

Suggested modifications to overcome OCC objections

This does not cover all the comments we made, but addresses our objections to soundness of the plan. Our additional text is shown as underlined, our suggestion for removed text is shown as struck through.

Policy 2 Landbank and Need

4.13 The NPPF requires Minerals Planning Authorities to plan for a steady and adequate supply of aggregates through preparing an annual Local Aggregates Assessment (LAA) from which future planned provision should be derived based on a rolling average of 10-years aggregates sales and an assessment of all supply options (including marine dredged, secondary and recycled sources), and other relevant local information. MHCLG have undertaken the Aggregates Survey for 2019, which along with sales, reserves and permissions, also includes movements of minerals between Authorities. Once published, the results of this survey, particularly in relation to movements of minerals into West Berkshire, will be critical for West Berkshire's future projections of need. The findings of that survey and any future surveys on the movements of minerals between Authorities will be considered within future LAAs.

Policy 4 - Location of Development – Construction Aggregates

Location of Development - Construction Aggregates

Allocated Sites

The following sites are allocated to meet the need for primary aggregates:

Sharp Sand and Gravel

- Tidney Bed, Ufton Nervet (Policy 30 'Tidney Bed')

Soft Sand

- Chieveley Services, Chieveley (Policy 31 'Chieveley Services')

A map showing the location of the allocated sites is given in Appendix 1 'Allocated Sites'.

~~There will be a presumption in favour of construction aggregate extraction proposals only in the following circumstances:~~ Planning permission will be granted for construction aggregate extraction where the following criteria are met:

- The site is allocated for mineral extraction in this plan, provided that the identified site specific requirements are satisfied; or
- The extraction proposal relates to a proposal for a borrow pit, or
- The extraction proposal relates to the extraction of minerals prior to a planned non mineral development (prior extraction); or
- The extraction proposal relates to a proposal for another beneficial and acceptable use and mineral extraction is a necessary part of the proposed development; or
- The extraction proposal is required to maintain the requirement provisions in Policy 2 'Landbank and Need'; and
- The requirements of all other policies in this plan are met.

For soft sand planning permission will additionally be granted for extraction where the following criteria are met:

- The site is located within an area of search for soft sand; or
- For proposals within the North Wessex Downs AONB, the requirements of the exceptional circumstances test in the NPPF are satisfied.

~~Although there is a presumption in favour of development in the areas identified in this policy, proposals must meet the requirements of all relevant policies in this plan.~~

Supporting text for Policy 4

We are not giving specific text for all the paragraphs for paragraphs 4.38 – 4.54, but we would like to see it follow this structure:

- Allocated sites.
- Areas of search where planning permission will be granted if the set criteria and other policies are met.
- If that does not result in sufficient permission to meet West Berkshire's need, a Statement of Common Ground has been prepared with Oxfordshire which agrees some supply of soft sand. refer to 'current' levels as it does in paragraph 4.40 of the submitted document.

Some specific suggestions are:

4.40 "The Soft Sand Study identifies that ~~part of the current~~ some of the soft sand sales pattern in Oxfordshire comprises supply to West Berkshire, so this would be a continuation of ~~this current~~ situation. Therefore, if Oxfordshire were to continue to make provision to enable ~~the current~~ previous levels of sales to continue, then it could be inferred that ~~the current~~ movements of soft sand from Oxfordshire to West Berkshire will be able to continue. This would enable at least some of the identified need for soft sand in West Berkshire to be met by imports, as is currently understood to be the case. ~~from Oxfordshire.~~ However, this would rely on a formal agreement with Oxfordshire County Council to make provision for supplying West Berkshire as well as addressing its own requirements.

4.41 Therefore, liaison has been undertaken through the Duty to Cooperate regarding whether Oxfordshire County Council could make provision to enable ~~current~~ the levels of soft sand supply as set out in the Oxfordshire Minerals and Waste Local Plan Part 1 – Core Strategy to continue through their emerging Site Allocations Document.

4.47 Allocated sites identify areas where planning permission will be granted if the criteria and Policies in the plan are met ~~there will be a presumption in favour of development.~~ The mineral allocations have been selected as the least damaging potential sites for extraction in terms of the effect on environmental and social sustainability. ~~It therefore, follows as a general principle that outside the allocated sites there will be a general presumption against planning permission being granted unless the additional requirements of the policy are met.~~

Section 2.9 - Sales of recycled aggregate

2.9 Increasingly construction and demolition waste is being used, where the specification allows, as a substitute for primary aggregates. This poses new and different demands on the construction aggregate supply industry in finding sites and processing capacity to recycle and deliver these materials. ~~Since 2012 the sales of recycled aggregates from sites in West Berkshire have exceeded the sales of primary aggregates won from mineral extraction sites within the district.~~

Meeting wider needs

Include an additional sentence to the strategic objective M4 to recognise that mineral movements do occur between Authorities .

To maintain a stock of permitted reserves (a landbank) for aggregate minerals, in accordance with current Government advice to ensure an adequate and steady supply of minerals, as far as is practical, from outside the North Wessex Downs Area of Outstanding Natural Beauty, Scheduled Monuments and Conservation Areas. Whilst also taking into account the potential for future contribution that should be made from mineral working in West Berkshire towards the aggregate supply needs of other areas.

Policy 3 Supporting Text

We don't have any specific proposed changes to the document, but would prefer to see a table included that shows how the waste is to be managed eg composting, recycling etc.

The plan should also set out the deficit in non-hazardous landfill capacity, and link to policy 7 to show how this deficit is planned to be overcome.

Policy 5 Location of Development - General Waste Management Facilities

~~There will be a presumption in favour of waste management development proposals (excluding landfill) only~~ Priority will be given to waste management development proposals in the following areas:

- Existing sites with permanent planning permission for waste management development; or
- Existing sites with permanent planning permission for industrial development (B2 and B8 land uses) or within suitable protected employment areas; or
- On previously developed land; or
- Agricultural or forestry buildings and their curtilages where they are demonstrated to be redundant; or
- In the case of inert waste management facilities, in aggregate quarries and inert landfill sites for the duration of the host facility.

Waste development outside these areas ~~will only~~ may be permitted where they meet the policies in the local plan, ~~in exceptional circumstances~~ and consideration will be given to the proximity of the proposed development to the source of waste arisings.

The co-location of waste management activities within existing permanent waste management sites will be supported, where it would not result in intensification of uses that

would cause unacceptable harm to the environment or communities in a local area due to cumulative impacts.

Policy 5 supporting text

4.56 ~~The policy seeks to steer waste development away from greenfield sites,~~ The Plan gives priority to existing waste sites, industrial and employment areas, the re-use of previously developed land and redundant agricultural and forestry buildings in line with the National Planning Policy for Waste. In the case of inert waste recycling facilities, these often have functional linkages with the restoration of aggregate quarries and inert landfill facilities, and therefore, these are appropriate locations for this type of waste management. Policy 16 'Temporary Minerals and Waste Infrastructure' provides greater detail on this situation. Within the specified areas there will be a presumption in favour of waste management development. However, consideration will also need to be given to all other policies in the plan that are relevant to the development proposal and any other material considerations.

4.58 The main types of waste facility that could be developed in accordance with this policy include, but is not limited to, waste transfer stations, materials recycling facilities, inert waste recycling facilities, energy from waste, Waste Electrical Electronic Equipment (WEEE) waste facilities and scrap metal facilities.