is absolutely justified.
DM2 – Support its important to have a positive view of environment protection, DM4 – Supported it provides a facility to ensure post extraction repair work, DM5 Support – Green Belt is very important. DM7 – Support It must always be managed intensively DM9 – Support Must have due deference to flooding issues as high risk DM10 – Very important

<b>Policy DM1</b>
Policy DM1 - support for the policy but those implementing it have not complied with legal requirements and 'Duty of care' [ref Star Works].
Policy DM1 – it fails to meet the test of soundness as there should be a presumption away from development in Central and Eastern Berkshire [ref Star Works].
DM1 – Support this policy approach, but would suggest that this needs to be extended to reflect the consideration of non-minerals development proposals within Minerals Safeguarding Areas in a manner that reflects the advice contained in Recommendation 9 of the Minerals & Waste Safeguarding Study.
Sustainable development (page 74 to 75) [DM1] - The policy needs to be more pro-active and identify that the consequences of any decision will have an impact for decades. The current plan is based on the past and not the future of how waste will not just be dealt with but also produced. There are no measures too incentivise 'green' behaviour.
Paragraph 7.4: Welcome a commitment within paragraph 7.4 for the minerals planning authorities to consult in a timely fashion.

<b>Policy DM2</b>
DM2 - Another useful metric to record would be the carbon cost/emissions of the transport and handling of both Mineral and Waste, by category. The traffic routing of HGVs and their access to the SRN would have an impact to this and should be considered in site assessment.
Policy DM2 Climate Change – Mitigation and adaptation- This policy should state that development should not result in increased flood risk elsewhere and where possible reduce flood risk overall.
Paragraph 7.7 - This paragraph needs to include a sentence about the increase in flood risk as a result of climate change. A reference back to the SFRA should discuss the impacts of climate change on flood risk and how this should be assessed in a site-specific FRA.
Paragraph 7.8 - This says, 'Opportunities for water storage in flood zones'. Generally, for additional floodplain storage to be created, land outside of flood zones needs to be lowered. Therefore suggest this is changed to 'opportunities for increasing floodplain storage when sites are restored'.
Climate change mitigation and adaptation [DM2] - Climate change requires that no trees are removed. The need is for more tree so that more CO2 can be removed from the atmosphere.

<b>Policy DM3</b>
Policy DM3 - against Star Works being included in the plan for the following reasons: Linden Hill wood is an ancient and protected wood and the area has been designated "a local wildlife site and within an area of special landscape importance" as described in a legal search upon the purchase of our house and woodlands. We have a

habitat that needs to be protected, including active badger setts in the woods, great crested newts in the streams. I have seen a great crested newt in our pond (pictures as evidence) that would have come from the stream that runs from the top of the hill near the Star Works site. To create more landfill area at Star Works would have a detrimental effect on all this habitat and it needs to be looked after. This is a responsibility that needs to be taken seriously by you the councillors for the future of our increasingly precious land.

Policy DM3 - Flood risks, river contamination close to Thames water intakes, loss of habitat for endangered birds i.e. Kingfisher plus water voles. Noise and air pollution from large diesel engines with no exhaust filters. [ref Riding Court Farm, Ham Island]

Policy DM3 – Change sought to policy - remove Ham Island and Riding Farm from site list.

DM3 - The minerals and waste site allocations and activities have the potential to negatively impact the environment, however the draft plan sets out sound policies to ensure the natural environment is protected. Specifically, policy DM3 which sets out the criteria against which developments will be judged.

DM3 - The layout of policy DM3 is confusing as the list is set out as a, b, a, b, c, c - Support the inclusion of the second c, "features of the landscape that function as stepping stones, or form part of a wider network of sites..." however, if these sites are not identified at the plan stage, then there needs to be a set of criteria which sets out whether or not a habitat or land parcel fulfils this function, and can receive subsequent protection.

DM3 - Watercourses need to be specifically mentioned here – the important habitats list doesn't mention rivers etc.

Nature conservation and river corridors - We have serious concerns with regard to the protection and enhancement of river corridors, and that the Joint Minerals and Waste Plan could be more effective and reflect national planning policies (NPPF) 170, 174 and 175. Within the plan there is no single clear message to developers on the standards which must be met with regard to development in river corridors; a number of other policies deal with various aspects of protecting watercourses, but this gives us no comfort that this Joint Minerals and Waste Plan specifically addresses the exclusive requirements of river corridors. Watercourses are not covered in any detail in this plan. A specific river habitat policy is required to ensure the best possible outcomes for watercourses impacted by minerals and waste sites. This needs to cover the protection and enhancement of rivers and their corridors. Watercourses are important environmental assets and an undeveloped 16 meter buffer zone (Thames Region Land Drainage Byelaws, as amended) should be required on both sides of a main river to promote strong and resilient ecosystems, green and blue infrastructure links, water quality and human health (pleasant amenity space). The policy should make it clear to applicants how the Joint Minerals and Waste Plan will expect protection and enhancement of all watercourses. This policy will reduce the likelihood that new developments next to main rivers will contribute to the deterioration of the ecological status of the waterbodies and where feasible will contribute to raising their status while providing a pleasant living environment with the associated positive social and health benefits. This will make the Joint Minerals and Waste Plan more consistent with paragraphs 170 and 174 of the NPPF, water framework directive (WFD) requirements and numerous tenets of HM Government's 25 Year Environment Plan which will embed an "environmental net gain" principle for development and "recover nature" and "enhance the beauty" of landscapes. Paragraph 170 of the NPPF recognises that planning decisions should contribute and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. It states that development should, wherever possible, help to improve local environment conditions, taking into account relevant information such as river basin management plans. Paragraph 174 recognises that plans should promote the conservation, restoration and enhancement of priority habitats and ecological networks; and identify and pursue opportunities for securing measurable net gains for biodiversity. A good example of where

a watercourse policy has been applied locally is in Wycombe District Council's Adopted Delivery and Site Allocations Plan for Town Centres and Managing Development (July 2013), with the inclusion of Policy DM15 Protection and Enhancement of River and Stream Corridors. Alongside this sits Wycombe DC's River Wye Advice Note giving advice to developers and landowners with land adjoining watercourses. Article 10 of the Habitats Directive stresses the importance of natural networks of linked habitat corridors to allow the movement of species between suitable habitats, and promote the expansion of biodiversity. River corridors are particularly effective in this way and the network of river corridors may help wildlife adapt to climate change by providing a migration corridor.

Policy DM3 as presently proposed fails to comply with the revised NPPF 2018. The first paragraph requires rewording to be policy compliant. The NPPF requires for development to be permitted, that it must avoid adverse impacts, mitigate for impacts that cannot be avoided, then as a last resort compensate for remaining residual impacts (NPPF paragraph 175a) and ultimately ensure a net positive impact on biodiversity (NPPF paragraph 170d). There is a difference between the NPPF requirement to support development whose primary purpose is biodiversity conservation (paragraph 175d) and minerals and waste schemes in which there is a contribution to conservation, restoration or enhancement of biodiversity (Policy DM3). We consider that the latter should not receive blanket support under Policy DM3. Policy compliant wording would be to replace "will be permitted" with "will be encouraged", in line with NPPF paragraph 175d.

In the list of sites, habitats and species to be protected, ancient woodland appears twice, with differing degrees of "relative importance". The NPPF give clear and specific policy guidance in relation to irreplaceable habitats including ancient woodland and aged and veteran trees. The NPPF requires development that may harm irreplaceable habitats to be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists (NPPF 175c). For Policy DM3 to be NPPF compliant, the Policy must include the wording "wholly exceptional reasons" in relation to harm to irreplaceable habitats. Similar to the statement above, but in relation to SSSIs, the NPPF is clear (paragraph 175b) that any development affecting SSSIs will not normally be permitted with the only exception being where the benefits of the development in that particular location clearly outweigh both its impact on that SSSI and the wider network of SSSIs. The wording in Policy DM3 is not sufficient to reflect this emphasis on refusing inappropriate development, and for demonstrating clearly that the merits of the development in that location outweigh adverse impacts on the SSSI and SSSI network. We propose that it is clearly stated that any development likely to harm a SSSI or the SSSI network will be refused unless the benefits as described above are clearly demonstrated. The list of ecological features that should be protected appears incomplete; in order to be compliant with the NPPF, this list should include (as per paragraph 174a) wildlife corridors and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation. It is considered that the statement: "1. In proportion to their relative importance (alone or as part of a wider network), that the merits of the development outweigh any likely environmental damage;" is not NPPF compliant. In order to be NPPF compliant, the following wording is proposed; "1. In proportion to their relative importance (alone or as part of a wider network), that the merits of the development demonstrably and significantly outweigh any likely environmental damage;" Policy DM3 as currently proposed makes no reference to the NPPF requirement to identify and pursue opportunities for measurable net gains in biodiversity (174b) and to encourage biodiversity enhancement for proposed development where this can secure measurable net gains for biodiversity (175d). This requirement should be added to Policy DM3 thereby ensuring that the Plan is suitably compliant with the NPPF and that all allocated mineral and waste sites, plus those that may be proposed at a later date, provide adequate baseline data on biodiversity in a consistent format and propose habitat enhancements that can be quantified and monitored using a suitable biodiversity metric (i.e. based on the Defra biodiversity accounting methodology) in order to secure measurable biodiversity gains.

In relation to paragraph 7.14, the statement to "avoid any net loss of biodiversity as a result of development" is insufficient and not compliant with the NPPF which talks in terms of protecting and enhancing the natural environment, and minimising impacts on and securing measurable net gains in biodiversity. This statement should be reworded as follows; "The Central and Eastern Berkshire Authorities will seek to secure measurable net gains in biodiversity as a result of development..."

In relation to paragraph 7.15, the statement as it relates to "networks for biodiversity and green infrastructure" is superseded by the requirements in the revised NPPF to broaden this and, more specifically, include the hierarchy of designated biodiversity sites, wildlife corridors, stepping stones that connect them, areas identified by local and national partnerships for habitat management, enhancement, restoration and creation, priority habitats, ecological networks, and recovery of priority species.

In relation to Monitoring (section 7.24); Additional Monitoring Indicators are proposed: - the number of planning permissions granted in which a measurable net biodiversity gain is agreed - the increase in biodiversity units resulting from development (measured using a standard biodiversity impact assessment calculator based on the Defra methodology)

#### **Policy DM4**

Policy DM4 – seeking a change to the policy – protection should not just apply to 'AONB' but in this regard also to: Green Belt, Sites of Special Scientific Interest, Ancient Protected Woodland [*linked to comments on Star Works*]

Policy DM4 Protection of Designated Landscape: we support Policy DM4 in principle, although applying the criteria for the assessment of proposals for major development within AONBs to land outside the designated landscapes, even if within their setting, goes beyond paragraph 172 of the National Planning Policy Framework

#### **Policy DM5**

Policy DM5 – Change sought to policy - remove Ham Island and Riding Farm from plan.

Policy DM5 – seeking a change to the policy – in order to protect the countryside, sites should only be permitted in isolated or urban areas.

Policy DM5 - against Star Works being included in the plan for the following reasons: The area surrounding the Star Works, Knowl Hill site has a significant recreational use including bridleways, public footpaths, and sustains cycle routes. However, it is already affected by the noise, debris and odour from the site and on many occasions, I cannot use the adjacent footpaths because of the extremely bad odour, the toxic rubbish that is lying around (I have dogs and they have picked up contaminated nappy rubbish as an example). This will only get worse if an extension to the site is granted. This affects not only local people but also visitors who come from surrounding conurbations who to me have expressed surprise that there is a waste site so near and affects so many at the moment.

#### **Policy DM6**

Inappropriate development is deemed harmful to the Green Belt and should not be approved, except in very special circumstances. It is accepted that it is not possible to meet the anticipated waste management needs of the Plan area without developing waste management facilities on Green Belt land. Policy W4 allocates and supports sites for delivering waste management facilities, all of which are located in the Green Belt (and all but one sites allocated under Policy M4 for sand and gravel extraction are in the Green Belt). Through the preparation of the draft JMWP and evidence based assessments and study documents, 'very special circumstances' have been demonstrated in that these sites are: the most suitable locations in relation to arisings and recycles markets; no other appropriate sites can be found outside the Green Belt; and suitable mitigation can be provided to ensure the development would not cause harm to the objectives and purposes of the Green Belt. Sites allocated under Policy W4 (or Policy M4), should be considered as a factor contributing to 'very special circumstances' under Policy DM6.

Policy DM6 – seeking a change to the policy – no future waste facility would supersede the harm done to the Green Belt. How can a waste facility preserve 'openness'?

Policy DM6 - against Star Works being included in the plan for the following reasons: The Star Works site is situated in an area of green belt, and also woodland which has a tree preservation order (no 4/1951) on this mixed woodland. We own 20 acres of this mixed woodland (around the opposite end of Star Lane) and were notified that all the trees are protected and not to be felled. (Even remedial work needs authorisation). Further extension works to Star Works site would cause an effect on these trees and this is totally not acceptable, yet again another example of a flagrant breach of an order which has been in working practice for many years.

Green belt [DM6] - The green belt is being eroded from many directions and the joint minerals and waste plan contributes to further erosion.

Green Belt Policy [DM6] must be upheld and there do not appear to be any special circumstances to enlarge this site [Star Works] into more greenbelt. Areas outside the Green belt must be exhausted first and proven.

### **Policy DM7**

DM7 – Welcome the inclusion of policy DM7 outlining the importance of the historic environment and the need to conserve it. The policy wording identifies assets that are likely to require preservation in line with the NPPF. The proposed allocations will require careful consideration as proposals are put forward. The policy wording needs to include a requirement for archaeological field investigations to be required pre-determination for a new site.

Policy DM7 Conserving the Historic Environment: Welcome Policy DM7 in principle. However, the first and third paragraphs largely duplicate each other, but are contradictory as the first paragraph does not allow harm but the third paragraph does. The reference to “benefits” in the final paragraph of the policy should be to “public benefits”, in accordance with paragraphs 195 and 196 of the National Planning Policy Framework (2018), that can only be delivered by the proposed development In addition. The paragraph should refer to the significance of heritage assets, as the term used in the Framework and the heritage sector for the value of a heritage asset, as well as their special interest, character and appearance (which are normally used when referring to conservation areas

Policy DM7 the policy should include a requirement to record assets to be lost and the recording to be deposited in a public archive, but to emphasise that the ability to do this will not be a factor in determining whether or not permission will be granted. We also consider that paragraph 7.53 should be included in the policy.

We therefore suggest that Policy DM7 be reworded as follows:

*Proposals for minerals and waste developments will be required to protect and conserve, and where possible enhance, the historic environment and the significance, special interest, character or appearance of the heritage assets of the Central & Eastern Berkshire Authorities, including both designated and non-designated assets and the settings of these sites.*

*Harm to that significance, special interest, character or appearance will only be allowed where it is demonstrated that the harm is minimised and the need for and public benefits of the development cannot be delivered in a way that does not cause harm (e.g. locating the development on an alternative site that would result in no harm to heritage interests) and clearly and convincingly outweigh these heritage interests.*

*Any planning applications for minerals and waste development should therefore be informed by an assessment, proportionate to the circumstances, of the significance, special interest, character and appearance of any heritage assets that would be affected by a*

development proposal, of the potential impacts on those qualities and how those impacts could be avoided or minimised. This should include an appropriate level of field investigation if necessary and a screening to be submitted with the planning application.

Where harm to or loss of heritage assets would occur in the circumstances set out above, the asset should be fully recorded and the results deposited in a public archive (however, the ability to record an asset will not be a factor in determining whether or not a proposed development will be permitted).

The following assets will be protected in accordance with their relative importance:

- a) Scheduled Monuments;
- b) Listed buildings;
- c) Conservation areas;
- d) Registered parks and gardens;
- e) Registered battlefields;
- f) Sites of archaeological importance; and
- g) Other locally recognised assets.

Policy DM7 - It fails to meet or take into consideration the Historic character of a settlement area as mentioned in Neighbourhood plans, as in the case of Brock Hill and Maidens Green with its many Historic, listed buildings, and ancient fabric.

Change sought to Policy DM7 - to widen and take into consideration Historic and Ancient Fabric in addition to policy DM7

#### **Policy DM8**

DM8 - There is a contrasting tone between the Restoration Study document and policy DM8. Although paragraph 7.68 of the Draft Plan references the restoration study, it is presumably policy DM8 against which plans will be assessed. Whilst the Restoration Study is aspirational and contains a good principles which ensure high quality restoration, it does not appear that Policy DM8 ensures this level of high quality restoration is actually implemented. Suggest the wording of policy DM8 is strengthened to allow planning authorities to better ensure the quality of restoration plans.

Policy DM8 Restoration of Minerals and Waste Developments: support this policy, although we are not quite sure what is meant by the "*setting of the local area*".

Policy DM8 - Restoration of Minerals and Waste Development This policy relates to how mineral and waste sites will be restored after their operational use. There doesn't appear to be any consideration of link up with local catchment partnerships who often do a lot of work in the environment and rivers sectors on environmental enhancement projects. There may be opportunities here to work with and engage with local environmental groups to address WFD failures in waterbodies impacted by these sites. It would be encouraging to see this included in the policy.

DM8 Restoration – This policy states that 'Planning permission for minerals extraction and temporary waste management development will be granted only where satisfactory provision has been made for high standards of restoration and aftercare'

We also need the inclusion of the following text in this policy:-

'that the type of material used in this restoration of a minerals extraction site should not impact on controlled waters'.

DM8 – given the timing of cashflows from mineral extraction, history of delays in restoration beyond that approval in original planning permissions and recent examples of private sectors failure such as Carillion and the East Coast Rail debacle any policy needs to include broader protections for the community and the environment. This would be facilitated by: a. Any developer depositing with a council bodies sums for restoration as any sites are developed, so that any time the council will have access to capital for the



restoration of all sites should there be any private sector failures. b. This would mean that over the extraction period amounts deposited would rise and a board of independent trustees could also ensure that restoration is guaranteed and not subject to the whims and potential credit quality of developers decades into the future. c. This is the only way that Central & Eastern Berkshire Authorities can ensure that sites are restored as required and detailed contractual monitoring indicators need to be developed to be included with any Final Plan.

Policies for restoration [DM8] need to be developed to sit within an area wide approach delivering interconnected green corridors.

Restoration of minerals and waste developments [DM8] - The restoration of areas of historic natural wood land cannot happen. Although the expectation that tree felling can be somehow justified on the grounds that new trees will be planted when a site is being restored, this is not the case since the flare and fauna have been destroyed.

DM8 - Policy DM8 is supported in principle, however, it is considered that the Policy lacks the necessary 'teeth' to effectively enforce the principles of the policy are carried out [ref *Star Works*].

Paragraph 3.6 and Policy DM8

We support paragraph 3 in section 3.6 Strategic Plan Objectives and Policy DM8  
Restoration in terms of biodiversity

### **Policy DM9**

Policy DM9 - states the use of machinery and lighting can result in noise, light and air pollution and that development should not generate unacceptable impact upon public health, or release emissions to the atmosphere - but there is no specific reference to air quality. The policy does not include appropriate policy framework for considering the impact of proposed development on air quality and securing appropriate mitigation.

DM9 – the policy should require, and its implementation should ensure the following provisions: a. Consideration of particulate emissions from heavy goods vehicles in particular given the harmful effects recently highlighted and therefore all vehicles operating from sites should be Euro VI compliant, or any subsequent improved standard as part of any planning permission. b. Given the requirements not to have an unacceptable visual impact – this should be tested on a case by case basis and the 100m minimum buffer zone, should be an absolute minimum, and this should be increased as required to satisfy the policy objective from the perspective of the members of the community so affected. c. With respect to causing unacceptable noise, dust, lighting, vibration or odour, any implementation should consider permitted operating hours, to ensure that these are within normal working hours of a weekday to ensure that no operations are conducted at weekends, early in the morning or late into the evening on weekdays.

Policy DM9 – strong objection to the proposal of Mineral Extraction and Waste Land Fill on Ham Island as Resident of Park Avenue Riverside. Increased levels of noise pollution. This is on top of a proposed runway, and all the works associated with that before it gets built. And for the record along with my neighbours I did not vote for an expansion of Heathrow, and this was certainly not mentioned at any of the meetings I attended!

Policy DM9 - Will cause increased flood risk with high water flows and increased water levels. [ref *Ham Island and Riding Court Farm*]

Policy DM9 – change sought to policy - remove Ham Island and Riding Farm from site list.

Any Final Plan should include sufficient directive detail to ensure that policy objectives with respect to public health Policy DM9 Protecting Public Health, Safety and Amenity and Policy DM11 Sustainable Transport Movements are met, rather than as currently drafted which allows to much scope for failure to meet such policy objectives.

DM9 - The draft policy identifies that developments handling bio-waste need a buffer zone of up to 250 metres from sensitive human receptors. This may be breached in terms of the village hall which seems to be within this in relation to the Hydroclave building and expansion could even impact the primary school.

DM9 - object to policy DM9. The phrase public health is a wide term and difficult to assess in relation to land use and development proposals. The NPPF at Section 8 paragraphs 91-95 refer to health. Request that policy DM9 is rephrased to reflect the health of individuals and communities adjoining or in the vicinity of the development rather than the undefined term public health.

Draft Policy DM9 – It is recommended that draft Policy DM9 requires that minerals and waste developments demonstrate how they would prevent nuisance (and potential hygiene issues) arising from the attraction of pests/vermin.

### **Policy DM10**

Policy DM10 – strong objection to the proposal of Mineral Extraction and Waste Land Fill on Ham Island as Resident of Park Avenue Riverside:

Replacing flood gravel with compacted waste will not aid in the current area being maintained as a flood plain. Additional concern from the increased numbers of housing developments in the local area impacting upon possible future flooding

Who would be responsible for repairing damages made to privately owned pontoons and moored boats?

It is one of the narrowest points of the Thames, and below the Jubilee River bypass which creates flood conditions for the local area.

Damage to wild life will be considerable including recreational fishing. Visitors come and admire the natural nature of the area.

Policy DM10 - Increased risk of flooding any sand or gravel is already under the average water table level and all proposed workings, including, wharfs and equipment that will be under water during high floods as the river is flat across the weir at the top end of Ham. There is a bund across Ham Island that helps stop the water flow across the Island and protect the sewage plant and houses. [ref Ham Island and Riding Court Farm]

Policy DM10 – change sought to policy – remove Ham Island and Riding Court Farm from proposed site list

Welcome the recognition within the text which accompanies Policy DM10 – Water environment and flood risk.

There is a need therefore to guard against adverse impacts such as environmental damage resulting from changes to the water table; a safeguard which is currently absent from this development management policy. Accordingly, we suggest that a 3rd item is added to the wording of Policy DM10: Water Environment and Flood Risk so that it is clear planning permission will be granted for minerals and water development where proposals do not: (c) Have an unacceptable impact on the geophysical or hydrological properties of adjacent land.

Policy DM10 – Water Environment and Flood Risk - This policy and its supporting text covers flood risk, water quality and water resources. These three issues should all be covered by separate policies. The following wording could be used as a flood risk policy: "Flood risk management Minerals and waste development in areas at risk of flooding should: a) Apply the sequential test, exception test and sequential approach within the development site directing the most vulnerable development to the areas at lowest risk from flooding b) Not result in an increased flood risk elsewhere and seek to reduce flood risk overall; c) ensure development is safe from flooding for its lifetime including an assessment of climate change impacts d) Incorporate flood protection, flood resilience and resistance measures where appropriate to the character and biodiversity of the area and the specific requirements of the site; e) Include site drainage systems designed to take account of events which exceed the normal design standard; f) Not increase net surface water run-off; and g) If appropriate, incorporate Sustainable Drainage Systems to manage surface water drainage, with whole-life management and maintenance arrangements." The following wording could be used for a water quality policy "Water quality Planning permission will be granted for minerals and waste development where proposals do not: a) Result in the deterioration of the physical state, water quality or ecological status of any

water resource and waterbody including, rivers, streams, lakes, ponds, groundwater source protection zones and ground water aquifers. b) Include a hydrogeological risk assessment (HRA) where proposals are in a groundwater source protection zone. If the HRA identifies unacceptable risks then the developer must provide appropriate mitigation.”

Water resources: Water resources is about availability of water and the supply. We do not want the proposed site allocations to impact upon water availability. The extraction of minerals can have an impact upon groundwater and surface water supplies & therefore groundwater or surface water fed features such as Sites of Special Scientific Interest (SSSIs). We can work with you on the wording of a suitable policy for this issue.

DM10 - Horton is liable to flood and part of or some of the sites fall within the flood risk 3 category (Berkyn Manor). Any proposal for infill must be seriously assessed and controlled, particularly for infill of green waste.

Change sought - We do not feel there is adequate detail in the Draft Mineral Plan covering this proposal.

DM10 - South East Water has reviewed this draft plan and would like to ensure that all risks to surface and groundwater quality have been adequately assessed and mitigated for as well as confirmation from the applicant that there is no intention to abstract or impinge upon groundwater level, flow or yield. We are requesting additional details showing what will go into your hydrogeological studies and copies of these reports once completed for any sites where planning is submitted. This is due to the fact that many of the sites are located within Groundwater Source Protection Zones 1, 2 and 3 (as acknowledged at each site in your draft Plan). This is in line with your Policy DM10 which states that no application will be approved which causes an unacceptable impact on SPZ.

Paragraph 7.82 - This may need to be revised in light of the suggested policy wording above. Paragraph 7.83 - This paragraph should be changed to: “Mineral extraction may provide opportunities for flooding to be alleviated by providing additional floodplain storage when the area is restored.” Paragraph 7.84 - This paragraph says: “Landfill and hazardous waste facilities will not be permitted in Flood Risk Zones 3a and 3b”

Paragraph 7.85 - We are pleased to see that the sequential test and exaction test are acknowledge in this paragraph. It may need revising and reordering in light of the suggested policy paragraphs above. Paragraph 7.85 also says : “Where a flood risk is identified.....” This should be changed to “Where flood risk is identified.....” The ‘a’ is not necessary. Paragraph 7.86 For this paragraph you can refer to footnote 50 in the NPPF which sets out when a flood risk assessment is required.

### **Policy DM11**

Policy 11 - poorly drafted, it does not deal with the impact of vehicle movements upon air quality, it does not include the full range of possible mitigation measures and does not specifically cover the issue of lorry routing. The policies in the plan are generally worded to say that “proposals will only be permitted where....” Policy DM11 does not include this wording but simply states that “A Transport Assessment or Statement of potential impacts on highway safety, congestion and demand management will be required”. The assessment should “explore” how movements will not be detrimental to road safety and would not have an unacceptable impact upon the environment or local community to determine whether highway improvements may be required. It does not set out the basis upon which applications will be approved or refused. The only mitigation referred to is highway improvements, however there are other measures that could be used to mitigate impacts. There is no mention of the need to control the type of vehicle being used to reduce the impact on air quality.

Policy 11 - does not deal with the impact of increased vehicle movements upon air quality. The text of the plan lists potential environmental impacts of traffic as noise, dust, vibration, congestion and carbon dioxide emissions. The only reference to particulates and air quality is in the text which deals with the impact from the use of field conveyers.

DM11 - paragraphs 2.15 and 2.16 of the Strategic Transport & Traffic Assessment set out the guiding principles which include that mineral and waste development should not result in unacceptable levels of traffic congestion and specifically should not have unacceptable transport impacts on the local environment, communities and road network. The reference to unacceptable impact on the road network is however omitted within the text of policy DM11.

DM11 - paragraph 7.91 of the supporting text for the policy which refers to paragraph 32 of the NPPF (now paragraph 108 within the updated July 2018 NPPF). As currently worded, the supporting text states that the NPPF supports sustainable development opportunities which utilise alternative methods of travel and where safe and suitable access can be achieved. These requirements form the first two of three bullet points within paragraph 108 of the NPPF. However, it is notable that this wording ignores the 3rd bullet point of paragraph 108 of the NPPF which adds that it should also be ensured that "any significant impacts from the development on the transport network (in terms of capacity and congestion) on highway safety, can be cost effectively mitigated to an acceptable degree". There are limited opportunities to increase the use of sustainable trips attributable to mineral and waste developments, as is rightly acknowledged within the supporting text of the policy. Consequently, it is important that the effects of the traffic movements, which are invariably road-based HGV trips, are properly appraised and, if necessary, mitigated appropriately. In order to address this concern and to reflect the guidance within the NPPF and the findings of the Strategic Transport & Traffic Assessment document which forms part of the evidence base, it is suggested that the 2nd paragraph of the wording of Policy DM11: Sustainable Transport Movements is amended as follows to provide greater clarity: Specifically, the assessment should explore how the movement of minerals and/or waste within and outside the site will not be detrimental to road safety and would not have an unacceptable impact on the environment, of the local community, or the highway network and determine whether highway improvements are necessary to mitigate impacts associated with increased vehicle movements.

DM11 - paragraph 7.94 of the supporting text would benefit from the following rewording so that it properly reflects the guidance within paragraph 108 of the NPPF:

The NPPF supports developments where opportunities for sustainable transport have been taken up, the provision of safe and suitable access can be achieved and any significant impacts from the development in terms of capacity, congestion and highway safety can be cost effectively mitigated to an acceptable degree. Again, in order to reflect the NPPF guidance and the findings of the Strategic Transport & Traffic Assessment document which forms part of the evidence base, it is considered that the 3rd sentence of paragraph 7.92 of the supporting text would benefit from the following revision: Routing agreements may be required to ensure that access is not permitted on roads which result in unacceptable impacts on communities & the environment, or the highway network. For the same reasons, it is considered that para the 4th sentence of paragraph 7.93 of the supporting text would benefit from the following revision: In addition to potential capacity, congestion and safety impacts along the highway network, the potential and perceived impact of transportation on amenity may include vibration, visual intrusion and air quality.

DM11 – to ensure that the policy objectives are met with respect to highway safety and also to ensure that newly permitted sites contribute to the land bank, the following should be considered in implementation: a. Planning should only release additional land for mineral extraction with the condition that the final destination for the use of such minerals be within the locality of Central & Eastern Berkshire. Without this, there can be no guarantee that any Final Plan will deliver the policy objective of the NPPF. b. With respect to highway safety – given the current peaks in traffic during the morning and evening rush hours, together with school traffic. There should be a presumption that truck movements should commence their journeys to / from a site after 09:30 hours and complete any journeys to / from site before 15:00. To do otherwise would add significant additional truck movements at times of capacity constraint

Policy DM11 - The transport assessment proposes routes through Winkfield Row to accommodate an additional 50,000-75,000 tonnes of waste processing each year at Planners Farm. This will require approx. 49 additional 2-way journeys to and from the site - 98 additional HGV journeys daily. 1. Braziers Lane is listed as a preferred route. The road is unsuitable for HGVs as indicated in the current road signage "Unsuitable for HGVs" 2. Proposed routes pass 2 existing schools - Lambrook and Winkfield St Mary's - together with walking routes to both schools. There are 3 play areas in the area of proposed routes. 3. There are two conservation areas - Winkfield Row and Winkfield Village. The conservation area appraisal for Winkfield Row describes its architectural historic interest and states "the character or appearance of which it is desirable to preserve and enhance". This appears to be in conflict with increasing the use of HGVs within the area. 5. The consultation document does not appear to take into consideration proposals that are being considered under the Bracknell Forest Draft Local Plan - another school to be located in the Braziers Lane/Forest Road vicinity and closure of Braziers Lane with a new spine road running through a high-density residential area. 6. Lock's Ride has a very narrow footpath which is well used by pedestrians including children accessing the Lock's Ride Recreation area.

Change sought to the policy - If this policy is to be ratified, alternative HGV routes MUST be found as it is my belief that the current proposals will violate environmental (emissions, noise and vibration pollution) regulations.

Any Final Plan should include sufficient directive detail to ensure that policy objectives with respect to public health Policy DM9 Protecting Public Health, Safety and Amenity and Policy DM11 Sustainable Transport Movements are met, rather than as currently drafted which allows too much scope for failure to meet such policy objectives.

Draft Policy DM11 – the Policy would require Star Works to avoid detrimental impacts on the local community from “within and outside the site”. This would include noise, light and dust disturbance from vehicles moving within the site, and again once vehicles enter and leave the site. The policy allows for instances where such impacts can be mitigated, such as highway improvements. It is important to note however that there is only one means of entry and exit onto Star Lane then Bath Road, and this access is shared by a number of residential properties. Appropriate mitigation has not been successful thus far, indicating that a continuation and intensification of the site would worsen the degree of impacts as a result of traffic movements.

Policy DM11 - the policy fails to address or explain how evidence is carried out on settlement areas and the effect caused by HGV'S to health and well being in a small concentrated area with difficult connectivity.

Change sought to Policy DM11 - to add in depth evidence archer strips, police accident reports, local objection.

### **Policy DM12**

DM12 - the current policy does not ensure that the environment and residential issues take precedence over big business.

### **Policy DM13**

DM13 - Permission and structures to be temporary with a condition for removal of the structure when the site is no longer active. To avoid unnecessary and inappropriate buildings being erected whose main purpose is to be converted into another use after the approved activities at the site cease.

DM13 – Concerned that this is too open and could lead to difficulty controlling developments, needs to be more assertive.

Ancillary development [DM13] - This is a term that has no meaning. What ancillary development is proposed and how would it impact on the local environment and residents? Ancillary development could mean anything it is an insult to the intelligence of the local residents to use such a vague term.

Re-working landfills is a blanket term that needs to be identified in detail. Re-working should mean restoring to how it was before a landfill site was used

## Appendix H – Issues raised regarding the Sites

### Berkyn Manor Farm

<b>General</b>
Support the allocation of Berkyn Manor Farm Horton as the site is well located, able to service a wider area, divert waste from landfill and allow recovery of compost material and energy.
The proposal here is for a Green Waste and/or an Energy Recovery site. Colnbrook already has a major incinerator on the northern side of the Colnbrook bypass, and 3 or 4 other small-scale energy recovery plants. We would object to this type of new development unless there was a specific local need for such a development so close to the residential areas of the Horton and Colnbrook villages.
INFILL OF ALL SITES [Horton Brook, Poyle Quarry & Ext and Berkyn Manor] - The Horton Brook Quarry is obliged to infill with inert waste only and this should be a condition of each of the other sites.
RESTORATION OF SITES These sites [Horton Brook, Poyle Quarry & Ext and Berkyn Manor] are, or have been, largely agriculture in nature and should be returned as near as possible to their pre-development condition. Any planting made in order to preserve some resemblance to a rural scene should be retained where possible in order to retain and protect the new ecology systems developed during extraction / infill operations.
The Berkyn Manor site should not be used for green waste or energy recovery.

<b>Transport</b>
Road access to all of the above sites [Horton brook, Poyle Quarry & Ext and Berkyn Manor] must be via a dedicated private road across the landowner's property onto Poyle Road then directly to J15 of the M25.
Currently Foundry Lane, off the Stanwell Road, is an unmade single track road leading to Tanners' Waste recycling site. No mention of this existing site is made in the Draft Mineral Plan. There are many HGV vehicles which use this track every day, passing through the Village from all entrance roads to access it. It is imperative that no further vehicle movements are allowed to use this road. In fact it would be a far better arrangement for the protection of local residents and sites if the access to this site was made through the main proposed entrance in Poyle Road. In parallel with the Draft Mineral Plan, the expansion of Heathrow is also being discussed. It is known that this will involve heavy movement of building materials to enable the runway construction, M25 re-routing and other planned works. Horton Village is already used as a 'rat run' for vehicle trying to avoid congestion on the M25.
We strongly request that RBWM insist on no HGV movements through the Village. This must encompass forcing a new access for the proposed Berkyn Manor waste infill site. We also note that although there are railway lines in close proximity to the proposed sites (e.g. the track in the middle of the M25 / M4 interchange lately used for T5 construction) there has been no suggestion of using the existing resources to alleviate the HGV traffic in the Horton area. One suggestion is that by adding a branch line it could fork towards Colnbrook on the north side of the A4, and maybe reduce the heavy lorries moving gravel on the local roads.

<b>Landscape</b>
It will industrialise an area that needs to be enhanced as part of the wider green resource. Greater weight should be given to the need to protect the fragile nature of this

section of the Regional Park and Green Belt – for it to realise its enhancement potential, as Para 140 of the NPPF calls for.

### **Flooding**

Berkyn Manor Farm Our historic flood map indicates part of the site affected in January 2003. Along with the SFRA referring to 2014 flooding this would be 2 flood events in last 20 years so 'flooding history' rating should be red. This site allocation is proposed for waste management, which could be classified as less or more vulnerable development in accordance with Table 2 'Flood risk vulnerability classification' in the Planning Practice Guidance. There are areas of Flood Zone 3 within the site. Please note that only development classed as 'water compatible' or essential infrastructure (with exception test) will be permitted in Flood Zone 3b.

### **Archaeology**

According to our records there are no designated assets on this site. The Grade II listed dairy at Berkyn Manor at North East corner of House is located to the south of the site. We do not consider it likely that potential waste management development would have an unacceptable impact on the significance of this designated heritage asset

The historic 'Berklyn Manor' house, already under threat from years of neglect, must be fully protected from the effects such as subsidence, pollutants, airborne contaminants etc.

There is potential for important waterlogged archaeology, especially relating to the Late Upper Palaeolithic and Mesolithic (the draft SEA notes that the area has high archaeological potential). Evidence might not exist for such archaeology on the Historic Environment Record, owing to its depth and the lack of past investigation. Accordingly, the evidence in support of this allocation site would benefit from the construction of a geoarchaeological deposit model, to identify the nature of the deposits that would be impacted and their archaeological significance.

## **Bridge Farm**

### **General**

Support the allocation of this site.

The proposed site is disproportionate in size compared to the size and character of the surrounding villages

Local property values could decrease as a result of the proposed site being implemented

Objections to proposals have been ignored by Wokingham Borough Council.

No evidence has been provided that this site is better than another for such a mineral extraction – how has Hampshire Services ensured due diligence and duty of care in this selection process and how has every comment made on the consultation, been considered and investigated

This site of Arborfield is not practical and should not even be considered until after the Arborfield relief road has been delivered

Objection to the relationship between Reading University and Wokingham Borough Council and others who do not live in the affected area, making decisions about our future and our health

Lord Bearsted (Bridge Farm landowner) is a political supporter of, and has made financial donations to, John Redwood (MP for Wokingham) and enjoys a personal relationship with Head of Wokingham Council Charlotte Haitham-Taylor. Therefore both have advised that they are unwilling to get involved with local residents' concerns. This seems wholly inappropriate and gives unfair weight to the landowner's chances of getting the proposal passed. I hope you take the above into account before making any decision which will impact on the lives of many residents and may adversely affect the area for many generations to come



Consideration be given that the land within the boundaries of the scheme within the Parish of Shinfield be granted to them in perpetuity, for purposes of providing a Country Park for Community and Leisure Use, similar to Dinton Pastures within Wokingham Local Authority.

The creation of a quarry contravenes all current strategic development planning codes drawn up by the parish councils to ensure there is sufficient rural land marking a clear delineation between the villages of Shinfield and Arborfield (and all villages within the parishes).

The traffic light system in the SA/SEA shows two red negative effects, five amber/neutral effects and four green/positive effects. It is therefore relatively poor scoring.

There has been insufficient consideration to pre-emptive extraction at Grazeley

### **General - cumulative impacts**

Cumulative infrastructure impacts of:

- Ongoing new housing development in Shinfield and Arborfield, particularly Shinfield LDP
- Subsequent local population growth
- Through commuter growth from other outlying housing developments from further afield around Reading
- Existing plans and major developments (e.g. new road systems, University Science Park, Shinfield Eastern Relief Road)
- Other potential developments - Arborfield Relief Road, the University proposals that Hall and Cedar farm sites be considered for development)

This is going to fall upon a road network that is largely unchanged from when this area was almost wholly rural

Cumulative traffic impacts of ongoing new housing development (Including testing traffic flows), existing plans and major developments such as new road systems, in Shinfield and Arborfield, particularly Shinfield LDP.

Conflict between Minerals and Waste and economic development and other area plans, particularly neighbourhood ones. E.g. The location is completely surrounded on all sides by 3 areas of Wokingham's "Strategic Development Locations" which seek to ensure that residential development is in an area having appropriate services, facilities and public transportation opportunities for substantial development. It is also an area already under threat from overdevelopment of housing stock, and the mere thought that a cement factory and gravel extraction site should be placed right in the heart of that strategic location is completely flawed, and in total contradiction with Wokingham's own development and planning policies

Cumulative pollution impacts of ongoing new housing development, existing plans and major developments in Shinfield and Arborfield, particularly Shinfield LDP.

There must be many other sites around the UK that are not located near to substantial centres of residential population, and it is these sites which should be exploited in preference to an area such as Bridge farm. If there are not such sites anywhere in the UK, then the next option should be to import minerals from existing suppliers located around the world where these resources are already being mined. Where taking this alternative approach to sourcing minerals were to lead to an increase in minerals costs then these should be factored into the price of new housing, rather than accepting the impact of reducing the value of existing housing, Indeed I would be very surprised if taking a macro view to compare the increased cost of sourcing minerals from other sources was not significantly lower than the loss in value to the land and property impacted by this proposed development, not to mention when one includes the environmental and quality of life impact into the equation.

### **General – environmental and amenity**

The proposal does not restore the site to its former condition. It modifies it to become a private commercial inland fishery and deep quarry water park for Diving enterprise.

Pollution impacts on growing infant population.

Farley Estates pitch themselves as custodians of the countryside and claim in their literature that "looking after the natural environment is at the heart of everything we do .." A gravel quarry

and ready-mix cement works hardly seems to fit this ethos? Even looking 15 years to the future, it is very clear that based on the other gravel extractions in the area towards Yateley, that remediation of extracted land and its return to 'countryside' takes very many more years than this

Detrimental impact on the surrounding area regarding housing, residents, amenity, walkways, traffic, noise, flood risk, air quality e.g CO2 emissions and effect on the natural environment.

The effects on physical health of residents, e.g. incidents of asthma are on the increase, cement dust is an alkaline irritant, silica dust and its links to cancers and other serious lung diseases e.g. chronic obstructive pulmonary diseases a group of lung diseases including bronchitis and emphysema, vulnerability of residents already with respiratory conditions. The dust risk and hazard is not fully considered, nor is the reduction in the dust particle size caused by lorry movements over time and how this influences deep lung penetration and subsequent potential toxicity.

Concerns about the proximity of the site in relation to existing housing, two schools as well as it being in a rural area. What measures and safeguards would be put in place to protect the local communities from the pollution emitted from the proposed site?

Ground sprays and wheel washing are inadequate mitigation steps for dust unless they are independently monitored as are steps which are "economically viable" or "reasonably practicable" unless they are guided by independent opinion. The CEMEX site at Bramshill has left the road and road margins in a disgraceful condition and it is clear to see where the dust plume settles across the countryside. A proposal that allows similar poor management in a much more densely populated area must not be approved

Loss of footpaths and rights of way

Residents are concerned and cannot understand any benefit that would be generated to offset such environmental devastation

Is the quality of the gravel present good enough to justify the damage to the natural environment.

The quality of life for the local residents will fall.

The site comments state that additional planting and hedgerows would be needed in order to hope to restrict impact on local houses. Roads such as Hyde End Road do not have any space nor facility to plant these hedgerows to any meaningful effect, therefore this road cannot support any traffic relating to the site.

There appears to be no ability to address factors such as the impact on the quality of life or the practical impacts of the proposals, where the studies supporting the proposal are highly technical and very costly, presumably funded by the proposer or a supporter to prove the soundness of his proposal. Sadly we come to realise this is how big business and government works, to the detriment of the ordinary citizen; where he has to live with the real life consequences of some poor quality proposals and decisions. It appears this mineral extraction proposal consultation at Bridge Farm is a prime example of this kind of process.

Inert infill needs to be defined and regulated. What is the source, is this pre-processed, will there be processing on site, and critically, what monitoring will be implemented to ensure compliance?

Environmental effects of infilling the gravel pits with waste material

This proposed site is in conflict with Policy DM6

### **General - need**

The justification for this site, as there is currently a landbank significantly in excess of the legal requirements. According to the Berkshire Unitary Authorities Local Aggregate Assessments of 2014 and 2015 there is already a land bank of 11 years of sharp sand and gravel stock which obviates the requirement for the proposed quarry. Commercial pressure not genuine need.

Objection to the need to maintain the landbank and objection to the proposal being for a specific local requirement. Paragraph 3.18 of the Berkshire Unitary Authorities LAA (August 2016) identifies there is enough mineral resource capacity for the foreseeable future. Therefore, this proposal is premature and considered surplus to requirements. The only

significant source of very high demand is identified as Heathrow expansion, which is highly uncertain.

Bridge Farm is not listed as a Preferred Area in the Replacement Minerals Local Plan 1995/2001 which is described in the current plan and indeed this site was previously rejected as a suitable area for gravel extraction in 1992 following the Minerals in Berkshire Public Consultation.

### **General – existing application**

The planning application, to date, has not demonstrated that the proposed allocation is capable of providing adequate overall protection of the River Loddon, protection (as a minimum) to ecological and geological features as well as maintaining the overall quality of the existing landscape as a whole as well as individual features, namely the Ancient Woodland and special landscape features. Further to this, the application has not demonstrated the protection of the existing recreational sites (Langley Mead SANG), existing PRow's and protection as a whole to the recreational value to the South of the M4 as a whole.

Environmental and health mitigations in the planning documentation are inadequate and place too much responsibility for their implementation and compliance in the hands of CEMEX

Concern that comments made to Wokingham Borough Council on the Bridge Farm application not being considered for the Draft Plan Consultation

Application Ref 170433 is premature and should not be considered in advance of the Minerals and Waste Policy currently under development.

Bridge Farm at Arborfield has been included in the draft Plan as a site for mineral extraction, against a number of advisory provisions in the NPPF, contrary to existing planning policies, in contradiction with the draft Neighbourhood Development Plan for Arborfield and Barkham, and in spite of a damning landscape assessment.

Comments made in relation to the Bridge Farm planning application (170433):

- Concern that the objections and comments made on the Bridge Farm planning application (170433) have not been taken into consideration (including Hampshire County Council) for the Bridge Farm site allocation (<http://planning.wokingham.gov.uk/FastWebPL/Documents/DocList.asp?AltRef=170433>) The majority of comments have major environmental implications and they need to be independently evaluated as part of the site selection process.
- The timing of the Bridge Farm proposed allocation (given that an application is validated) is a concern. As the proposed allocation is outside of a Preferred Minerals Area and lies in an area of a strong presumption against minerals extraction, and in light of the landbank available and capacity at existing sites, we question the need for this development at this time
- There is a substantial amount of information which is either missing from the planning application or considered to be out of date, and therefore the Minerals Planning Authority is not able to make an informed view. With this in mind, it is considered that the allocation should be assessed in light of the need for the sand and gravel deposits in this location at this time mindful of Wokingham Borough Council's concerns and lack of information available to be able to determine the relative impacts accordingly.
- The application would have to demonstrate protection of the River Loddon, protection of geological and ecological features (ancient woodland and special landscape features), protection of existing recreational sites (Langley Mead SANG, PRow's, recreational value to the south of the M4)
- The application would need to demonstrate no negative impacts would be incurred to the water table
- The 1992 Minerals in Berkshire Consultation documents demonstrates Bridge Farm was rejected as a preferred area after this consultation, so it is misleading for the Draft Plan to identify Bridge Farm as a Minerals Preferred Area. Any application outside the preferred area would need to demonstrate extraction need in relation to existing supply, whilst proving preference over others

- Barton Willmore produced a response to the planning application on behalf of the University of Reading. The report highlighted the following (in addition to issues previously mentioned):
  - Transport
  - Ecology
  - Landscape, restoration and aftercare
  - Noice
  - Air quality
  - Hydrology
- Wokingham Borough Council requested further information from Cemex in December 2017 about the planning application, but Cemex has not yet responded
- In addition to the issues raised above from the Barton Willmore report on the Bridge Farm application, Arborfield and Newland Parish Council objected to the planning application due to dust, the visual impact of the site and the impact the site would have on Pound Copse (a local wildlife site gifted to the Parish in 1980)

<b>General – engagement</b>
Community Engagement - the landowner(s), constructor(s) and operator(s) hold well publicised and regular community engagement meetings with all members of the public, together with relevant parish / town and borough councillors at least once per year and that the content of such discussions are made public and kept on record for the duration of the works. (no Borough Policy number quoted - there does not appear to be one).
The process has been poorly advertised, bound up in local government wording so no normal person can understand and is fundamentally flawed.
This consultation has been difficult for the public to respond to, which breaches the Authorities Duty to care.
Wokingham Borough Council and Shinfield Parish Council failed to inform the local community that Bridge Farm was being proposed for inclusion in the Joint Minerals and Waste Plan. Local residents have not been considered

<b>Transport</b>
Noise impacts. Operation of heavy plant between 7am and 6pm Monday to Friday and from 7am and 1pm on Saturday, coupled with a major HGV movements of around 250 trucks per day plus ancillary vehicular movements must have a major impact on noise levels and consequently on residents and users of the countryside.
Untested Evidence - p36 Transport Assessment “This application has yet to be determined but supporting planning documents including an Environmental Statement and Transport Statement are available and relevant information from these documents has informed this review.” There have been a number of technical objections to the planning application, the subsequent residential planning applications and approvals and you have not considered the supplementary questions raised by Wokingham in December 2017
Arborfield Road already dangerous to walk along /cycle along
Cumulative traffic impact with M4 upgrade to Smart Motorway causing issues in the vicinity of Reading, Wokingham Junctions 11 and 10 for the next 4 to 6 years.
Cumulative transport related impacts from development within the South of the M4 Strategic Development Location (SDL) and the Thames Valley Science Park remain a concern
The road transport around this area is almost wholly of two carriage-way, relatively narrow rural roads, originally laid out and built in the 1950s or before to handle low density car traffic, farm vehicles and little heavy duty cargo or passenger traffic. The Hyde End Road is a classic example of this situation, where disruption and accidents have increased substantially in the past couple of years. These problems will increase and the road will become much more hazardous as more housing development is completed and more bus and other transport services increase e.g. home shopping deliveries, public transport, taxi’s and heavy goods traffic.

Combined effect of ineffective public transport facilities.
Proposed routing of facilities traffic, brings it in direct conflict with the surrounding land use (housing, domestic and recreational).
Outdated traffic assessment not done at peak times.
The proposed Arborfield bypass will traverse the site and interfere with the extraction of minerals from the proposed site
The development of the proposed site is not in line with the sustainable transport goals of the Plan. Local roads do not have the capacity to deal with an additional 250+ lorry movements a day. An independent survey submitted to WBC has already concluded that local roads "would be operating above capacity by 2026" shows that this site and transport impact with over 100 heavy goods vehicles a day is unsustainable, and will impact too heavily on an area with a recognised transport capacity constraint.
The proposed site entrance is also not wide enough for two large vehicles to pass one another.
The quality and type of the roads are inadequate for everyday traffic i.e. they are too narrow and the surface is too worn. Many lorries mount the pavements in the village and go up the curb when coming downhill towards pudding lane nursery.
Higher volumes of traffic, especially larger lorries causing safety concerns for children since there are a number of schools within the specified area and the pavements are too narrow
Strategic Traffic & Transport Assessment – Junction 10 and 11 of M4 presents daily traffic issues and there are further problems associated with the A327 Black Boy Roundabout which is already at full capacity
Nearby roads become dangerous e.g. due to poor visibility in the bends, as well as in the wet following mud spillages from lorries , vegetation is dying and signage is obscured
Sustainable Transport Movements; the use of historic data to determine the traffic situation, does not acknowledge the influence of ongoing housing development in the area
Inadequate transport links, the site is not directly served by a major road network
Access point at Hyde End Road is inappropriate for the projected 350+ daily lorry movements, this road is already treacherous and it is near to a nursery, infant and junior school
There is no consideration of more environmentally sustainable methods of transportation of the extracted material
Poor choice of Hyde Road in set up stage of the proposed site, due to Shinfield bends being unsuitable for HGV's
Whilst the supporting studies to this planning application may claim to prove that the addition of up to 200 HGV movements per day will not have an adverse impact on traffic flows/local roads, these conclusions are not supported by the real life experience of the 100s of local residents that drive these roads every day, theory is one thing but practical experience is fact.
Wokingham Borough Council's own forecasts of future traffic show the A327 to be at and beyond practical capacity in 2026, let alone 2036. In addition, traffic to and from the site would be characterised by large numbers of heavy vehicles, with a disproportionately high impact on traffic congestion and road safety.
Hyde End Road as an access route sends hundreds of HGVs a day past a nursery and two schools and putting the burden of further major HGV movements onto the A327, regardless of the Shinfield Eastern Relief road or the Arborfield Relief Road is unacceptable given the major congestion that already exists.
Where is the statement that considers the conflict between the proposed quarry site and the approved route of the Arborfield Relief Road? This needs clear definition before any further consideration of this proposal
Health and Safety - design, construct and operate the materials handling facility such that all delivery and removal vehicles are always moving in a forward gear and such that no use of reverse gear is ever required. Borough policy CP1, CP3 6 refers

<b>Ecology</b>
The River Loddon and its corridor is not mentioned in the ecology or water environment sections. There is a huge opportunity here for significant ecological enhancement.
Inadequate assessment of wildflower and protected species, no publicly visible report.
Impact of the proposed site on: the River Loddon (including river wildlife such as gravel fish spawning beds, crayfish and fresh water mussels); rare and protected species (skylarks and lapwings); other wildlife (otters, grass snakes, slow worms, bats), along with their natural habitats. Additionally, the disturbance of invasive plants such as Himalayan Balsam and Oxford Ragwort which will increase the spread of these notifiable species. It becomes SSSI designation further downstream from the site.
The effect of the site on the local badger population who are already suffering - regular badger casualties on the nearby A327.
Restoration does not include improving connectivity between existing ancient woodlands and there is no target specified for the proportion of the site to be dedicated to nature conservation. This target should be set in policy to enable the scheme at this site to contribute effectively to the objectives of the Loddon Valley South Biodiversity Opportunity Area.
Destruction of over 150 hectares of GREEN land, including more fields, countryside and wildlife in an already overburdened area. This will have negative impacts upon flora and fauna (which are already under huge strain from other developments)
Bridge Farm - There needs to be a biodiversity aspiration in the restoration section
Ecological and environmental surveys are inadequate and out of date
Under Appendix A - Proposed Sites. Development Considerations for Bridge Farm refer to buffers required for the Local Wildlife Site and ancient woodland habitats on the site, but the width of buffer is currently not specified and some habitats requiring buffers (such as hedgerows) are not included. The Bridge Farm planning application has proposed inadequate buffers of between 5 and 10m for hedgerow and woodland, respectively, 15m for Local Wildlife Site woodland, and 20m for the River Loddon - likely to risk significant permanent degradation of the habitats concerned. It should therefore be stated clearly in the site policy that buffer width should be fully evidence-based, should be composed of appropriate semi-natural habitat, and should not allow any operational or construction encroachment.
No timescale for restoration is specified and no mechanism for ensuring sufficient aftercare, monitoring, and evaluation is included. The management and monitoring of restored areas should be continuous for at least 25 years following the end of extraction.
The reason for shortlisting the site seems to be based purely on the fact that there is a current planning application in the system. No environmental concerns are raised at the shortlisting stage, despite the findings of the assessments

<b>Landscape</b>
Bridge Farm would suffer the highest level of destruction in terms of landscape and visual impact...regarding the Strategic Landscape and Visual Assessment (page 2), it shows the Bridge Farm plan to be the least viable with large adverse comments/red outcome
The effect of the site on the distinctive character of the Bridge Farm fields, which are an area of natural beauty, used for recreation.
Infringement on and destruction of 190 hectares of 'green land'
Impact of the development on the Loddon Valley as a place of beauty.
Agreement in local plans there would be a minimum area of green space left between new housing developments to maintain the character of existing villages. However, the proposed site could well be contrary to this
Proximity of the site to a rural community
Countryside Developments - To design, construct and operate any and all facilities on site in a way such that there is nil detriment to the surrounding rural landscape and neighbours. In this

sense, nil-detriment should apply just as much to the pleasant visual nature of the countryside. (Borough Policies CP1, CP7, CP11)

### **Flooding**

There needs to be clearer definition of the impact of the water management. Flood management plans are included in the application but fail to consider the impact of housing developments either approved or currently in the construction phase. During this last 2017/18 winter following 12 months of substantial housing development in Shinfield and Spencers Wood the road was subject to very serious flooding that caused the road to be impassable and closed for a period of a few days. This was unprecedented, and much more housing development is still to be completed which is destroying the lands natural ability to absorb and cope with heavy weather. Destroying a vast swathe of rural land for the minerals site can only exacerbate the "flood" risk potential of the area. Impacts of landfill and restoration to aquifer and water table changes, potential interactions with increased housing and shifting the local floodplain.

Have the drainage systems following the construction of the Eastern Relief Road been future proofed, as there would likely be excess water / flooding from the proposed site and other developments

The site is within EA flood zone 3a and 3b (referenced in SFRA Statement).

Impact on River Loddon from runoff and other waste from site

Impact on water courses - ground water infiltration and pollution. The application must demonstrate that no negative impacts will be incurred to the water table, including impacts to flow, features and the water environment as a whole.

History of flooding in the area due to the Loddon River. Given the many well documented issues with the Loddon floodplain, where is the assessment of the impact of potential water diversion down the Loddon from the proposed site and how this might impact on the new road and residential infrastructure being built?

Given that the extraction of minerals will take place below the groundwater table, there is potential for the water table to reduce as a result.

Because of the high permeability properties of sand and gravel strata, the resultant influence on the water table can extend over a significant area.

Bridge Farm is stated to be within SPZ2 and that an HRA is required. But this abstraction is from the confined chalk

Quarrying & aggregates extraction is likely to be far more acceptable to the residents of the Borough of Wokingham, the Royal Borough of Windsor and Maidenhead and other downstream communities if design and implementation are arranged so as to deliver a large-scale flood mitigation scheme for the whole of the River Loddon catchment area.

Bridge Farm Our historic flood map shows that the site was impacted by fluvial events in 1990, 1991, and 2007. This should also be added to the 'Flooding history' section. Site allocations and river corridors - Most of the site allocations are situated in or adjacent to river corridors. A strong River Corridor Policy is required to protect and enhance these sites and networks.

In the Water Environment and Flood Risk section this says:

"Site partly within Flood Zone 3 and Groundwater Source Protection Zone (2) – a Flood Risk Assessment and Hydrological Assessment will be required."

This needs to be changed to:

"Site partly within Flood Zone 3 and Groundwater Source Protection Zone (2) – a Flood Risk Assessment and Hydrogeological Risk Assessment will be required."

### **Archaeology**

The site is within an area of high archaeological potential; and contains or is adjacent to scheduled ancient monuments

A moated site scheduled monument is located outside the site to the south-east. Concerned at the proximity of quarrying to the monument - whilst there would be no direct physical impact on the monument (and the site and its archaeological potential would therefore stay intact),

there may be an impact on its significance through development within its setting (paragraphs 190 and 194 of the National Planning Policy Framework recognise that development within the setting of heritage asset can affect its significance).

According to our records there are no designated heritage assets on this site. The Grade II listed Bridge House is located just outside the site to north and the Grade II High End Farmhouse is located just outside the site to the south-west. This is not noted in Appendix A but we do not consider it likely that the proposed mineral extraction would have an unacceptable impact on the significance of these designated heritage assets.

The proposed development appears from the mapping data to currently be located within a rural landscape, characterised by open fields and divided by hedgerows, and amongst this it may be possible to identify other elements or features of medieval settlement. There is therefore potential for identification of related medieval archaeology in the surrounding landscape, and they will also need to give consideration to the potential impact on landscape character, from development in such an open rural landscape.

The proposed development may cause harm to the historic landscape character of the area and the scheduled monument, by impacting directly on any associated archaeological remains, such as ridge and furrow, and impacting the understanding of the moated site and its relationship with the surrounding agricultural landscape.

This area has high archaeological potential - crop marks and geophysical survey suggest extensive prehistoric activity in the vicinity of the site and there is good potential for associated waterlogged archaeological remains within the alluvial floodplain deposits of the River Loddon.

River terraces exist on the site, representing ancient courses of the Rivers Loddon and Blackwater, both tributaries of the Thames. Elsewhere these river terraces have revealed significant Palaeolithic remains. Therefore, the potential of the sands and gravels for Palaeolithic archaeology should be considered.

Evidence might not exist for such archaeology on the Historic Environment Record, owing to its depth and the lack of past investigation. Accordingly, the evidence in support of this allocation site would benefit from the construction of a geoarchaeological deposit model, to identify the nature of the deposits that would be impacted and their archaeological significance.

We therefore consider that this site should not be taken forward without further investigation and assessment of the contribution of that part of the setting of the Scheduled Monument within the proposed allocated site to the significance of the Monument, and appreciation of that significance (in the form of a desk based assessment and setting analysis); of the potential impact of mineral extraction at this site on that significance, and of the significance and potential impact on the significance of other archaeological remains in this area.

## Datchet Quarry

<b>General</b>
Any waste dumped into Riding Farm will leach into the river and who can tell what pollutants will be in the waste from the third runway build and there are two drinking water intakes down river from this site.
No further lakes are need in the area as the present ones are under used for pleasure use.
Support the allocation of this site.

<b>Ecology</b>
Datchet Quarry - Protection, enhancement and buffer of stream corridor is mentioned for this site. However, the watercourse is not mentioned in the water environment section.
No habitat or species protection has been considered.



<b>Landscape</b>
Protection of the countryside and green belt has not been considered

<b>Flooding</b>
Riding Court Farm This site allocation is proposed for waste management, which could be classified as less or more vulnerable development in accordance with Table 2 'Flood risk vulnerability classification' in the Planning Practice Guidance. There are large areas of Flood Zone 3 within the site. Please note that only development classed as 'water compatible' or essential infrastructure (with exception test) will be permitted in Flood Zone 3b.
In the Water Environment and Flood Risk section this says: Site largely within Flood Zone 3 and in Groundwater Source Protection Zone (3) - a flood Risk Assessment and Hydrological Assessment will be required. This needs to be changed to: Site largely within Flood Zone 3 and in Groundwater Source Protection Zone (3) - a flood Risk Assessment and Hydrogeological Risk Assessment will be required.
Any removal by water will increase the road distance to the third runway build not reduce it and cause further pollution environmental and air with diesel particulates.
Increased flooding risk not just increased levels but high water flow streams.
Objection to the plan because of its detrimental impact on flooding in the Datchet area and the fact that if even more gravel is removed, then this is putting residents and any new households at risk.

<b>Archaeology</b>
According to our records there are no designated assets on this site. The Grade II Registered Historic Park and Garden of Ditton Park lies a little way to the north (according to the National Heritage List for England, part of the site is not the Registered Park as stated in the draft SEA) and the Grade listed Riding Court Farmhouse is located a little way to the north-west. We do not consider it likely that the use of this site for aggregates recycling would have an unacceptable impact on the significance of these designated heritage assets.
Known historic site from at least Saxon times

## Ham Island

<b>General</b>
Unjust favour – difficult to obtain planning permission to make small changes to residential dwellings on Ham Island, so how and why will permission potentially be granted for the construction of wharves and other associated buildings be granted?
Social and financial impact including the devaluation of local properties
The fact that the area within the red lined extraction area includes a number of items of sewage treatment plant of substantial concrete construction and huge settling lagoons which are in current use.
The escalated demand for housing demonstrates that extension of STW capacity will be even more desperately needed rather than reduced by gravel extraction
The only reference to residents on Ham Island is in on page 135 under the Landscape & Townscape reference to screen planting.
Appendix A – Proposed Sites Ham Island – Sand and Gravel The site is owned by Thames Water leased to a 3rd party. The site is adjacent to the operational Ham Island Sewage Treatment Works. The site was also identified as a potential borrow pit for gravel extraction in association with the Heathrow Airport 3rd Runway construction. Thames Water supported the identification of the site as a potential borrow pit site and are similarly willing to work with the Council in relation to assessing the feasibility of the site for gravel extraction. However, a key

consideration will be that any such proposals must not detrimentally impact upon the adjacent Sewage Treatment Works operations, and careful consideration will need to be given to potential archaeological remains at the site and the archaeological investigation work which will need to be undertaken.

Any waste dumped into Ham Island or Riding Farm will leach into the river and who can tell what pollutants will be in the waste from the third runway build and there are two drinking water intakes down river from this site.

Believe the Ham Island site is undeliverable and should be removed from the allocation.

There is no evidence of gravel on the site. While constructing a replacement dwelling, as a result of flooding, a resident reported that they drilled down 15m and the only material found was earth.

There is no proof that it will deliver sustainable development or that it will not negatively affect economic, social and environmental conditions.

Impact of the site on the nearby horse sanctuary

### **General - restoration**

Concerns about the restoration plan as well as how it would be 'monitored' in the longer term without causing detrimental impacts on the residents

The compatibility of the restoration plan with the nearby sewage plant

No further lakes are need in the area as the present ones are under used for pleasure use.

### **General - amenity**

The effect of noise, dust, vibration, pollution and loss of privacy on general amenity of the area and health of residents and their homes (also applicable post extraction)

Detrimental impact of the proposed site in terms of polluting the air as well as the site producing unnecessary light pollution

### **General – engagement**

This proposal within the consultation has been poorly advertised and communicated with local residents. Lack of information from the Council on this, when if a neighbour wants to add an extension to their property we get notified by letter, but not on an important proposal that affects a large area prone to noise, pollution and flooding and without doubt will affect our well-being.

There was no consultation with the parish council nor the ward councillors about the suitability of this proposed site before it was added to the JCEB draft plan.

We have concern regarding Duty to Cooperate as we, and residents, were not informed of the inclusion of this site in the draft plan.

### **General - river**

The practicality of removing minerals by Barge when the formation of a barge loading station is in a known critical flood area and the locks have limited capacity and the locks close in winter for maintenance.

Safety of the boating public and other river users.

Flooding has impacted the physical health of residents

Amenity space (used by visitors) at the 'The Lock' will be impacted by the proposed site

Cannot be used as a landfill as its part of the Floodplain

Waterway used for swimming, paddle boarding, canoeing, rowing and powerboating as a recreational and safe area, free from heavy commercial traffic and pollution. How will this continue with commercial barges restricted in their ability to manoeuvre carrying large loads, pass?

An astonishing lack of respect has been demonstrated to the land, environment, wildlife, the residents and of course the future generation of young River users

<b>Transport</b>
Limited transport links. Access to the site is restricted and unsuitable. Roads around the site are small, congested, limited and with pinch points such as river bridges and rail crossings there will be significant traffic disruption
Concerns about barges being used as the stretch of river is very narrow and regularly exceeds 20 Knots and rises 10 feet in height. It is also currently used mainly by small pleasure boat owners and anglers. Additionally, the river has not been dredged recently and there are concerns about it being too shallow
Ham Lane is a private road (as per the Old Windsor Enclosure act of Parliament 1813), currently with pedestrian right of way, therefore it is unclear regarding the legality of the access to the proposed site
Concerns about access road – dangerous for larger vehicles to use as it is predominantly used by walkers, cyclists and horse riders. Too narrow for larger vehicles to use on a regular basis
The access roads to Ham Island are in a bad state, full of pot holes and uneven surfaces. Fears they could worsen if the roads are being used more frequently by the proposed site's associated traffic
There is only a single track access to the island that has to service the residents, Thames Water Sewerage Treatment Works and an animal sanctuary.
There are several level crossings in the area close to Ham Island and it is feared with the implementation of the proposed site and the associated traffic could cause further congestion problems and gridlocking at peak times
Concerns over how barges will navigate the narrow and shallow weir system.
Concerns that there is not enough space to build a wharf.
Any removal by water will increase the road distance to the third runway build not reduce it and cause further pollution environmental and air with diesel particulates.
The proposal that the area is regenerated as a local park is not possible as the Island access is a private road.

<b>Ecology</b>
The effect of the site on protected habitats and species (e.g. bird sanctuary), on the riverside, Ham Island beach and River Thames
Ham Island is considered a haven for wildlife and the proposed site would destroy the habitats and disrupt the natural surrounding corridors. There are also distinctive tree species on the Island that would be threatened by the proposed site
The proposed wharf facilities would cause harm to the natural Island habitats
Reeds and willow trees lining the river's edge provide important habitats for local wildlife and the roots provide stability to the river bed. Without them, the threat of landslides would increase
The overflow reed bed system provides important breeding grounds for various species and this could be jeopardised with the implementation of the proposed site
Ham Island is home to a wide range of plants, birds and mammals including the Kingfisher and has been identified on many maps as a bird sanctuary. There are also trees that would indicate suitability for bat roosts. Please see Acorn Ecology report (sent by email)
The effect of pollution on the nearby River Thames and its biodiversity
Ham Island - The River Thames is not mentioned in the ecology or water environment sections.
Arguably negligent to potentially allow pollutants from a landfill to enter a river used throughout the year for leisure activities including fishing, boating and swimming

<b>Landscape</b>
The effect of the site on the 'wild' character of the area
The local landscape will be "devastated" by the possible implementation of the site

Protection of the countryside has not been considered
Ham Island is part of the designated 'Setting of the Thames'. The area surrounding it is public open space and includes the very picturesque and much loved Old Windsor Lock. The 'Thames Path' runs parallel to the Island and is well used by residents and visitors alike due to the attractiveness of the countryside. The Thames itself surrounds Ham Island and is very popular with boaters, canoeists and residents therefore any engineering construction (to transport material) will have a very detrimental effect on Old Windsor's amenity and that of Wraysbury (across the river). Although Old Windsor is classified as a Rural village we have very little easily accessible, unspoilt countryside of our own.
Protection of the green belt has not been considered

<b>Flooding</b>
The Jubilee River that discharges upstream of old Windsor Lock and its associated weir stream around Ham Island, which happens to be one of the narrowest points of the Thames, takes the full brunt of the relief discharge in order to protect Maidenhead and Windsor from flooding. When flooding occurs the level in that weir stream rises to 3 meters above the summer water level and it is at that point when Ham Island floods and prevents further damage to Wraysbury.
No mention or allowance been made of the combined increase risk of flooding due to the Jubilee River and Extraction scheme
There have been three severe flooding incidents since 2000 necessitating evacuation of residents, e.g. flooding that took place in the area in 2014
The Environment Agency have acknowledged the critical flooding problem in Wraysbury and surrounding areas have planned in the longer term for a by-pass river to alleviate the pressure, has the scheme taken this into account.
Under 'Flooding History' the Jubilee River does not need to be mentioned. The area does not benefit from the scheme but it does not increase the risk of flooding either. Our historic flood map shows site was affected by events in 2000, 2003, and 2012, and 2013/14 in recent years. These flood events need to be included in the flooding history section.
Our modelling indicates that around 1/3rd of the site is in Flood Zone 3b – i.e. the 5% AEP flood extent. This means that only development classed as 'water compatible' or essential infrastructure (with exception test) will be permitted in Flood Zone 3b.
If flooding occurs during or post extraction, it will cause the water to drain through landfill and pollute the waterways.
Concerns of river pollution
The practicality of removing minerals by Barge when the formation of a barge loading station is in a known critical flood area.
Increased risk of flooding to Wraysbury, Sunnymeads and towns downstream, particularly properties in Wraysbury, due to the site being in the flood plain and a decrease in permeable surface area. How do you propose to mitigate the flood risk that will rise?
The removal of the mineral from the site would put the area at higher risk of flooding – the Island needs more protection; not for existing natural barriers to be removed
Concerns the proposed modifications of the western end bunds for the construction of the wharf and conveyor belt would compromise the flood defences
There is a groundwater protection policy in place – how on earth could this be protected particularly in run-offs from flood zone 2 to flood zone 3
The site is immediately adjacent to the River Thames so an appropriate buffer will be needed to ensure that development does not damage the river or destabilise the river banks.
Extraction will disrupt the Jubilee River Operation
Fearful of the damage future flooding (caused as a result of Ham Island development) could result in and the impact upon properties and the surrounding area

This is an area of historic flooding it serves as flood plain for Wraysbury and also catchment for the whole of Old Windsor and the Great Park run off. Groundwater levels are very high and Ham Island will flood before anywhere else in the village. In the last 20 years we have had 3 incidents of serious flooding that has caused property damage.

Who will the contact be and who will take responsibility for the flooding of the village and associated costs in the event that is directly attributed to the scheme?

Wraysbury home owners pay very high insurance premiums which now comes under the Government Flood Re Scheme because the area has been designated the highest possible flood risk, has anyone ascertained how the scheme will be viewed by the insurers and will any resultant increases be paid for by the Borough. Changes to our risk level increases when land excavation is near and this has cost elements and possible insurance refusal

In the Water Environment and Flood Risk section this says:

Site wholly within Flood Zones 2 and 3 and Groundwater Source Protection Zone (3) – a Flood Risk Assessment and Hydrological Assessment will be required.

This needs to be changed to:

Site wholly within Flood Zones 2 and 3 and Groundwater Source Protection Zone (3) – a Flood Risk Assessment and Hydrogeological Risk Assessment will be required.

Under 'Summary' it says 'Overall it has high flood risk but given the type of manageable'. Should this say, 'Overall it has high flood risk but given the type of development it should be manageable'?

Please note that any development of the site will need to take into account climate change. If development results in loss of floodplain storage it may be difficult to provide adequate compensatory storage. This is because once climate change is taken into account there is likely to be little land outside the 1% flood extent, and land on the edge of the floodplain is usually required for compensatory storage.

Any impact on residential properties will need to be carefully considered, as the site is in close proximity to a number of houses. Any proposal which increases flood risk to these properties will be contrary to national planning policy.

Ham Island site has been historically identified as prone to flooding. The EA have not published their climate change adjustment figures yet, however do acknowledge that any planning applications in this area should take increased flooding due to climate change into account. The EA have established that there are no effective flood defences/mitigation that could be applied to this area.

Ham Island is a flood plain which works to help protect Wraysbury

Water levels rise it is extremely stressful and obviously even more so when it starts to damage your home and leads to unplanned cost and time to fix problems and increases to insurance costs.

Increased flooding risk not just increased levels but high-water flow streams.

The STW's treated effluent outfall crosses the nearby fields within the proposed mineral extraction area in an easterly direction to the Thames. This outfall currently also discharges partially treated effluent at frequent times when incoming sewage exceeds the capacity.

There is a residential community immediately adjacent to the proposed area, any development will exacerbate the existing flooding issues.

In the recent past the area was used as overflow lagoons in times of capacity issues at the Works, although we understand that this is being addressed there is no evidence to date that the lagoons will not be needed in the future.

### **Archaeology**

The effect of the site on the historic character of the area as it partly lies within the Heritage Category List Entry No 1006995, is within the area designated "Setting of the Thames" and the "Thames Path". Also the southern part of Ham Island is a Scheduled Ancient Monument with many signs of Saxon habitat being found.

Possibility of ancient relics, yet to be excavated, in and around the site which could be impacted by the proposed site

This site includes the early medieval and medieval palace and associated monuments of Kingsbury scheduled monument and has high archaeological potential. It is a large scheduling that includes a Saxon (9<sup>th</sup> century) settlement built on the site of an earlier Roman settlement, with a royal palace providing a seat of government. The monument was partly excavated in the 1950s with a range of settlement-related and high status artefacts being discovered. There is however, still much about the extent of the settlement and nature of deposits in this location that is not understood.

The relationship of the monument within the surrounding landscape and river is a crucial part of its significance, as it demonstrates why the settlement was placed in this particular location in the first place. Whilst there has been some development encroachment from the adjacent sewage works etc. the peninsula of the island remains as open ground which makes it possible to orientate the monument within the surrounding landscape and in relation to the river. Removing the evolved landscape that surrounds the monument would not only change the whole character of the landscape to which the monument relates, but has the potential to impact directly on any associated buried archaeological deposits, though further research and investigation would be needed to assess this fully

It is possible that related archaeology is present in the non-designated area, though desk based study and field work would be necessary to establish this. The fields on the opposite side of the river also have high archaeological potential.

Paragraph 193 and 194 of the NPPF require great weight to be given to the asset's conservation and that any harm to the heritage asset requires clear justification. There are therefore major concerns over the proposed allocation of this site – indeed, as the allocation covers a significant area of the scheduled site, and the crucial part of the monument that connects the settlement site with the river, we consider that it is likely that the proposed excavation would cause substantial harm to the significance of the scheduled monument.

The site should not be taken forward, certainly not without further investigation and assessment of the significance of the scheduled monument; of the other archaeological interest and significance of the site; and of the potential impact of mineral extraction at this site on that significance. The allocation of this site should not be taken forward in the absence of clear evidence that extraction at this site would not be harmful to the significance of the scheduled monument or other archaeological remains in this area.

Disappointed with the negative attitude towards this potentially nationally important archaeological remains which the authors describe as “burdensome”.

Ham Island is the location of a significant Scheduled Ancient Monument site. Please see report - Oxford archaeology and document from Berkshire Archaeology (sent by email) that details the significance of the site and its potential.

The draft SEA fails to recognise the harm – we do not understand how the authors of the SEA can conclude that mineral extraction at this site would have a neutral or negligible effect on the scheduled monument, although it is possibly because on page 235 the monument is described as “adjacent” to the site, whereas it is within the proposed allocation site, as recognised on page 236.

We note that Appendix K of the draft SEA does not suggest any example mitigation measures for the likely substantial harm that mineral extraction at this site would cause to the significance of the scheduled monument.

## Horton Brook Quarry

### General

This quarry has recently been granted an extension to the extraction permitted time as it has been unable to sell the available aggregates.

INFILL OF ALL SITES [Horton Brook, Poyle Quarry & Ext and Berkyn Manor] - The Horton Brook Quarry is obliged to infill with inert waste only and this should be a condition of each of the other sites.

RESTORATION OF SITES These sites [Horton Brook, Poyle Quarry & Ext and Berkyn Manor] are, or have been, largely agriculture in nature and should be returned as near as possible to their pre-development condition. Any planting made in order to preserve some resemblance to a rural scene should be retained where possible in order to retain and protect the new ecology systems developed during extraction / infill operations.

### **Transport**

The A4 Bath Road at Brands Hill is already a pollution hot spot with highly illegal levels of air pollution, and very high traffic densities. The extension to the life of this quarry together with the infill years, will continue to blight Brands Hill for many years to come.

Road access to all of the above sites [Horton brook, Poyle Quarry & Ext and Berkyn Manor] must be via a dedicated private road across the landowner's property onto Poyle Road then directly to J15 of the M25.

### **Ecology**

Horton Brook Quarry - There is no mention of the Colne Brook or its river corridor. This needs to be included.

### **Landscape**

The harm to this section of the Park and the frustration to the delivery of much needed environmental improvements and green 'connectivity' in the area its asked that greater weight is given to the need to protect that fragile nature of this section of the Regional Park and Green Belt.

We contest the conclusions in the SEA (pages 14, 244 onwards and page 272) that show positive or neutral impacts and which fail to give due weight to the landscape/ quality of life/ functionality of the Green Belt and CVRP in this area.

LANDSCAPING DURING SITE USE - in addition to bunds and the planting of native trees on the outskirts of each site, we would propose the tops of the bunds are densely planted with low (5 feet) growing bushes and shrubs in order to reduce the flight of sand during strong winds and reduce the noise travel from plant during working hours. Land between the bunds and boundary fencing must be more densely populated with a mix of native trees, bushes and wild flowers to preserve and encourage wildlife, and hide the unsightly weed covered bunds. This is not the case with the Horton Brook Quarry which is an eyesore on what is otherwise a country lane linking Colnbrook with Horton. Such planting of the areas between the bunds and boundary fencing could provide nature walks for residents and local school children to offer some compensation for the lack of views of open fields, grazing animals and crops. Colnbrook and Horton villages are remnants of farming communities.

Landscaping must be greatly improved, as the Horton Brook Quarry is out of keeping with a rural setting in which it exists. This will enhance the chances of a rapid reintroduction of wild life upon the closure of the sites at the end of their life.

### **Flooding**

Horton Brook The historic flood map indicates a small part of the site affected in January 2003. Along with the SFRA referring to 2014 flooding this would be 2 flood events in last 20 years so 'flooding history' rating should be red. The site is immediately adjacent to a large reservoir. Any works will need to demonstrate that they do not impact on the structural stability of the embankment

### **Archaeology**

According to our records there are no designated assets on this site. The Grade II listed Horton Lodge and the Grade II listed The Old Rectory are located outside the site to the south-west and the Grade II listed Ashgood Farmhouse is located to the south. These are not noted in Appendix A but we do not consider it likely that potential waste management development would have an unacceptable impact on the significance of these designated heritage assets. However, we do not consider that waste management development at this proposed site would actually result in a positive outcome for heritage assets as indicated in the draft SEA.

## **Monkey Island Wharf**

### **General**

The site is identified as a draft allocation for housing in the submission version of the Royal Borough of Windsor & Maidenhead (RBWM) Borough Local Plan 2013 – 2033 (Draft Policy HO1 and Site Proforma HA23). The draft allocation of the site as an aggregate wharf in JCEB Minerals and Waste plan would not jeopardise the housing allocation. It is envisaged that the site will be used as a wharf, associated with the Monkey Island Lane Processing site in the short to medium term. The housing allocation is a long-term allocation, which will seek to deliver housing during the latter part of the RBWM Local Plan period, by which time, the use of the site as a wharf will have been completed and the site can come forward to deliver housing as envisaged in the RBWM Local Plan. Any future policy with regards to the allocation of the wharf within the JCEB Minerals and Waste Plan should include suitable wording which makes it clear that the allocation will not be in perpetuity but rather, it will provide a short/medium term function, before the site is brought forward for housing development as envisaged by the RBWM Local Plan. This is considered to be an efficient and sustainable use of land, delivering benefits associated with its use as a wharf before the site is brought forward to deliver the housing required by the RBWM Local Plan.

Poyle Quarry, Poyle Quarry Ext, Water Oakley, Monkey Island Wharf Summerlease welcome the inclusion of the sites as draft allocations and welcome the acceptance in principle that the sites are suitable for working to commence during the plan period, subject to satisfying detailed planning requirements.

The draft allocation for the wharf at Monkey Island Lane will assist in the efficient movement of raised mineral to serve the existing processing site at Monkey Island Lane. We welcome the inclusion of the draft allocation within the plan, which will contribute to addressing the current shortfall and meeting the requirement

The joint authorities have established that where potential negative impacts have been identified, these can be mitigated and would be outweighed by the benefits associated with allocating the sites. As a result, the site has been put forward for allocation in the draft plan.

### **Flooding**

In the Water Environment and Flood Risk section this says:

Site largely within Flood Zone 2/3 and Groundwater Source Protection Zone (1) – a Flood Risk Assessment and Hydrological Assessment will be required.

This needs to be changed to:

Site largely within Flood Zone 2/3 and Groundwater Source Protection Zone (1) – a Flood Risk Assessment and Hydrogeological Risk Assessment will be required



## Planners Farm

<b>General</b>
Object to the site being included due to the unsuitable location in a rural area. Waste management facilities should be in industrial or brownfield locations so that the impact from HGVs does not ruin small villages and towns.
Site already in breach of planning conditions, with noise on the site starting as early as 7:00 am, heard by families who lives a quarter of a mile away from the site and regularly hear vehicle reversing alarms and other noises associated with plant and machinery, including loud occasional thuds.
Planting popular trees are not an acceptable solution. The trees are tall, the leaves off the trees blow into gardens and need to be cleared to avoid blocking drainage, they do not obscure buildings in winter and due to their height, they don't obscure the view in summer too now. Trees don't reduce noise pollution or dust.
The only people who will benefit from this proposal are BFC, Gary Short and the people who live outside our area when all their green waste is sent to us.
The proposal would be contrary to Policy EN8 of the Bracknell Forest Borough Local Plan and Policies CS1 and CS9 of the Core Strategy Development Plan Document and The National Planning Policy Framework.
There is evidence of residents in this area feeling strongly that their opinions and concerns are not being listened to. A large petition in Wokingham <a href="https://www.bracknellnews.co.uk/news/16958103.total-lack-of-interest-councillors-slammed-for-not-not-listening-to-shinfield-residents-housing-fears/?ref=mr&amp;lp=8">https://www.bracknellnews.co.uk/news/16958103.total-lack-of-interest-councillors-slammed-for-not-not-listening-to-shinfield-residents-housing-fears/?ref=mr&amp;lp=8</a> is focused entirely on this, and in Ascot there is a movement afoot to wrest local politics away from the mainstream political parties. These developments reflect a growing concern that the whole of the planning process is a done deal between politicians and developers (largely, if not wholly driven by money) who have little or no interest in listening to what the residents want.
There has been no communication from the council or the planners on this proposed site.
What are the financial aspects related to this project e.g. where is the funding coming from; where are the benefits accruing and with whom? What is the local government viewpoint on this?
We are nearly all elderly on the High Pines and some need carers, so their access will be limited. To gain access to Parkers Lane could become very difficult

<b>General - waste</b>
Advice at the event indicated that the proposed 'biomass' could be the woodier elements of composting material, and the product could be wood chips, although it is not detailed in the draft plan. If the site is allocated, can the Plan specify precisely what the site can be allocated for? If not, what guarantees do residents have?
The existing site at Planners Farm would not be able to handle 50,000 to 75,000 tonnes extra waste without some development, however, there has been no planning application to support this, as yet.
Concerned about the increase in tonnage of material handled. Concerned that the licence will be increased to handle significantly more tonnage than currently authorised. Recommendation - Assurance that there will be no increase to the current licence conditions regarding tonnage handled without a full public consultation.
Possible Waste Transfer Operations. Concerned that going forward waste transfer operations will take place on this site. Recommendation - Any future change to the operation at Planners Farm should take full account of the local community's concerns.
Will Planners Farm be used by Shorts as an overflow site for its Ascot waste transfer station in St George's Lane? RBWM planning application 18/00945/out refers

With the closure of Shorts (Gary Short) at Ascot, St Georges Lane, is there intention of also moving the waste skip lorries to Planners Farm? This would mean even more HGV traffic in the area.

Planners Farm is situated in a prime rural residential area having a permit ERP/BP3290LX a composting facility of 25,000 tonnes evidence referred in planning app 18/00945/out states in 2016 it was underused by 16,900 tonnes. Adding the suggested extra capacity under this joint waste plan and the site increases to a possible capacity to 50,000-75,000 tonnes [this comment was originally put under responses to Policy DM3. Moved to this document as comments refer specifically to Planners Farm]

What are the waste categories for this site? Current descriptions are not clearly defined - to the ordinary person there is not enough detail and information for them to make a considered assessment. More detail required.

Bio-mass fuel and any safety issues that may be associated. Does this involve food waste? More detail required.

### **General - amenity**

The site is in close proximity of 2 existing schools and 3 play areas. Overall, there are 3 schools in the area - Montessori on Brock Hill, St. Mary's C of E, Winkfield Row and Lambrook, Winkfield Row.

Residents are already having to put up with unpleasant odours, noise and increased pollution

The increase in activities will have a detrimental impact on the mental health on residents.

The current site poses a health hazard for residents when it generates an unacceptable amount of dust which is blown into nearby houses. Respiratory issues will worsen if activities at the site increase.

The stench from Gary Shorts will quadruple with that amount of green rubbish dumped each day.

Concern about the increase in odours being omitted from the site. Currently odours are evident during May and September resulting from green wet grass. Recommendation - Controls to be put in place to control odours.

Page 14 of the draft policy promotes the protection of the local community and the well being of those in the Plan areas. However, should any future application associated with this site be permitted, this objective would not be achieved.

The site already has a negative impact on the nearby existing settlements but any significant increase in traffic and activities would be cause unacceptable further damage to properties and quality of life for residents. In terms of the increase in emissions (e.g. NO<sub>2</sub>, CO<sub>2</sub>), pollution, odours, noise, vibration and house shakes that occur throughout the day.

The increase in activities at this site will eventually make flood lighting a necessity, affecting our dark Skies status

Polluting emissions from a large industrial site and numerous HGVs would be a health risk for all residents - especially children and the elderly or anyone with an existing respiratory condition. Air pollution is the biggest environmental health risk and contributes to 40,000 deaths each year in the UK. Children are more at risk because their young lungs are more permeable. The silent death toll from poisoned air is not acceptable. The UK government is already in breach of EU air quality limits and has warned 5 Councils outside of London that they have failed to meet the deadline for dealing with air pollution. We must not let Bracknell join them

Concerns about the potential pollution risks of uncontrolled waste substances coming from far and wide with no audit process in place. Contamination and health risks have not been adequately addressed in the past with such proposals. A clear statement of control and intent needs to be provided in order to reassure local people

Existing schools and play areas - The proposed routes pass two existing schools - Lambrook and Winkfield St Mary's and walking routes to school. There are also three children's play areas in the vicinity of potential routes. Recommendation - Given the rural

residential nature of the area and that children walk to the schools and play areas daily, it would also appear inappropriate to permit increased routing of HGVs along these routes.

Noise: There are regular complaints about the noise from this operation which currently breach the planning consent 02/00839/FUL, vehicles exit the premises from 05.30 am. Regulatory controls are not adhered to.

Smell: This impairs residents enjoyment of their amenities throughout the neighbourhood. It is particularly noticeable during the summer months. Any increase in waste (not yet defined) could add to the existing issue making the situation unbearable for local residents. The increased volume of waste has not been defined - rock and mineral would be completely unacceptable in the confines of this premises. There seems to be potential for the site to develop into a waste transfer station which is completely at odds in this setting

### **General – cumulative impact**

The Consultation documents do not appear to have cross-referenced or considered proposals that are pending under the BFC Draft Local Plan, that will affect its current semi-rural status over the next 5-10 years. E.g. several large housing developments, another school to be located along Forest Road in the vicinity of Braziers Lane and the closure of Braziers Lane with a new spine road running through a high-density residential area.

I would also like you to take into consideration that amount of new homes that are being proposed for the area. Sommerton Farm on Forest Road, 400 homes, Romans on the Forest Road, 10 new homes. The potential increase in traffic from these proposed developments will also only add to the problem.

Inadequate local infrastructure

Overdevelopment in the Green Belt.

### **Transport**

Planners Farm is not a suitable location due to the adjoining roads/preferred routes being already overloaded and causing issues. E.g. junctions of Locks Ride/Forest Road, Oaktree Garden Centre, The Stirrups Hotel, The B3022 and A330 at Maidens Green and others in the area are heavily congested at peak periods. The Locks Ride/Forest Road junction is inaccessible for large vehicles turning right onto Locks Ride ever since the council installed a safety island at the junction - the net result is that large lorries that do try to turn right onto Locks Ride often drive on the wrong side of the road at that junction just to get around without hitting the island. These issues would increase if the site activities increase.

Most of the roads near to the site are relatively narrow country lanes and go through 'pinch-points' or are restricted to one way traffic by parked cars – particularly in Brockhill:

- The T junction of Cricketers Lane with Brock Hill is on a winding narrow road with a blind corner which is often flooded and is icy in cold weather.
- The T junction at Brock Hill with Winkfield Row has a sharp curve and large vehicles often straddle the road.
- The 4 way junction from Maidens Green onto Church Road is a notoriously hazardous one having a blind corner just before the junction.
- The Chavey Down Road is narrow
- Braziers Lane is already signposted as not suitable for HGVs. The draft BFC Local Plan proposes closure of Braziers Lane anyway, to be replaced by a new road through a residential area - also completely unsuitable to route HGVs through

The routes you have highlighted are not suitable for HGV traffic or (as stated in your own draft) the route via Lambrook School is highly sensitive and passes within close distance of two junior schools. One of these school has regular foot traffic with children as young as four years old. Braziers Lane is not suitable for HGV traffic. There are inherent difficulties with vehicles passing each other, particularly at the entrance of Forest Rd, where the road narrows. The junction of Braziers Lane and Forest Road is an accident hotspot and has the highest record of accidents within Winkfield. The Strategic Transport Assessment that you have submitted does not

acknowledge concerns relating to access or routing, in fact it indicates a less than thorough assessment. If the same methodology has been used throughout, then the assessment of the site is open to debate

The proposed vehicle routing compromises two conservation areas, Winkfield Row and Winkfield Village. The arrangement would be far better placed near an existing Highway structure in an Industrialised area, rather than in an area surrounded by residential homes, green belt land and structures of historic interest. The existing Highway structure will not cope, with roads already crumbling under the weight of traffic.

Drivers typically ignore the posted 30mph signs and generally expect other oncoming traffic to move over

The junction of the B3022 and A3022 and Maidens Green crossroads is notorious for the frequency of extremely serious collisions which arise from the restricted vision of vehicles exiting the B3022, equally, several of the other junctions within the vicinity offer very little vision of oncoming traffic, which can be particularly troublesome from residents exiting their driveways.

Past 5 year road accidents around the proposed routes which have been formally logged are shown as follows, with a further number of incidents yet to be logged: Braziers Lane junction with Forest Road – 8 personal injury accidents Bracknell Road junction with Malt Hill / Hayley Green – 5 injury accidents Lovel Road junction with North Street / Pigeonhouse Lane – 5 personal injury accidents Lovel Road junction with Hatchet Lane - 2 accidents. TOTAL NUMBER OF LOGGED ACCIDENTS 20 (4 a year, one every 3 months at these junctions alone). It is clear the current traffic volume along the local roads is already a dangerous problem.

The exit at the junction with Church Road/Pigeonhouse Lane is quite dangerous due to restricted vision towards North Street.

The B3022 is a rat run that is heavily used by commuter traffic and has considerable HGV movements of waste landfill being dumped at The Royal County of Berkshire Polo Club. This road is problematic for HGV's due to the location of Stirrups Hotel on one side of the road and Oak Tree Garden Centre on the other, both of which attract cars. And further up the road there are private dwellings where cars are often parked on the road which causes problems to passing traffic. In winter there is often flooding on the B3022 between Brock Hill and Hayley Green.

Safety concerns regarding the crossroads where the A330 crosses Bracknell Road and Winkfield Lane. Despite it being a very busy junction, used by pedestrians, motorists and horse riders, there are no traffic control measures in place.

Requested a change to Policy DM9 - that there be no further additional work or services at Planner's Farm and therefore no increase in HGV traffic in the Maiden's Green Area.

Requested a change to Policy DM11 - that there be no additional HGV visits to the Planner's Lane site.

Braziers lane is unsuitable for HGV's to avoid Winkfield Row. It is not practical given the restricted width of this carriageway, with barely enough room for two cars to pass let alone an HGV. Cars and lorries sometimes have to back up to allow oncoming traffic including lorries and buses to pass in the opposite direction. There is also poor vision on several of its bends.

The existing speed cushions have proved to be totally ineffective against HGV's, the axle width allowing the wheels to easily passing either side.

Some large HGVs / trucks regularly hit the speed bumps causing serious vibration to their homes

HGV's are powered by large volume diesel engines, there would be a significant increase in the diesel particulates emitted in to the local atmosphere. The harmful effects of this pollution on human and particularly young people's health have been extensively documented.

There are two primary/junior schools in Winkfield Row which consequently results in heavy traffic at key periods in the day, a situation made potentially more dangerous with the addition of a significant number of HGVs.

Previous attempts at creating 'traffic calming' measures have been halted at the behest of 'Shorts' and Planners farm, due to the 'agreement' in place with the council to ensure 'Shorts' vehicles can safely return to the farm and not be impeded by lane width restrictions, due the extensive size of some of the vehicles entering and leaving the premises. Now the idea/consultation is to not only 'forget/leave/fall back' on calming measures BUT introduce even MORE HGV traffic along the Bracknell Road - a road that has still not had its 'Drain covers' repaired, (which when 'run over' by HGV, causes the homes to shake and do unknown damage to the properties - Continuation of failure to respond to this repair will require further investigation and any detrimental effect on the property will be then the fault of the governing parties responsible and compensation will be sought). The Council and its representatives should 'fix existing issues before trying to add any further issues which the expansion would bring

The Lane strains to meet compliance with The Traffic Management Act (2004).

The site is not in close proximity to the strategic road networks

The plan details the intention that proposed sites should be located on major roads. Planners Farm is not.

The road surface on B3022 has been damaged by the current HGV traffic, as well as considerable damage to the roads and overhead electricity cables. The road has not been designed or constructed to take the current volume of traffic. Church Lane has suffered 2 breaks to the Gas mains and 1 to the Water Mains in the past year alone due to HGV movements

I notice that times of day are not mentioned within 98 daily trips some of which must be after dark.

Closer to the site, immediately to its north when exiting, is a sensitive 30 mph limit with former farm cottages either side. The road is blinded by parked cars and used by families' children when leaving / arriving home. It is already a concern to all residents in the neighbourhood. Large lorries / HGV's will only add to these concerns. There is already a need for traffic control implementation.

If the site is to process 75,000 tonnes per year, based on an eight-hour day this would mean HGV journeys to and from the site every 4.7 minutes through Maidens Green village to the cross roads at Bracknell Road. This is a dangerous junction with a number of recorded accidents and fatalities. Additionally, with these extra road movements, the roads would quickly fall into a state of disrepair, thus causing further hazards for the road users.

Local residents feel that they have no control over the ever increasing volume and speed of traffic in the area.

Because of the poor road surface and the dropped man hole covers, HGV's making crashing noises as they go over them, which make the local houses shake.

The HGV traffic using these roads currently is already causing structural damage to the properties south of the hump backed bridge on Winkfield Row, mainly due to the heavy lorries passing Lambrook school hitting the speed bumps too fast. Add more lorries and you will exacerbate the problems.

That information would be used to consider the proposal. I understand there have been many traffic flow studies since I have lived from 2007. Furthermore, the fact that there is often a police traffic car here checking for speeding indicates that the highways are aware that a lot of traffic is generated on this stretch of road and that it exceeds the speed limit of 30 miles. 2. The safety aspect of increased traffic along this stretch of B road. Reading the review, it is clear that HGVs have no alternative but to use B roads here as this a relatively rural area. The road shakes when existing amounts of heavy traffic go by. Planners farm may have access and clear visibility onto the 3022 but does not uphold the speed limit often. The conclusion that s the inconvenience is minor ie less than 1% for the SRN may be the case but that is not the case for LRN which is the one that is most directly affected. An increase of 98 trips a day is unacceptable and unsafe. The road is extremely busy now. 3. The routes Explored. Braziers lane is extremely narrow and has a restricted junction with Locks Ride and the Forest Road crossroads and this itself is a minor C class road an unsuitable for HGV along most of its

length. In conclusion then my concerns are that the due diligence required to create the review of Planners Farm did not happen re traffic information and its impact, the impact on safety on the local roads, and the alternative routes offered. I would like to know what traffic studies will be undertaken as in the document it clearly states that “Minerals and waste development should be expected to include a Transport Assessment or Statement of potential impacts on highway safety, congestion and demand management “

In the Strategic Transport and Planning Assessment it states there is no Traffic model for the 4 counties “4.6 Therefore, a high level study has been undertaken to establish the suitability of each site in terms of transport”. The document clearly states that information has been provided by site promoters and where no information has been provided, the impact of development has been considered based on the nature of the existing highway network. This does not tally with the next comment highlighted here - Likely Traffic Flows and Site Operations - No information regarding existing levels of traffic from the site is available at this stage and therefore has been excluded from the assessment of net additional movements. I would like an explanation then of the contradiction here as I understand there have been many traffic flow studies since 2007 conducted by BFC. The Transport Assessment Document (TAD) is incomplete without considering the exiting traffic usage caused by Planners Farm or the existing traffic flow and congestion periods

The Strategic Transport and Traffic Assessment dated March 2018 appears to indicate the following on Planners Farm:

"No immediate identified concerns relating to access or routing" in addition the document states: "Suggested routing aside from using the existing access road to Planner's Farm, waste traffic could travel north through Maiden's Green, or south through Winkfield Row to connect with the B3017 which then leads on to the A329 east of Bracknell through North Ascot. Both are similar in terms of distance (3.3-3.6 miles) but the route south would potentially affect the sensitive receptor of Lambrook School (high) and therefore the preferred routing would be north and then along Braziers Lane. Both routes avoid routing through major urban areas. "

- Disagree with the above statements as there are immediate concerns that relate to access and routing.

I would like to know what traffic studies will be undertaken as in the document it clearly states that “Minerals and waste development should be expected to include a Transport Assessment or Statement of potential impacts on highway safety, congestion and demand management “

The conclusion that the inconvenience is minor ie less than 1% for the SRN may be the case but that is not the case for LRN which is the one that is most directly affected. An increase of 98 trips a day is unacceptable and unsafe.

The Transport Assessment Document is vague and difficult to understand

The Transport Assessment Document states that the proposed route – via Maidens Green, avoiding the Lambrook ‘sensitive receptor’ avoids urban areas – again incorrect due to the amount of building in the area the urbanisation of the northern area of the BFC area has increased.

Proposed routing seems to have been done from an OS map, not through route inspection

The existing speed bumps (in Winkfield Row) do not slow down the traffic (both cars and lorries).

The location of Planners Farm means that access is through small villages, through conservation areas and alongside narrow footpaths (some of which are school walking routes and recreational areas), none of which are suitable for use by HGVs. There is also a bridge which is unlikely to be able to cope with this level of HGV usage.

The TAD also states that the road surface of the northern route is in good order – it is not, and its deterioration rate has increased since the recent increased use by fully load 35-Ton HGVs removing aggregates from the Berkshire Polo fields, also building work around the Binfield/Blue Mountain areas.

The road (which has no pedestrian pavement) is also shared with pedestrians and dog walkers as 2 public footpaths exit onto the road a few hundred metres apart, resulting in a dangerous area to work with just regular traffic. In addition, the BFC Draft Local Plan has pending

proposals for a school to be located near Braziers Lane and for Braziers Lane to be replaced with a road running through a high density residential area. There would also be additional traffic and associated issues generated by a proposed new development in North Bracknell
The draft Plan preferred HGV routes are flawed, possibly (as acknowledged at the event) because they are the output of a largely desk job.
The Transport Assessment Document regarding Planners Farm has intentionally been left incomplete or vague to enable a favourable perception of the low impact and minimal environmental damage that this site would have on the surrounding human population and animal life
Should it be decided to go ahead with this site using a 'so far unidentified route', would residents be consulted?
The Forest Road / Chavey Down Road is dangerous and does not lend itself to further heavy goods vehicle traffic as it is frequently used by families with small children accessing Winkfield St. Marys school and the recreation ground. Winkfield Row should be bypassed and / or weight limits should be imposed due to the sensitive nature of this area. It is too narrow, and the roads are dangerous as a result.
The traffic increase would be far greater than 1%. The new home development at Warfield Street has already increased the traffic considerably and with the additional 49 two-way HGV movements the Bracknell Road will become gridlocked from the junction at Church Road back to Planners Farm.
Sensitive receptors would not be medium but high due to the intersection of Braziers Lane and Church Lane. This junction is very dangerous. Furthermore, at the cross roads of Church Road and Bracknell road, there have been many accidents, with some fatalities. This junction is extremely dangerous.
Maidens Green residents, the hotel and also the High Pines would be affected by the proposed route
The proposed development planned for the rear of the Cricketer's Pub will only add to the high volumes of traffic that exist along the B3022. The road is also heavily used by large agricultural vehicles too.
There are several dangerous crossroads and T junctions with impaired sight lines.
Damages to verges are common
HGVs speed up and down the road to the site from 05:00 hrs
There are plans for another school to be built in the area, which again would exacerbate existing issues with roads in Winkfield.
Braziers Lane is to all intents and purposes a national speed limit single-lane track. While it is technically has two-way traffic, it is extremely tight and dangerous for car users. HGVs would be a seriously unsafe addition.
Increased HGV vehicle movements and resulting noise and pollution particularly to nearby schools. Detail - Planners Farm sits within a residential area adjacent to a conservation area. Local residents in Brockhill and Winkfield Row already suffer with increased vehicle movements on the immediate roads which cause disruption and disturbance from early morning.
There are speed humps on the B3017 and when HGV pass over these they create a lot of noise and cause vibration to the adjacent properties. Recommendation - Routing of the HGV vehicles to cause the least disruption to the local area.
The B3017, Winkfield Row, and Braziers Lane is an inappropriate route – in Winkfield Row there are speed humps and 20mph speed restrictions applying as there are two schools in close proximity, and Braziers Lane is an accident black spot at its junction with Forest Road. The road signage at the entrance to Braziers Lane states 'Unsuitable for HGVs'. The B3022 Bracknell Road northbound to Maiden's Green is also an inappropriate route due to the narrow road and on-street parking of cars at Brockhill.
The road network system immediately surrounding the Farm is less than ideal to support this business. The area is considered at least semi-rural if not rural and the roads were not built to take heavy traffic and HGV vehicles. The area has numerous dangerous T-junctions and

crossroads with impaired sightlines. A new road should be built to take the traffic from the Planners Farm junction with Bracknell Road which would better serve the problems currently experienced from the HGV vehicles plus take the additional traffic resulting from the advent of Crossrail and indeed the substantial additional developments across the area. Any new road needs to be planned to link up with the NDR to facilitate traffic bypassing the unsuitable Winkfield through roads

Safety of residents e.g. Locks Ride has a very narrow footpath which is used by pedestrians, cyclists and horses, as well as children accessing Locks Ride Recreation Ground. There are many young families who live in the area and there is also a sizeable elderly population. Residents feel unsafe whilst walking children to nearby schools, due to the high speed of cars, vans and HGVs, some having to mount the pavements to pass one another as they are too wide for the local roads.

The Conservation Area Appraisal for Winkfield Row states it is desirable to protect and enhance the area but this is in conflict with the proposed increased routing of HGV's. It will affect the special architectural/historical character of both conservation areas that are near the site (Winkfield Row and Winkfield Village).

There are two conservation areas located on the possible routes – Winkfield Row and Winkfield Village. Recommendation - The Conservation Area Appraisal for Winkfield Row describes its special architectural / historic interest and states that the character and appearance is desirable to preserve and enhance. It would therefore seem inappropriate to permit increased routing of HGVs through Winkfield Row.

## **Ecology**

Given the proximity of the site to the settlement of Brockhill, heritage and conservation areas, and environmentally sensitive sites, can the Plan specify criteria that a planning application would need to meet before consideration, e.g. including a full assessment that demonstrates beyond reasonable doubt that there are: i. No adverse social and environmental impact on Brockhill (e.g. noise/vibration, smell, air pollution/emissions from processing, as well as HGV movements). ii. No adverse environmental impact on the conservation areas and other built heritage, and environmentally sensitive sites including The Cut, Chawridge Bourne SSSI, European sites (notably Windsor Forest and Great Park SAC and Thames Basin Heaths SPA), and locally important sites. (Potential problems are listed in the Waste Proposals Study, p.39 on, with a few exceptions, e.g. invasive alien species, and N deposition on the SAC and SPA.)

Chawridge Bourne Site of special interest as well as local wildlife at Stirrups not considered.

The wildlife will suffer, there is a SSSI nearby

The site is inappropriate since it is adjacent to a SANG

Further development of Planners Farm would potentially endanger the SSSI of Chawridge Bourne in addition to the local wildlife sites nearby

Habitats Regulations Assessment, Windsor Forest & Great Park SAC – the context, Planners Farm – planned increased composting + biofuel processing using garden waste transported by HGV. Up 75,000 t/year. A major external threat to Windsor Forest and Great Park SAC is invasive alien species (IAS). Noting that IAS are addressed in the HRA with the conclusion that “all European and Ramsar sites included ... are at risk ... However effective management of ... sites should minimise the risk of spread”:

i. Does the acknowledgement that management of risk is necessary imply mitigation sensu Sweetman?

ii. Regarding reference to “site management”, transport is acknowledged as a significant pathway for IAS spread. HGV traffic carrying plant material destined for Planners Farm on roads through or near the SAC could pose a real risk which does not seem to be included in the site assessment. Should it be?

Japanese knotweed (JK). HRA paragraph 3.15: “The spread of invasive species is an issue particularly associated with mineral extraction but could also result from compost waste sites where garden waste is being processed. Wetland sites will be particularly vulnerable to the spread of invasive aquatic and terrestrial plants, such as Japanese knotweed.”



Surely JK should not be processed as compostable material?

See [www.gov.uk/guidance/prevent-japanese-knotweed-from-spreading](http://www.gov.uk/guidance/prevent-japanese-knotweed-from-spreading)

ii. This seems the only mention of JK in documentation. Could you clarify how you will deal with garden waste in relation to this invasive weed? Does the JWMP need a policy/text for management of JK & also potentially JK-contaminated material?

iii. JK contamination seems to have been missed as a constraint for Planners Farm. Can it be addressed as potentially serious for The Cut watercourse & nearby residences.

3. The HRA.

a. Consistency query. The HRA refers to a 5-km distance in paragraph 3.10. The Waste Proposals Study p.40, says for Planners Farm: "European designations: None within 2km of the site". This seems an error, perhaps generic?

b. 'Wealden' judgment (EWHC 351), paragraph 4: "the north-eastern boundary of [Lewes District Council] is approximately 5-6 km from the nearest point on the south-eastern boundary of the [Ashdown Forest] SAC." The relevant Lewes proposed sites and stretch of the A26 are some km more distant (west and east) than this. The potential impact was N deposition. The number of additional daily vehicle journeys within 200 m of the Ashdown Forest SAC was the issue, not the distance from proposed development. There is more on this in the judgment.

c. HGV movements: Some sites are screened out in the JWMP HRA partly on basis of distance from SPA, SAC or Ramsar sites. Given the importance of HGV transport to waste/mineral management in the Plan, is the Wealden judgment relevant? E.g. Planners Farm is 3.35 km from Windsor Forest & Great Park SAC and 5.59 km from Thames Basin Heaths SPA – both less than the distance at issue with 'Wealden'.

d. Planners Farm is estimated to generate 98 extra HGV journeys/day (only a proportion near/through the SAC, though HGV journeys are 'weighted' for daily traffic estimates). N deposition is a threat to the SPA and SAC. The HRA says of potential traffic-related pollution on the SAC, "As the site is 3.35km from the European site, the hazard is considered to have negligible potential to cause a likely significant effect." Is this sound?

e. In-combination effects. A (small) potential for in-combination effects was 'flagged' in the HRA for RBWM BLP (near the A332/B383 roundabout). It specified potential impact in relation to the BFC BFLP, presumably relevant for any Plan generating relevant traffic. i. Should the RBWM BLP HRA 'flag' be dealt with in the JWMP HRA? ii. Is it sound to screen out sites without summing impact of (notably) BFC's and other LPAs' plans/projects? iii. As the RBWM BLP HRA in-combination assessment does include some other LPAs, would it be helpful to use this information in the JWMP HRA?

f. Threats: Could threats to European and Ramsar sites (e.g. for SACs and SPAs, as listed in JNCC documentation) be included in the JWMP HRA, particularly major external ones? This would ensure they are not missed in assessment.

### **Landscape**

Responding to the consultation is hampered by lack of detail in the Plan. The proposal concerns a site on the edge of Brockhill (Green Belt settlement) although documentation indicates that this type of waste management is "not normally appropriate ... close to villages"

The site is in relevant proximity to an SSSI, European sites, and various locally important undesignated sites (LWS, etc.). It seems unreasonable to allocate until and unless adverse social and environmental impacts on these have been ruled out. For the European sites it may be a regulatory issue.

### **Flooding**

Flooding is commonplace and problematic, when large vehicles accessing the site make the situation worse by the displacement of flood water from the road into properties. The current flooding issues need to be totally resolved before any consideration is given to increase HGV volume.

Rainwater from both the local houses and the road is drained using natural 'soakaways'. The substantial increase in HGV traffic causing vibration and general damage to the road would

potentially reduce the effectiveness of the 'soakaways' and cause an increase in flooding issues.

Planners Farm - There is no mention of River Cut and its corridor in water environment section. This needs to be added to the text.

In the Water Environment and Flood Risk section this says:

Part of site within Groundwater Source Protection Zone (3) – a Hydrological assessment will be required.”

This needs to be changed to:

“Part of site within Groundwater Source Protection Zone (3) – a Hydrogeological Risk Assessment will be required.”

### **Archaeology**

According to our records there are no designated assets on or in close proximity to this site. However, we do not consider that waste management development at this proposed site would actually result in a positive outcome for heritage assets as indicated in the draft SEA.

## **Poyle Quarry Extensions**

### **General**

Support the proposed sites known at Poyle Quarry and the Poyle Quarry extensions included in the draft plan.

Supportive of the proposed operator, Summerlease Limited because of their experience, environmental credentials and track record of working and restoring similar sites.

The restoration of the site is of particular importance in order to continue to farm the land following restoration.

INFILL OF ALL SITES [Horton Brook, Poyle Quarry & Ext and Berkyn Manor] - The Horton Brook Quarry is obliged to infill with inert waste only and this should be a condition of each of the other sites.

RESTORATION OF SITES These sites [Horton Brook, Poyle Quarry & Ext and Berkyn Manor] are, or have been, largely agriculture in nature and should be returned as near as possible to their pre-development condition. Any planting made in order to preserve some resemblance to a rural scene should be retained where possible in order to retain and protect the new ecology systems developed during extraction / infill operations.

### **Transport**

It will be apparent from the information above that the route Horton Road – Old Bath Road (Colnbrook) – A4 Brands Hill, to the M4 at Junction 5 (Langley) will not be able to support any additional HGV traffic from these developments. The existing Foundry Lane is not fit for this purpose, and the Horton Road through Horton Village is already blighted by traffic from the Cemex site and is a largely a small residential road connecting villages. The only sensible option for road access to all of these sites would be a dedicated road from the Poyle Road in order to allow access to the Motorway network via junction 15 of the M25. Much of the land on which these quarries are planned is under the common ownership of the Rayner Family / Trusts, and such a road must be a condition of planning permission for all / any of these developments, and direct access onto the existing public roads (Poyle Road excepted) and use of Foundry Lane must be prohibited.

Road access to all of the above sites [Horton brook, Poyle Quarry & Ext and Berkyn Manor] must be via a dedicated private road across the landowner's property onto Poyle Road then directly to J15 of the M25.

**Ecology**

Poyle Quarry (extensions) - There is no mention of the Colne Brook or its river corridor. This needs to be added to the text.

**Flooding**

Poyle Quarry & Poyle Quarry extensions The Environment Agency's historic flood map indicates that parts of the site flooded in 2003 due to river flooding. The SFRA mentions flooding in 2014 meaning there have been two flood events in the past 20 years. We think the 'flooding history' rating should be red.

In the Water Environment and Flood Risk section this says:

"Both sites partly within Flood Zones 2 and/or 3 – a Flood Risk Assessment will be required."

This needs to be changed to:

"Both sites partly within Flood Zones 2 and/or 3

The site is not located within a Source Protection Zone (SPZ), but the closest SPZ is located to the west of the site approximately under 1km away.

A Flood Risk Assessment and Hydrogeological Risk Assessment will be required."

**Archaeology**

According to our records there are no designated heritage assets on this site. The Grade II listed City post is located to the south of north extension and the Grade II listed dairy at Berkyn Manor at North East corner of House is located to the south of the south extension. These are not noted in Appendix A but we do not consider it likely that the proposed mineral extraction would have an unacceptable impact on the significance of these designated heritage assets. However, we do not consider that mineral extraction at these two proposed sites would actually result in a positive outcome for heritage assets as indicated in the draft SEA.

There is potential for important waterlogged archaeology, especially relating to the Late Upper Palaeolithic and Mesolithic (the draft SEA notes that the area has high archaeological potential). Evidence might not exist for such archaeology on the Historic Environment Record, owing to its depth and the lack of past investigation. Accordingly, the evidence in support of this allocation site would benefit from the construction of a geoarchaeological deposit model, to identify the nature of the deposits that would be impacted and their archaeological significance.

**Poyle Quarry****General**

Support Poyle Quarry site allocation and we welcome the inclusion of the draft allocation within the plan, which will contribute to addressing the current shortfall and meeting the requirement within the plan area.

Poyle Quarry, Poyle Quarry Ext, Water Oakley, Monkey Island Wharf Summerlease welcome the inclusion of the sites as draft allocations and welcome the acceptance in principle that the sites are suitable for working to commence during the plan period, subject to satisfying detailed planning requirements.

The joint authorities have established that where potential negative impacts have been identified, these can be mitigated and would be outweighed by the benefits associated with allocating this the site. As a result, the site has been put forward for allocation in the draft plan.

INFILL OF ALL SITES [Horton Brook, Poyle Quarry & Ext and Berkyn Manor] - The Horton Brook Quarry is obliged to infill with inert waste only and this should be a condition of each of the other sites.

RESTORATION OF SITES These sites [Horton Brook, Poyle Quarry & Ext and Berkyn Manor] are, or have been, largely agriculture in nature and should be returned as near as possible to their pre-development condition. Any planting made in order to preserve some resemblance to

a rural scene should be retained where possible in order to retain and protect the new ecology systems developed during extraction / infill operations.

### **Transport**

Road access to all of the above sites [Horton brook, Poyle Quarry & Ext and Berkyn Manor] must be via a dedicated private road across the landowner's property onto Poyle Road then directly to J15 of the M25.

### **Ecology**

Poyle Quarry - There is no mention of the Colne Brook or its river corridor. This needs to be added to the text.

### **Flooding**

There is no section for Water Environment and Flood Risk under this site allocation. This needs to add the following text under Water Environment and Flood Risk.  
"Both sites partly within Flood Zones 2 and/or 3  
The site is not located within a Source Protection Zone (SPZ), but the closest SPZ is located to the west of the site approximately under 1km away. A Flood Risk Assessment and Hydrogeological Risk Assessment will be required."

## **Star Works**

### **General – existing operation**

Litter and clinical waste from the site have been carried outside of the site, by wind, birds and other pests that have not been controlled. Landfill Waste has been left uncapped, whilst clinical waste vessels are stored in the open air around the perimeter of the Star Works site.

This is a clear abandonment of the Duty of Care from Wokingham Borough Council and its understanding of the Planning History surrounding the site, resulting in the council not being able to effectively enforce or monitor the site.

Wokingham Borough Council have failed in their 'Duty of Care' to residents. They have failed to: enforce planning breaches; obtain any knowledge of the history of the site; maintain an awareness of existing businesses operating without permissions; retain key documentation relating to extant planning permissions; understand the fundamental principle of 'Full Restoration of the Landscape' and protect residents' health and welfare (clinical waste, litter and needles have been found in residential gardens or along public footpaths) - there are no apparent controls in place to prevent this from happening

During their tenure, Grundon have been found guilty of a number of infringements / breaches of their operating licences

Permission should not be granted for further operations to take place on site as the premise for extension was only temporary.

There have already been several documented pollution incidents surrounding the Knowl Hill site due to its activities. Already an unacceptable risk, further operations or development could endanger the life and health of residents even further.

The water table has disappeared and as such 40 trees have died and need to be felled. This has caused 'songbirds' to exit the area and only crows remain.

It is a matter of record that Star Works activities have created unacceptable environmental impact relating to (a) & (c) of policy DM9 affecting areas including Knowl Hill, Bowsey Hill, and Warren Row

Just because something exists in a place is not a good enough reason to keep it and/or extend its use. This assumes that the original decision to grant it and promises made regarding its operation at the time were sound and kept. Just by modifying the area of legislation the new

facility falls under does not affect the fact that Wokingham Borough Council have broken a direct promise given to residents, that when the landfill was completed that there would never be any further extensions to landfill in Knowl Hill.

Impacts of the site on nearby residents has been raised with the EA. Detailed correspondence including photographs can be found in the paper responses collection tray [should we upload these or not? There is a lot]

This Green Belt site has been the subject of extensive scrutiny in terms of its landfill and waste operation both at Local and Central Government levels which resulted in a definitive conclusion. Therefore, planning conditions relating to the restoration of the site are consistent with the national guidance (NPPW para 7) and should be robustly applied without exception

Star Works has had a well-documented impact upon the local environment creating anxiety for a generation of local residents.

Site not managed well - it produces litter; there have already been several documented pollution incidents (and prosecutions), pests, noxious smells on several occasions has extended not just in the lane and along the local footpaths but also along the A4 as we approach and leave our home. This causes unacceptable emotional upset and anger. There is also noise, vibration and lights at antisocial hours and these will worsen if the site increases its capacity.

The blight on the surrounding villages and their occupants has, to a degree been accepted, based upon the agreement that works would cease in 2021, when a new restored landscape and woodlands would be available for all to enjoy. For this reason many local residents have reduced their complaints about the recent history of noise, odour etc, believing the end was in sight.

The landfill – in July 2007 there was a huge landslide of waste from a prepared cell into an unprepared cell. This caused monumental problems for residents as the smell was pretty unbearable. The residents all over Knowl Hill and beyond suffered for months with no windows open – no sitting in the garden – no putting clothes out – no children being able to play out etc. Children were vomiting, people had headaches and, in some cases, more severe ailments.

Prevailing winds carry unpleasant odours (they are often acrid and burn the back of your throat), noise and litter and debris, including plastics, across a wide radius of the site amongst others including: Warren Row, Bowsey Hill and Knowl Hill

The smells produced from the site make you feel unwell. It is not possible to keep windows open as the site smells then enter your home.

Managers of the site have not communicated well with residents with regards to the giving of information and their commitments

Wokingham Borough Council and Grundons have broken their promises regularly in terms of time scale, restrictions on smell, dispersal of windblown waste and noise. Also, because the site should be fully restored by 2021.

Wokingham Borough Council and the Environment Agency do not appear to have enforced planning conditions and environmental laws (respectively), and so it would appear Grundon has breached a number of these regulations that should have been enforced, regarding the operations at Star Works

Star Works is coming to the end of a 20 year “time-limited” development and restoration, as in accordance with Policy DM5

Ancillary operations required to support landfill restoration should be removed following completion of restoration, as stated by the Secretary of State.

Concerns over previous pollution of the woodland and watercourse. Why would that same site be supported as appropriate for a permanent waste facility?

The current operations pose a threat to Cayton Park Stud with regard to the health and wellbeing of horses on the estate and the proposals are not appropriate given the implications for animal health and welfare. The maintenance team within the estate as well as vets tending to the animals are gravely concerned regarding the planned extension, as the current operations have already caused damage to a number of horses and foals with a number of these animals found choking on lumps of plastic and other bits of waste which have blown across or been picked up by birds and dropped on the land.

The Environment Agency issued Grundon with at least one non-conformity notice in August. It is essential that Grundon take some permanent steps to stop these odour releases.

A Borough Councillor for the adjoining Ward met with the MP and the Director of the RBWM and outlined the seriousness of the detrimental issues from this site to residents. A motion was put forward to Full Council requesting representatives from the Royal Borough work with Wokingham Borough Council, Grundon, the two Parish Councils, residents and the EA to ensure there is a modicum of closure of the detrimental issues (it is noted by the EA that there will always be odour from a landfill) and to ensure all authorities work in the best interest of residents relating to this site. This motion was unanimously agreed and regular meetings took place. However, there followed a fire at the Hydroclaves and a new abatement system was put in. There followed many years of pushing for the Hydroclave building to be a double skinned operation after it was decided just to plug the holes in the old brick building with DIY expandable foam. Even after all this work there is still unfortunately more than too often a very strong smell of urine that permeates over the area and this can especially affect the residents in the surrounding area and the walkers on the public footpaths. No resident in the nearby region can plan for entertaining in their garden they can't sit outside or have windows open. Walkers have mentioned that their walk was not pleasant due to the urine smell. All this has occurred with the belief that an end date was in sight.

Any consideration of Star Works for waste management facilities would need to align with paragraph 6.25 of the Plan which states that; "It is important that existing and potential waste sites are not hindered by 'encroachment' of inappropriate development in close proximity in order that the operational potential of the waste site is not negatively impacted." 5.12 Star Works operations as a waste management facility are clearly hindered by their proximity to residential properties, with a daily high probability of conflicting activities which cause detrimental impacts on residential amenity. It is clear therefore that it is not an appropriate site for this activity in the long term and would suffer from significant 'encroachment'

It is pertinent to note that the Councils state that appropriate locations (paragraph 6.102 of the Plan) which involve open areas, will only be supported if they do not have adverse environmental impacts, and noise and emissions are controlled by effective enclosure and other techniques. Compared against such requirements, it is apparent from the attached report that measures thus far at Star Works have not been effective.

Once the landfill is complete, the site should be vacated. The former factory units should then be repurposed for a non-waste use, where impact on adjacent Residential properties and heritage assets can be minimised.

Star Works itself dates back to the 1820s. Grundon bought the site in 1994 – when brick making stopped. However, it is now two separate operations. Landfill and a waste to energy plant for medical waste. The majority of the site is covered we believe by a 1947 planning application. Landfilling started in 1999. No commercial waste has been delivered to this site since April of this year. The site now only imports inert waste (soils and clays) used to restore the site to areas of grassland and woodland. This will be complete by January 2021. The waste to energy plant has a capacity of some 10,000 tonnes per annum and sorting takes place for an additional 3,000 tonnes per annum which is sent elsewhere. All the site is in the Green Belt. It has a complicated planning history which needs to be available so that it can inform the Plan. At the moment much of the planning history is unavailable. The Proposition "Grundon is promoting the permanent industrial area into the updated Waste Plan, to continue its use as an integrated waste management facility. The landfill area is not included in the promotion, as that is already being restored in line with our planning permission." Grundon we believe is deliberately not seeking to explain what that integrated waste management facility might be or what engineering works or buildings may be required to exercise it. They no doubt feel such an approach provides them with greater flexibility and therefore less protection for local residents. Grundon seeks to argue that it has had historic permissions to do a variety of industrial applications and that those permissions survived the current permissions that it exercises. "It further argues that historic applications resulted in the site currently generating some 90,000 tonnes equivalent of lorry movements per year, which is similar to what which was put forward in our submission to the

draft Plan. As such no significant change in lorry numbers from the site and onto the local road network is anticipated. "The 80,000 tonnes Grundon currently claim to have authority for include 70,000 tonnes related to the landfill permission which finishes in 2021. We believe that only 10,000 tonnes survive as permitted. This needs to be clarified within the process.

With regard to the proposal that the site could handle 100,000 tonnes of waste on an annual basis, based on the fact that the two sites had handled 80,000 tonnes, is a little incredulous. Only once in the years from 2010 to 2017 was the combined tonnage 80000, and that was 2017 the average tonnage going into the 2 sites in that period was 67100 tonnes. Consequently we are talking about an increase of 32900 tonnes which is a 49% increase. The increase in lorry traffic would be disruptive to both the A4 and to residents. The waste was also going into 2 sites and the landfill site was much further away from human habitation, and this was still disruptive. The new proposal would put 100000 tonnes into a site that at present is dealing with 12000 tonnes and is only a few metres away from houses, and this alone should make any right thinking person doubt the validity of the plan.

Have the RBWM policies, in which there is a strong presumption against locating any waste facility/ treatment plant in or close to residential areas, been considered in choosing this site?

Many residents had expected the waste movements to cease within 5 years and this has been communicated to residents by Grundons themselves in the recent past.

Has the planning history of Grundon's been considered in choosing this site?

The end date is in sight for the landfill BUT the treatment of waste which should have come to an end with the landfill is looking to continue. Not just to continue as it is but with the huge increase from 10,000 tonnes per year to 100,000 tonnes per year. No information has been submitted as to how the waste is to be treated.

The current operator, Grundon's, stated they have had insufficient landfill waste to allow them to complete their restoration works in the permitted time, due to the lack of waste and increase in recycling.

Wokingham Borough Council has previously committed to residents that when the Canhurst Farm Canhurst Lane, Knowl Hill Berkshire. RG10 9XT - landfill was completed that there would never be any further extensions to landfill in Knowl Hill.

Wokingham Borough Council committed to residents that when the landfill was completed that there would not be any further extensions to landfill in Knowl Hill. These proposals break that commitment.

### **General - restoration**

The restoration of minerals and waste developments [*ref Policy DM8*] should reinforce or enhance the character and setting of the local area and should contribute to the delivery of local objectives for biodiversity, landscape character, historic environment or community use. Little or next to no weight has been given to the above in relation to the site allocation of 'Star Works'.

Any prior uses of landfill at Star Works should not be classed as existing, because the site is currently going through restoration.

The waste management activities at Star Works are intrinsically linked with the restoration of the former quarry / landfill, and should not be seen as a separate entity. Therefore, if Star Works were to be allocated for waste management operations through the Plan period, beyond the completed restoration of the former quarry void / landfill, it would need to be assessed as a new site. Further, given its temporary nature in assisting restoration activities, Star Works as a waste management facility could not be deemed an existing permanent operation and as such should not benefit from safeguarding under draft Policy W2.

The Council granted permission for the site to be restored after current planning permission expires (2021), however it's proposed continued operations contravenes this

### **General**

Introduction, first paragraph, second and third sentences, should read: "Lutmans Haven lies to the east of Star Lane Works.

Existing waste sites should not receive any special protection or be automatically safeguarded from other development as this could encourage over landfill use or other waste development in one place and puts too much pressure in one area.

The Secretary of State concluded in 1994 "landfilling of waste is not recognised as appropriate in the Green Belt, in general national policy but is acknowledged in the statutory Development Plan to be, in principle, an acceptable method of restoring mineral excavation sites." So restoration of a Green Belt site, damaged by industrialisation, was the sole reason for an existing waste facility being permitted. The granting had clear time limits, which have not been met and also clear details regarding quitting the site and final care, as outlined in Condition 3 of Recommendations 153171 that the committee authorise the grant of planning permission subject to the following - Conditions and Informatives: 'the use of the site as a security compound, skip container store, aggregate store and vehicle park shall cease on completion of the Knowl Hill landfill site - Reason : to restrict the period of operations in the interest of amenity and in accordance with the application' As such safeguarding existing facilities as a whole is flawed. Each site should be assessed on the historic reasoning behind granting of its use as a waste facility and not assume a permanent grant of use.

This will have a negative effect on the value of our home and would imagine that it will also make it difficult if we wanted to move, as who wants to live next to a dump in a rural area.

Support the inclusion of the site as an allocated site for waste management infrastructure.

Bringing waste to process before taking it off site again would be environmentally detrimental in terms of the carbon footprint and vehicle movements.

'Star Works' does not meet any of the required criteria to run as a waste site (as set out in Policy W2) so the land needs to be returned to its previous restored state.

Objection to star Works being included in the Draft Plan since it does not meet the 'test of soundness' or any of the criteria required in order to run as a waste facility.

Safeguarded sites should be judged on Central & Eastern Berkshire Authorities' Site Assessment criteria and any existing sites should be judged on any previous prosecutions, infringements and pollution incidents should also be considered with regards the viability of continued use and the existing Operator's suitability to retain both the site and its operating licences. In the case of Star Works these prosecutions / incidents are: 2010 - Guilty of Breaching conditions of held waste permit 2009 - Pollution Incident - Atmospheric pollutants and effects - Smoke & firefighting run-off 2007 - Pollution Incident - Atmospheric pollutants and effect - other 2004 - Pollution Incident - Atmospheric pollutants and effects - Landfill Odour 2002 - Guilty of deliberately pumping 500,000 Gallons of Stagnant Water from a Quarry Lagoon into Woodland surrounding the Watercourse.

There was only ever a need for landfill due to a large hole created from clay extraction from 1994.

In light of the Government's decision to support the third runway at Heathrow, which would result in the demolition of Grndon's Lakeside energy from waste facility, it would make more sense to review the capacity of the proposed replacement facility in the immediate vicinity of that site in order to accommodate more of Wokingham's waste. The social and environmental impact of expanding the capacity at the replacement Colnbrook facility would be far less than utilising the Star Works site for waste treatment. This should be thoroughly considered as an alternative option. Bearing in mind that the Lakeside EfW facility is in the same ownership as the Star Works site, you would expect that the draft Minerals & Waste Local Plan should be able to address this matter in more detail than the brief statements on page 60. It could also be considered that it is premature to proceed with the draft Plan before there is more certainty about the future of the Lakeside EfW facility.

Star Works poses a fire risk

### **General – mineral extraction**

Further extraction of soft sand, with further landfill to follow cannot be tolerated in this residential area where work must cease as promised once restoration is complete in 2021.

Planning permission for extraction granted under an Interim Development Order in July 1947 (ref.no. 184/87), permission renewed (ROMP) and subsequently granted in September 2006



allowing excavation of minerals from 32 hectares of land north of Star Works until 2042. Estimated reserve of 1.2m tonnes of minerals (clay and sand) from the site.
Confusion over how the soft sand reserves identified at the site would be extracted, given the majority of the existing site has waste deposited on top of it
Concern that there further clay extraction at the site will only be taking place in order to provide further landfill 'space'

<b>General – engagement</b>
Concerns about the lack of consultation during the earlier stages of the Plan production, particularly in relation to residents, those representing residents or local bodies (Parish Councils). This was confirmed by an FOI request. The responses provided in the first consultation appear to be inadequate and lack meaningful detail or general understanding of what was being asked. This is due to the inadequate consultation process and the publicising of the Waste and Mineral Plan during the early stages of the Plan making process.
A lack of formal communication from any of the councils involved in this consultation. I'd like to know what communication strategy has been used to advertise this to the residents because I have received nothing via post or email. How can you be sure you've properly advertised this consultation to the local residents, a lot of whom are elderly and live in relatively isolated properties if someone essentially 3 doors down has received nothing as part of the consultation?
The consultation was only open for a short time with an end date of 12 October 2018, but in the interests of transparency and proper process, this date should be extended. It is also incumbent on Wokingham BC and Windsor and Maidenhead to provide information which may be relevant to allowing consultees sufficient time to respond in full. In the absence of a planning application which may be years away, publication notes of meetings or correspondence between Grundon or their agents with local councillors and officers may be helpful. Will these be made available?
The W2 policy is flawed. It is based upon poor and uninformed selection criteria. By HCCs own admission (at the Knowl Hill presentation) that no attempt was made to visit the site or engage with local residents; it was purely a theoretical exercise.

<b>General – alternatives / choice of site</b>
There was not a good enough investigative approach to finding alternative sites within the boroughs for waste treatment/handling on this scale.
The selection of an existing facility is perhaps indicative that research into alternative (and more suitable) sites has not been carried out in full as it should have been.
Processing plants for the landfill should be located on brown field sites in pre-existing industrial areas in the Thames Valley Park or Slough Trading Estate.
How can four different councils deem Star Works to be a suitable waste site, if it is not known how the site will be used?
The prospect of the site being used for the recycling of hazardous electrical goods, e.g. fridges and freezers is especially worrying and would exacerbate the problems.

<b>General – need</b>
Cannot see how there is a satisfactory or acceptable policy which justifies the continued use of the Star Works site.
The fact that there is an existing facility does not provide empirical evidence that future usage is appropriate.
Site is in contrary to policy W1 as it is not located near to the sources of waste or markets for its use and it is unlikely for Star Works to substitute or deliver the 70,000tpa capacity that will be lost when the Landfill Restoration complete in January 2020 due to planning policies restricting storage & Treatment Facilities

The plan states that there is insufficient treatment capacity, yet the current Star Works facility treats waste from the whole of the UK, not just Central & Eastern Berkshire.

Processing of waste from outside of the Joint Minerals and Waste Draft Plan should be discouraged. Presently sites process waste from outside of the area and priority should be given to our own capacity requirements. This could be achieved with the introduction of tariffs out on waste coming from outside of the Central & Eastern Berkshire Authorities' jurisdiction.

### **General – amenity and environment**

There is significant recreational use of the area surrounding Knowl Hill Star Works including use of bridal ways, footpaths, The Chiltern Way, Knowl Hill Bridal Way Circuit and Sustrans Cycle Route. Further development would negatively impact these amenities. At times it can be very dangerous for numerous walkers trying to enjoy the walks access the footpaths.

Residents suffer from the environmental consequences of living right next to a waste site. As an example of the problems, waste appears to be stored against the fence separating the site from residents' properties rather than in the appointed buildings.

The Hydroclaves – all the others in the world had been placed well away from residential areas. These were placed within 50 metres to the nearest resident as can be seen [*NB – photo appended and will be taken into consideration*]

Knowl Hill is a residential village in the Green Belt and there should be a general principle that waste facilities should not be located near residential family properties.

Star Works is located in close proximity to Grade II listed buildings, and this is one reason why it should not be permitted to continue operating as a waste site

The access to the Star Works site is via a privately-owned restricted byway, which is adjacent to listed residential heritage assets and leisure and recreational routes.

Cumulative Impact is one of the criteria that site suitability is judged upon, and safeguarding existing sites would increase the cumulative impact on residents, where the original premise of use was granted based upon "the considerable long term benefit to be derived from the restored landscape and public access."

Star Works, Knowl Hill is clearly unsuitable for further waste operations due to its location within a village, within 50 yards of residential property and subsequent increase in traffic. Waste facilities should never be located near residential properties.

The landfill at Star Works is now in the restoration phase and in the process of being restored back to woodland. Any further development would be detrimental to the village and the landscape.

Environmental concerns at a local level should predominate decision making for this site

This is an area of beauty, and a place where people walk to gain health.

This site is in a residential area and following the recent renovation of the seven stars properties this has now moved the immediate surrounding area into residential use. Prior to this the commercial use of the Seven Stars area meant the impact from the Grondon's site was proportionate given the adjacent land use. However following the renovation and change of use the site now finds itself nestled within residential area, affecting quality of life.

New development which would surely be necessitated to manage an additional 100,000 tonnes of waste would be incalculably detrimental to the village, residents and the surrounding area. By having a landfill site so close to residential properties it will result in the fall in the quality of life for those residents.

Proximity of the site to residential properties (within 50 yards) is undesirable and impacts residents' quality of life, health and wellbeing and has done so for 20+ years for some residents.

Mental health is affected. Residents have many personal examples of how the landfill site has negatively contributed to the emotional and psychological health of our families and neighbours

The National Planning Policy for Waste, October 2014 states that in identifying suitable sites and areas waste planning authorities should assess the suitability of sites in terms of, amongst other things: "the cumulative impact of existing and proposed waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential"

Contradicts with draft Policy DM3 of the JMWP which suggests that waste development should not be located in areas that could impact Ancient Woodland and local interest sites for biodiversity or priority habitats and species listed in the national and local Biodiversity Action Plans, unless: the merits of development outweigh any likely environmental impact; the development could be reasonably located on another site; or appropriate mitigation or compensation measures for impact to biodiversity could be provided. These have not been adequately demonstrated in relation to the Star Works site, due to its absence from the Habitats Assessment and Screening report in the evidence base

### **General - proposal**

Theresa May has previously campaigned for its closure and has been opposed to further expansion of the site.

Areas of land, ancillary to the Landfill operations now appear to have been included in the plans for a permanent waste facility, however these areas are already designated as areas for restoration and completion by 2021. The current ancillary areas included a security compound, skip/container store, aggregate store and vehicle park under permission 344446 were to be removed within 6 months of their cessation of use, ancillary to the Landfill.

Current arrangements, and any future permitted works, be re-structured in such a way that vehicle movements, and the movements of material within the site, will take place within strictly controlled operational hours and days of work, to reduce the noise impact at anti-social times. Future waste treatments, if permitted, should be restricted in such a way to protect residents and the nearby school from pollutants (including vehicle movements) and odours.

Expansion of the treatment works would be at odds with the potential restoration use on the landfill next door.

The preferred option of WBG7 is redevelopment of the site, underlining the conclusion that current proximity to dwellings within a Green Belt location severely limits potential. Following the completion of the Landfill Restoration, the remaining hydroclave activities make a minor contribution to the Plan's capacity requirements unless new waste management treatments can be accommodated. The site constraints make this a difficult implementation

Star Works does not need to be maintained or expanded for you to meet the needs of the boroughs covered in the report.

The potential intensification of waste activity suggested for Star Works represents a significant increase over current levels. This upsurge is far greater still when taken in the context of the current baseline including a substantial level being attributable to the site's landfill restorative works which are due to conclude soon. Based upon cumulative policy decisions, the impacted local community and environment has held a predictable expectation of reduction not exacerbation.

The inclusion of Star Works within Policy W4 does not accord with the National Planning Policy for Waste (NPPW) as detailed below: i) The cumulative impact of the existing and potential waste facility would be detrimental to the well-being of the local community including environmental quality contrary to paragraph 5. ii) The site does not support the sustainable movement of waste by use modes other than road transport. iii) Any expansion of the site would be inappropriate development in the Green Belt contrary to paragraph 6. iv) Expanded operations at this site would conflict with the locational criteria of Appendix B (paragraph d – nature conservation) including a site with a nationally recognised designation and protected species. v) Noise and vibration from goods vehicle traffic movements to and from the site, Appendix B (paragraph j – noise light and vibration). Additional adverse considerations in relation to the NPPW are: • air emissions and the close proximity of sensitive receptors (humans); • the reliance on local roads for access; • odours and the close proximity of sensitive receptors.

Star Works does not comply with the statement that, "some waste, such as large-scale facilities requiring an open site are difficult to accommodate in urban areas. Waste uses not requiring a more isolated location and minerals developments that are not specifically linked to the natural occurrence of a mineral, should be located in urban areas". This is because Star Works is neither urban nor isolated.

5.36 It must be reminded that the promotion of Star Works as a waste management facility over the Plan period suggests that it could manage all types of waste category. A simple analysis of the locations the Councils consider inappropriate for such development/uses provides stark reading.

[ALL SUPPORTING EVIDENCE OF THIS RESPONSE CAN BE FOUND

VIA <https://www.muckmentum.co.uk/important-information/supporting-documents-for-opposition>]

In conclusion, the operational contribution that the Star Works site has provided to the waste strategy for the area is 21 years with a preceding mineral extraction dating back to 1947. It is considered that this site has served its purpose and more than adequately made its contribution as a waste and minerals facility to an area much wider than the locality in which it is situated.

## **Transport**

Increase in heavy goods vehicles would be an unacceptable health and safety risk to our community.

Concern that an increase in HGVs would not be sustainable and would impact A4 commuters, including major facilities such as Castle Royle with over 3000 members.

Traffic on the A4 road is already congested, also the A4 is the main diversion when the M4 is out of use as it will intermittently be until 2022, so this will get worse if the site expands, coupled with other proposed housing development in the area. Currently, accessing the A4 from Warren Row Road heading eastbound can be extremely difficult with the volumes of traffic using this key highway.

The A4 is more likely to be grid locked affecting residents commuting time if capacity at Star Works was significantly increased.

No consideration has been given to the actual road traffic movements associated with Grundon's previous peak operation, which are much lower compared with their stated volume of 100,000 tonnes at peak.

The assessment will need to take into account actual vehicle movements, rather than current permitted movements, as local residents judge their current levels of disturbance on actual movements.

If the Star Works site is granted planning permission to continue to function as a waste site in the future, what measures will be implemented to mitigate the effect of the traffic increases on the residents of Star Lane?

Many parts of the A4 have had speed restrictions imposed over the past few years with many stretches now 40 mph.

The access point for Grundon's is terrible – the site lights are not good from the entrances and the narrow width of the road makes it dangerous for large lorries to pass. At the narrowest point Star Lane is 507cm wide (\*Picture Provided\*). Some residents' drive entrance is tucked behind entrance to Star Works and they cannot see the entrance easily and show no courtesy.

Knowle Hill Bridleway Circuit crosses the A4 at Knowle Hill and continues along north past Star Works. The route is marked on the RBWM definitive map as a restricted by way ref 41. Concern about any increase in traffic or size of vehicles delivering waste. Horses frighten easily in the vicinity of large vehicles, especially if accelerating from the A4 junction going uphill, consideration needs to be made to this important Bridle way circuit. You might consider having a Pegasus crossing across the A4 where the bridle way circuit crosses this very busy road

The site does not have good connectivity as the access is via a privately owned restricted Byway (forming a part of the Knowl Hill Bridleway circuit, Leisure Routes, PROW and the Sustrans National Cycle Network). Current site permissions related to vehicular movements are limited, but are breached daily. The transport links in the area are neither suitable nor sustainable.

There is a significant recreational use of the area surrounding the Knowl Hill Star Works which include bridle ways, footpaths, The Chiltern Way, Knowl Hill Bridal Way Circuit and Sustrans Cycle Route; further development would impact considerably on these amenities and activities.

HGVs arrive uncovered / unsheeted in breach of Conditions and all HGV traffic shares the same Restricted Byway with children, cyclists, dogs, horses and walkers of all ages.
The main suggested route into the works goes past several high sensitivity receptors including directly past a primary school and other community facilities.
The A4 (particularly between the Maidenhead Thicket roundabout and the Wargrave roundabout) is a known dangerous road and has seen multiple injuries and fatalities over the last 10 years ( <a href="http://www.crashmap.co.uk/search">http://www.crashmap.co.uk/search</a> ). M4 "smart" alterations will exacerbate this. Heavy lorries using the site cause danger e.g. frequent near misses between vehicles exiting Star Lane and the Star Works traffic
Village centre location within 1 mile of two primary schools, which poses danger to the pupils. The pupils, parents and staff face ever growing numbers of vehicles and the dangers associated with this entering and leaving the school, not to mention the higher levels of air pollution affecting the children, parents and staff. Young children are particularly vulnerable e.g. asthma
Drivers should be compelled to adhere to the speed limits and anything that increases the risk of reckless driving (such as payment by the load) be strongly discouraged
Concern for people safety due to high number of recent collisions and fatalities on roads surrounding the site. Encourage consultation with the school local to Star Works as it should be able to provide information on recent incidents relating to parents and / or children attempting to arrive at school safely, despite the local roads presenting several hazards and risks.
The road from the A4 to Star Works is narrow. There is no room for a lorry and a car to pass each other. There is an ongoing safety risk caused by lorries not giving right of way to cars. This must be addressed if Star Works is to continue operating vehicle movements.
Many cyclists who join the westbound A4 coming out of Bottle Lane then try to cross the flow of traffic to turn right onto Warren Row Road where they will be particularly vulnerable to lorry traffic.
The car park at Flics Café is regularly used by Grundon waste vehicles (sometimes it's full of them). The smell caused by the vehicles impacts the use of private gardens as it is very potent. No consideration is shown, by the drivers of the HGVs for the local neighbours of Flics Café and the vehicles produce so much dust (in the cafe carpark), it is not possible to dry washing outside or sit peacefully in gardens.
Current transport assessments are not based on existing traffic movements and not site specific so do not take into account the changes in operation of the site post 2020 (increased traffic movements out once their own landfill site closes).
It is unclear from the presentations given whether any consideration has been made to integrate plans with other high impact road traffic implications such as the plans to substantially increase housing in and around Twyford just 2 miles further along the A4.
Future Waste Management sites should be located where there is direct access to the rail network as a more sustainable transport solution than the road networks.
There is very poor sustainable vision for suitable transport links in the area.

## **Ecology**

Star Works incorporates a Wildlife Heritage site, where there are several protected species including great crested newts, cattails, bats, badgers plus a wide selection of Butterflies, some of which have reduced significantly in numbers over the past 10-20 years.
The location of the proposed site is within a Greenbelt, which contains many different species of animals (deer, foxes, badgers, owls, newts, grass snakes, lizards and bats) who need places for them to live, thrive and survive.
Knowl Hill is in an important area of particular scientific interest. The possibility of increasing capacity at Star Works for commercial waste facilities in this area would have a detrimental impact and on the area's protected species, flora and fauna of six local wildlife sites, due to loss or threat to habitat from pollutants, development, noise and light
The site sits within protected woodland which has a tree preservation order on it (no 4/1951).

'Star Works' lies within an area that holds 'Sites of special Scientific interest' status, has protected species including Great Crested Newts/Cattails and the ancient woodland which has blanket protection. It is vital that this is preserved. This beautiful protected area has already been impacted by the Grundon facility when gallons of polluted water (500,000) was emptied into the woodland.

Berkshire Nature have identified our open woodland areas of significant importance having been established in Roman times beside the Ancient Woodland. Increasing the intensity of use of the Star Works and site prejudices this historic environment.

Protection should be afforded to other areas of designation, such as sites adjacent / nearby to Sites of Special Scientific Interest, nationally protected species, and Ancient Woodland (e.g. Linen Hill to the north of the site).

There seems to be no full assessment of the Habitat.

Unable to understand the justification for the extension of the site in relation to the threat to woodland and trees, the majority of which are protected and subject to TPO. Concerns raised over the wholesale destruction of protected trees in order to facilitate the justification for the extension and intensification of operations at Star works. We conclude that habitat assessments are not appropriate for the allocation and expansion of the site.

### **Landscape**

Any further development would be detrimental to the village and the landscape

Knowl Hill is surrounded by designated important landscapes - Linden Hill Wood and Bear Wood is ancient and protected, Knowl Hill Brick Pits LWS and Cayton Park Woodland LWS, Bottom Boles Wood LWS, Square Wood LWS, Common South-east of Warren Row LWS.

Knowl Hill is a large residential village in the greenbelt and waste sites should not be located here

The site is in Green Belt, but this could be compromised with an increased site capacity and operations as further development (and associated infrastructure) may eventually result. As a new waste facility within the Green Belt, it does not meet the required criteria based upon its location, ecology, landscape, proximity to residential properties and the community's health, safety and welfare.

The development of Star Works within a green belt is unacceptable, because the processing plant is unlikely to preserve openness, owing to its size, height and industrial appearance.

The site itself was an area of outstanding natural beauty, it is time that it is restored to this state

### **Flooding**

Star Works/Knowl Hill We suggest that rather than saying 'fluvial flooding risk – none', this should say that there is 'low risk of fluvial flooding' as there are some small watercourses in the vicinity of the site. Site allocations and river corridors

In the Water Environment and Flood Risk section this says:

"Within Groundwater Source Protection Zone (3) - a Hydrological Assessment will be required."

This needs to be changed to:

"Within Groundwater Source Protection Zone (3) - a Hydrogeological Risk Assessment will be required."

The site is within Groundwater Source Protection Zone (3) —this critical public health issue seems to have been dismissed by suggesting a Hydrological Assessment would be required at planning application stage. The proposals must therefore be contrary to draft Policy DM10 which states that development should not have an unacceptable impact on groundwater Source Protection Zones.

### **Archaeology**

According to our records there are no designated assets on or in close proximity to this site. We note the draft SEA assessment of this site against SEA objective 3 that it is likely that archaeological remains will be encountered. At this stage we do not know the extent, nature or

significance of these remains and we consider that the allocation of this site should not be taken forward in the absence of clear evidence that waste management at this site would not be harmful to the archaeological significance of this area.

We are not sure what is meant by “*extraction is likely to overcome the constraint through archaeological mitigation*” – the Plan proposes to allocate this site for waste management, not excavation. Nevertheless, we are still unsure as to what archaeological mitigation there could be - we note that Appendix K of the draft SEA just suggests “historic environment schemes” as an example of mitigation measures which rather suggests that the authors are not sure themselves as to what mitigation measures there could be.

Access to the Star Works site must retain the rural open landscape and historical setting compatible with adjacent Grade 2 listed buildings.

## The Compound

### General

The site is located in the Green Belt.

RBWM have been unable to confirm that other ancillary buildings would not be additional requirements for the successful operation of a waste treatment facility on this Green Belt site.

Drowning the public in information that masquerades as consultation does not serve the public and is not consultation.

### General – health and safety

This site triggers the Environment Agency 250m rule on detailed risk assessment for bio aerosols due to the close proximity of residences and school (Beech Lodge) at less than 250m. Bio aerosols are a major risk factor

If there was a fire smoke would blind the motorway, causing serious danger. There is always a severe risk of spontaneous combustion with garden waste.

There are well documented issues with garden waste spontaneously combusting in Heat. The site is south facing with no shielding from the sun given and so makes it a bad site for processing of this kind.

Objection due to the potential health risks presented from the potentially harmful organic material that would be processed at the proposed site, and the fumes / waste products circulated into the atmosphere as a result of the processing. Additionally, the proposal study does not evidence a risk assessment to the nearby residents and pupils due to potential emissions of bacteria, spores and fungi that such composting could produce. Indeed, the proposal does not specify the exact nature of the potential waste operation so therefore there is no fully evidenced and researched justification for allocation of this site. Surely there are laws to control exposure of nearby residents and pupils to hazardous bioaerosols.

The site is directly under the approach and take off routes from White Waltham airfield with light aircraft crossing above at very low altitudes. The landowner has logged numerous complaints to Bisham Parish Council and RBWM about this low flying activity. The processing of Green waste on this site will attract an abundance of birds feeding on waste and vermin that the processing of that waste will attract. This includes gulls which have collected in large numbers in our area recently and predatory birds (there is a large number of Red Kites in the area). This could create a hazard for the aircraft on takeoff and approach to the airfield.

It's questionable to whether the site is viable, because the Joint Waste Proposal Study refers to the consideration of site of 2ha or more, whereas Stubbings Compound is 1.2ha. The site is totally inappropriate due to its small size (3 acres), odd shape, lack of useable space and poor vehicular access.

The site, which measures 1.2 hectares, is too small for such an intensification of use.

It is not a 'compound' but a field which was only used for accommodation works temporarily for the A404 construction about 15 years ago for a short period.

Alternative sites should be considered in rural areas that are not populated at all. Such sites may, by virtue of the fact that they are more isolated, offer a much larger area for green waste processing than the two hectares proposed here.

Objection to the site as there must be more suitable, alternative sites

### **General - amenity**

There is a new school / co-educational facility, designed for children and young people with additional needs, and it is in close proximity to the proposed site. The impacts of the proposed site on the school (and those using it) would be detrimental

It would be detrimental to the area as a local amenity for ramblers, dog walkers, and equestrians who are all frequent users of the National Trust Woodland and regularly use Stubbings Lane to access Maidenhead Thicket and to follow the Berkshire Loop footpath.

The proposed green waste recycling site is actually located in Stubbings Village (not Pinkneys Green as stated) on Green Belt agricultural land, adjoining Stubbings Lane.

The landowner was recently granted planning permission to build a barn and create hardstanding on the basis that it was necessary for agricultural use. This permission was on the strict understanding that it would not result in any intensification of use of the site. Waste management and treatment do not represent private agricultural use.

The site is currently covered by hardstanding and has planning for a barn.

The area should have been restored to its agricultural status, as required by R.B.W.M. following a temporary planning consent for storage of road works equipment, which has so far been ignored.

The entrance to the proposed site is shared with Stubbings House (a building of very significant local historic importance), a local Garden Centre, and the new school. This does not seem to be a suitable mix of neighbours for a waste recycling plant

Oppose and object to the proposed Stubbings Compound site as a waste recycling facility as being inappropriate (petition signed by 61 residents)

The site would have a detrimental impact upon the prices of nearby residential properties

We already have the purpose-built R.B.W.M Recycling Centre at Stafferton Way Maidenhead, SL6 1AY, which is just 2.5 miles by road from Stubbings, so there is no need for another site.

The proposed waste recycling plant would be adjacent to a nursery which provides healthy plants and sells them to consumers from a very wide area; these plants are at present healthy and they include perfectly edible salad and root vegetables; the proposed waste recycler is much too anti-social to be near household consumers; faults do occur which can be life threatening.

Processing of green waste on this site, in bulk and in close proximity to residential properties will make the lives of those with respiratory problems very difficult and be a detriment to their wellbeing.

There are two schools in the vicinity of the The Compound. One of these schools is on Stubbings Lane, the only access road to the Compound. This school offers specialist provision for very vulnerable children who have considerable sensory and neurological needs. Special planning consent was given by the planning Inspector at a recent Tribunal because of the unique aspects of the site and the needs of the children. The operation of a green waste management and treatment plant adjacent to the school would severely compromise the wellbeing of these vulnerable children.

The proposed site would have negative impacts upon quality of life for those living in close proximity to it, within 50m of some gardens and homes

Objection to the proposed site, since several residential dwellings are located at approximately 83 metres from the site boundary (using the scale provided in the proposal study).

Oppose due to environmental issues including noise of recycling plant, heavy machinery and heavy lorries all of which have to have reversing buzzers fitted as standard for safety would have a devastating effect on a quiet residential and woodland area. Also the smell (green waste processing plants are notorious for release of odours, whether enclosed or not), possibility of Rodents will increase dramatically and flood lights.



<b>Transport</b>
Oppose and object to the proposed Stubbings Compound site as a waste recycling facility as being inappropriate for the following reasons: increased traffic along the Henley Road (which cannot easily support heavy goods vehicles and plant and machinery),
Object due to potential congestion and increased danger from Henley Road onto Stubbings Lane (which serves Stubbings Nursery, cafeteria and business centre, Beech Lodge School and the Compound)
There would be a major increase of heavy goods traffic along the narrow country roads of the village of Burchetts Green, a residential area close to the proposed site
Objection as there would be an increase in traffic on Pinkneys Drive, a narrow lane with dangerous blind bends, which has a 7.5 ton weight limit in place. Pinkneys Green Village is a designated conservation area and this could be jeopardised by commercial vehicles using the small local roads regularly as a short cut to the proposed site.
Residents struggle getting out of drives, the road is already too fast for these people as drivers do not adhere to the speed limits even though some of the road has recently changed to 40 at this junction.
The increased traffic along Henley Road would pose a danger to cyclists and walkers/the commuting public whose numbers have significantly increased over the last couple of years.
Heavy lorries coming and going to the site will cause major congestion on the A4. The A4 is a very busy road with serious traffic incidents and fatalities in the past 10 years. It is especially busy when there are traffic problems on the M4, which is also about to undergo major works over the next few years, causing even more chaos for people who live along the A4 and the many side roads trying to exit onto it.
People ride horses along Henley Road and this is already becoming quite problematic with such heavy traffic.
Increased risk of accident and injury for both vehicle occupants, other road users and pedestrians.
The junction of Henley Road and Stubbings Lane would become too congested and dangerous, and because of the topography of the Compound site it can only be accessed at this junction. The Authorities have even stated, "an adequate routing strategy would need to be agreed and works to the site junction."
Cumulative impacts of traffic and pollution on the Henley Road and Stubbings Lane as a result of the Beechwood School (planning permission granted for construction on the other side of the A404, also on green belt land) in addition to the green waste processing site will be unacceptable
Concern regarding additional private traffic using the site to deposit green waste
If emergencies occur, reversing and forward moving traffic will be chaotic and quickly turn to a halt
The access to the site is also not directly from Henley Road but via the road to Stubbings Estate. It is difficult to see how this access can be made safe for HGVs - the site entrance is immediately on the right after the Stubbings Estate turning and the entrance itself is also not entirely suitable for HGVs on an ongoing basis.
Concern about the increase in air pollution which would be generated by the additional vehicle movements associated with the site
The proposed site of 1.2 hectares (not 2 hectares as stated) has insufficient space to accommodate the necessary access, turning and parking areas, let along the recycling operation.
The site is allegedly used for storage and there is nothing to show that HGV traffic for a recycling plant would be neutral.
There would be a sizeable increase in regular heavy goods vehicles and plant and machinery.
Difficult access on to A404 at either end of Henley Road, exacerbated by the additional waste movements.

Sustainable Transport Movements The Compound is accessed by Stubbings Lane. This lane is very narrow and is already very busy as it services a school, a busy plant nursery open to the public and public tearooms. The heavy truck movements the Waste Management and Treatment Site will generate all day will create an intolerable strain and put these current users at risk. RBWM has been unable to confirm that the Waste Management and Treatment Site would not be open to the general public. Further public use on top of the heavy truck movements will further endanger current users.

Stubbings Lane runs from a junction with the Henley Road. This road is already causing Bisham Parish Council concern because of the heavy use and the speeds at which cars travel down this stretch. Bisham Parish Council spent three years successfully campaigning for a speed restriction on this road. There are a number of well used footpaths and routes used by horses which run close to the entrance of the proposed site. An increase in traffic movements and in particular heavy traffic movements could cause the users of the footpaths and horse riding routes to come into conflict with deadly ramifications. Henley Road is also used extensively by walkers and horse riders, particularly around the junction with Stubbings Lane and Footpath 35. Heavy traffic movements in and out of the proposed site would not be consistent with road safety at the junction.

increased congestion and danger at Stubbings Lane junction with the Henley Road (60 mph speed limit immediately east of the lane).

### **Ecology**

Stubbings ancient woodland is in close proximity to the proposed site and the area is enjoyed by the local community. This could be jeopardised by the operation of the proposed site

Increased smoke, unhealthy fumes and dirt would have a great effect on soil pollution, and atmospheric oxygen for all living animals and beings within an immeasurable area.

The Compound is in close vicinity to a number of Local Wildlife Sites (LWS). These include; • Maidenhead Thicket (already under severe pressure from the A404), • Carpenters Wood • Dungrove Hill • Temple Golf Course. All of these sites have been mentioned as concerns in the consultation document. These sites would be placed under severe threat should The Compound be developed as a Waste Management and Treatment site.

### **Landscape**

The proposed site is surrounded by National Trust land and the whole area is protected countryside. The proposed development would have detrimental impacts upon these protected areas.

This proposed waste disposal and recycling plant would be touching an area designated National Trust, and would also be within The Green Belt, both of which surely discourage waste industry within their areas.

The small and idyllic village of Stubbings with its ancient Parish Church and large detached houses would have its rural character destroyed by siting such an operation in its centre. Stubbings sits between the communities of Pinkneys Green and Burchetts Green - both local Conservation Areas.

When the current planning permission was granted for the storage barn, one of the conditions of consent was the removal of permitted development rights. The reason given was, "in this case given the isolated location of the site in the Green Belt and the potential effects of additional development, the removal of PD rights in this regard via condition is considered to be justified". How can you justify the use of the whole site now?

### **Flooding**

In the Water Environment and Flood Risk section this says:

"Site in Groundwater Source Protection Zone (3) – a Hydrological Assessment will be required."

This needs to be changed to:

"Site in Groundwater Source Protection Zone (3) – a Hydrogeological Risk Assessment will be required."

A further concern detailed in the proposal is the management of waste water and the prevention of its encroachment through the mature boundaries of the neighbours. The proposal provides no details about containment and management strategies and is creating huge distress for the neighbouring residents.

### **Archaeology**

According to our records there are no designated assets on or in close proximity to this site. However, we do not consider that waste management development at this proposed site would actually result in a positive outcome for heritage assets as indicated in the draft SEA.

The proposed waste site (if implemented) would be a great discourager for access to the historic Robin Hood's Arbor.

## **Water Oakley**

### **General**

Monkey Island Processing Plant 17. The detailed policy wording for the Allocated Site (HA23) outlines that mineral processing will take place at an existing plant at Monkey Island Lane. It is however important to note that the Draft RBWM Borough Plan allocates the processing plant site for 100 dwellings, with an expected delivery timescale of 11+ years. We note that the mineral extraction from the Allocation Site is expected to take 8 years from commencement with infilling by inert waste over a similar 8 year period, albeit commencing approximately two years after the start of mineral extraction.

Farmglade Limited controls land adjacent to the Allocated Site to the north of the A308 Windsor Road. This benefits from extant planning permission for 69 dwellings in total and is also subject to a current outline application for up to 127 dwellings with associated open space, landscaping, community pavilion and other infrastructure (RBWM planning ref. 18/01804/OUT). A plan showing the extent of land controlled by Farmglade Limited can be found at Appendix 1 [see email]. The JMWP must be subject to a Proposed Submission consultation, which is expected to take place in 2019, and then Examination in Public in 2019/2020. Accordingly, adoption is unlikely to take place until 2020 at the earliest. Given the above, by the time a planning application is prepared, submitted and approved on the Allocated Site following the adoption of the JMWP, extraction is unlikely to commence until 2021/22, perhaps even later. Assuming an 8 year extraction period (which could in reality be even longer) and then allowing for the processing plant site at Monkey Island Lane to be vacated and remediated, this leaves little or no time for housing allocation HA23 of the RBWM Borough Plan to be delivered before the end of the plan period (2033). Accordingly, HA23 would neither meet the definition of deliverable or developable as set out within the NPPF and would therefore be unsound, having regard to the requirements of paragraph 35 of the NPPF. This is a significant conflict which requires resolving, either through the deletion of the Allocated Site or HA23 in the RBWM Borough Plan. It should however be noted that the latter would present significant issues for RBWM, given that it is currently midway through the examination of its Borough Plan and simply deleting a site would render the Plan unsound

Given processing will be undertaken at Monkey Island Lane, it would appear that a clear opportunity exists for the use of a conveyor over or under the A308, particularly given that Summerleze, the owners of the Allocated site and the processing plant at Monkey Island Lane, own land to the north of the A308, opposite the Allocated site. Paragraph 7.96 of the Draft JMWP supports this approach noting that "in particular the use of field conveyors and/or site haul roads at mineral sites, could be implemented in combination with road transport, in order to help reduce the impacts from road transport." Whilst we appreciate that the provision of a conveyor over the A308 could present some temporary adverse visual impacts, this must be balanced against the substantial benefits that would be achieved in environmental and sustainability terms through the removal of significant HGV movements off the A308, particularly given the presence of an Air Quality Management Area at Bray Wick. Indeed, paragraph 7.95 of

the Draft JWMP notes that “alternative methods of transport may provide opportunities to reduce and manage impacts of traffic and reduce potential carbon emissions associated with HGV movements. This may help to offset potential impacts on the climate. Alternative methods may include the use of field conveyors...”

We would suggest that the detailed policy wording for the Allocated Site on pages 149-151 of the Draft JMWP should be amended to state that if access is proposed off the A308, this should be located as far west as possible, and that consideration should be given to the use of a conveyor across the A308. [relates to paras 5, 6, 7, 8, 9, 10]. Accordingly, we consider that the detailed policy wording should be amended to state that screen planting along the A308 frontage should be significantly enhanced, including the introduction of a bund, for the lifetime of the development. Without such a change, the allocation would be unsound. [relates to paras 12, 13, 14, 15]

Support the Water Oakley site allocation and we welcome the inclusion of the draft allocation within the plan, which will contribute to addressing the current shortfall and meeting the requirement within the plan area

Poyle Quarry, Poyle Quarry Ext, Water Oakley, Monkey Island Wharf Summerleaze welcome the inclusion of the sites as draft allocations and welcome the acceptance in principle that the sites are suitable for working to commence during the plan period, subject to satisfying detailed planning requirements.

### **General - amenity**

Concerns about the potential for significant adverse impacts upon residential amenity if an access is located opposite, or in close proximity to, land controlled by Farmglade Limited; the approach to screen planting along the A308 frontage of the Allocated Site and the potential adverse impacts that will arise in Green Belt, landscape and amenity terms; and the conflicts between anticipated timescales for the extraction of minerals from the Allocated Site (and associated use of the processing plant at Monkey Island Lane), and the expected timescales for the redevelopment of the processing plant site at Monkey Island Lane as outlined within the RBWM Borough Plan (site allocation HA23).

The joint authorities have established that where potential negative impacts have been identified, these can be mitigated and would be outweighed by the benefits associated with allocating this site. As a result, the site has been put forward for allocation in the draft plan.

The location of the allocations will allow the company to operate in an efficient manner. For example, the proximity of the draft allocation at Water Oakley and the Wharf at Monkey Island Lane, within close proximity to the company’s existing processing site at Monkey Island Lane will allow the operator to manage fuel consumption, emissions etc associated with transporting material.

### **Transport**

The Draft JMWP outlines that access to the Allocated Site is required from the A308. In this context, it is important to note that vehicular access onto land controlled by Farmglade, which benefits from planning permission for residential development, is located directly off the A308. In fact this access benefits from planning permission for the introduction of right hand turn filter lane into land controlled by Farmglade. Where mineral and waste sites are located in close proximity to sensitive receptors, paragraph 7.92 of the Draft JMWP advises that “routing agreements may be required to ensure that access is not permitted on roads which result in unacceptable impacts on communities or the environment.” Accordingly, any access serving the Allocated Site should be located to the west, furthest away from the greater concentration of sensitive residential receptors.

Given that the detailed policy wording for the Allocated Site establishes that processing will be undertaken at Monkey Island Lane (to the northwest of the site), locating an access as far west as possible would reduce operational road miles and therefore the overall perceived impact of transportation. This aligns with paragraph 7.93 of the Draft JMWP, which advises that “the potential and perceived impact of transportation on amenity may include vibration,

visual intrusion and air quality. It is therefore beneficial for mineral and waste development to be located either close to the Strategic Road Network, or where there is potential for the sustainable movement of materials and/or where operational road miles can be minimised” (my emphasis).

At the peak of activity on the Allocated Site, the Appendix 1 of the Strategic Transport and Traffic Assessment outlines that there will be up to 162 HGV movements per day. Whilst the A308 experiences fairly high traffic flows in any given day, the introduction of such a large number of HGV movements undoubtedly raises a clear prospect of harm arising to the amenity of future residential occupiers of Farmglade’s site as a result of the inevitable noise, dirt, and dust that would be generated. The severity of this issue would only be exacerbated if a vehicular access into the Allocated Site is proposed opposite or in close proximity to Farmglade’s existing site access (which would be retained and approved as part of the extant planning permission for the site), particularly given it would not be possible to screen mineral extraction activities at the site entrance.

### **Landscape**

Policy DM9(d) of the Draft JMWP advises that minerals developments should not “have an unacceptable visual impact”. Paragraph 7.73 further notes that the “screening of sites and other mitigation measures are often required to ensure an acceptable degree of potential impact of minerals and waste developments on the habitats, landscape, townscape and local communities.” We are aware that there is some existing landscaping along the boundary of the Allocated site fronting the A308 which was planted relatively recently and we note that the detailed policy wording for the Allocated Site states that “existing screen planting around the site should be retained and protected”. Whilst we support the general approach of the JMWP in seeking to screen the Allocated Site from the A308, we consider that the existing screening along the A308 is wholly insufficient as it has failed to establish in many locations and does little, if anything, to obscure views of the Allocated Site from the A308 and nearby sensitive receptors.

### **Flooding**

In the Water Environment and Flood Risk section this says:

“Part of site within Groundwater Source Protection Zone (3) – a Hydrological Assessment will be required.”

This needs to be changed to:

“Part of site within Groundwater Source Protection Zone (2) – a Hydrological Assessment will be required.

A Hydrogeological Risk Assessment will be required.”

### **Archaeology**

According to our records there are no designated heritage assets on this site but it is known to have high archaeological potential. Some pre-application archaeological evaluation has already been done at Water Oakley, which lies just across the river from Eton Rowing Lake, where a lot of significant prehistoric remains were found in a waterlogged floodplain environment

The Water Oakley site was found to lie on less-significant valley-side deposits, however, and appears to be of lesser potential but nevertheless we consider that this site should not be taken forward without further investigation and assessment of the archaeological interest and significance of the site and of the potential impact of mineral extraction at this site on that significance.

The allocation of this site should not be taken forward in the absence of clear evidence that extraction at this site would not be harmful to the archaeological significance of this area.

The draft SEA refers to an archaeological evaluation of the site but we are not sure if this is the pre-application evaluation to which we refer above or further assessment. The draft SEA rightly acknowledges that a considerable range of archaeological material has been found in the vicinity and that the location should be regarded as having a high archaeological potential. Given that likelihood, and the fact that the extent, nature and significance of these remains may not be fully

understood, we do not understand how the authors of the SEA can conclude that mineral extraction at this site would have a positive effect on heritage assets

Unsure what is meant by “*extraction in similar Thames floodplain contexts have been able to overcome constraint through archaeological mitigation*” – what mitigation is there for potential total loss (given that the ability to record evidence of our past is not a factor in deciding whether such loss is acceptable)? We note that Appendix K of the draft SEA does not suggest any example mitigation measures for the potential harm that mineral extraction at this site would cause to the significance of the archaeological remains

## Appendix I – Issues raised regarding the Evidence Base and the Draft Plan (in general)

<b>General – Minerals &amp; Waste</b>
The existing sites should be reclaimed, restored and returned to safe land that has less environmental impact.
Objection to Section Three - The Evidence Base (Appendix C) in the Draft Joint Minerals and Waste Plan. My objection is based on incorrect, incomplete, outdated and evidence that could be considered to contain a vested interest. Summary The evidence base is unsound, and given the technical deficiencies this draft plan cannot move forward for adoption in its current guise.
The overarching issue is that government and councils should be working together to severely reduce what is being thrown 'away'. Further investment in recycling and stipulating only recyclable packaging to producers/suppliers/catering/etc is really the only way forward. The only way to apply pressure to the government to introduce these measures across the board is for councils to resist waste dumps, to speak up and for financial implications to those not adhering to new policy to be brought in.
Processing of waste from outside of the Joint Minerals and Waste Draft Plan should be discouraged. Presently sites process waste from outside of the area and priority should be given to our own capacity requirements. Tariffs, or other restrictions on waste from other Counties could be imposed by policy to safeguard resource to meet the Joint Minerals and Waste Draft Plan capacities.
There are a number of suitable sites within the boundaries of the Joint Minerals and Waste Draft Plan that could provide suitable locations for new waste facilities, requiring restoration which could be facilitated by landfill. These new sites should not be safeguarded forever, but their life term should be based upon the time required to suit the end purpose, the timescale required for restoration.
Minerals and waste operations are in a unique situation which enables them to deliver high quality restoration plans to benefit the natural environment at the end of their operation. The restoration plan correctly notes the large potential for high quality restoration programmes to significantly enhance the natural environment, specifically in the context of a suite of international, national and locally designated sites within the plan area. The study also includes good examples of best practice from other places and sets out over-arching principles which should help to deliver high quality schemes.
Processing plants should be sited in areas of brownfield development, or existing industrial use amongst other industrial usage i.e. large industrial estates such as Thames Valley Park, Slough Trading Estate, etc.
Safeguarding of sites should not be automatic. Unless they are deemed suitable by policies in the document and there is a specific need for that site.
In the preparation of the current Draft Plan there seems to have been no reference to any assessment of the current plan and how this has been implemented in practice and whether or not, given the significant time that has elapsed since the previous plan, what if any expertise exists for the preparation of the same within the respective authorities.
Concern about setting a "hard" minimum requirement, as if insufficient suitable sites are identified, then unsuitable sites will be chosen, regardless of policies that would otherwise rule out the site.
During a site's operation any facility should be designed to help reduce greenhouse gases and encourage a sustainable use of resources. All environmental impact should be mitigated against to acceptable levels. If this is not achievable, or limits are breached, the site should be reassessed, the operator enforced to comply and, if proved to have failed repeatedly, have their licences revoked
The belief that waste disposal is sustainable is a non-sequitur. The emphasis must be on reducing the production of waste at household and domestic level. Supermarkets must avoid using plastics that cannot be re-cycled.

The suggestion that there can be a joint minerals and waste plan is illogical. The justification for mineral extraction on the grounds that it produces landfill for waste does not take into account the overall adverse environmental impact on the environment and the wildlife, the local facilities and the quality of life for residents

### **General**

Landscape Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry-stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. The Landscape Institute Guidelines for Landscape and Visual Impact Assessment should be used for further guidance.

Colne Valley Park Community Interest Company asks for a dialogue before the draft Plan is turned into a final Plan so the provisions in the Plan maximise the opportunity for environmental enhancement

We are conscious that proposals associated with Heathrow expansion may also affect this area and a coordinated approach will be in everyone's interests. This requires further discussion.

Evidence base documents contribute nothing to a forward looking plan, but represents just a historical review. Written by people who do not live in the area and cannot gain a true realisation of what would occur in just a short site visit. Many of the documents are political documents that fails to address the conflict of interest between commercial interests and those making the plans. The Strategic Transport Assessment is a commercial assessment that does not take into account the local priorities. This whole plan has been developed with commercial priorities given top priority. The Council should be asked to make a Declaration of Interest.

It is clear that the supporting plans and studies were developed on the basis that we simply accept and accommodate, rather than manage and influence the key factors in the development and growth of the UK as a whole, where these factors include:

A. The UK has and will continue to see population growth; which is a reasonable assumption based on historic trends etc, but hopefully is within some sensible, managed boundaries that take account of the UK capacity to absorb and support these growth numbers

B. However, having accepted a level of population growth does not mean we should simply accept and plan for an ever growing population that wishes to work and live in the relatively "over-populated" areas of the UK

C. Where this assumption has to date meant migration of people from abroad or across the UK to the South East, and in particular to the eastern towns and countryside of Berkshire

D. A consequence of accepting this concentration in the South appears to be that we need more minerals and waste capacity in areas such as Eastern Berkshire, rather than in other less populated parts of the UK, presumably in order to minimise transport and other costs

E. Also, that it is acceptable to plan to extract all and any minerals believed to be located in existing rural and residential areas without question, and to process or dump waste in those same areas; thereby disrupting and devaluing these existing communities

People across the UK elect their Central and Local Government representatives to plan and manage the country at large in the best interests of our people and the country in the long-term, not to simply accept trends and developments that may be detrimental to the quality of life of some or all people today, and in the long-term future. By limiting housing development in overcrowded areas today – in particular the South East, including Eastern Berkshire - and at the same time by encouraging and incentivising business investment and expansion and housing development in these other generally less crowded and/or deprived areas of the UK will balance



the environmental impact, quality of life and health of all parts of the UK. We desperately need a complete rethink of how we manage the use of space and resources across the UK to the benefit of all in the UK, and not simply take the easy routes.

\*Ref Appendix A Proposed sites crossed or in close proximity to National Grid infrastructure: Electricity Transmission: Horton Brook Quarry, Horton - VW Route – 275kv two circuit route from West Weybridge substation in Runnymede to Iver substation in South Bucks (app ref ET252) Poyle Quarry, Horton - VW Route – 275kv two circuit route from West Weybridge substation in Runnymede to Iver substation in South Bucks (app ref ET253) Poyle Quarry (Extensions), Horton - VW Route – 275kv two circuit route from West Weybridge, substation in Runnymede to Iver substation in South Bucks (app ref ET254) Please see enclosed plan referenced ET252-ET254 at Appendix 1. The proposed Minerals and Waste sites are crossed by a National Grid high voltage electricity transmission overhead line. The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. Electricity Distribution SSE Power Distribution owns and operates the local electricity distribution network in Hampshire County Council. Contact details can be found at [www.energynetworks.org.uk](http://www.energynetworks.org.uk) National Grid Asset Guidance National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines. National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government. National Grid requests that any High Pressure Major Accident Hazard Pipelines (MAHP) are taken into account when site options are developed in more detail. These pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to retain our existing transmission pipelines in situ. National Grid may have a Deed of Easement for each asset which prevents the erection of permanent/temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required for any crossing of the easement. In the first instance please consider checking with the Land Registry for the development area.

Regarding the totality of the plan and confusion over how various parts of the planning process join up. In recent months, comments have been sought on both the Draft Local Plan for Bracknell and this Draft Minerals and Waste Plan. Proposals have been made relating to the infrastructure of the area and have been detailed and radical. However, both sets of plans are very different and bear no relation to each other, despite them being produced in relation to the same geographical area. There is no evidence the different sets of planners have consulted each other, and the idea of fusing plans together is perceived to be too difficult.

There is an expectation that the Waste Plan would show some evidence of Hampshire being briefed on the thinking Bracknell have done to date. So, in the proposals relating to transportation of waste from the Planners Farm site there is no mention of the suggestion in the Draft Local Plan for Bracknell to build a new spine road in Braziers Lane. Why not? Weren't Hampshire aware of it? How can the proposals in the Minerals and Waste Plan be taken seriously if they are based on assumptions that are likely to be invalid and out of date? Or is the whole thing, both the Waste and Local Plan, 'provisional'? In which case, how can one respond to the content in a sensible manner?

These developments reflect a growing concern that the whole of the planning process is a done deal between politicians and developers (largely, if not wholly driven by money) who have little or no interest in listening to what the residents want.

The potential for water containing high suspended solids reaching water courses is fairly high due to short pathway between the source (extraction) and the receptor (river). This could be over ground flow or through the gravel deposits where it is determined to be in direct hydrologic connectivity to the rivers. Water with high suspended solids would have an impact on the fish populations of the receiving water bodies. This could cause a deterioration in the ecological status of the rivers under the WFD. All sites would need to be compliant with the WFD. Operational concerns would need to be addressed. It is vital that all on site operational standards are complied with regarding pollution prevention and management, and any trade effluent discharges are appropriately permitted through the Environment Agency. At the planning application stage we would expect to see a site drainage strategy to highlight what is proposed for disposal of trade, foul, surface waters. This will ensure that all water leaving the site is considered and potential impacts identified and mitigated.

Dewatering is now a licensable activity. In order for us [*Environment Agency*] to issue a licence we would need to ensure that any water dependent features impacted by any of these sites were protected. This could mean we would apply restrictions to the licence which may impact the viability of the scheme. Each scheme which requires dewatering will have to go through the normal licensing process, whereby each application is dealt with on a first come first serve basis and is determined on its merit, viability, and water availability.

#### Groundwater Hydrology

##### Appendix A – Proposed Sites

The summary information listed in Appendix A for each proposed site allocation under the heading "Water Environment and Flood Risk" needs to take proximity to major / minor aquifers, in addition to the proximity to SPZ, into consideration. This wording needs to be added for each site.

#### Section 60 Accommodations Licence

The Environment Agency is the navigation authority for the River Thames, a public river regulated by statute. Successive Thames Conservancy Acts have declared it unlawful for any person to install an accommodation in or over the public river without a licence from us. This licence is called an Accommodation Licence and is issued under Section 60 of the Thames Conservancy Act 1932.

The term 'accommodation' applies to mooring piles, slipways, landing stages and other private structural encroachments in the public river. Any accommodation in or over the River Thames can affect the public right of access over public river space and may impact on normal river flow, flooding, the fishery and ecology of the river.

Please consider this when allocating sites and this may affect the viability of some sites. We advise you to seek early consultation with us on any proposals that may affect the River Thames as set out above.

#### **Glossary & Acronyms**

-Definition of Environment Agency Please note that The Environment Agency only covers England. Natural Resources Wales is the body responsible for Wales.

-Definition Sequential Test The sequential test needs to be carried out by the planning authority and not the Environment Agency.

-Definition of Exception test This paragraph refers to “the Environment Agency’s sequential test” this needs to be removed as this is incorrect. The sequential test is carried out & applied by the planning authority. For the requirements of the exception test the Glossary needs to refer to paragraph 160 of the NPPF. Parts a and b need to be applied by the planning authority when considering their site allocations.

-Definition of Flood Risk Assessment Add ‘the FRA should also demonstrate that the development will be safe for its lifetime and will not increase flood risk elsewhere.’

**Appendix A** – Proposed sites All sites will likely require some consideration of flood risk, although currently this has only been mentioned for some sites (e.g. Bridge Farm). The following sites have more significant fluvial flood risk issues which will need addressing: Poyle Quarry, Berkyn Manor Farm, Horton Brook, Water Oakley Farm, Ham Island, Monkey Island Lane, Bridge Farm. We note that this is covered in the SFRA - perhaps there should be a note referring the reader to the SFRA for flood risk considerations.

### **Environmental Permit**

Either the SFRA or the main Minerals & Waste Plan document should include an informative about sites which are adjacent to, or include, a main river needing an environmental permit. Currently environmental permits are only mentioned in the glossary of the Plan.

Suggested wording: “Developments may require an Environmental Permit from the Environment Agency under the terms of the Environmental Permitting (England and Wales) (Amendment) (No. 2) Regulations 2016 for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of designated ‘main rivers’. This was formerly called a Flood Defence Consent. Some activities are also now excluded or exempt. An environmental permit is in addition to and a separate process from obtaining planning permission. Further details and guidance are available on the GOV.UK website: <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits>.”

**Nature conservation and river corridors:** We have serious concerns with regard to the protection and enhancement of river corridors, and that the Joint Minerals and Waste Plan could be more effective and reflect national planning policies (NPPF) 170, 174 and 175. Within the plan there is no single clear message to developers on the standards which must be met with regard to development in river corridors; a number of other policies deal with various aspects of protecting watercourses, but this gives us no comfort that this Joint Minerals and Waste Plan specifically addresses the exclusive requirements of river corridors. Watercourses are not covered in any detail in this plan. A specific river habitat policy is required to ensure the best possible outcomes for watercourses impacted by minerals and waste sites. This needs to cover the protection and enhancement of rivers and their corridors.

Watercourses are important environmental assets and an undeveloped 16 meter buffer zone (Thames Region Land Drainage Byelaws, as amended) should be required on both sides of a main river to promote strong and resilient ecosystems, green and blue infrastructure links, water quality and human health (pleasant amenity space).

The policy should make it clear to applicants how the Joint Minerals and Waste Plan will expect protection and enhancement of all watercourses. This policy will reduce the likelihood that new developments next to main rivers will contribute to the deterioration of the ecological status of the waterbodies and where feasible will contribute to raising their status while providing a pleasant living environment with the associated positive social and health benefits.

A good example of where a watercourse policy has been applied locally is in Wycombe District Council’s Adopted Delivery and Site Allocations Plan for Town Centres and Managing Development (July 2013), with the inclusion of Policy DM15 Protection and Enhancement of River and Stream Corridors. Alongside this sits Wycombe DC’s River Wye Advice Note giving advice to developers and landowners with land adjoining watercourses. Article 10 of the Habitats Directive stresses the importance of natural networks of linked habitat corridors to allow the movement of species between suitable habitats, and promote the expansion of biodiversity. River corridors are particularly effective in this way and the network of river corridors may help wildlife adapt to climate change by providing a migration corridor.

Suggested Policy POLICY – PROTECTION AND ENHANCEMENT OF RIVER AND STREAM CORRIDORS 1. Planning permission will only be granted for development proposals which would not have an adverse impact on the functions and setting of any watercourse and its associated corridor. 2. Development should seek to conserve and enhance the biodiversity, landscape and recreational value of the watercourse and its corridor through good design. 3. Opportunities for de-culverting of watercourses should be actively pursued. Planning permission will only be granted for proposals which do not involve the culverting of watercourses and which do not prejudice future opportunities for de-culverting. 4. Development proposals adjacent to or containing a watercourse should provide or retain a 16m buffer between the top of the river bank and the development, and include a long term landscape and ecological management plan for this buffer.

### General – Consultation

Community Engagement - well publicised and regular community engagement meetings with all members of the public, together with relevant parish / town and borough councillors at least once per year and that the content of such discussions are made public and kept on record for the duration of the works

The consultation documentation is lengthy and full of jargon (i.e. meaning of 'Test of Soundness' etc), making the information difficult (at points) to fully comprehend. Deliberately made to be complicated to ensure as few people as possible respond.

This consultation process is highly structured and constraining, with the consequence that it limits one's ability to challenge or object to purely legal or process grounds

Consultation process means we will talk about it then sites are put in place regardless

Inadequate consultation process and the publicising of the Waste and Mineral Plan in the first stages. Even landowners and residents directly adjacent to the proposed sites were not consulted, neither were local Parish Councils, according to a recent Freedom of Information request.

The current consultation has also been poorly advertised.

Questionnaire is laborious and overly complicated and therefore excludes certain people e.g. elderly with arthritis, laymen

The consultation channels responses based on precise terms and criteria that it fails to define in the in the policy documents

Many people living in the locality are older or do not have internet access, making the consultation process difficult.

This electronic survey must be one of the most inaccessible, non user friendly surveys we have ever had to undertake. In fact many of our residents who wish to comment felt completely overwhelmed by the task. it seems to have been written for professional respondents only. accordingly we have advised our resident to send in their comments any way they feel they can but unfortunately without guidance many will not feel able to do so.

Absence of representatives from Wokingham Borough Council or Royal Borough of Windsor and Maidenhead (RBWM) at public exhibition in Knowl Hill Church in September.

Inadequate materials at public exhibitions e.g. map of Knowl Hill was too small and was not available elsewhere. It almost looked like a cover up.

The parties implementing the policy have shown that they have not complied with the legal requirements and their duty of care. As such, there should be a change to the policy to ensure that parties do comply with their legal obligations / duty of care.

It fails to meet the test of soundness as there should be a presumption away from development in the Central and Eastern Berkshire.

The plan makes it clear that development considerations will be assessed at the planning application stage. Early engagement with stakeholders would be mutually beneficial.

Confusion as to why Hampshire County Council is driving this JMWP and not Wokingham Borough Council.

Limited information on the Wokingham Borough Council and Royal Borough of Windsor and Maidenhead websites, which means limited information is available to the local communities who are most impacted by this Draft Plan.

Which of the 56 preferred sites listed in the Draft Plan were proactively found by Hampshire County Council?

West Berkshire Council welcomes the efforts that have been put into meeting the Duty to Co-operate to date. However, it should be noted that the Statement of Common Ground between West Berkshire and the Central and Eastern Berkshire Authorities drafted in September 2017 has not yet been finalised. West Berkshire would welcome further discussions to progress this to support the progression of the Central and Eastern Berkshire Joint Minerals and Waste Plan and the West Berkshire Minerals and Waste Local Plan in both plan-making areas

We [Horton Parish Council] have asked for face to face meetings with the Royal Borough of Windsor and Maidenhead officers for help in ensuring our concerns are considered and actions taken to help safeguard the Village.

We would welcome the opportunity to discuss our concerns with you, as part of the on-going engagement between our two authorities under the duty to cooperate. We think it would be appropriate to do this before preparation of the Central and Eastern Berkshire MWLP moves on to the next stage. As part of this discussion, we would like to explore with you the possible need for and scope of a statement of common ground, as now required by the NPPF.

The Parish of Horton is bounded on two sides by Colnbrook Parish – part of Slough Borough Council – yet neither of these bodies have been included in the consultation as part of the Draft Mineral Plan. The Draft Mineral Plan is not inclusive of neighbouring Boroughs and resources. To be effective, there has to be proper consultation and discussions with all the neighbouring councils.

The Royal Borough of Windsor and Maidenhead are aware that from previous planning applications for mineral extraction in the Village of Horton, there are still section 106 provisions which have not been met by companies who form part of the Draft Mineral Plan proposals. This makes a mockery of the system and until and unless they can be compelled to meet their commitments, any further such assurances cannot be taken seriously.

Hampshire Services is simply the vehicle through which Hampshire County Council takes on work for other public sector organisations, so the work is, in fact, being undertaken by staff from a neighbouring authority. At the consultation meeting at Bohunt School in August, the lead technical officer was identified as Hampshire County Council's Head of Planning. This raises two conflicts of interest:

- Hampshire County Council is a neighbouring authority and thus involved in minerals planning. Extraction sites in Hampshire, both current and future, will be involved in the local, regional and national minerals market, alongside sites in Central Berkshire. Given the considerable cross-boundary supply evidence set out in the background documents (Hampshire was a significant source of locally-used aggregates in both the 2009 and 2014 data), it is clear that extraction proposal in Central Berkshire will have a bearing on the future need for extraction in Hampshire.
- As a neighbouring authority, Hampshire County Council will be consulted on the emerging Plan in relation to impacts in their administrative area, and it is difficult to see how the HCC planning department can be on both sides of the process at the same time.

These sites need to be agreed by the communities that would be affected. This plan does not allow for that.

Strong objection to the statement in online document that "the first stage in the plan preparation was the Issues and Options Consultation conducted in Summer 2017." Not one single local resident was ever consulted about the options, certainly not the option of using Star Works to manage an additional 100,000 tonnes of waste per annum. This is an inexcusable lapse of duty of care to local residents, who should be served and whose taxes support your Authority. *[relates to Star Works]*

The complexity, specialist nature and length of the consultation document was frustrating. Attempting to fill in the online survey was challenging - on several occasions, the

document returned to the beginning and all completed responses and work was lost, so it became necessary to submit a response via email. It is unacceptable to make the process of commenting - the alleged consultation process - so opaque and difficult as to ensure the general public - whom the plan most affects - find it virtually impossible to express their views.

### **Strategic Transport Assessment**

Ensure good standards of amenity are retained for local communities (both in close proximity to sites and along transportation routes), protection and enhancement of the local environment and impacts on the highway network.

The Transport Assessment consider the HGV haul routes; however, the draft plan does not specify which routes will be used.

Any new sites that come forward or are predicted to generate significant number of trips a detailed Transport Assessment should be submitted with any application. Any vehicle trips to/from the site should be encouraged to occur outside of the peak hours to minimise any impact on the SRN

Sites must have good transport links that do not involve roads which are already overloaded or are unsuitable to HGVs. Routing and transport operating hours should be used and be enforceable easily.

### **HRA**

Air Quality The plan is not likely to result in the construction of new roads, however increases in traffic, or changes to routes, especially of HGVs, could lead to impacts on the environment. Protected habitats can be vulnerable to the effects of a number of air pollutants such as nitrogen oxides (NOx), ammonia (NH3) and sulphur dioxide (SO2). Impact can be caused when pollutants settle on to the ground (deposition) causing nutrient enrichment of the soil (eutrophication) or changes to the soil Ph (acidification). These effects can decrease the ability of a plant species to compete with other plants and can hinder the inherent capacity for self-repair and self-renewal under natural conditions. Nitrogen effectively acts as a fertiliser for plants which thrive on high nitrogen levels, which can then begin to dominate plant communities. This is likely to damage the interest features in protected sites which are notified for their plant communities (for example, the Thames Basin Heaths). Natural England's publications: NECR200 – 'Potential risk of impacts of nitrogen oxides from road traffic on designated nature conservation sites' and the Atmospheric Nitrogen Theme Plan may help developers to ascertain what, how, where and when to target their efforts on sites of conservation importance and the areas surrounding them.

Theme plans can provide an overarching direction or outline approaches to achieve target conservation status of Natura 2000 sites in England, to complement work already underway on individual sites.

Air quality effects to European sites have been considered within the HRA Scoping Report. Natural England's guidance on how to assess the impacts from air quality has been published here and may be useful. It should be noted that air quality effects can also impact SSSI's, Local Wildlife Sites (LWS) and other areas of botanical interest. As indicated earlier, these can be considered at the plan stage. Our guidance above does not specifically cover nationally significant sites such as Sites of Special Scientific Interest (SSSIs), which are covered by a different regulatory framework. However, the general principles for air quality assessment outlined here for European Sites are likely to be equally relevant for this and other designations. Best and most versatile agricultural land and soils Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply the requirements of the NPPF. This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in

Natural England's Technical Information Note 049. Agricultural Land Classification information is available on the Magic website on the Data.Gov.uk website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further. Guidance on soil protection is available in the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites, and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site. Our other advice can be found at Annex A. Annex A Natural England offers the following additional advice: Protected Species Natural England has produced standing advice<sup>1</sup> to help planning authorities understand the impact of particular developments on protected species.

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraph 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Specific information on local sites can be obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies. Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found here<sup>2</sup>. Species data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

You should consider any impacts on ancient woodland and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland/veteran trees where they form part of a SSSI or in exceptional circumstances. Environmental enhancement Development provides opportunities to secure a net gain for nature and local communities, as outlined in paragraphs 8, 32 and 170 of the NPPF. We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you may wish to consider off site measures, including sites for biodiversity offsetting. Opportunities for enhancement might include: Providing a new footpath through the new development to link into existing rights of way, Restoring a neglected hedgerow, Creating a new pond as an attractive feature on the site, Planting trees characteristic to the local area to make a positive contribution to the local landscape, Using native plants in landscaping schemes for better nectar and seed sources for bees and birds, Incorporating swift boxes or bat boxes into the design of new buildings, Designing lighting to encourage wildlife, Adding a green roof to new buildings. You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

European Sites and Habitats Regulations Assessment Screening - There are a number of European sites within the plan area, and within 10k of the plan boundaries, which could be effected by the plan; Windsor Forest and Great Park SAC, Chiltern Beechwoods SAC, Thames Basin Heaths SPA, South West London Water Bodies SPA (and RAMSAR), Burnham Beeches SAC, Hartslock Wood SAC, Thursley, Ash, Pirbright and Chobham SAC/SPA. The applied methodology in the screening report is robust, and that likely significant effects, both alone and in-combination, to European sites arising from the plan have been considered.

The scoping report makes reference to the possibility of allocated sites providing supporting (or functionally-linked) habitat for the South West London Water Bodies Special Protection Area. Special Protection Areas (SPAs) are classified for rare and vulnerable birds, and for regularly occurring migratory species. Annex 1 bird species associated with the SPA receive protection both within and outside of the SPA boundary. Sites outside of the SPA which support the Annex 1 bird species, often referred to as SPA supporting habitat or 'functionally linked' habitat, play an important role in maintaining the SPA bird population through the provision of additional roosting or feeding areas. Due to the importance of these off-site habitats in maintaining Annex 1 bird populations, the supporting habitat benefits from the same level of protection as the SPA itself. Therefore, any impact to, or loss of, SPA functionally linked habitat would need to be adequately mitigated against or compensated for. The specific restoration plans for proposals affecting the SPA should also be designed in order to serve the SPA species. If necessary, compensating for the loss of functional habitat would require that any compensatory habitat provision would have to be situated in close-proximity to the SPA or another SPA which supports the same species interest features to maintain ecological coherence of the network. The location of compensatory habitat would require careful planning due to the potential for bird-strike issues to arise. We would add that in accordance with the guidance on article 6 (4) any compensatory measures must be effective at the time the damage occurs on the site concerned. Paragraph 3.15 of the HRA Screening Report, relating to invasive species, correctly identifies the vulnerability of aquatic habitats to invasive non-native species (INNS). It goes on to say that "effective management... should minimise the risk of spread". INNS have the potential to cause LSE to European sites and so this aspect of the plan should be strengthened. As it is currently written, this paragraph suggests 'effective management' of an allocated site is assumed, which is not sufficiently precautionary

### **Archaeology**

Paragraph 31 of the National Planning Policy Framework (2018) requires "*The preparation and review of all policies should be underpinned by relevant and up-to-date evidence*". Paragraph 1.2 of the Draft Plan refers to the evidence base as set out in Figure 2. We note that the Figure does not identify any evidence base for the historic environment nor is there any reference in Appendix C or on the Joint Local Plan webpage to any archaeological studies or historic impact assessments.

At the very least the Berkshire Historic Environment Record and East Berkshire Historic Landscape Character Assessment should have been used in preparing the Plan and to be identified accordingly.

The tributaries of the Middle Thames are very important for Palaeolithic archaeology. Where gravel extraction targets sand and gravels below the modern floodplain (for example of the River Loddon at Arborfield) then there could also be potential for important waterlogged archaeology, especially relating to the Late Upper Palaeolithic and Mesolithic, as known from the nationally important archaeology in the nearby Kennet and Colne Valleys. Given that the



true potential for Palaeolithic archaeology is unlikely to be represented on the Historic Environment Record, owing to depth of burial and lack of previous investigation, this aspect of archaeology is likely to require specific assessment by a specialist familiar with the period to provide a robust evidence base

The tributaries of the Middle Thames are well-known for the survival of well-preserved Late Upper Palaeolithic and Mesolithic archaeology found in association with waterlogged environmental evidence, typically at the interface of the sands and gravels and the overlying alluvium on the floodplain. The evidence in support of any allocation site that lies on the floodplain would benefit from the construction of a geoarchaeological deposit model, to identify the nature of the deposits that would be impacted and their archaeological significance.

There is no reference in the Vision to the historic environment or heritage assets. There is a reference to the natural environment, but the National Planning Policy Framework makes it clear that the historic environment is a separate entity from the natural environment – in addition to references in the Framework to the *natural, built and historic environment*, it specifically defines the historic environment as “*All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora*”.

There is no specific reference to the historic environment or heritage assets in the Strategic objectives. Heritage is included in Principle ix of paragraph 3.14, which is welcomed, but not in Principle iv (the terms “built environment” and “historic environment” are not interchangeable).

**Paragraphs 5.75, 6.75, 6.76, 6.77/6.78:** Consider that the considerations in paragraphs 5.75, 6.75, 6.76, 6.77/6.78 should actually be set out in policies, not the supporting text, which does not carry the same weight as the policies.

Paragraph 7.50: whilst it is true that minerals and waste development can lead to archaeological investigations, mineral extraction is by its very nature, a destructive process and such investigations are usually required because of the imminent destruction of archaeological remains. We feel the Plan should acknowledge this.

We are not sure if “*the record of historically or architecturally significant structures*” is meant to refer to the National Heritage List for England (the only official, up-to-date, register of all nationally protected historic buildings and sites in England) or the Berkshire Historic Environment Record, which includes non-designated heritage assets, or both. We consider that this should be clarified. Whatever is actually meant by this reference, it is not itself a heritage asset, and therefore “protecting heritage assets” does not include this record. However, we would welcome a commitment to maintaining the Historic Environment Record (although it should be remembered that paragraph 199 of the National Planning Policy Framework (2018) cautions “*the ability to record an asset will not be a factor in determining whether or not a proposed development will be permitted*”. We welcome the last sentence of paragraph 7.50

Paragraphs 7.51 - 7.52: support these paragraphs; although the revised National Planning Policy Framework does not refer to core principles in the same way as the original Framework, the principle that “*heritage assets should be conserved in a manner appropriate to their significance*” is restated.

**Paragraph 7.56:** we do not consider it accurate to say that “*Minerals or waste developments will be considered on their merits*” – surely they will be considered in the context of relevant legislation, Policy DM7 and any relevant material considerations?

**Paragraph 7.57:** welcome the principle set out in the paragraph that “*Major historic features, such as Scheduled Ancient Monuments located or discovered on sites proposed for minerals and waste development must be preserved as part of the development*”, this is not consistent with the third paragraph of Policy DM7 which allows for harm to heritage assets where the need for and benefits of the development decisively outweigh these interests and impacts will be mitigated. We are not clear why the paragraph states “*as appropriate*” in reference to enhancement – this should be “*where possible*”.

**Monitoring indicators;** we suggest that these should also include “*Number of planning permissions contrary to Council’s conservation and archaeological advisers’ advice*”.

**Paragraph 7.62:** we support this paragraph, although we suggest that it says “*quality and character*”. The wording also needs minor revision to fully make sense

**Paragraph 7.64:** we welcome the seventh bullet point but we consider that the paragraph should have an additional bullet point: “*historic landscape character and other heritage assets*”.

**Glossary and Acronyms:** We are not clear to what “Sites” in “Listed Buildings and Sites” refers.

**Appendix A – Proposed Sites:** we welcome, in principle, the site-specific development considerations relating to the historic environment for each site, but as these considerations are not set out in any policy, nor is there any requirement in any policy for these development considerations to be satisfied, they would appear not to actually carry any weight for the assessment of planning applications. We consider that Policies M4 and W4 should each include a requirement for development proposals for any of the allocated sites to take the site-specific considerations into account.

**Monkey Island Lane, Bray:** whilst we welcome the recognition of potential archaeological issues in relation to this site, we do not consider that simply identifying them as a material consideration to be dealt with at the planning application stage, particularly when there is no requirement within the Plan to adhere to these site-specific considerations, will provide sufficient protection for any archaeological remains. We consider that this requirement should be set out in a specific policy for Monkey Island.

### **Strategic Flood Risk Assessment**

Flood Risk Management Sequential test and flood zone compatibility with development. From the submitted information a sequential test has not been carried out for the proposed site allocations.

“Flood risk management

Minerals and waste development in areas at risk of flooding should:

- a) Apply the sequential test, exception test and sequential approach within the development site directing the most vulnerable development to the areas at lowest risk from flooding
- b) Not result in an increased flood risk elsewhere and seek to reduce flood risk overall;
- c) ensure development is safe from flooding for its lifetime including an assessment of climate change impacts
- d) Incorporate flood protection, flood resilience and resistance measures where appropriate to the character and biodiversity of the area and the specific requirements of the site;
- e) Include site drainage systems designed to take account of events which exceed the normal design standard;
- f) Not increase net surface water run-off; and
- g) If appropriate, incorporate Sustainable Drainage Systems to manage surface water drainage, with whole-life management and maintenance arrangements.”

The following wording could be used for a water quality policy

“Water quality

Planning permission will be granted for minerals and waste development where proposals do not:

- a) Result in the deterioration of the physical state, water quality or ecological status of any water resource and waterbody including, rivers, streams, lakes, ponds, groundwater source protection zones and ground water aquifers.
- b) Include a hydrogeological risk assessment (HRA) where proposals are in a groundwater source protection zone. If the HRA identifies unacceptable risks then the developer must provide appropriate mitigation.”

We agree that a Hydrogeological Risk Assessment will be required for risky sites. For example:- Water Oakley within Source Protection Zone (SPZ3) for Bray public water supply where water is abstracted from Shepperton Gravel Principal Aquifer.

Strategic Flood Risk Assessment - The SFRA should include a section which defines Flood Zones 1, 2, and 3, and in particular discuss and define Flood Zones 3a and 3b. This is important as in the Planning Practice Guidance, developments which 'less vulnerable', i.e. most waste sites, should not be permitted in Flood Zone 3b. Flood Zone 3b (the functional floodplain) is usually defined as land with a 5% or greater annual exceedance probability (AEP). While the individual borough councils have defined this in their own SFRAs, it is important that the minerals & waste plan has a consistent definition.

Sequential test and sequential approach - In the SFRA it is important to be clear on the difference between the sequential test and the sequential approach. The sequential test looks at steering development to sites at a lower risk of flooding. Some of the site allocations within this local plan are within Flood Zones 2 or 3. There need to be evidence that other sites at a lower risk of flooding have been considered and the reasons for discounting these sites will need to be clear. The sequential approach is applied after the sequential test and is carried out at the site level when looking at the flood risk across the site and where to allocate development within that site

The SFRA needs to consider the impact of climate change, and should include the new climate change allowances as part of the SFRA assessment in order to be compliant with the NPPF.

Paragraph 2.4 Table with Rivers - The Harveyford Ditch is repeated twice in this table.

Paragraph 2.80 - In this paragraph should 'Winnerash' be 'Winnersh'?

Paragraph 3.2 - It needs to be acknowledged in this section that while sand and gravel extractions are considered 'water compatible', ancillary activities such as processing, stockpiling, amenity bunds and offices are not considered 'water compatible' and don't have to be placed in flood plains in many cases.

Paragraph 3.5 says: "All sites within flood risk zones will need a Flood Risk Assessment to be undertaken". This should be modified to be consistent with NPPF. "An FRA is needed for developments: - in Flood Zone 2 or 3 - more than 1 hectare in Flood Zone 1 - less than 1 ha in Flood Zone 1 if it is a development type that results in a more vulnerable use, where they could be affected by sources of flooding other than rivers and the sea - in an area within Flood Zone 1 which falls in a critical drainage area as notified by the Environment Agency

SFRA - The sequential test will also apply to any proposed safeguarded land, borrow pits, oil, gas, coal, chalk and clay sites, waste and minerals infrastructure, proposed landfill sites, transport infrastructure, restoration uses, hazardous waste and non-hazardous waste. If there is no sequential test then this could also impact on the following policies for development although these policies are more general and do not refer to specific sites they do refer to potential development. These policies are M6, M8, W2, W3, W5, DM8, DM11 and DM13.

Please be aware that some of these developments are more or less vulnerable and would not be compatible in Flood Zone 3b (Functional Floodplain) and we may have soundness points to make on site allocations that are not appropriate in certain Flood Zones as set out in Table 3 'Flood risk vulnerability and flood zone 'compatibility.' Please see table 1 'Flood Risk' in the Planning Practice Guidance for the Flood Zone definitions and table 2 'Flood risk vulnerability classification' for the different vulnerabilities for development types and table 3 for the 'Flood risk vulnerability and flood zone 'compatibility.' This table sets out which vulnerability is appropriate in certain flood zones and which is not. You need to consider vulnerability of a development when allocating sites as some of the ancillary infrastructure or uses may be at a higher vulnerability than the sand and gravel extraction. This means that after the sequential test has been applied and passed and then in some cases the exception test, if some of the sites are in Flood Zones 2 and 3 then the sequential approach which looks at locations of least risk of flooding within the site will need to be applied.

The sequential test has also not been included as a policy requirement in Appendix A of the local plan which sets out the descriptions of the site allocations. The sequential test needs to be included in a flood risk policy for this local plan. This so it its clear for developers that they need to apply this test if there are any developments within Flood Zone 2 and 3. There are some exceptions to this. Please see 164 of the NPPF. Central & Eastern Berkshire Minerals & Waste

consultation paper Paragraph 5.114 - This paragraph number has no text within it. Paragraph 5.117 - While it is true that the River Thames upstream of Teddington Lock is less influenced by the tides, we are unsure as to what this has to do with navigation of freight. This needs clarification.

Please be aware that in the Planning Practice Guidance it says that Landfill and sites used for waste management facilities for hazardous waste are More Vulnerable and that should not be permitted in Flood Zone 3b but can be located in Flood Zone 3a following the application of the sequential test and exception test. Please also be aware that there are other development types that should not be permitted in Flood Zones 3a & 3b.

### **Sustainability Appraisal**

Paragraph 3.51 This says: "CEB24 and 26 have scored negatively against flood risk"  
Do you mean CEB21 and 26?

**Sustainability appraisal - Interim SA/SEA Report Table 3.7** For Planners Farm: under constraints this should also mention high surface water flood risk around the site entrance. Bridge Farm: "the site is within a flood zone and susceptible to surface water flooding from the River Loddon" we think this should be changed to "the site is at risk of fluvial flooding from the River Loddon and as such parts of the site fall in Flood Zones 2 and 3. Ham Island: "Flood Zone 2&3 and susceptible to surface water flooding from the Thames" we think this should be changed to "susceptible to fluvial flooding from the Thames, site is in Flood Zones 2 & 3 and is at risk of surface water flooding". Poyle Quarry: Flood Zone 2 and small areas of Flood Zone 3 need to be included in the considerations. Berkyn Manor, Horton: Under 'considerations' it needs to include that a small area of Flood Zone 3 is within the site. Paragraph 3.51 This says: "CEB24 and 26 have scored negatively against flood risk" Do you mean CEB21 and 26? Glossary Sequential test and exception test Please note that it is the planning authority that carries out the sequential test and exception test and not the Environment Agency. This needs amending in the glossary text.

### **Restoration Study**

Restoration Study Paragraph 4.16 This says: "reduce flood risk on local communities" This should say, "reduce flood risk to local communities" You also need to add the following text to this paragraph, "Note that permanent open water features will not normally provide much additional floodplain storage in times of flooding, since they will already be full of water. Generally, for additional floodplain storage to be created, land outside of flood zones needs to be lowered, but should remain hydraulically connected to the floodplain.

### **Restoration Study**

Paragraph 7.15 This section needs to mention Blue Infrastructure  
Paragraph 7.62 Please remove the words "usually" and "wherever possible" within this paragraph. These words add great weakness to the text and it just reads as a loophole

### **Waste Proposal Study**

Page 139 of the Waste Proposals Study – under category two, there is no precise information on the type of waste and so making comments is not possible.

### **Minerals Proposal Study**

Access to the site – p49 Minerals Proposal Study "Transport (including access) Potential access into the site: The access to the site is located on the Strategic Road Network via the A327." Incorrect: The A327 runs from the site to the M3 (SRN) but 80% of the traffic would be routed via the A327 West Bound and on to the B3270. Background: The current A327 is a busy

road and the main entrance will be on a single carriageway section that is approached by National Speed Limits and 40 mph respectively. The proposed 250+ HGV movements a day will pose increased hazards for both right hand turns in and out of the site and left hand turns exiting the site. The site is approached via a blind bend from the Arborfield side and slow turning lorries pose an increased collision risk.

Transport Assessment Summary – p50 Minerals Proposal Study Change in traffic volumes The change in HGV traffic on the SRN would be less than 1%. The magnitude of change from the existing conditions would be negligible and therefore the significance of impact of the new proposals would be neutral. Incorrect: No allowance has been given to the newly opened Reading University Science Park or substantial housing developments completed, underway and approved for Shinfield and Arborfield. It should also be noted that there are inadequate pedestrian and cyclist facilities from the site entrance all the way West and on the Eastern Shinfield Relief Road.

Summary – Justification for Allocation – p51 Minerals Proposal Study The site has been proposed for allocation in the Joint Minerals & Waste Plan as it was previously identified as a candidate Minerals Preferred Area in the Joint Minerals and Waste Development Framework - Detailed Minerals and Waste Development Control Policies and Preferred Areas Development Plan Document Reg. 25 (2008): Proposed Minerals Preferred Area for extraction of sharp sand and gravel W M02; a planning application has already been submitted to be determined by Wokingham Borough Council; ecological and landscape constraints are acknowledged but it is considered that they can be mitigated; good connectivity to the strategic road network; and a phased approach to extraction with restoration opportunities. Who has considered that they can be mitigated? This is a statement that portrays fact but lacks any evidence. If we were to consider planning application 170433 the following issues are unresolved by the applicants, and have been since December 2017.

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