

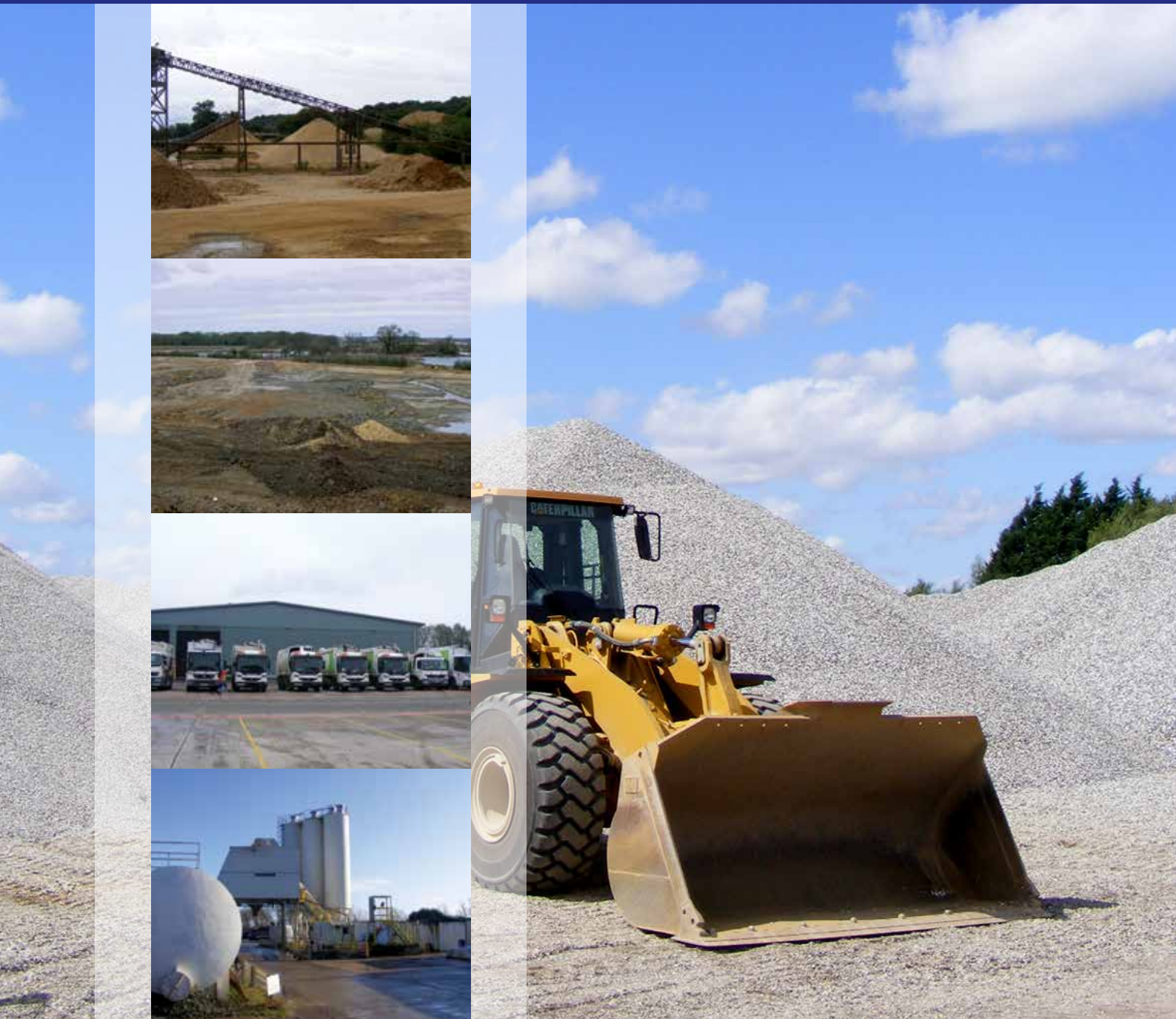
Statement of Consultation

Annex 3 - Preferred Options Consultation Summary Report

West Berkshire Minerals and Waste Local Plan
Preferred Options Consultation Response Report

September 2018

West Berkshire Local Plan



West Berkshire Minerals and Waste Local Plan Preferred Options Consultation Response Report

September 2018

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West Berkshire Minerals and Waste Local Plan – Preferred Options Consultation Response Report

Background

The West Berkshire Minerals and Waste Local Plan (MWLP) is currently being prepared and will set out the planning policies for minerals and waste development within West Berkshire. The MWLP will replace the existing Replacement Minerals Local Plan for Berkshire incorporating the alterations adopted in 1997 and 2001 (RMLP) and the Waste Local Plan for Berkshire adopted in 1998 (WLPB) and will provide a robust, up to date, policy context for assessing planning applications for minerals and waste development in the District.

The Preferred Options Consultation

As part of the development of the new Minerals and Waste Local Plan the Council published its Preferred Options plan in May 2017 for consultation. The Preferred Options plan set out the Council's proposed policies to manage mineral and waste development in the district as well as proposed sites to be allocated for mineral extraction. Members of the public, landowners and operators were invited to comment on the proposals in the plan.

Notification of the consultation was sent to all those registered on the Council's Planning Policy consultation database (<http://consult.westberks.gov.uk/portal>), all Parish Councils, all neighbouring Parish Councils, and all neighbouring District and County Councils as well as specific and general consultation bodies involved in the planning process.

The Consultation was advertised on the Council's website and documentation was available in the Council Offices. The consultation, despite being non statutory, was carried out in accordance with the Council's adopted Statement of Community Involvement, which can be found on the Council's website at: <http://info.westberks.gov.uk/CHttpHandler.ashx?id=38265>

The consultation ran for 6 weeks between 19th May 2017 and 30th June 2017. A total of 423 comments were received from 192 individuals and organisations. A petition with 143 signatures was also received.

This Report

This report sets out a summary of all the comments received as part of the Preferred Options consultation, followed by a Council response to the comments received. The report is set out as the Preferred Options Minerals and Waste Local Plan Consultation document, using the same sections and chapter headings.

The comments received will be taken into account in the preparation of the submission version of the plan, and where appropriate changes will be made to the plan.

Next Steps

The Council is in the process of preparing the proposed submission version of the Minerals and Waste Local Plan. The comments made as part of the Preferred

Options consultation are being taken into account, and where appropriate changes will be made to the plan.

In addition, further evidence required to support the plan is being collected. This will be published alongside the proposed submission version of the plan.

The Council proposes to publish its proposed submission version of the Minerals and Waste Local Plan for consultation in line with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 in the summer of 2019.

Following this formal period of consultation, the plan will be submitted to the Planning Inspectorate for examination on behalf of the Secretary of State towards the end of 2019. It is expected that examination of the plan will take place in the spring of 2020, with final adoption of the MWLP towards the end of that year. The current timetable for the plan is set out in the Local Development Scheme (LDS) (<https://info.westberks.gov.uk/lds>)

All those who requested to be kept informed of the progress of the plan will be notified when the proposed submission version of the plan is published for consultation.

Summary of Responses

1. Introduction

Introduction		
Topic	Summary of Consultation Responses	Council Response
General	Exploitation of shale gas is unacceptable due to the physical impact this has on the community (earthquakes, collapsed earth).	There are no known resources of commercially viable energy minerals in West Berkshire and no Petroleum and Development Licenses that cover the plan area. However, oil and gas development is allowed for by national legislation and policy and it is prudent to include provisions to control this should commercial reserves be found or Petroleum and Development Licenses be granted in the Plan area in future. The proposed approach to the possible exploitation of oil and gas resources is to allow exploratory drilling under controlled conditions, and to require any commercial exploitation to be fully justified in terms of balancing need against environmental and other considerations, taking into account the specific arrangements for working, restoration, ancillary development and associated activities.
	Alternative options to working sites (recycling/environmentally neutral options) must be considered.	Minerals can only be worked where they are found, and this as well as other constraints limits where proposals for mineral extraction come forward. The environmental and other effects of sites to be taken forward in the plan have been fully considered in the Sustainability Appraisal. The proposed approach is to encourage the use of recycled and secondary aggregates in preference to primary aggregates to minimise the need to extract primary aggregates. It is understood that recycled aggregates can, in some applications replace primary aggregates. However, recycled materials cannot, at present, replace all applications for which primary aggregates are used, particularly for higher grade uses. This situation will be monitored as advances in

		<p>the recycling industry mean that higher quality recycled materials may be able to increasingly substitute for primary materials in future.</p>
	<p>Local trends in the market (regarding a shift towards recycled aggregates) have not been fully considered.</p>	<p>The most recent Local Aggregates Assessment considers the demand and supply issues around land won sand and gravel and recycled aggregates, including relevant local information as required by the NPPF. Although sales of recycled aggregates have increased they have generally remained at approximately 23 – 28% of market share in recent years. It is currently estimated by the Mineral Products Association that the extent to which recycled aggregates can substitute for primary aggregates based on current technologies is 28-29%. While it is accepted that recycled materials cannot, at present, replace all applications for which primary aggregates are used, it is the Council's understanding that recycled aggregates can replace primary aggregates in some applications. Therefore, the increase in recycled aggregate sales in recent years could partly account for the decrease in landwon aggregates sales. In this context, the contribution of recycled aggregates is likely to be reflected in the 10 year average landwon sales figure. However, this situation will be monitored as advances in the recycling industry mean that higher quality recycled materials may be able to increasingly substitute for primary materials in future.</p>
	<p>Consider there is only a need for an additional 2.89m tonnes over the plan period.</p>	<p>The provision in the plan will be based on the most up to date assessment of need provided in the LAA. This will be a calculation of the annual requirement rate multiplied by the number of years left in the plan period, taking into account already permitted reserves.</p>

Supply	Preferred sites should be reconsidered to ensure adequate supply to meet need, especially where there are potential deliverability concerns.	The sites to be taken forward in the plan will be based on the most up to date assessment of need provided in the LAA. Deliverability will be a factor in assessing sites for allocation, although the Council cannot require sites to come forward.
	0.75m tonnes of construction aggregates above the identified need is not considered enough of a buffer. Concern over under-delivery should some sites not come forward.	The sites to be taken forward in the plan will be based on the most up to date assessment of need provided in the LAA. Deliverability will be a factor in assessing sites for allocation, although the Council cannot require sites to come forward.
	Agree with assessment of need for soft sand which has historically been of limited demand.	Comments noted.
Net self-sufficiency	Support ambition to provide for net self-sufficiency in waste terms.	Comments noted.
	Recognise plan to be as self-sufficient as possible, but will still rely on neighbouring authorities for some waste processing. Policy 3 should be renamed and references to being self-sufficient in the policy should be amended as they are not accurate.	Agree references to 'self-sufficiency' should be amended to 'net self-sufficiency'.
Recycled Materials	No assessment of the potential for recycled sources in accordance with the requirements of the NPPF.	An assessment of the contribution of recycled and secondary materials to the supply of minerals in West Berkshire has been given in the most recent Local Aggregates Assessment (LAA).
	Assessment of the need for new sites should only take place once capacity of recycled material is taken out.	The most recent Local Aggregates Assessment considers the demand and supply issues around land won sand and gravel and recycled aggregates, including relevant local information as required by the NPPF. Although sales of recycled aggregates have increased they have generally remained at approximately 23 – 28% of market share in recent years. It is currently estimated by the Mineral Products Association that the extent to which recycled aggregates can substitute for primary aggregates based on

		<p>current technologies is 28-29%. While it is accepted that recycled materials cannot, at present, replace all applications for which primary aggregates are used, it is the Council's understanding that recycled aggregates can replace primary aggregates in some applications. Therefore, the increase in recycled aggregate sales in recent years could partly account for the decrease in land-won aggregates sales. In this context, the contribution of recycled aggregates is likely to be reflected in the 10 year average land-won sales figure. This situation will be monitored as advances in the recycling industry mean that higher quality recycled materials may be able to increasingly substitute for primary materials in future.</p>
	<p>Recycling capacity is above the volume estimated to be considered, suggesting higher demand than recorded.</p>	<p>Unfortunately it is difficult to derive an estimate of exactly how much permitted capacity of a site is related to recycled aggregate production, as this can change on a regular basis and it is dependent on the waste being imported to the sites. The most recent LAA shows that the level of actual recycled aggregate production is lower than the theoretical levels of production capacity. This is likely to be due to the fact that some of the sites do not deal exclusively with the production of recycled aggregates, and not all inert waste treated at such sites is suitable for recycled aggregate use. However, it does also indicate that there would be sufficient capacity to accommodate an increase in demand for recycled aggregate should the need arise.</p>
Ecology	<p>Removal of natural vegetation and soils results in loss of wildlife/biodiversity etc.</p>	<p>Any site being taken forward for allocation will be required at the planning application stage, where necessary, to undertake assessments to include consideration of the potential ecological impacts and to set out relevant mitigation measures.</p>

		Ecological assessment work is also being commissioned by the Council as part of the plan-making process, and this will be factored into the drafting of the submission version of the MWLP.
	Impact on ecosystems of noise, dust, pollution, contaminated water.	<p>Consultation has taken place with the Council's Environmental Health Officers and the Environment Agency in respect of the promoted sites, and the outcome of these consultations will be taken into account as part of the site selection process.</p> <p>Ecological assessment work is also being commissioned by the Council as part of the plan-making process, and this will be factored into the drafting of the submission version of the MWLP.</p> <p>Where appropriate, at planning application stage planning conditions can be imposed for all sites taken forward to ensure amenity impacts are limited to an acceptable level. This can include restricting working hours and measures to reduce dust and noise levels. Such an approach is endorsed by the NPPF para 204.</p>
Transport	Untenable transport link to A4 from rural roads with narrow bridges.	The Council's highways department and transport policy officers have been consulted on all the sites being considered for allocation and have provided comments regarding the likely traffic impact of each site. Further transport assessment work will be carried out prior to the submission of the plan.
	Increased traffic resulting in poor air quality in rural locations.	The plan includes a policy to protect public health, amenity and the environment (Policy 26). This requires any sites coming forward to demonstrate that the development would not result in unacceptable impacts on air quality.

Energy Supply	132kV line passes between Colthrop Processing Plant and Waterside Farm. Unclear what impact the plan would have on access to the line. Further work with SEPD is required.	Further discussions will be undertaken regarding this issue and potential to impact on the plan.
Other sites	Chieveley services should have been considered as a reasonable alternative.	<p>Due to commercial confidentiality agreements between the authority and minerals industry the sharp sand and gravel sales and soft sand sales have historically been combined. This has meant that a separate provision figure for soft sand has previously been unable to be determined.</p> <p>However, during the preparation of the most recent LAA, the mineral companies involved indicated for the first time since West Berkshire began preparing LAAs that they wished to forego commercial confidentiality in order that separate soft sand production figures could be published. Therefore as part of the 2017 LAA, separate landbanks, annual requirements and requirements over the Plan period have been calculated.</p>

Background		
Topic	Summary of Consultation Responses	Council Response
General	CLH Pipeline system – maps provided.	Details of the CLH pipeline and other utilities will be added to the site assessment forms.
	The plan is not based on the evidence, therefore vulnerable to legal challenge	The plan is based on a number of evidence base documents as set out in section 2.36 of the document. Further evidence has been, or is in the process of being collected to further support the plan.
	No documents come from the site promoters. The burden seems to fall to WBC to assess the site. Site promoters should be required to provide more evidence to prove their sites meets the NPPF/WBC policies. This information should then be available to the public.	All site promoters submitted their sites with some accompanying details to the Council as part of the “Call for Sites” in early 2014. The sites are assessed by the Council on a consistent basis using the information provided by the site promoters, as well as the Council’s own information, data and evidence. Further information will be sought from site promoters where there are questions over the deliverability of a site, or where specific details are required to support the allocation of a site.
	Is consenting of new sites “essential development”? If so, then sites could occur within the AONB. Some of which would be more suitable than the preferred options. If mineral development is not considered essential then why are the preferred options being perused?	New sites need to be allocated to ensure the Council can continue to meet its need for minerals as set out in the Local Aggregate Assessment. While there is a need to protect and conserve the AONB, if it is demonstrated by the evidence that there is a need for specific minerals which can only be found within the AONB, then sites within the AONB may be allocated through the plan. In this context, to meet the Council’s need, mineral development would be considered essential development.
Duty of Care	Local Authorities have a duty of care to its citizens. Dramatic changes to a village environment could make WBC vulnerable from a legal point of view. 2 of the 7	New sites are required to maintain a supply of minerals to meet the need of the District as set out in the Local Aggregate Assessment. Minerals can only be dug where they lie, in West Berkshire, the

	sites are in Brimpton and one is only a couple of km to the East.	majority of minerals are located along the Kennet Valley. Mineral extraction is temporary in nature, and following restoration of the sites the impact of the extraction will be neutral and can result in net benefits for biodiversity and public access to sites.
Transport	HGVs would use Long Lane which is not suitable for any further HGV movements.	<p>The Council's highways department have been consulted on all the sites being considered for allocation and have provided comments regarding the likely traffic impact of each site. Further transport assessment work will be carried out prior to the submission of the plan.</p> <p>All sites applying for planning permission will be required to submit a Transport Assessment/Statement as part of their planning application. This will consider the potential impact on the highway network and set out relevant mitigation measures.</p> <p>Regarding Long Lane, the Council's highways department have raised some concerns regarding the allocation of Long Lane due to poor sight lines relating to the access. Currently the Long Lane site is not proposed for allocation.</p>
	<p>Rail capacity is underutilised, with 3 railheads in West Berkshire.</p> <p>Network Rail – no specific comments.</p>	The capacity of the railhead sites are governed in part by the capacity on the railway lines in the area, as well as operationally on the individual sites. The railhead sites in West Berkshire are currently in receipt of construction aggregates, however it is still the case that new primary aggregate sites need to be allocated to ensure the Council can continue to meet its need for primary land-won construction

		aggregates as set out in the NPPF and Local Aggregate Assessment.
	WBC has decided against 6 sites which are adjacent to A roads (3 are in the AONB)	Access to the highway network is just one of many factors that are considered when assessing sites.
	<p>The Local Access Forum support sites which</p> <ul style="list-style-type: none"> o do not adversely impact ROW, public open space o offer equivalent/improved diversion of ROW affected by quarrying o offer additional ROW which improve the network in the area, by offering new definitive, multi user paths not just footpaths. 	<p>Comments from the Local Access Forum are noted. All sites proposed for allocation will be required to protect or divert rights of way while works are carried out on the site. The Council will be supportive of the creation of new rights of way as part of restoration proposals.</p> <p>The NPPF para 98 states that planning policies should protect and enhance public rights of way and access. Public rights of way that would be affected by the working of the site would be diverted, and/or potentially screened through landscaping works to protect the users from any nuisance aspects of the working. The rights of way would likely be reinstated at the earliest possible opportunity and there would potentially be opportunities for the enhancement of public rights of way as part of any scheme that came forward on the site.</p>
Landscape	Some sites in the AONB have been blighted by the M4, A34 and A4. Meaning they are better accessible to HGV traffic.	It is noted that some of the sites within the AONB have good access to the strategic road network. Landscape advice has been sought for all sites and this has been taken into account when assessing the sites.
SA/SEA	The historic environment/heritage assets are not mentioned in the summaries given in table 10, even though the potential impact has been considered. For Tidney Bed the impact was assessed as negative.	The summaries provided in Table 10 of the SA/SEA summarise the overall impact of the site in sustainability terms. The SA/SEA will be reviewed and where changes are required to the assessment or the summaries these will be made and the tables in the SA/SEA report updated.

	<p>Table 12 (assessment of proposed policies) concludes that over all there is likely to be neutral impact on sustainability as a result of the policy. Given the potentially significant positive environmental effects as a result of the policy focusing on preserving/enhancing the historic environment and no potential negative impacts identified, how can it be concluded that there would be an overall neutral impact on sustainability.</p>	<p>The SA/SEA is an iterative process and will be updated to support the submission version of the plan where appropriate.</p>
	<p>The council should ensure future results of the SA clearly justify any policy choices.</p>	<p>The SA/SEA Environmental report sets out the assessment of the policies/sites and will set out the reasons for policies/sites to be included within the plan.</p>
	<p>Para 5.1.2 – automatically excluding sites in the AONB is not in line with what the NPPF says Rejection of 60 Acre field (Site 2) because it is in the AONB is not justified</p> <p>Option 4 page 23. States the policy would consider all types of minerals in the AONB, but the plan then rejects sites in the AONB, the wording is ambiguous, misleading and contrary to the NPPF</p>	<p>The NPPF (Para 172 (NPPF 2012 para 115) states that planning permission should be refused for major development other than in exceptional circumstances and where it can be demonstrated to be in the public interest. NPPF para 205 states inter alia, that in considering proposals for mineral extraction, minerals planning authorities should (a) 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 PPG (ref ID: 27-008-20140306) states inter alia, that in exceptional circumstances, such as where a local authority area is largely made up of designated areas such as Areas of Outstanding Natural Beauty, it may be appropriate for mineral planning authorities to rely largely on policies which set out the general conditions against which applications will be assessed.</p>

		<p>Due to commercial confidentiality agreements between the authority and minerals industry the sharp sand and gravel sales and soft sand sales have historically been combined. This has meant that a separate provision figure for soft sand has previously been unable to be determined.</p> <p>However, during the preparation of the most recent LAA, the mineral companies involved indicated for the first time since West Berkshire began preparing LAAs that they wished to forego commercial confidentiality in order that separate soft sand production figures could be published. Therefore as part of the 2017 LAA, separate landbanks, annual requirements and requirements over the Plan period have been calculated.</p> <p>As a result the Council is in the process of re-evaluating its approach to soft sand in the emerging MWLP.</p>
Evidence Base		
Historic Environment	<p>Evidence should include consideration of:</p> <ul style="list-style-type: none"> ○ The Berkshire Historic Environment Record, ○ The National Heritage List for England, ○ The West Berkshire Historic Landscape Character Assessment, ○ The Assessment of the Archaeological Resource In Aggregate Areas of West Berkshire. 	<p>Further historic heritage assessment may be required on sites and this will be done to support the submission version of the plan.</p>

	<p>There should be consideration of potential impacts on specifically designated or non-designated heritage assets</p> <p>There is no reference to any assessments on specific heritage assets (note there is a landscape and visual assessment for each site)</p>	
	<p>The true potential for Palaeolithic archaeology is unlikely to be represented on the HER (due to depth of burial/lack of previous investigation), therefore specific assessment by specialists is likely to be required to provide a robust evidence base.</p> <p>The Middle Kennet Valley has been identified by HE as one of 50 outstanding areas of England for Exceptional Wetland Heritage (well preserved Late Upper Palaeolithic and Mesolithic archaeology) evidence to support allocations of sites on the floodplain would benefit from a geoarchaeological deposit model.</p> <p>Consideration of NPPF paragraphs 9, 8, 126 - 141.</p>	<p>The Council will consider including site specific allocation criteria which will require relevant sites to submit a Heritage/Archaeology Assessment/Statement as part of their planning application and any further archaeological work that is necessary. The NPPF confirms that where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation (paragraph 189).</p> <p>The Council has taken the updated NPPF paragraphs relevant to the historic environment into account in the preparation of the plan.</p>
Landscape	<p>For Manor farm state that there are no historic factors, but the site is adjacent to a listed building, scheduled ancient monument and conservation area. The fields are unique being described in an Anglo Saxon document from 944AD. Therefore, the wrong conclusions have been drawn</p>	<p>The Landscape Assessment considers the historic environment where it relates to the landscape character of the area. Heritage is considered separately through the site assessment process, where these factors will be taken into account.</p>
	<p>The LVA does not put forward any substantive reason why 60 Acre field should not be put forward. It is considered that the site could be extracted and restored</p>	<p>The LVA has been carried out on a consistent basis for all sites.</p>

	<p>by landfilling without any significant impacts on the local landscape of the AONB.</p> <p>There should be no long term impacts, and development will offer the opportunity for landscape and biodiversity enhancements through new hedgerows to sub-divide the existing large arable field and provision of no hedgerows/linear woodland plantations on the perimeter of the site.</p>	<p>The site has been assessed as having a medium overall landscape sensitivity, with a medium/high landscape value. As a result the combined landscape capacity has been determined as medium/low and is not recommended for development from a landscape and visual perspective.</p>
Local Waste Assessment	<p>Newer data on radioactive waste has been produced by NDA and BEIS http://ukinventory.nda.gov.uk/the-2016-inventory/2016-uk-data/</p> <p>Exec. Summary table does not include radioactive/equine waste, but these have been included in the capacity calculations in table 4.3 and 4.5 (approx. 34,000tpa) – need a consistent approach as this affects the projected capacity at the end of the plan period and impacts on the idea of self-sufficiency.</p> <p>Assuming capacity has not been double counted in tables 4.1-4.6 where facilities have been included multiple times where distinct uses occur at the same facility.</p>	<p>It is noted that there is newer data on radioactive waste.</p> <p>The Council will take these comments into account. The Local Waste Assessment will be updated to take into account the most up to date information prior to publication of the submission version of the plan.</p> <p>Capacities have not been double counted. Relevant capacity at a facility has been attributed to the appropriate capacity type (e.g. Padworth IWMF has been broken down into HWRC, Biological Treatment Facility, MRF and transfer)</p>
	<p>Table 4.5 total does not appear to be correct (4,999 + 4,500 +30,000 = 39,499 c.f. 39,998) assuming transfer is excluded.</p>	<p>The Council will take these comments into account and the LWA will be updated prior to publication of the proposed submission version.</p>
	<p>Why have table 4.6 facilities been excluded from the capacity calculations when these are known sites contributing to C&I waste?</p>	<p>The Council will take these comments into account and the LWA will be updated prior to publication of the proposed submission version.</p>
	<p>Consideration does not appear to have been given to achieving the recycling targets set out in the waste</p>	<p>The Council will take these comments into account. The Local Waste Assessment will be updated to take</p>

	framework directive/landfill directive set out in section 2. If these are not included it will not be possible to ensure that facilities are planned to achieve these targets/monitoring whether they are achieved	into account the most up to date information prior to publication of the submission version of the plan.
	Support aims for net self-sufficiency	Noted
	Estimates drawn from waste survey data need to be treated with caution. WDI offers more up to date info, although acknowledged this has significant shortcomings and estimates are lower than other methods used. The use of a range of methodologies and choice of worse case scenarios seem to be a reasonable approach.	The Council will take these comments into account and the LWA will be updated prior to publication of the proposed submission version.
	Acknowledged that a variety of waste streams move between Hampshire and West Berks. While restrictions have been placed on HWRCs on both sides of the border on what can be deposited, commercial facilities do not usually have these restrictions.	The Council will take these comments into account and the LWA will be updated prior to publication of the proposed submission version.
	Growth for CDE waste is set at 0% which accords with England wide trends but it is not immediately clear how this assumption is arrived at.	National Planning Practice Guidance for Waste states that 'Waste planning authorities should start from the basis that net arisings of construction and demolition waste will remain constant over time as there is likely to be a reduced evidence base on which forward projections can be based for construction and demolition wastes.' (paragraph 033 Reference ID: 28-033-20141016).
	Typos (incorrectly references tables, figures etc).	The LWA will be updated prior to publication of the proposed submission version.
	Demand for land won primary aggregates is falling (and has done since 2007), therefore, fewer sites are required.	The Local Aggregate Assessment will be updated prior to the publication of the proposed submission version of the Plan, and the most up to date information used to support the number of sites proposed for allocation.

	<p>NPPG talks about use of the 3yr average</p> <p>Review of the 3yr average does not then following through the conclusions into the plan.</p> <p>3yr average shows reserves as 17.6 years, meaning there is no need for any new sites. This could be reviewed in 10 years.</p>	<p>Reference has been made to using the 3 year sales average as a basis for establishing a lower primary aggregate demand figure for plan-making. The NPPG states (ref ID 27-064-20140306) that Mineral Planning Authorities should [as well as the 10 year average] look at average sales over the previous three years in particular to identify the general trend of demand as part of the consideration of whether it might be appropriate to increase supply. Rather than an indicator for the purposes of considering whether supply should be decreased, the guidance indicates that the 3 year average should be used as an indicator for the purposes of considering whether supply should be increased.</p>
	<p>Increased demand for recycled aggregates has not been taken into account when calculating future aggregates use.</p>	<p>Reference has been made to the contribution that recycled aggregates make to aggregate supply being justification for establishing a lower primary aggregate demand figure for plan-making. The LAA does consider recycled aggregate production in West Berkshire. Between 2010 and 2012 recycled aggregate production in West Berkshire increased, and it now appears to have stabilised. Broadly speaking, land won aggregates in West Berkshire have been decreasing in recent years. While it is accepted that recycled materials cannot, at present, replace all applications for which primary aggregates are used, it is the Council's understanding that recycled aggregates can, in some applications replace primary aggregates. Therefore, the increase in recycled aggregate sales in recent years could</p>

		partly account for the decrease in landwon aggregates. In this context, the contribution of recycled aggregates is likely to be reflected in the 10 year average sales figures for primary aggregates.
Minerals Evidence	Much of West Berkshire aggregate is sold outside the district, therefore, cannot prove increasing demand. No monitoring of where aggregates are actually used.	The most recent LAA shows that sales of aggregates within West Berkshire are decreasing. Not all aggregates sold within West Berkshire are consumed within West Berkshire, as a certain amount are exported for consumption elsewhere. However, some aggregates are also imported from other areas for consumption within West Berkshire. National Planning Practice Guidance recognises that there are significant geographical imbalances in the occurrence of suitable natural aggregate resources, and requires mineral planning authorities which have adequate resources of aggregates to make an appropriate contribution to national as well as local supply (Paragraph: 060 Reference ID: 27-060-20140306). Therefore, sales data in West Berkshire reflects the need to supply a local market, and also an appropriate contribution to national supply. Historic movements of aggregates in and out of Berkshire have only been captured every four years when Berkshire-wide data is published as part of the aggregates minerals survey commissioned by Central Government. This information is only available at a Berkshire-wide level, and at the point of writing this it is not certain whether funding is secured to continue the survey in future.
	Importing materials is a real opportunity, use of railhead sites could import material rather than digging it up in a small corner of West Berkshire.	The NPPF requires Mineral Planning Authorities to provide for their own needs where possible. There are adequate sites within West Berkshire to meet the

		<p>Council's need for minerals and therefore, it would not align with National policy to rely on further imported material from elsewhere in place of allocating primary sites. The railhead sites in West Berkshire are currently in receipt of construction aggregates, however it is still the case that new primary aggregate sites need to be allocated to ensure the Council can continue to meet its need for primary land-won construction aggregates as set out in the NPPF and Local Aggregate Assessment. The capacity of the railhead sites are governed in part by the capacity on the railway lines in the area, as well as operationally on the individual sites.</p>
	<p>Insufficient evidence to support need to extract 4,250,000t primary aggregates</p>	<p>The Council's need is set out in the Local Aggregates Assessment. The calculation is based upon the average of the last 10 years primary aggregates sales within the district.</p>
	<p>Lack of separate soft sand landbank would seem to be contrary to the NPPF. Other MPAs have found ways around this issue (eg. Kent)</p>	<p>Agreement has been sought from the relevant operators to publish separate landbank figures. The Local Aggregates Assessment has been updated to reflect this.</p>
	<p>Soft Sand provision – para 10.8 states there is one site outside the AONB and para 12.11 suggests there is scope to meet WB's demand from with the authority. Para 11.7 – 11.53 use various methodologies to estimate the requirement, but the plan itself does not identify any sites to meet the requirement. Para 12.12 implies future demand can be met from existing operations in neighbouring authority areas and this will be appropriate discussed, however policy 2 assumes no soft sand sites will be allocated.</p>	<p>Due to commercial confidentiality agreements between the authority and minerals industry the sharp sand and gravel sales and soft sand sales have historically been combined. This has meant that a separate provision figure for soft sand has previously been unable to be determined.</p> <p>However, during the preparation of the most recent LAA, the mineral companies involved indicated for the first time since West Berkshire began preparing LAAs that they wished to forego commercial</p>

		<p>confidentiality in order that separate soft sand production figures could be published. Therefore as part of the 2017 LAA, separate landbanks, annual requirements and requirements over the Plan period have been calculated.</p> <p>As a result the Council is in the process of re-evaluating its approach to soft sand in the emerging MWLP.</p>
	<p>The Mineral Evidence paper demonstrates continuous demand for soft sand over the past 10 years, but this has not been recognised through the production of a soft sand landbank. Based on local sales data the 7 year landbank calculation would result in a requirement of at least 140,000 tonnes to meet local demand.</p>	<p>Due to commercial confidentiality agreements between the authority and minerals industry the sharp sand and gravel sales and soft sand sales have historically been combined. This has meant that a separate provision figure for soft sand has previously been unable to be determined.</p> <p>However, during the preparation of the most recent LAA, the mineral companies involved indicated for the first time since West Berkshire began preparing LAAs that they wished to forego commercial confidentiality in order that separate soft sand production figures could be published. Therefore as part of the 2017 LAA, separate landbanks, annual requirements and requirements over the Plan period have been calculated.</p> <p>As a result the Council is in the process of re-evaluating its approach to soft sand in the emerging MWLP.</p>
	<p>Some disparity in the determination of requirement figure paragraph 3.14 (5,608,963 – 17 years, not 21 years to the end of the plan – 6,928,719)</p>	<p>The LAA will be updated to ensure the most up to date figures are used to support the plan when the pre submission version is published.</p>

	<p>Support use of rolling 10yr average of sales used as an indicator</p>	<p>Comments are noted.</p>
	<p>Noted a significant proportion of land-won sand and gravel and marine sand sold in Berkshire comes from Hampshire. There is no evidence this is likely to change in the immediate future.</p> <p>Work on construction aggregate demand and consumption is considered comprehensive</p> <p>Methods for calculating soft sand demand is also comprehensive</p> <p>Discussion of the 'regional picture' of soft sand is supported</p> <p>Noted that Hampshire's most northerly soft sand resources are also constrained by the South Downs National Park</p>	<p>West Berkshire will engage with Hampshire County Council through the Duty to Cooperate to consider cross boundary issues.</p>
<p>Flooding</p>	<p>There is no up-to-date SFRA incorporating the latest climate change allowances. This evidence is required to inform the sequential test, exception test, flood risk policy and supporting text.</p> <p>These tests ensure the local plan is deliverable and compliant with NPPF (para 93, 94, 100, 101, 158, 165, 173)</p> <p>The Strategic Flood risk Assessment Statement (Mar 2017) refers to a sequential approach for allocating sites, this should be called the sequential test (in accordance with para 101 of NPPF)</p>	<p>The Council are in the process of updating the SRFA, and any new evidence brought to light as a result of this review will be taken into account. This was made clear in the SFRA Statement published alongside the Preferred Options document. The updated SFRA will be published alongside the pre submission version of the plan.</p> <p>Comments noted. The SFRA statement will be superseded by the publication of the SRFA itself in due course and the updated SFRA will be used to support the plan.</p>

	The sequential approach is applied after the sequential test, this is about locating development within a site at the lowest risk of flooding (para 103 of NPPF)	Comments noted.
	Advise the following sentence of the statement is reworded “sand and gravel extraction is defined as ‘water compatible development’ and therefore a development type that is not considered to be vulnerable to flooding”. The measure of flood risk depends on the flood zone it is in, there are some sand and gravel sites that are in flood zone 1. Sand and gravel extraction is water compatible, but other minerals (clay, chalk, slate etc) are less vulnerable developments). PPG table 3 shows water compatible development is appropriate in FZ3, however you still need to apply the sequential test to these proposals.	Comments noted. Where flooding is discussed in the relevant documents the wording will be reviewed to ensure it is correct.
	Less vulnerable development in FZ3b is not appropriate and would be objected to (EA)	Comments noted.
	Landfill is not an appropriate development in FZ3b.	Comments noted.
	EA advise that the updated SFRA and sequential test is for us to review before the submission stage to ensure there is a sound and robust evidence base for the local plan Partnership working on SFRAs offers a good opportunity for increased flood storage and enhancement of the natural environment.	The updated SFRA will be sent to the EA for comment and review prior to the publication of the pre submission version of the plan.
Habitats Regulation Assessment	HCC agrees with the report’s conclusion that there is not likely to be a significant effect on the Thames Basin Heaths SPA. <ul style="list-style-type: none"> • Typos - Para 1, page 3 – ‘Natura’ rather than Nature. 	Comments noted, the HRA will be updated.

	<ul style="list-style-type: none"> Page 10 – ‘Hampshire County Council’ rather than Hampshire Country Council. 	
Policy Omission	NPPG (March 2014) includes a section on water supply, waste water and water quality and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs.	Comments noted.
	TW consider that the MWLP should specifically refer to waste water/sewage sludge treatment, as was done in the last adopted Waste Local Plan for Berkshire (1998) and other Waste Local Plans (eg. Surry, policy WD6 (2008), Wiltshire, policy WCS3 (2009))	The Council will consider the inclusion of a specific waste water/sewage sludge treatment as well as considering changes to the wording of the existing specialist waste policy to clarify the types of waste that the policy covers.
Identified Sites	<p>Aldermaston Bridge (site 1) – Mid Berks Ramblers support outcome of LVA, which removes any direct impact on ROW</p> <p>Grange Lane (Site 7) – Mid Berks Ramblers support outcome of LVA providing access from A4, which also provides permeant access to Site 1</p> <p>Gravel Pit Farm (Site 11) – Mid Berks Ramblers support outcome of LVA for no development on the site, as this removes any impact on ROW</p> <p>Spring Lane (Site 13) – Mid Berks Ramblers support outcome of LVA as this removes any direct impact on ROW</p> <p>Moores Farm (Site 17) – Mid Berks Ramblers broadly support recommendations of LVA</p>	Comments noted.

	<p>Padworth Park Farm (Site 14) – Mid Berks Ramblers support recommendations of LVA that the site should not be developed</p>	
	<p>60 Acre Field (Site 2) Reasons for rejection of the site have not been justified, therefore the plan is unsound.</p> <p>Extraction and restoration of the site would not have a detrimental impact on the landscape and would provide landscape and biodiversity benefits by breaking up a large agricultural field.</p> <p>The site is well connected to the local and main road network</p> <p>The site has very few constraints other than being in the AONB</p> <p>Small-scale operations mean any impacts on the local community can be mitigated</p> <p>The site is considered to be confined and well screened with mineral impacts on the AONB of development</p> <p>The site can be fully restored to provide overall benefits and improvement to the AONB</p> <p>There is a local need to provide soft sand.</p>	<p>Comments are noted.</p> <p>As part of the assessment and allocation of sites, the following issues (not exclusively) form part of the considerations: landscape and visual; biodiversity; transport; national landscape designations, and the need for soft sand.</p> <p>Due to commercial confidentiality agreements between the authority and minerals industry the sharp sand and gravel sales and soft sand sales have historically been combined. This has meant that a separate provision figure for soft sand has previously been unable to be determined.</p> <p>However, during the preparation of the most recent LAA, the mineral companies involved indicated for the first time since West Berkshire began preparing LAAs that they wished to forego commercial confidentiality in order that separate soft sand production figures could be published. Therefore as part of the 2017 LAA, separate landbanks, annual requirements and requirements over the Plan period have been calculated.</p> <p>As a result the Council is in the process of re-evaluating its approach to soft sand in the emerging MWLP.</p>

3. Vision and Objectives

Vision and Objectives		
Topic	Summary of Consultation Responses	Council Response
Vision	<p>Support the vision to deliver capacity which meet the requirements for West Berkshire in accordance with national policy.</p> <p>The apparent lack of specific assessment and consequent potential adverse impact of the allocated sites on heritage assets is at odds with the Vision for the Plan.</p> <p>Support Objectives M2, M4, M5)</p> <p>Support objective 8, but wonder why it does not use the same terminology as M2 - "<i>To attain the principles of sustainable development set out in the NPPF by taking into consideration the need to protect and seek to improve the quality of life of residents, the quality of diversity of areas of nature conservation interest, historic and heritage assets, water environment and landscape character</i>". Prefer this wording</p> <p>No reference in vision to environmental element of sustainable development – this is a critical omission.</p> <p>The vision should explicitly reference enhancing the nature environment in line with the NPPF (para 7 and 9). The following wording is recommended...</p>	<p>The comments are noted.</p> <p>The Vision currently states:</p> <p><i>To facilitate the planned delivery of mineral resources and waste management capacity which meet the requirements for West Berkshire in accordance with national planning policy. In particular to plan for the delivery of mineral resources and waste management capacity in locations which meet the needs of the communities and economy of West Berkshire in the most sustainable way.</i></p> <p>Due to the diversity of issues this statement covers, the Strategic Objectives of the Minerals and Waste Local Plan then provide more specific key delivery outcomes that the Minerals and Waste Local Plan should achieve.</p>

	<ul style="list-style-type: none"> • “... to plan for the delivery of mineral resources and waste management capacity in locations which meet the needs of the communities, the economy and the environment of West Berkshire in the most sustainable way.” 	
Objectives	<p>Fail to comply with NPPF requirement to improve the natural environment through plan-making and planning decisions.</p> <p>Do not address the NPPF requirement for plans to allocate land with the least environmental value.</p> <p>BBOWT recommend an additional objective stating that the allocation of sites will prefer land of least environmental value while seeking to achieve a net gain for nature and restoring links between habitats.</p>	<p>It should be understood that minerals can only be extracted where they exist and in terms of site allocations in plan-making, from sites that have been requested to be considered for development by the landowner.</p> <p>All sites being considered for allocation have been subject to Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) which considers, amongst other factors, the environmental sustainability and impact of a policy documents including site allocations. This is an iterative process during the preparation of the MWLP, and as new information becomes available the SA/SEA will be updated.</p> <p>The requirement to enhance the natural environment in the NPPF is evidenced by the SA/SEA, which ensures that the natural environment is considered during the plan making process. The Minerals and Waste Local Plan will ensure the NPPF requirement to enhance the natural environment is addressed through planning decisions.</p>

<p>M2</p>	<p>Remains inadequate to meet NPPF in terms of seeking improvements to biodiversity and natural environment (para 7,9,17,109,114,118,152,157)</p> <p>Limiting the scope of the objective to pre-existing areas of nature conservation interest will not fulfil the obligation under the NPPF for sustainable development</p>	<p>The comments are noted. The requirements of the NPPF, and in this case specifically those requirements relating to biodiversity will be factored into drafting of the submission version of the MWLP</p>
<p>M4</p>	<p>Does not align with the NPPF and disregards the exceptional circumstances test.</p> <p>The objective is a misinterpretation of the NPPF para 115/116.</p> <p>The allocated sites prejudice the exceptional circumstances test for sites in the AONB</p>	<p>Comments are noted, the Council will consider changing the objective to better reflect the NPPF.</p>
<p>M8</p>	<p>Omits any reference to biodiversity enhancements as part of the restoration of mineral sites. Therefore, not compliant with NPPF. The objective should state that restoration must result in a net gain in biodiversity and should make reference to opportunities to create links between natural habitats particular within BOAs as required by CS policy CS14, CS17 and should priorities the restoration and creation of Habitats of Principal Importance as part of the Council's duty to conserve biodiversity under S40 of the NERC Act 2006.</p> <p>Would support the creation of a district wide restoration strategy as a supporting document for the evidence base. Would enable:</p> <ul style="list-style-type: none"> • Biodiversity enhancements to be targeted to improve green infrastructure and guide 	<p>The comments are noted. The requirements of the NPPF, and in this case specifically those requirements relating to biodiversity will be factored into drafting of the submission version of the MWLP.</p> <p>Policy 20: Biodiversity and Geodiversity, states that opportunities will be taken to create links between natural habitats and, in particular, strategic opportunities for biodiversity improvement will be actively pursued within Biodiversity Opportunity Areas identified in West Berkshire.</p> <p>Policy 17: Restoration and After-use of Sites, provides the strategic direction for former extraction site restoration across the district. This criteria based policy states that proposals for restoration will be</p>

	<p>restoration proposals for sites rather than rely on piecemeal approach</p> <ul style="list-style-type: none"> • A strategic approach to green infrastructure is required by NPPF para 21,114,117,157 • Where allocations fall within West Berkshire Living Landscape we recommend that restoration priorities utilise and be guided by habitat-specific targets and vision of this project 	<p>approved where they make a positive contribution to biodiversity and wildlife conservation.</p> <p>Ecological assessment work is also being commissioned by the Council as part of the plan-making process, and this will be factored into the drafting of the submission version of the MWLP.</p>
W8	<p>Should be broadened to include NPPF obligation to enhance the natural environment and achieve a net gain for nature.</p>	<p>The comments are noted. The requirements of the NPPF, and in this case specifically those requirements relating to biodiversity will be factored into drafting of the submission version of the MWLP.</p> <p>Policy 20 requires all new development should maximise opportunities to achieve net gains in biodiversity. This is in accordance with the NPPF.</p> <p>Ecological assessment work is also being commissioned by the Council as part of the plan-making process, and this will be factored into the drafting of the submission version of the MWLP.</p>

4 Policies

Policy 1: Sustainable Development	
Summary of Consultation Responses	Council Response
Policy is unsound because the Plan does not adequately define sustainable development in relation to the environmental role that contributes to the achievement of sustainable Development.	The policy states, inter alia that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF), National Planning Policy for Waste and the associated Planning Guidance. Sustainable development is defined in the NPPF and the MWLP will align with the NPPF.

4.2 Landbank and Need

Policy 2 – Landbank and Need	
Summary of Consultation Responses	Council Response
Boot Farm will only produce hoggin, a lower quality gravel for which there is limited need. Therefore it will not appreciably contribute to the landbank requirement.	It is for the site promoter to demonstrate that the sand and gravel is of a volume and quality to be extracted. Further information has been sought from the site promoters to confirm the likely viability of the sites.
The policy should include the numbers from the current LAA and waste assessments to quantify provision and to set targets. The use of numbers in policy has been confirmed by the Planning Inspectorate in the recent EiP for Oxfordshire.	The Inspector's Interim Report (IR) for the Oxfordshire Minerals and Waste Core Strategy EiP concluded (at paragraph 50) that a numerical provision for 'objectively assessed need' should be made in policy if that could be determined from the evidence, in order to be compliant with national policy. Policy 2 in the West Berkshire Minerals and Waste Local Plan (preferred options) regarding Landbank and Need does specify that the plan will make provision for the identified requirement of 4 million tonnes, thus satisfying this requirement. In terms of waste management, The National Planning Policy for Waste confirms at paragraph 3, that Waste Local Plans should include the tonnages and percentages of municipal and commercial and industrial waste requiring different types of management in their

	area over the period of the plan. The Council will consider how to amend Policy 3 in order to be compliant with national policy.
The policy should also seek to maintain sufficient production capacity, and specify the LAA rate, in order for this to be achieved.	The Council will consider including reference in policy to maintaining sufficient production capacity
A minimum annual requirement for recycled and secondary aggregates should be set.	The Council will consider including an annual requirement for capacity to produce recycled and secondary aggregates. It should be noted that the Council cannot influence the actual production of recycled and secondary aggregates, it can only make provision for the capacity to produce them.
The decision not to safeguard temporary recycled aggregate facilities could make the policy intention to use recycled aggregates in preference to primary aggregates difficult to achieve.	The Council will consider safeguarding temporary recycled aggregate facilities, as they are contributing to the waste management capacity in the district. If their operation was prevented or prejudiced because of non-waste development, this could impact upon the ability for West Berkshire to be net self-sufficient in waste management.
The 10% buffer for overprovision of aggregate minerals is insufficient given the uncertainty over the deliverability of some of the permitted reserves, and the fact that the mineral resource in many proposed sites has not been proven. Further clarification is needed as to how the need will be delivered if the permitted reserves do not come forward or demand for aggregate minerals increases in future.	The number of sites to be taken forward in the plan will be based on the most up to date assessment of need provided in the LAA. Deliverability will be a factor in assessing sites for allocation, although the Council cannot require sites to come forward. Additional mineral assessment work will be undertaken to support the selection of sites for inclusion in the plan. Annual monitoring of the plan will determine whether the provision remains adequate and the monitoring framework specifies what triggers will require a review of the plan.
The policy lists seven preferred sites for allocation, however paragraph 4.16 suggests that eight sites have been proposed for allocation – clarification is needed.	Seven sites were put forward as preferred options. The incorrect reference to eight sites will be corrected.
Paragraph 2 could be interpreted to mean that need is met if the landbank is at or close to 7 years. However, National policy is clear that this is a minimum, and there is no maximum level	The policy reflects paragraph 207 of the revised NPPF and is clear that the Council will seek to maintain a landbank of <i>at least 7 years</i> . There already being a landbank of 7 years would

for a landbank. The policy should also refer to the maintenance of supply (alternative wording suggested).	not be a reason to refuse permission in itself. The Council will consider an amendment to policy to refer to the maintenance of supply in order to maintain sufficient production capacity.
The additional requirement for aggregate minerals should be expressed as a minimum - 'at least'.	The Council will consider this amendment.
Given the uncertainty over future need, it is important that a degree of flexibility is maintained to enable new reserves to be permitted and that the 7 year landbank is not treated as a 'cap'.	The Council will consider an amendment to policy to allow for the permission of reserves where the requirement to maintain a steady and adequate supply of aggregates cannot be met from site allocations, provided that requirements of all other relevant policies in the plan are met.
Flexibility to achieve a steady and adequate supply of aggregate minerals could be achieved by including provision for the exceptional permission for non-allocated sites, should need not be met by allocated sites.	The Council will consider an amendment to policy to allow for the permission of reserves where the requirement to maintain a steady and adequate supply of aggregates cannot be met from site allocations, provided that requirements of all other relevant policies in the plan are met.
Support the use of a single combined sand and gravel landbank.	Comment noted.
Support the decision not to allocate soft sand sites based on the information provided and limited demand for this resource.	Comment noted.
Concern over the decision not to publish a separate landbank for sharp sand and gravel and not provide for soft sand in the Plan despite historical local supply over the last 10 years	Historically due to commercial confidentiality agreements between the Council and minerals industry, sharp sand and gravel sales and soft sand sales have historically been combined. This has meant that a separate provision figure for soft sand has previously been unable to be determined. However, during the preparation of the most recent LAA, the mineral companies involved indicated for the first time since West Berkshire began preparing LAAs that they wished to forego commercial confidentiality in order that separate soft sand production figures could be published. Therefore as part of the 2017 LAA, separate landbanks, annual requirements and requirements over the Plan period have been calculated.

<p>The relevant supporting paragraphs are not accurate in that aggregate minerals are often capable of supplying a range of aggregates, e.g. 'concreting sand' has been produced from 'soft sand' deposits in the AONB to serve the Marley factory. In addition, sharp sand must have been used for mortar following the closure/reduced production of soft sand. This confirms that a single landbank is difficult to justify for practical, resource and sales reasons.</p>	<p>Comment appears contradictory, as interchangeable uses between sharp sand and gravel and soft sand would strengthen the argument for a combined landbank. Due to commercial confidentiality agreements between the authority and minerals industry the sand and gravel sales and soft sand sales have historically been combined. This has meant that a separate provision figure for soft sand has previously been unable to be determined.</p> <p>However, during the preparation of the most recent LAA, the mineral companies involved indicated for the first time since West Berkshire began preparing LAAs that they wished to forego commercial confidentiality in order that separate soft sand production figures could be published. Therefore as part of the 2017 LAA, separate landbanks, annual requirements and requirements over the Plan period have been calculated.</p>
<p>The sequential test will need to be undertaken in order to ensure that the preferred options are deliverable and the plan compliant with National policy.</p>	<p>An updated Strategic Flood Risk Assessment has been produced to support the West Berkshire Minerals and Waste Local Plan. The sequential test will be undertaken to ensure national policy is complied with.</p>
<p>Should consider writing separate policies for the proposed site allocations.</p>	<p>The Council will consider writing separate policies for the proposed site allocations.</p>
<p>The policy only seeks to allocate a small part of Waterside Farm, based on landscape impact. However, the landscape assessment was inconsistent, and phasing the development may limit impacts. The whole site should be included.</p>	<p>The Landscape Assessment of site options was undertaken by an independent consultancy and assessment of site options is expected to be consistent within this report, as the same methodology is followed and the same professional has undertaken all site assessments. The site is identified as being of medium/low landscape <i>capacity</i> (not landscape <i>sensitivity</i> as suggested by representor). Phasing of development will not limit impacts in areas where impacts upon landscape are not deemed acceptable.</p>

<p>Three preferred sites are in close proximity to the Hampshire boundary, and further liaison on these is supported.</p>	<p>West Berkshire will engage with Hampshire County Council through the Duty to Cooperate to consider cross boundary issues.</p>
<p>The allocated sites prejudices the exceptional circumstances test for sites in the AONB (Para 115, 116 of the NPPF). This might be appropriate if there were viable soft sand reserves outside the AONB, but this is not the case.</p> <p>The NPPF policies are for development control, not local plan making. Sites should not be rejected purely on the basis that they are in the AONB.</p> <p>There should be a policy for soft sand extraction which incorporates the test in para 116</p>	<p>The NPPF (Para 172 (NPPF 2012 para 115) states that planning permission should be refused for major development other than in exceptional circumstances and where it can be demonstrated to be in the public interest. NPPF para 205 states inter alia, that in considering proposals for mineral extraction, minerals planning authorities should (a) 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 PPG (ref ID: 27-008-20140306) states inter alia, that in exceptional circumstances, such as where a local authority area is largely made up of designated areas such as Areas of Outstanding Natural Beauty, it may be appropriate for mineral planning authorities to rely largely on policies which set out the general conditions against which applications will be assessed.</p> <p>While the Council was unable to publish separate sales and landbank figures for soft sand, the need for soft sand could not be quantified. However, following agreement from relevant companies to forgo commercial confidentiality (to an extent), the Council has been able to publish separate figures for soft sand. As a result the Council is in the process of re-evaluating its approach to soft sand in the emerging MWLP.</p> <p>As a result the Council is in the process of re-evaluating its approach to soft sand in the emerging MWLP.</p>

4.2 Self-Sufficiency in Waste Management

Policy 3 – Self-sufficiency in Waste Management	
Summary of Consultation Responses	Council Response
This policy should set out the amounts and types of waste to be managed, and needs to set targets for recycling, recovery or landfill and the capacity required to meet such targets.	The National Planning Policy for Waste confirms at paragraph 3, that Waste Local Plans should include the tonnages and percentages of municipal and commercial and industrial waste requiring different types of management in their area over the period of the plan. The Council will consider how to amend this policy in order to be compliant with national policy.
It is unclear how waste management targets are being applied in the Plan, as reliance is being based on the assumption that there is sufficient capacity, therefore there is no need to allocate further sites.	Waste management targets are outlined in the Local Waste Assessment. These will be included in the plan for clarity.
The Plan states reliance on facilities outside of the Plan area, however it does not quantify this, nor address where these facilities are no longer available.	The current contract arrangements and approach to securing capacity outside of the Plan area will be addressed in the Local Waste Assessment and included in the plan. Where necessary, West Berkshire will engage with other Waste Planning Authorities through the Duty to Cooperate to consider cross boundary issues.
There is inconsistency between waste arisings attributed to waste management capacity. Although there is surplus capacity for inert/CDE waste, there is an under supply of non-hazardous recovery and disposal capacity, relying on exporting this waste. The export of this waste in future may be compromised by limited landfill capacity in other areas, and local energy from waste contracts prioritising local waste (and the fact that Berkshire's only EfW plant is impacted by the Heathrow expansion project).	West Berkshire will always be reliant on other local authorities to manage some waste arising within West Berkshire, specifically due to the lack of non-hazardous landfill capacity and geology such that additional non-hazardous landfill capacity is unlikely to be forthcoming. However, by achieving net self-sufficiency, total waste management capacity will be equal to or greater than volumes of waste arisings. Reliance on waste management facilities in other areas will continue to be explored and agreed through the Duty to Cooperate.
If the plan takes the approach that there is sufficient overall capacity to manage the principal waste streams, it will need to be sufficiently flexible to allow facilities to vary their throughput	The proposed approach is considered to be sufficiently flexible, as Policy 5 does not prescribe technologies or tonnages for specific sites. It allows a range of locations to be considered for

<p>and type of waste handled, and also of the technologies used in order to meet future waste management requirements.</p>	<p>waste management, and the policy only requires that facilities demonstrate waste cannot be reasonably managed higher up the waste hierarchy, in order to be consistent with the waste hierarchy.</p>
<p>The title of this policy is inaccurate and should be amended to 'Net self-sufficiency' to reflect the fact that it is recognised the Plan area cannot be completely self-sufficient in waste management and that other authorities will still be relied on for some waste management.</p>	<p>Agree references to 'self-sufficiency' should be amended to 'net self-sufficiency'</p>
<p>Concerns over capacity estimates and consequent decision not to allocate sites.</p>	<p>The provision for waste management capacity in the plan will be based on the most up to date assessment of need provided in the Waste Needs Assessment. The Council undertook a call for sites as part of the preparation of the Minerals and Waste Local Plan, and although a number of 'waste sites' were submitted for consideration a number were withdrawn and most were existing waste management sites operating under permanent or temporary permissions. In the case of the site operating under temporary permission, the nomination was only for a further temporary period. It is therefore considered that there is no need to allocate existing permanent waste sites for waste development, given that there is a presumption in favour of replacement or additional facilities at existing waste facilities, (Policy 5) and that it is proposed to safeguard existing waste management capacity (Policy 9).</p>
<p>Overall net self-sufficiency (in the principal waste streams) may not be sufficient, as inert and non-hazardous waste are not interchangeable in their management methods. While it is acknowledged that it is not always possible to be self-sufficient in specialist waste streams, due to the small arisings typically associated with these waste streams, the impacts on other authorities are not usually significant. However, where it is not possible to be self-sufficient in the principal waste streams</p>	<p>West Berkshire will always be reliant on other local authorities to manage some waste arising within West Berkshire, specifically due to the lack of non-hazardous landfill capacity and geology such that additional non-hazardous landfill capacity is unlikely to be forthcoming. However, by achieving net self-sufficiency, total waste management capacity will be equal to or greater than volumes of waste arisings. The current contract arrangements and approach to securing capacity outside of the</p>

(individually), potentially significant amounts of waste will need to travel to other areas for management.	Plan area will be addressed in the Local Waste Assessment and included in the plan. Reliance on waste management facilities in other areas will continue to be explored and agreed through the Duty to Cooperate.
In acknowledgement of the shortfall of facilities to manage non-hazardous waste in the Plan area, it should be demonstrated that adequate provision has been secured elsewhere. Alternatively the plan should make separate provision for non-hazardous and inert wastes.	The current contract arrangements and approach to securing capacity outside of the Plan area will be addressed in the Local Waste Assessment and included in the plan. Reliance on waste management facilities in other areas will continue to be explored and agreed through the Duty to Cooperate.

4.3 Location of Development

Policy 4 Location of Development – Construction Aggregates	
Summary of Consultation Responses	Council Response
It is noted that there are to be no allocations of soft sand within the AONB in the Plan. However, it is not clear how a proposal for soft sand outside of the AONB would be assessed if it were to come forward outside of the plan making process. Further consideration of the 'need' for soft sand would be required.	<p>Any proposal coming forward for a non-allocated site would be subject to all the policies set out in the plan. While there is a presumption in favour of development for sites meeting the criteria in this policy, any proposal coming forward would need to meet the requirements of all relevant policies in the plan in the context of the relevant material considerations, in order to be considered acceptable. This is set out in the final paragraph of the policy.</p> <p>The Council is considering its approach to soft sand sites further and has commissioned a soft sand study to help identify the most appropriate approach to take.</p>
The location of certain preferred areas is not appropriate.	The preferred areas are those sites to be allocated by the plan. This will be made clearer in the supporting text.

Policy 5 Location of Development – Waste Management Facilities	
Summary of Consultation Responses	Council Response
Certain mineral extraction sites are unsuitable for restoration with inert fill due to the shallow nature of the deposits and subsequent void.	The economic viability of infilling of mineral extraction sites would generally be more of a consideration where the material is non-inert rather than inert, as with an engineered landfill the set up and maintenance costs would potentially be prohibitively expensive if the void is too shallow. The minute detail of restoration would be provided at planning application stage and would set out the depth of mineral reserve to be extracted, the subsequent void and how the site would be restored.
The policy is more restrictive than NPPW para 4, as it does not allow waste management facilities to be located at redundant agricultural & forestry buildings and their curtilages. It also does not allow consideration to be given to siting waste management facilities close to where waste arises.	The policy sets out where sites, in principle, would be acceptable for waste development, this does not mean that other sites would not be considered suitable under other policies within the plan where exceptional circumstances can be demonstrated. The Council will consider amending the policy wording to be more in line with the NPPW.
The implication that AD facilities would be suitable in urban areas, as suggested, in line with this policy, could prove problematic.	The policy sets out where, in principle, waste sites would be acceptable. The policy also states that any proposal coming forward would need to “meet the requirements of all relevant policies in this plan”. Therefore, if a site was likely to cause unacceptable harm under another policy of the plan it would be likely to be refused.
Policy 5 covers phase 1 of the Theale Quarry site, but not Phase 2 (land to the east of site 17).	Since the Preferred Options consultation the land covered by Phase 2 has received planning permission and therefore, would be treated the same as phase 1 under this policy.

<p>Regarding Reading Quarry – it is requested that the whole of the blue line, shown on the attachment is covered by Policies 5 and 9</p>	<p>Policy 5 indicates where there would be a presumption in favour of permanent waste management development proposals (excluding landfill), and this includes sites which have permanent planning permission for waste development. Policy 9 safeguards sites which have permanent planning permission from other forms of development or development in close proximity to a waste facility which may prejudice the permanent waste management capacity.</p>
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<p>Policy 6 – Location of Development – Landfilling of Waste</p>
<p>No comments received.</p>

<p>Policy 7 – Borrow Pits</p>	
<p>Summary of Consultation Responses</p>	<p>Council Response</p>
<p>This policy does not require any environmental standards to be met for planning permission to be granted which is contrary to the requirements of the NPPF. An additional bullet point should be added to require that NPPF requirements in relation to biodiversity are met.</p>	<p>The Council will consider including a reference to meeting the requirements of all relevant policies in the plan, which will include environmental considerations.</p>

4.4 Safeguarding

<p>Policy 8 Mineral Safeguarding</p>	
<p>Summary of Consultation Responses</p>	<p>Council Response</p>
<p>This policy does not reflect the ‘balance’ of the NPPF that encourages prior extraction of minerals ahead of non-mineral development where it is both practicable and environmentally feasible. This should be amended.</p>	<p>The policy seeks to safeguard minerals resources from sterilisation in line with the NPPF, the wording of the policy has been amended to use the wording included in para 204 of the NPPF for clarity.</p>
<p>Mineral Safeguarding Areas should be based on the best available information and details should be included in the</p>	<p>The mineral safeguarding areas are based on the British Geological Survey data for mineral resources. The policy does</p>

<p>evidence base. The currently identified areas are vast and cover main settlements which are the most sustainable locations for future development.</p>	<p>not prevent non-mineral development, rather it seeks to safeguard the mineral deposits from sterilisation, and where alternative developments are proposed the policy seeks prior extraction of the mineral resource to prevent sterilisation of the mineral resource. This is set out in the supporting text of the policy. Minerals can only be dug where they are present and provide the basis for construction of other development, therefore, the prevention of sterilisation of the resource is critical. The BGS Guidance¹ which is specifically referred to in the PPG (ref ID 27-003-20140306) states (para 4.2.10) that in urban areas MPAs should define MSAs to highlight the potential for extracting minerals beneath large scale regeneration projects and brownfield sites. It is also stated in that same paragraph that defining MSAs in urban areas avoids disputes over the definition of what constitutes an urban area.</p>
<p>Safeguarding policies should be suitably flexible to ensure a balanced view is taken between the need to safeguard mineral resources and the need to enable development requirements to be met. A pragmatic approach needs to be taken to indicate that a balanced view will be taken when assessing the merits of competing development needs.</p>	<p>Comments are noted.</p>
<p>The current wording of the policy is ambiguous and needs to include a clear and positively worded criteria based approach against which proposals for non-minerals development can be assessed. Supporting text should explain what is expected from future applicants for non-minerals development in such areas.</p>	<p>The policy sets out under what circumstances non-mineral development may be considered acceptable within the safeguarded area. The policy and supporting text (para. 4.72, 4.75) does set out what prospective applicants would be required to demonstrate in relation to mineral safeguarding areas. The text will be updated to include requirements for non-minerals development near mineral safeguarded infrastructure.</p>
<p>Support safeguarding applied to resources and infrastructure.</p>	<p>Comments are noted.</p>

¹ British Geological Survey (2011) Mineral safeguarding in England: good practice advice

Mineral safeguarding is about long-term (beyond the plan period). Therefore bullet 3 which allows for non-mineral development that may operationally prejudice mineral infrastructure if it is not operational and will not be for the plan period to be considered acceptable is not consistent with the principle of safeguarding. It is also not consistent with the NPPF requirement to safeguard 'potential' infrastructure.	The comments are noted. Consideration will be given to the wording of the policy.
Given the importance of rock imports into Berkshire, the Plan should ensure long-term safeguarding of mineral infrastructure. Including planned and potential infrastructure.	Potential, planned and existing minerals infrastructure is also safeguarded by this policy.
Fully support Policy 8.	Comment noted.
There is no reference to environmental considerations in determining the acceptability of non-mineral development in safeguarding areas. An additional policy point should be added requiring this.	Any application being considered under this policy would also need to meet the requirements of all other relevant policies in the plan, which include environmental considerations. This policy only seeks to deal with the safeguarding of mineral resources/infrastructure.

Policy 9 Waste Safeguarding	
Summary of Consultation Responses	Council Response
Object to waste safeguarded site: A4 Breakers until all issues concerning inappropriate use of brideway Beenham/18 as an access road have been resolved.	The site is a permanent waste management site and therefore is automatically safeguarded through the policy.
The use of and/or connectors between clauses would make it clear whether all clauses need to be met or not. If clauses are intended to be individual and not cumulative, the first clause may highlight the pressure for housing at a national level which could be overly powerful, and could undermine efforts to safeguard waste infrastructure.	Comments noted, the policy has been updated.
Allowing the gradual loss of waste infrastructure would limit the locations for future waste facilities.	Comment is noted, the policy is aiming to prevent this happening.

Fully support policy 9.	Comment noted.
Not safeguarding temporary waste management facilities could lead to the need to provide additional capacity if these facilities stop operating due to pressures from non-waste development.	Comment noted, the wording of the policy has been changed to include temporary waste management facilities.
Phase 2 has previously been submitted to the Council as part of the 'Call for Sites' seeking the site to be included within the Local Plan. It is requested that both phase 1 (site 17) and phase 2 of the Theale Quarry Site are safeguarded under this policy.	Phase 2 has been submitted and has been identified as site 21. Since the Preferred Options consultation the land covered by Phase 2 has received planning permission and therefore, the whole site will be safeguarded.
Regarding Reading Quarry – it is requested that the whole of the blue line, shown on the attachment is covered by Policies 5 and 9	Policy 5 indicates where there would be a presumption in favour of permanent waste management development proposals (excluding landfill), and this includes sites which have permanent planning permission for waste development. Policy 9 safeguards sites which have permanent planning permission from other forms of development or development in close proximity to a waste facility which may prejudice the permanent waste management capacity.

4.5 Specialist Minerals and Waste

Policy 10 – Chalk and Clay	
Summary of Consultation Responses	Council Response
Welcome the inclusion of provision relating to biodiversity enhancement and environmental mitigation.	Comments noted.
The policy does not reflect the NPPF requirement for plans to allocate land with the least environmental value and to observe the mitigation hierarchy when considering sites for development.	Sites for chalk and clay extraction will not be 'allocated'. Where they are proposed they will be considered in line with policy 10 and any effects considered in line with other relevant policies in the plan. The Council will consider including a reference to meeting the requirements of all relevant policies in the plan.
There is no reference to existing landscape-scale habitat creation priorities within Biodiversity Opportunity Areas which	The requirement to consider landscape scale habitat creation priorities within Biodiversity Opportunity Areas is already

<p>should be referred to in order to align with WBC Core Strategy CS17.</p>	<p>included in Policy 20 (Biodiversity). Restoration will be considered in line with Policy 17 'Restoration and After-use of Sites' and the Council will also consider including reference in this policy (17) to landscape scale creation of habitats in line with paragraph 171 of the revised NPPF. Rather than introduce duplication, the Council will consider including a reference to meeting the requirements of all relevant policies in the plan.</p>
<p>Extraction of Chalk and Clay are less vulnerable development and would not be appropriate in Flood Zone 3b, which should be acknowledged in the policy.</p>	<p>No sites for chalk and clay extraction are proposed for allocation in the plan. It is considered that it is not necessary to repeat national policy specific to 'less vulnerable development' in this policy (in line with revised NPPF para 16).</p>

Policy 11 – Energy Minerals	
Summary of Consultation Responses	Council Response
<p>By permitting the commercial production of oil and gas the policy is contrary to the core environmental role of sustainable development to adapt to climate change and move to a low carbon economy.</p>	<p>There are no known resources of commercially viable energy minerals in West Berkshire and no Petroleum and Development Licenses have been issued that cover the plan area. However, oil and gas development is allowed for by national legislation and policy and it is prudent to include provisions to control this should commercial reserves be found or Petroleum and Development Licenses granted issued in the Plan area in future. The proposed approach to the possible exploitation of oil and gas resources is to allow exploratory drilling under controlled conditions, and to require any commercial exploitation to be fully justified in terms of balancing need against environmental and other considerations, taking into account the specific arrangements for working, restoration, ancillary development and associated activities.</p>
<p>The policy does not provide protection from fossil fuel exploration for areas designated for nature conservation other than AONBs. Advise against fracking in designated sites.</p>	<p>The Council will consider including a reference to meeting the requirements of all relevant policies in the plan, which will include wider environmental considerations.</p>

Recommend additional point to require consideration of environmental requirements in relation to the NPPF are met.	The Council will consider including a reference to meeting the requirements of all relevant policies in the plan, which will include wider environmental considerations.
The policy should include water quality as a consideration for hydraulic fracturing in addition to water resources.	The Council will consider including a reference to meeting the requirements of all relevant policies in the plan, which will include wider environmental considerations.
Shale gas wells will need to apply to the Environment Agency for a licence to abstract water for the fracturing process.	Comments noted.
The Environment Agency is specifically mentioned in this policy with regards to the need to obtain a permit for oil and gas development. However there is no equivalent mention of the need to obtain an EA permit for waste management activities, including landfill in policies 5 and 6. This should be clarified.	The Council will consider including this clarification as suggested.
Support reference to Source Protection Zones in this policy.	Comment noted.

Policy 12: Specialist Waste Management Facilities	
Summary of Consultation Responses	Council Response
<p>There is no definition of 'specialist waste management facilities'. Clarification would be beneficial.</p> <p>This policy refers to agricultural waste, which is the main component of AD facilities, however, AD facilities are also mentioned in policy 5 (Location of Development – Waste Management Facilities).</p> <p>This policy does not include any environmental considerations – requirement to observe the mitigation hierarchy, deliver environmental mitigation or achieve a net gain in biodiversity as required by the NPPF. Recommend additional point to require consideration of environmental requirements in relation to the NPPF are met.</p>	<p>Paragraph 4.101 of the preferred options consultation document gives an overview of what a specialist waste is and then gives a number of examples including clinical and veterinary waste, equine and agricultural waste, waste water and sewage sludge.</p> <p>As has been outlined above, policy 12 mentions a number of potential specialist waste streams, which is not limited to agricultural waste. Policy 5 sets out the criteria where there will be a presumption in favour of waste management development. Policies have not been written to be mutually exclusive, and as such there will be instances where more than one policy can/will apply to a development proposal.</p>

	<p>In complying with the requirements of national policy, environmental considerations are included within overarching and specific topic area policies within the preferred options:</p> <ul style="list-style-type: none"> 1 - Sustainable Development; 17 - Restoration and After-use of Sites; 18 - Landscape; 19 - Protected Landscapes; 20 - Biodiversity and Geodiversity; 24 - Flooding; 25 - Climate Change; 26 - Public Health, Environment and Amenity; and 29 - Cumulative Impacts.
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Policy 13: Radioactive Waste Treatment and Storage at AWE	
Summary of Consultation Responses	Council Response
<p>Policy is welcomed. The wording is clear and reasonable in the criteria it sets.</p> <p>It is important that all radioactive waste is considered in an integrated way.</p>	<p>Comments noted.</p>

Policy 14 – Reworking Old Landfill Sites	
Summary of Consultation Responses	Council Response
<p>Welcome the inclusion of provisions relating to biodiversity enhancement and environmental mitigation.</p> <p>Former landfill sites can be valuable biodiversity assets. By allowing their re-working, this does not reflect NPPF para 17 and 110 to allocate land with the least environmental value nor NPPF para 118 to observe the mitigation hierarchy. There is</p>	<p>Comments noted.</p> <p>Sites for re-working landfill will not be ‘allocated’. Where they are proposed they will be considered in line with Policy 14 and any effects considered in line with other relevant policies in the plan. The requirement to consider landscape scale habitat</p>

also currently no reference to landscape scale habitat creation priorities in West Berks within BOAs in order to align with CS policy 17 in cases where restoration is planned.	creation priorities within Biodiversity Opportunity Areas is already included in Policy 20 (Biodiversity). Restoration will be considered in line with Policy 17 'Restoration and After-use of Sites' and the Council will also consider including reference in this policy (17) to landscape scale creation of habitats in line with paragraph 171 of the revised NPPF. Rather than introduce duplication, the Council will consider including a reference to meeting the requirements of all relevant policies in the plan.
It is not clear whether this policy relates only to the re-working of inert landfill, or whether it relates to any type of landfill, with only inert material being re-worked locally. Clarification is needed.	The policy relates to the re-working of inert landfill and this is clarified in the first bullet of this policy.

4.6 Infrastructure

Policy 15: Location of Permanent Construction Aggregate Infrastructure
No Comments received.

Policy 16: Temporary Infrastructure	
Summary of Consultation Responses	Council Response
The erection of processing plant will cause extreme inconvenience and nuisance in the form of noise, dust, and air pollution in an area of open countryside, and will also adversely affect local wildlife.	Policy 16 is not the only policy that a temporary processing plant proposal would be assessed against. Policies 18, 19 and 26 for example would be relevant in terms of environmental, amenity and landscape issues.
This policy should include a bullet point about locating temporary infrastructure such as processing plants within areas at the lowest probability of flooding. This type of development is 'less vulnerable' and would not be compatible with Flood Zone 3b (Functional floodplain).	It is not considered necessary to include a point regarding the locating of temporary infrastructure within areas at the lowest probability of flooding as Policy 24: Flooding, requires development to demonstrate that it would not increase the risk of flooding. Further, the supporting text of the policy in paragraph 4.186 of the Minerals and Waste Preferred Options

	Local Plan states that “less vulnerable” development is considered acceptable in flood zone 3a.
<p>As it becomes more difficult to find mineral sites, the consideration of processing plant can become a major constraint – environmentally and economically, as the capital cost needs to be depreciated over the lifetime of the working. This is particularly relevant for smaller site (3-5 years).</p> <p>Mineral extraction plants are specialised. As such it is uncommon to site them on industrial estates or other similarly zoned employment land. This is due to the uncertainty over securing supply of mineral, and the fact that the plant would be unsuitable to process other material.</p>	<p>The policy allows for the provision of temporary infrastructure required for the restoration of mineral sites. Reference has been made to the potentially prohibitive capital cost of setting up a processing plant in the context of shorter timescales for development. This is acknowledged however, for clarity only 2 of the 7 mineral sites suggested for allocation are projected to have a 5 year lifetime, while the other 5 are projected to have lifetimes of between 6 and 15 years. The re-wording of the policy to include the phrase ‘in close proximity’ would add confusion as the term could be interpreted subjectively.</p>
<p>Greater flexibility is needed in this policy in order to allow the industry to respond to these increasing challenges [suggested re-wording: <i>The temporary infrastructure is located within, adjacent to or in close proximity to the boundary of the extraction site. Additional bullet In the case of temporary mineral processing plant it is used to process minerals arising from specific sites and is removed at such time when the minerals are exhausted from the specific sites.</i>]</p> <p>Importation to processing plants is normally discouraged, as they are usually located in the countryside where this industrial activity is not permitted.</p>	<p>The suggestion to include an additional bullet point: <i>In the case of temporary mineral processing plant it is used to process minerals arising from specific sites and is removed at such time when the minerals are exhausted from the specific sites</i> would duplicate an existing bullet point within the policy to an extent, and also would potentially allow the importation of aggregates from other sites for processing and this would potentially not be satisfactory from a sustainability point of view. There are also the wider amenity impacts associated with allowing importation of aggregates from other sites. The idea of processing minerals and waste in or adjacent to active quarries is to confine the impacts and to minimise transport movements and distances.</p>

4.7 Restoration and After Use

Policy 17 Restoration and after use of sites	
Summary of Consultation Responses	Council Response
There is no reference to the requirements of the land / mineral owner to be considered in restoration. This factor needs to be given considerable weight in the decision / design process as it is the landowner who is responsible for the site once the formal period of aftercare has been completed. This could be included by way of amendment to paragraph 4.128 [Suggested rewording: 4.128 <i>While restoration back to the existing use is not necessarily precluded, restoration of mineral workings is regarded as an opportunity to achieve wider environmental and public benefits and the Council will work co-operatively with the landowner and mineral company to seek the provision of economic and environmental benefits, making a positive contribution to the vicinity through restoration.</i>]	Comments noted, the Council will consider updating the supporting text to include working with the landowners and mineral company.
Would welcome the addition of an extra bullet point: 'the conservation or enhancement of the historic environment' and "Historic Landscape Characterisation" after "...(LCA)" in paragraph 4.132.	Comments Noted, the Council will consider changing the text as suggested.
It should be clarified whether all the points (cumulative) regarding proposals for restoration are required (use of 'and') or whether the points are individual (use of 'or').	Noted. This will be clarified.
The policy correctly reflects national policy by stating bonds or legal agreements will only be required in appropriate circumstances. However, paragraph 4.138 implies that given historic failures, financial agreements will be considered alongside <i>all</i> applications. Such an approach would be contrary to national policy.	Paragraph 4.138 only states that the use of financial guarantees or bonds will be <i>considered</i> alongside applications. In accordance with national policy, they will only be <i>required</i> in appropriate circumstances.
Welcome the inclusion of Policy 17.	Support for the policy is noted.

<p>The bullet point relating to biodiversity and wildlife conservation is a useful starting point, but is not sufficiently detailed to meet all requirements relating to biodiversity in restoration. The policy should also reference the requirement to demonstrate a net gain in biodiversity, specifically through a metric, which is the most fair, transparent way to demonstrate that net gains are being delivered.</p>	<p>Any site considered under this policy would also need to have regard to policy 20 Biodiversity, which does specify that “all new development should maximise opportunities to achieve net gains in biodiversity and geodiversity”. The Council will also consider amending the policy to require net-gains for biodiversity in restoration and expand the bullet point relating to biodiversity and wildlife creation.</p>
<p>Broadly supportive of the general principle for restoration to deliver wider environmental and public benefits than the previous land use in para 4.128.</p>	<p>Comments noted.</p>
<p>4.132 as currently stated requires aftercare for a minimum of 5 years. However, for biodiversity this timeframe is generally too short. Recommend the standard long-term management period is 20 years, in addition to statutory 5 years aftercare. Where sites are within the West Berkshire Living Landscape, aftercare should be undertaken for 30 years to ensure the objectives of Living Landscape are met.</p>	<p>The statutory aftercare period (as defined in the Town and Country Planning Act 1990) is 5 years. The supporting text refers to a “minimum of 5 years”. Longer aftercare periods could be required depending on the specific circumstances and restoration of the site. . It is acknowledged that a longer time period can be required to fully allow the afteruse to become established.</p>
<p>Welcome the importance of enhancing biodiversity when considering planning applications and restoration proposals.</p> <p>Habitats created on former gravel workings have become some of the areas of greatest biodiversity of wild life regionally. The proposed sites could be useful in creating a network of wetland wildlife sites to add to existing ones in the District.</p>	<p>Comment noted.</p>
<p>Opportunity exists for restoration of Cowpond piece to heathland as it lies adjacent to important heathland areas.</p>	<p>Comments noted. The council would seek net biodiversity benefits for the restoration of all sites.</p> <p>Ecological assessment work is also being commissioned by the Council as part of the plan-making process, and this will be factored into the drafting of the submission version of the MWLP.</p>

Applicants should be encouraged to contact wildlife conservation organisations at an early stage of formulating restoration proposals.	Comments noted. The Council will consider including reference to contacting wildlife organisations with regards to restoration in the supporting text.
Could be useful to link to policy 25 which refers to the provision of potential climate change benefits through site restoration and after use.	The Council will consider including reference to climate change within the policy.
Appreciate that consideration has been given to achieving the timely restoration of sites to a high environmental standard to avoid the difficulties achieving satisfactory restoration in the past.	Comments noted.
The bullet point 'flood water management' should read as 'flood risk management'.	Comment noted, phrasing will be updated.
Recommend to include that flood risk can be reduced through restoration of mineral workings in this policy.	Comments noted. The Council will consider including this sentiment within the supporting text.
At the end of the last sentence of this policy, add 'and to secure appropriate after-care.'	Comments noted. The Council will consider including this addition.
In the 5 th bullet point after "Nature conservation interests" add 'both existing and potential'.	Comments noted. The Council will consider including this addition.
The statement "the restoration of mineral sites has the potential to deliver hydrological benefits" should be clarified.	The Council will consider amending this paragraph as suggested.
5 year aftercare is a short time frame. Where phased restoration is taking place, areas should be brought into aftercare as they are restored and kept in aftercare until the end of the aftercare period for the development as a whole.	The statutory aftercare period (as defined in the Town and Country Planning Act 1990) is 5 years. The supporting text refers to a "minimum of 5 years". Longer aftercare periods could be required depending on the specific circumstances and restoration of the site. . It is acknowledged that a longer time period can be required to fully allow the afteruse to become established.
Support paragraph 4.138.	Comments noted.
Decision about mineral development and restoration should take account of the impact on soils and the sustainability of the ecosystem services they deliver.	The restoration policy (policy 17) does refer to making a positive contribution to soil quality. The plan also includes a policy on preserving best and most versatile agricultural land (policy 21). The Council will consider widening this policy to include general

	considerations for the impacts on soil quality in line with para 170 of the NPPF.
Best and Most Versatile soils are present on Waterside Farm and may be present on Boot Farm and Manor Farm. Restoration and aftercare of these sites should consider how to preserve the long-term potential of the soil as a national, high quality resource.	The restoration policy (policy 17) does refer to making a positive contribution to soil quality. The plan also includes a policy on preserving best and most versatile agricultural land (policy 21).

4.8 Development Management Policies

Policy 18 Landscape	
Summary of Consultation Responses	Council Response
Expect the Plan to include strategic policies to protect and enhance valued landscapes, as well as criteria based policies to guide development, as required by NPPF.	The plan includes a policy on requiring minerals and waste development to conserve and enhance the character of the surrounding landscape, which will include protected landscapes where they occur (policy 18). Policy 19 on protected landscapes is a criteria based policy, setting out the considerations in assessing development proposals in these areas.
The plan area includes an AONB and therefore account should be taken of the relevant AONB management plan and the advice of the AONB Partnership.	The Council will consider including reference to the AONB management plan in the supporting text.
In the first line of the policy, add 'only' to read "...will be permitted only where..."	The Council will consider including this addition as suggested.

Policy 19 Protected Landscapes	
Summary of Consultation Responses	Council Response
Development proposals should avoid significant impacts on protected landscapes, including those outside the Plan's area, and early consideration should be given to the major development test in para 116 of NPPF.	The plan includes a policy on requiring minerals and waste development to conserve and enhance the character of the surrounding landscape, which will include protected landscapes where they occur (policy 18). Policy 19 reflects the major developments test in paragraph 172 (2012 version para 116) of

	the NPPF, and therefore consideration will be given to this in assessing development proposals in these areas. Protected landscape will be considered where appropriate, through Landscape and Visual Impact Assessments.
Welcome policy 19 in principle and the reasoned justification of policy set out in text.	Comments noted.
As worded, it may be interpreted that a proposed development would only need to meet one of the set criteria (not all of them) in order to be acceptable.	The Council will clarify the policy.
It is hard to see how major minerals and waste development could conserve and enhance the AONB. If this is referring to the restored state, rather than the operational phase this should be made clear.	Comment noted. The Council will consider clarifying that this relates to the restored state of minerals and waste proposals.
It may be preferable to follow the wording of NPPF para 116 regarding major developments more closely in order to avoid confusion.	Comment noted, the Council will consider changes to the policy in line with paragraph 172 (2012 version para 116) of the NPPF.
Several major waste sites currently lie within the AONB and this policy should make clear whether it applies only to new development, or redevelopment. As written the redevelopment of these waste facilities would fail this test.	The policy does not specify whether it relates to new sites or to redevelopment opportunities on existing sites. Therefore, the policy would relate equally to new sites proposed and to proposals for the redevelopment of existing sites. The policies of the development plan would be taken as a whole, including location of development for waste management facilities.
Mineral development is accepted as being 'major' in the AONB and such development would need to meet the tests in para 116 of NPPF.	Comments noted.
The supply of sand previously worked in the AONB can be supplied from proposed sites outside the AONB, and therefore there is no reason to allocate sites or consider proposals in the AONB.	The Preferred Options did not seek to allocate sites within the AONB. The plan needs to provide for the opportunity that there may be a change in need and that applications could be made for sites within the AONB and therefore, it is considered appropriate to include a policy within the plan should this arise.

	<p>The Council's approach to sites within the AONB is being reassessed. During the preparation of the most recent LAA, the mineral companies involved indicated for the first time since West Berkshire began preparing LAAs that they wished to forego commercial confidentiality in order that separate soft sand production figures could be published. Therefore as part of the 2017 LAA, separate landbanks, annual requirements and requirements over the Plan period have been calculated.</p> <p>As a result the Council is in the process of re-evaluating its approach to soft sand in the emerging MWLP.</p>
<p>The first three bullets in considering major minerals and waste development reflect the requirements of the NPPF. However, the fourth bullet point regarding conserving and enhancing the natural beauty of the AONB while desirable, does not accurately reflect NPPF which does not apply this as one of the exceptional circumstances test. Meeting the other three parts of the test may mean that this is not achievable.</p>	<p>Comment noted, the Council will consider changes to the policy in line with paragraph 172 (2012 version para 116) of the NPPF.</p>
<p>This policy should include the requirement to allocate extraction sites on land of least environmental value, and demonstrate that the proposal observes the mitigation hierarchy and will deliver a net gain in biodiversity, as required by the NPPF.</p>	<p>Where sites are to be allocated landscape work has been completed and the developable area of sites takes into account the landscape advice received, and sets out required mitigation measures. Policy 20 (Biodiversity and Geodiversity) does require development to maximise opportunities to achieve net gains in biodiversity.</p>

Policy 20 – Biodiversity and Geodiversity	
Summary of Consultation Responses	Council Response
<p>Welcome the recognition of the importance of enhancing biodiversity when considering applications.</p>	<p>Comments noted.</p>

<p>The Plan should include criteria based policies to ensure the protection of designated biodiversity and geological sites and distinguish between international, national and local sites.</p>	<p>The Council is aware of paragraph 113 of the NPPF (revised NPPF paras 170/171) and considers that the current Policy 20 is in conformity with this.</p>
<p>All relevant SSSIs should be shown on the policies map in relation to the proposed allocation sites.</p>	<p>The Council will include these as suggested.</p>
<p>The policy could allow the development of a designated site or protected species where it would not result in and adverse impact on the special qualities of the site or species, which is a contradiction. Suggest alternative wording: add "potentially" before "adversely" in the first line of the policy or simply omitting "adversely".</p>	<p>The Council will consider amending the policy as suggested.</p>
<p>Welcome the recognition of enhancing biodiversity when considering applications and proposals for restoration.</p>	<p>Comments noted.</p>
<p>Over the past decades, gravel extraction has created new wildlife habitats and the habitats created on former gravel workings in the Kennet Valley have produced some of the areas of greatest diversity of wildlife regionally. The proposed sites in the valley could be useful in helping to develop a connected network of wetland wildlife sites to add existing sites.</p>	<p>Comments noted.</p>
<p>The opportunity exists for enhancement of biodiversity of proposed site 1.2 (Cowpond Piece), and restoration should be to enhance the adjoining heathland areas.</p>	<p>Comments noted. The council would seek net biodiversity benefits for the restoration of all sites. Ecological assessment work is also being commissioned by the Council as part of the plan-making process, and this will be factored into the drafting of the submission version of the MWLP.</p>
<p>Applicants should be encouraged to contact wildlife organisations at an early stage of formulating restoration proposals – this could be included in policy.</p>	<p>The Council will consider including reference to contacting wildlife organisations with regards to restoration in the supporting text.</p>
<p>Support policy, but suggest it could be more robust by including requirement for a biodiversity-led restoration strategy that is required to lead to a net-gain in biodiversity, in line with national policy.</p>	<p>Policy 20 does include a requirement for development to maximise opportunities to achieve net gains in biodiversity. The Council will consider including requiring a net-gain in biodiversity through restoration in Policy 17.</p>

Support a specific policy on biodiversity.	Comment noted.
Disappointed that watercourses and riparian corridors, including River Kennet SSSI and River Lambourn are not included in this policy or supporting paragraphs. This is particularly important as sites are being proposed in close proximity to these watercourses.	Paragraph 4.153 does refer to the Kennet and Lambourn Floodplain SAC and the River Lambourn SAC. Paragraph 4.156 does also refer to the 51 SSSIs within West Berkshire, although they are not mentioned specifically. However, the Council will consider including reference to watercourses and riparian areas including relevant designated areas, as mineral extraction has historically been concentrated in the river valleys and several preferred options are located in close proximity to the River Kennet.
All watercourses adjacent to and within proposed mineral sites must have undeveloped, fenced ecological buffer zones, a minimum of 8 metres wide. In addition, a 16 m buffer is required through environmental permitting for any quarrying adjacent to a main river. This should be included in this policy or a separate policy for watercourses.	The Council will consider including details of relevant buffers where necessary in site specific policies. Therefore it is not considered necessary to include a specific reference to riparian buffers in this policy, particularly if this is included as a requirement of the permitting regime.
Site specific policies should also include points about conserving and enhancing the river corridor.	This will be included where appropriate.
Paragraph 4.161: At the end of the paragraph add 'Watercourses and their associated corridors are prime examples of these connecting features.'	The Council will consider making this amendment.
Third bullet in second set of bullets – compensation falls below mitigation in the mitigation hierarchy of para 118 NPPF. This bullet appears to confuse the two, suggesting that mitigation can be achieved by compensation.	The Council will consider amending this policy to be in line with the mitigation hierarchy in paragraph 175 of the revised NPPF.
Inappropriate to group biodiversity and geodiversity together in last sentence of first paragraph, as these are subject to different statutory and policy protections.	The Council considers that the general statement of intent to 'protect and enhance' applies equally to both biodiversity and geodiversity.
Regarding SSSIs - as worded, the policy allows for development to be permitted provided there are no adverse impacts on the special qualities of the sites only 'where possible'. This is unacceptably weak and inconsistent with	The Council will consider amending the policy to remove the words 'where possible'. The policy reflects the wording of revised NPPF paragraph 170 which states that 'planning

<p>national policy and legislation The statement 'where possible' should be removed, and 'must' should be used instead of 'should'.</p>	<p>policies and decisions should contribute to and enhance the natural and local environment'.</p>
<p>At present, Local Wildlife sites are not included in the policy. In order to be consistent with national policy and legislation, they should be included.</p>	<p>The Council will consider including reference to Local Wildlife Sites as suggested, although the policy does refer to 'Local interest sites'.</p>
<p>Ancient replanted woodland is not included in the policy. It is considered an irreplaceable habitat and therefore should be included.</p>	<p>The Council will consider including reference to Ancient replanted woodland as suggested.</p>
<p>Suggested re-wording provided: <i>"Minerals and Waste development proposals within or adversely affecting sites designated for their ecological or geological importance and/or protected species will only be permitted where the development can be undertaken without resulting in an adverse impact on the special qualities of the designated site or species. The development must protect and enhance the relevant biodiversity and geodiversity.</i></p> <p><i>The degree of protection given will be appropriate to the status of the site or species in terms of its international or national importance:</i></p> <ul style="list-style-type: none"> • <i>The highest level of protection will be given to sites and species of international and national importance; development affecting them will not normally be permitted.</i> • <i>Development proposals which would result in the loss or deterioration of irreplaceable habitats including ancient woodland and aged or veteran trees will not be permitted unless the need, and benefits of, the development clearly outweigh the loss.</i> • <i>Development proposals which would result in damage to or loss of a site of biodiversity value of regional or local</i> 	<p>The Council will consider revisions to the wording of Policy 20.</p>

importance, and habitats or species of principal importance, and habitats and species identified in the UK Biodiversity Action Plan (BAP) and the Berkshire Biodiversity Strategy, and the areas identified in the Berkshire Local Geodiversity Action Plan, will only be permitted where it has been demonstrated that:

- o There are no **suitable** alternative **sites** to meet the need for the development;
- o **It has been clearly demonstrated that** the overriding need for, and the benefits of the development outweigh the **harm to** the designated site, habitats and/or species, and;
- o The impact of the development can be satisfactorily mitigated, **or as a last resort, compensated to achieve an overall net gain to biodiversity.**

All new development **must** maximise opportunities to achieve net gains in biodiversity. **All development proposals are required to demonstrate a measurable net gain in biodiversity using a recognised metric. Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust A company limited by guarantee and registered in England. Reg. No. 680007 Reg. Charity No. 204330 8/12**

Opportunities will be taken to create links between natural habitats **through large-scale habitat restoration and creation** and, in particular, strategic opportunities for biodiversity improvement will be actively pursued **with a primary focus on delivery** within the Biodiversity Opportunity Areas (BOA) identified in West Berkshire and **contributing towards the Berkshire Biodiversity Action Plan Targets.”**

Suggest the policy reference measuring net gain in biodiversity using a recognised tool such as the Defra biodiversity metric.	Net gains in biodiversity will be considered during a site's operation, restoration and aftercare. These will be assessed by an ecologist qualified to determine the extent of the gain, which may include use of biodiversity metrics.
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Policy 21 – Agricultural Land	
Summary of Consultation Responses	Council Response
The policy prevents development of best and most versatile land unless there are no reasonable alternatives, this goes beyond the NPPF (para 112, guidance para 40).	The Council will consider amending the policy in line with the revised NPPF.
Where working is proposed on BMV land, the restoration strategy should show how methods used in restoration and aftercare will enable the land to retain its long term capability, although the after-use need not be agriculture.	This will be considered at the planning application stage, the policy does not restrict restoration to agriculture, although the long-term capability of the land should be retained.

Policy 22 Transport	
Summary of Consultation Responses	Council Response
In West Berkshire, the strategic road network (SRN) includes the M4 and A34. If minerals and waste workings would result in a material increase in traffic on the SRN careful consideration should be given to mitigation measures. The Plan should provide a framework to ensure that development cannot go ahead without the required infrastructure in place.	Comments are noted. General transport assessment work to support the pre submission version of the plan will be carried out. This assessment would indicate where there could be an impact on the SRN. All sites would be required to provide a transport assessment/statement to support planning applications, which would need to set out any mitigation measures required.
When considering proposals for growth, any impacts on the SRN should be identified and mitigated as far as reasonably possible.	The policy requires that sites will not result in unacceptable impacts to the road network, where there are likely to be impacts mitigation measures would be required.

<p>Proposals that consider sustainable measures and manage down demand and the need to travel will be supported in general. Improvements to the SRN should only be considered as a last resort.</p> <p>The transportation of minerals and waste has the potential to generate significant numbers of HGV movements, a large proportion of which are likely to use the SRN. Development proposals should be accompanied by a transport impact assessment, including consideration of cumulative impacts.</p>	
<p>Recommend that reference is made in the Plan to identifying and managing any adverse impacts to road safety from proposed developments.</p>	<p>Paragraph 1.173 refers to the need to consider road safety for all development where freight routes are included.</p>
<p>Support proposals that promote alternatives to road based transport, such as transportation by water or rail.</p>	<p>Comments noted.</p>
<p>Should be looking to reduce traffic trips at peak periods including through construction and operation management plans.</p>	<p>Comments noted. This would be considered at planning application stage.</p>
<p>Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network.</p>	<p>The council will consider additions to the supporting text to highlight the value of the rights of way network in relation to health and wellbeing.</p>

Policy 23 Public Rights of Way	
Summary of Consultation Responses	Council Response
<p>The Plan should include policies to ensure protection and enhancement of public rights of way and National Trails, as outlined in paragraph 75 of the NPPF.</p>	<p>Comments noted. The policy seeks to ensure that the rights of way network is not adversely affected and requires consideration for improved access to the countryside.</p>
<p>Recognition should be given to the value of rights of way and access to the natural environment in relation to health and wellbeing and links to the wider green infrastructure network.</p>	<p>The council will consider additions to the supporting text to highlight the value of the rights of way network in relation to health and wellbeing.</p>

Policy 24: Flooding	
Summary of Consultation Responses	Council Response
<p>There should be an extra bullet point at the beginning, about avoidance of development within the fluvial flood zones and for sites known to be at risk of surface water and groundwater flooding to be compliant with the sequential test.</p> <p>When the SFRA has been updated, there may be recommendations that will need to be fed into this policy, including any local flood risk issues.</p> <p>The following bullet points should be added to with the following wording to strengthen this policy:</p> <ul style="list-style-type: none"> • "It can be demonstrated that the development would not increase the risk of flooding, both to the site itself and the surrounding area <i>and they shall seek to reduce flooding.</i>" • "There is no net increase in surface water run-off; <i>and proposals shall seek to reduce surface water run-off.</i>" • "The impact of the development in terms of flood risk can be satisfactorily mitigated <i>managed</i> through adequate <i>robust flood</i> compensation and mitigation measures <i>and shall seek to reduce flood risk.</i>" <p>Support inclusion of requirement for flood protection and resilience measures.</p> <p>Recommend that the requirement for the new climate change figures is included within the supporting text for policy 24 as</p>	<p>A new Level 1 SFRA, which includes an updated climate change figure, has been prepared and will inform the Minerals and Waste Local Plan. This will be published alongside the submission version of the Plan when it is consulted on.</p> <p>The suggested additions will be considered as to their suitability.</p> <p>Policy 25: Climate Change requires development proposals to avoid areas vulnerable to flood risk, unless adaptation and mitigation measures are provided.</p> <p>Paragraph 4.188 of the supporting text of this policy states that a sequential test would be required for development within flood zones 2 and 3.</p> <p>The Council will consider including reference to the updated climate change figures in the supporting text.</p> <p>The Council is in the process of updating the core strategy, and will seek to be consistent in both flooding policies.</p>

<p>developers will need to be aware of this guidance and the figures will need to inform local plan policies and evidence base. The new allowances will also need to be included in the SFRA.</p> <p>Some of the wording in Core Strategy policy CS16 could be used in this policy in order to be consistent (e.g. flood flows and maintenance and management of mitigation measures).</p> <p>It is noted about the compatibility of mineral workings in the flood zones. However, the sequential test will still need to be applied within flood zones 2, 3a and 3b.</p> <p>Clarification is required over when the SFRA was updated (2016 or 2015).</p>	
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Policy 25: Climate Change	
Summary of Consultation Responses	Council Response
<p>Please clarify what is meant by <i>Minerals and Waste development proposals will be permitted where the proposals demonstrate how they will minimise their impact on the causes of climate change.</i> In terms of what the causes of climate change are.</p> <p>When the SFRA has been updated, there may be recommendations that will need to be fed into this policy.</p> <p>Support inclusion that development should avoid areas at risk of flooding and climate change. However, development in flood risk areas should not be justified by adaptation and mitigation</p>	<p>Causes of climate change are wide ranging, the NPPF describes the role of environmental sustainability as: contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.</p> <p>Accompanying text paras 4.193 to 4.199 (inclusive) discuss the causes of climate change in the context of minerals and waste development, focusing primarily on greenhouse gas emissions, therefore it is considered that this issue has been addressed,</p>

<p>measures. Avoidance on development in flood risk areas should be considered first by applying the sequential test. The sequential approach within proposed sites should also be applied. Only then can sites within higher areas of flood risk be justified with mitigation and adaptation measures.</p> <p>Support covering the potential benefits from the restoration and after-use of mineral sites, including for climate change, ecology and flood risk.</p>	<p>however consideration will be given to whether this could be made clearer in the accompanying text.</p> <p>If a development proposal is submitted within flood zone 2 or 3 then a sequential test, which directs development to areas of lowest flood risk, would be required. The Exception Test and Sequential approach would also be applied where appropriate. Policy 25 has been expanded upon to reflect the comments regarding avoidance of development in flood risk areas.</p> <p>Paragraph 54 of the NPPF states:</p> <p>“Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions ...”</p> <p>It is considered that after the sequential test has been applied that adaptation and mitigation measures can be applied through planning conditions.</p> <p>Paragraph 4.186 states that the Flooding policy aims to steer vulnerable development away from areas affected by flooding.</p>
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Policy 26 – Public Health, Environment and Amenity	
Summary of Consultation Responses	Council Response
<p>Certain proposed allocations are contrary to this policy, as they will cause unacceptable impacts on air quality, noise, pollution from vehicle exhausts, mud on roads, litter and general degradation of a pleasant environment.</p>	<p>Paragraph 204 of the revised NPPF confirms that development plans should “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, taking into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in</p>

	a locality.' Where appropriate, planning conditions can be imposed for all sites taken forward to ensure amenity impacts are limited to an acceptable level. This can include restricting working hours and measures to reduce dust and noise levels. Such an approach is endorsed by the revised NPPF, paragraph 204.
Support reference to water supply and water resources in this policy, including reference to ground water and Source Protection Zones.	Comments noted.
Pollution prevention control measures should be used on mineral and waste sites to prevent pollution entering a water course, which could cause deterioration of ecological status and undermine the WFD. All sites would need to be compliant with the WFD.	Comments noted. This would be covered at the planning application stage.
Vital that all on site operational standards are complied with regarding pollution prevention and any trade effluent discharges are appropriately permitted. At the planning application stage, a site drainage strategy should be prepared for disposal of trade, foul and surface waters. Applications will also need to include plans and procedures to prevent untreated flow back and oil spills entering surface or groundwater.	Comments noted, although some relate to environmental permitting considerations rather than planning considerations. Relevant drainage considerations would be covered at the planning application stage. Planning practice guidance and the NPPW confirms (paragraph 052 Reference ID 28-052-20141016) that waste planning authorities should assume that other regulatory regimes will operate effectively. The focus of the planning system should be on whether the development itself is an acceptable use of the land and the impacts of those uses, rather than any control processes, health and safety issues or emissions themselves where these are subject to approval under other regimes.
The supporting text should refer to the Environment Agency's approach to groundwater protection March 2017. This document will show where the EA will object to certain development within SPZ1. For instance the Tidney Bed site is within SPZ1, and landfill would be an inappropriate form of	The Council will consider including reference to EA guidance in supporting text as suggested. The southern part of the site, south of the railway line, is within SPZ1, with the northern part of the site, north of the railway line, within SPZ2. The southern part of the site is not included within the developable area of the site. The site is separated from the area in SPZ1 by the railway

restoration. It is also inappropriate for any works to disturb groundwater in SPZ 1.	line and therefore, there are unlikely to be flow paths between the two areas of the site. A risk management based approach would be required to the consideration of the northern part of the site within SPZ2.
The SA/SEA states that water supply and demand are not specific issues for mineral and waste working. However, this appears to conflict with this policy which requires proposals to demonstrate they will not impact upon quantity of resources. This needs clarifying or the wording amended in the SA.	The SA/SEA will be amended to clarify the impact of mineral sites on water resources.

Policy 27 – Historic Environment	
Summary of Consultation Responses	Council Response
Welcome the policy in principle.	Comments noted.
The second paragraph should refer to the <i>significance</i> of heritage assets.	The Council will consider amending the policy as suggested in line with section 16 of the revised NPPF.
The first bullet point should read ".....public benefit of"	The Council will consider amending the policy as suggested.
A recording aspect should be added to the third bullet point, i.e. <i>The impact of the development on the historic environment and/or heritage assets is minimised and mitigated, at least through the recording of the assets to be lost or harmed in an appropriate manner and deposition of the record in a public archive.</i> The policy should set out what is required of applicants i.e. what is included in paragraphs 4.210 – 4.212 [suggested wording].	Paragraph 4.214 in the supporting text includes reference to the recording aspect in relation to assets that may be lost or harmed. Recording would form mitigation measures recommended as part of an assessment on historic assets that would be required for planning applications where relevant. Therefore it is not considered necessary to include this measure specifically in policy. The Council will consider including these aspects in site specific policies where necessary. Paragraph 189 of the revised NPPF confirms that in determining planning applications 'local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting'. Reference to this

	requirement is included in paragraph 4.210 of the supporting text.
It is not accurate, in paragraph 4.206 to say that ‘designated heritage assets have statutory protection’. For example, registered parks and gardens and registered battlefields are designated but do not have statutory protection, although they are a material consideration in determining planning applications. Although National Policy does afford greater protection to some historic assets, it should be noted that all heritage assets are an irreplaceable resource to be conserved in a manner appropriate to their significance and any harm or loss should require clear and convincing justification.	The Council will consider amending the reference to ‘designated heritage assets have statutory protection’ along the lines suggested. Paragraph 4.206 does already state that heritage assets are irreplaceable and should be conserved in a manner appropriate to their significance.
The last sentence of paragraph 4.207 "The significance of a heritage asset derives not only from its physical presence, but also from its setting" applies equally to both designated and non-designated assets, and would therefore read more logically as part of paragraph 4.206.	The Council will consider amending the supporting text as suggested.
The first sentence of paragraph 4.209 should read " <i>The significance of heritage assets.....its setting</i> ".	The Council will consider amending the first sentence of paragraph 4.209 as suggested.
The second paragraph of the policy is not consistent with paragraphs 131 – 135 of the NPPF, as it contains three tests to be met, these are not mutually exclusive. The policy should be amended to reflect the NPPF.	The Council will consider amending the policy in line with the revised NPPF in relation to conserving historic assets in a manner appropriate to their significance.
The word “and” should be added at the end of the second bullet point to confirm that all three bullet points need to be satisfied.	The Council will consider amending the policy as suggested.

Policy 28: Design	
Summary of Consultation Responses	Council Response
Welcome policy 28.	It is acknowledged that in the short to medium term extraction does have some negative impacts. However, it should be recognised that extraction developments are not permanent,

<p>Certain proposed extraction sites will not enhance the area, which is clearly against policy.</p> <p>Support paragraph 4.218</p> <p>At the end of the first paragraph of this policy add 'including restoration and after-care.'</p>	<p>unlike other development, and once the site has been restored can provide enhancements to the area. Furthermore, paragraph 205 of the NPPF states that "When determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy".</p> <p>The Council will consider amending the policy as suggested.</p>
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Policy 29: Cumulative Impacts	
Summary of Consultation Responses	Council Response
<p>Cumulative impacts of preferred options would be unacceptable in terms of: noise, dust and vibration, impact on local highways due to increase in HGVs, and road safety impact.</p> <p>In paragraph 4.220, reference could usefully be made to the successive aspect of cumulative impacts as referenced in Policy 29.</p>	<p>The introduction of this policy will prevent any unacceptable cumulative impacts from occurring.</p> <p>Consideration will be given to whether this is necessary.</p>

5. Monitoring Framework

Monitoring Framework	
Summary of Consultation Responses	Council Response
Heading are missing from the monitoring framework table	Comments noted. This is a formatting error in the online document.
Under policy 17 there should be a target relating to the after-care on all sites being fully satisfactory such that the full benefits of the approved restoration are realised.	<p>The monitoring targets for policy 17 include:</p> <ul style="list-style-type: none"> - 'All applications approved providing satisfactory restoration and after-use' <p>The Council will consider re-wording the target to:</p> <ul style="list-style-type: none"> - 'All applications approved providing satisfactory restoration and <u>aftercare</u>' <p>To provide clarity that satisfactory aftercare will enable the intended afteruse and support the restoration of the site.</p>

Appendix 1

1.1 Boot Farm

Boot Farm		
Topic	Summary of Consultation Responses	Council response
Amenity	Failure in duty of care to residents	<p>Paragraph 170 of the NPPF states “Planning policies and decisions should aim to mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions.”</p> <p>The Council will take reasonable care to avoid acts or omissions which can reasonably be foreseen would cause harm and could not be mitigated to an acceptable level in accordance with the NPPF.</p> <p>Planning conditions can be imposed for all sites to ensure amenity impacts are limited to an acceptable level. This can include restricting working hours and measures to reduce dust and noise levels. Such an approach is endorsed by the NPPF para 204</p> <p>All sites have been assessed, with the outcomes of the assessment set out in the SA/SEA. The Council have also carried out several consultations on the sites and the Preferred Options Plan, giving members of the public opportunities to be involved in the plan making process.</p>
	Negative impact on property prices	Property values are not a material planning consideration and therefore, cannot be considered as part of the plan making process.

	<p>Noise, dust pollution and knock on effects on human health.</p> <p>Poor air quality</p> <p>Vibrations from traffic will have a potentially negative impact on property</p>	<p>The Council's Environmental Health team have been consulted on the plan and have not raised any objections.</p> <p>The Plan includes policies to protect public health, environment and amenity and requires any sites coming forward to demonstrate that the development would not result in unacceptable impacts on air quality. The relevant planning permission and Environment Agency permit where appropriate would ensure that amenity and environmental impacts including noise and air pollution would be within acceptable parameters at the planning application stage.</p> <p>Community liaison groups could potentially be established to bring any issues that the local population do not feel are being addressed to the operator's attention.</p>
	<p>Already quarrying going on in the area damaging the environment</p>	<p>Planning conditions can be imposed for all sites where a planning application is submitted for mineral extraction, to ensure amenity and other impacts are limited to an acceptable level. Quarrying is temporary in nature and therefore, there will be no long term negative impacts. Restoration of the site could return the site to a similar state, or better quality than before.</p>
	<p>Solar Farm already permitted contrary to villagers wishes. Proposals are for commercial profit only.</p> <p>Residential planning applications are being refused in this area. How can a quarry be acceptable when housing to support the local population is not?</p>	<p>All planning applications are determined on their own merits against the relevant policies of the Development Plan.</p> <p>Minerals can only be extracted where they lie and the development is temporary in nature (NPPF para 203) Applications for housing development would be assessed in line with the Core Strategy 2012 and Housing Site Allocations DPD 2017 as to whether they are in accordance with the relevant policies. Applications for</p>

		minerals related development are assessed in line with relevant minerals and waste policies.
Need	<p>The NPPF states that allocations should only be considered once all alternative sources have been fully assessed. There is no evidence this has been done.</p> <p>Recycled aggregates are ignored</p> <p>The allocation of sites should only be considered once every alternative source has been fully assessed. There is no evidence this has been done.</p>	<p>The Council is required by the NPPF to plan for a steady and adequate supply of aggregates (NPPF para. 207). The LAA looks at the different way of meeting the Council's need (including volumes of imported, recycled and primary aggregates).</p> <p>If the increase in recycled aggregates has resulted in a decrease in landwon aggregate demand, this use of recycled aggregates will be reflected in the 10 year average sales figure for primary aggregates.</p> <p>Para 207 of the NPPF requires MPAs to maintain a landbank of at least 7 years for sand and gravel based on 10 years sales data and any other relevant information. The NPPF (para 204) also confirms that minerals planning authorities should aim to source mineral supplies indigenously. Therefore, to rely solely on imported minerals may not comply with the NPPF and is less sustainable.</p>
	<p>Recent trends in gravel extraction mean there is no proven need for sites of this size to be extracted. The use of the 10 year average ignore the NPPG guidance that if 10 year averages are falling one must look at the 3 year average.</p> <p>Using the 3 year average reserves are shown to be 17.6 years and therefore, there is no need for new sites.</p>	<p>It is recognised that there is a declining trend in aggregate sales within West Berkshire. The NPPG states (ref ID 27-064-20140306) that Mineral Planning Authorities should [as well as the 10 year average] look at average sales over the previous three years in particular to identify the general trend of demand as part of the consideration of whether it might be appropriate to increase supply. Rather than an indicator for the purposes of considering whether supply should be decreased, the guidance indicates that the 3 year average should be used as an indicator for the purposes of considering whether supply should be increased.</p>

	<p>The gravel produced in West Berkshire is not used in West Berkshire.</p>	<p>It is recognised that some of the sand and gravel extracted from within West Berkshire is exported to other areas of the country where they do not exist. Similarly hard rock is imported into West Berkshire for use in construction as there are no hard rock quarries within the district.</p>
Landscape	<p>The site is very visible from Brimpton Village this is not recognised in the Landscape Assessment</p> <p>Development would result in the loss of special scenic views around Brimpton making up the setting of the village</p> <p>Areas of the site of higher landscape value need to be treated with due diligence</p> <p>No consideration of views of the site from adjacent residential properties</p>	<p>The Landscape Assessment has been carried out using standard practice for such assessments and all sites are assessed on a consistent basis. The Landscape Assessment also sets out the mitigation measures required to ensure no long term negative impacts result from development and in the short/medium term the impacts are adequately mitigated.</p> <p>All sites taken forward in the plan will be required to submit a Landscape and Visual Impact Assessment, and where necessary, an Environmental Impact Assessment to fully assess the impact of the site and set out the detailed mitigation measures to be provided on the site.</p> <p>Planning does not protect an individual's right to a view and therefore, this cannot be taken into account in the plan making process.</p>
	<p>What is the green infrastructure marked on the plan for?</p>	<p>Green infrastructure on the site will be used as part of the mitigation on the site to reduce the impacts to acceptable levels. This can include tree and hedge planting and the creation of grass bunds.</p>

Ecology	<p>Proximity to Local Wildlife Site (LWS), Ancient woodland - detailed ecological work (including consideration of hydrology) will be needed to determine the ecological impact of development on these sites.</p> <p>The site is close to two SSSIs. Risk of dewatering has not been considered.</p> <p>A 2km buffer has been imposed around SSSIs in Brimpton Common, the same buffer should be used for this site.</p> <p>Impact on biodiversity/wildlife</p> <p>The proposal is contract to the NPPF para 118</p>	<p>It is noted that the site is close to a number of ecological assets. Consultation has taken place with the Council's ecologist and Natural England and their comments have been taken into account in the site assessments. All sites coming forward for development would have to have regard to policy 20 (Biodiversity and Geodiversity) of the plan which seeks to "maximise opportunities to achieve net gains in biodiversity and geodiversity".</p> <p>Further ecological work on the sites is to take place to support the submission version of the plan, and any mitigation measures required will be set out in the site policy within the plan. This will include, where relevant, appropriate buffers and stand-off areas to protected areas.</p> <p>Mineral extraction operations provide many opportunities for biodiversity and ecological gains and improvements through the restoration of the site.</p>
	No ecology work has been carried out	Further ecological work on the sites is to take place to support the submission version of the plan, and any mitigation measures required will be set out in the site policy within the plan.
	Impact on local water courses across the site	Consideration of these water courses would need to be considered as part of the extraction proposals submitted as part of any planning application on the site.
Heritage	Appropriate desk-based assessment and where necessary a field evaluation should be provided where there is potential for heritage assets.	Comments noted. The Council will consider adding wording along these lines to the relevant policies.
	The site is close to a number of heritage assets including grade II listed buildings, a registered Historic Park and Garden, registered Monument, bronze age tumulus	It is noted that the site is close to a number of heritage assets. The Council's archaeology and conservation teams and Historic England have been consulted and their advice taken into account in the site assessments.

	Criteria should be introduced to the site allocation policy to conserve the significant and settings of heritage assets and assess the potential for archaeological remains	Policy 27 of the plan sets out the criteria development proposals will need to meet in relation to the historic environment. Where appropriate, the Council will consider adding additional wording to the site policies.
Transport	<p>Poor access for HGVs. Other sites have better access to the strategic road network.</p> <p>While the A340/A4 are included in the freight strategy the local roads are not.</p> <p>Narrow roads and bridges along the route to the A4.</p> <p>Poor junction at Pineapple Pub</p> <p>Poor sight lines at local junctions</p>	<p>The Council's Highways department have indicated that suitable access can be provided to the site. It is likely that traffic from the site would be required to travel south, avoiding Brimpton village, due to the narrow road network going north.</p> <p>A detailed Transport Assessment, and traffic management plan, would be required to accompany any planning application coming forward for the site demonstrating that safe access and haulage routes can be provided.</p> <p>It is noted that there are some concerns regarding the junction at the Pineapple Pub. This junction is in Hampshire and therefore discussions will take place between West Berkshire and Hampshire County Council through the Duty to Cooperate. Hampshire County Council have been consulted on the plan and have not raised any specific concerns, although have asked for further discussions regarding cross-boundary transport issues.</p> <p>Transport Assessment work for the plan as a whole is to be carried out to support the submission version of the plan.</p>
	Significant increase in traffic, particularly HGVs.	<p>Vehicle movements are estimated to be approximately 40 - 48 movements a day (20 – 24 vehicles in / 20 – 24 vehicles out per day).</p> <p>The Council's Highways department have not raised any objections in the context of vehicle movement numbers.</p>

		Detailed transport assessment work would need to be carried out to support any planning applications coming forward. This would need to consider the local road network and whether any mitigation measures would be required.
	Concerns over road safety impact, particularly outside the primary school and for those walking or cycling along these local roads Corner of Brimpton Lane recently subject to Traffic Management and Road Safety Scheme and currently under a speed reduction review.	The Council's Highways department have indicated that suitable access can be provided to the site. Detailed transport assessment work would need to be carried out to support any planning applications coming forward. This would need to consider the local road network and whether any mitigation measures would be required to ensure the safety of all road users.
	Weight restrictions are in place locally and often ignored	The weight restriction in this area is an environmental weight restriction and as a result where access is required this is permitted.
	Sites located on the Strategic Road Network should be given greater priority	M4 and A34 are the only roads within West Berkshire classified as the Strategic Road Network. Minerals can only be extracted where they lie and therefore local road networks are often required to transport material to the strategic road network.
	Hampshire County Council would welcome further liaison regarding the site, particularly regarding vehicle movements.	Comments noted. Further discussions will take place with Hampshire County Council through the Duty to Cooperate.
Employment	Loss of this field would negatively impact on the tenant farmer and could result in the farm becoming unviable resulting in loss of local jobs.	The site is in private ownership and has been promoted for development on behalf of the landowner. Issues relating to tenant/landlord relationships are private matters between individuals and are not considered a planning matter. Economic/employment impacts will be assessed through the SA in a plan-making context, and against relevant policies at the planning application stage.
	Impact on nursery school located adjacent to the site.	Development on the site would need to take into account neighbouring land uses and provide appropriate mitigation.

Flooding	Extraction of one area of gravel could impact on flood risk elsewhere	Mineral working should not increase flood risk elsewhere. Extraction sites must be deigned, worked and restored with consideration to impacts on wider flood risk.
Rights of Way	A number of rights of way cross the site	The Council's rights of way team have been consulted and the comments received will be used as part of the site assessment process. Where rights of way are likely to be impacted upon by the development of a site, diversions or new routes can be provided, the details of which would be determined at planning application stage, in line with para 98 of the NPPF.
Cumulative Impact	There are a number of quarries in this area, or proposed in the area.	The Council has been advised by the operator of Kennetholme quarry that mineral extraction work will cease on the site before the end of 2018. The potential for cumulative impacts have been taken into account in the site assessment process and draft Policy 29 'Cumulative impacts' also considers these issues.
Restoration	<p>If the site is to be restored to agriculture this should be High Nature Value agriculture in line with the requirements of the NPPF and Biodiversity 2020 Strategy targets</p> <p>Welcome restoration proposals that reflect the proximity of the site to designated ecological sites.</p> <p>Restoration must result in a larger area of priority habitat in a better condition</p> <p>Time periods for completion of restoration (fully recovered site) have not been identified.</p>	Comments noted. Details of restoration of the site will be set out in the submission version of the plan and will take into account landscape and ecological recommendations as well as any other relevant information appropriate to the restoration of the site. This will include setting out approximate timescales for the development.

	<p>Restoration proposals are welcome that reflect the proximity of the site to designated sites.</p> <p>The greatest possible proportion of the site should be restored to nature conservation purposes. If agricultural restoration is proposed this should be high nature value agriculture to provide maximum biodiversity benefits.</p>	<p>Comments are noted. It is important that the site is restored to provide net gains to biodiversity.</p>
	<p>Restoration is often of poor quality and not suitable for farming (grazing or crops)</p> <p>Poorly restored sites result in swamps and ponding of water, gravel allows water to infiltrate in to the ground</p>	<p>Restoration of any site can return the land to the same or better quality. Site monitoring can be undertaken to ensure adequate and acceptable long term restoration of the site is achieved.</p>
Policy	<p>The proposal is contrary to the NPPF</p>	<p>Para 203 of the NPPF states that it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. The NPPF recognises that mineral resources are finite and can only be worked where they are found, and as a result states that best use needs to be made of them to secure their long-term conservation.</p> <p>The NPPF states (para 54) that local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations.</p>
	<p>Contrary to the Core Strategy</p> <ul style="list-style-type: none"> • CS18 • CS19 	<p>The Policies within the proposed Local Plan are aligned with the policies in the Core Strategy, and the Local Plan includes a policy on the historic environment (Policy 27) and various policies relating to green infrastructure (GI). The detailed site policies will set out specifics for the protection of existing GI,</p>

		the requirements for GI as mitigation and finally requirements for GI as part of the restoration of the site.
	Contrary to the West Berkshire Local Transport Plan Fright Strategy (2014). Proposals do not seek to reduce local transport-based carbon emissions	The freight strategy seeks to balance the requirement for efficient distribution of goods around the district with the social and environmental effects of freight movement. It recognises a need to transport freight, but seeks to find more sustainable modes of transport where this is possible. Sand and gravel extraction is required to meet the Council's need, and therefore, there will be a need to transport these minerals within and outside the district. Sites coming forward for development, will be required to demonstrate that they have considered all modes of transport.
	Contrary to the West Berkshire Partnership Climate Change Strategy (2014)	The SA includes assessment of all options against the objectives relating to climate change and traffic, and the plan includes policy 25 (Climate change), which requires minerals and waste proposals to demonstrate how they will minimise their impact on the causes of climate change.
Viability	No work undertaken to determine the viability of the site	British Geological Survey (BGS) data indicates that the site is underlain by sand and gravel. It is for the site promoter to demonstrate that the sand and gravel is of a volume and quality to be extracted. At this stage they have estimated that there is approximately 1m tonnes of sand and gravel. It is unlikely that the site would have been promoted for development if the site promoter did not consider the mineral resource to be viable. Further information has been sought from the site promoters to confirm the likely viability of the site.
	The site is in close proximity to AWE Blacknest facility, a forensic seismology site capable of distinguishing the seismic signals generated by nuclear explosions and earthquakes. There is potential for this site to be compromised should	Comments are noted. The Council are awaiting further work from AWE in order to be able to fully assess the impact of the potential development on this facility. AWE have indicated that the work will be completed by the end of September 2018.

	mineral extraction go ahead. Further work regarding the potential impact is being carried out and will be provided to the council in due course.	
Consultation	Would like to be kept informed and notified when the plan is to be discussed by Councillors at a public meeting as I may wish to speak	The proposed submission version of the plan will be discussed at Council in due course. Details of Council meetings are published on the Council's website five clear working days in advance and the Council will publish the date of the meeting on the Planning Policy News page of the website (http://info.westberks.gov.uk/planningpolicynews). There will be a further period of consultation on the proposed plan prior to submission of the plan to the Planning Inspectorate. The timetable for publication of the plan is set out in the Local Development Scheme available on the Council's website.
	Lack of consultation Local people and neighbouring parish council (Baughurst) not made aware of consultation	The Council have carried out the consultation in line with the Statement of Consultation and the Council's consultation requirements. Notification of the consultation was sent to all neighbouring Local Authorities and neighbouring Parish Councils. The Consultation was also published on the Council's website and notifications sent out to all those registered on the Council's consultation database.
	Accessing consultation information is difficult and complicated to understand	The Council is required to provide a proportionate evidence base, in line with para 31 of the NPPF in order to consider whether the plan is justified as the most appropriate strategy.
	Sites previously consulted on with significant issues raised regarding highways. Cannot see how they have been progressed to be proposed for allocation	All comments made in previous consultations have been taken into account, and where relevant reviewed by technical experts. The Council's highways department have not raised any significant concerns regarding access to this site and therefore, the site has been progressed as a preferred option.

	Would like to be notified if/when a formal planning application is made for the site	When a formal planning application is received and validated the Council will put up orange notices on the boundary of the site to notify the local community that an application is being considered, giving members of the public 21 days to comment on the application.
SA/SEA & Site Assessment	<p>There are a number of errors in the SA/SEA.</p> <p>It is not clear how the outcome of the assessment can be anything other than negative</p> <p>Local risk assessment has been carried out which suggest that the site should not be taken forward.</p>	The SA/SEA is carried out on a consistent basis for all sites. The SA/SEA assesses each site and then takes into account the scope for mitigation measures to reduce any likely negative impacts. The SA/SEA is a tool used to assess a plan, it does not show which site/s should or should not be allocated. It may be in some circumstances that sites with negative impacts are taken forward where they meet an identified need. In these cases mitigation measures and a good restoration strategy will be necessary to ensure no long term negative impacts.
	There is no evidence that WBC have accurately surveyed the site	Officers have visited all the sites put forward for development as part of the site assessment process. The site assessment work is set out in an appendix to the SA/SEA.

1.2 Cowpond Piece

Cowpond Piece		
Topic	Summary of Consultation Responses	Council Response
General	HCC would welcome further liaison regarding these sites, particularly regarding vehicle movements.	The Council will contact HCC regarding liaison about sites through the Duty to Cooperate.
	Sites close to previous workings and therefore, supported	Comments noted.
Phasing	Sites is adjacent to Firlands, only one site should be developed at a time.	Comments noted. Consideration of phasing of the two sites will be included in the site policy should the sites be allocated in the final plan.
Ecology	Meadow is a Conservation area registered with Rural England	Comments are noted. The site is in private ownership with the majority under commercial forestry.
	Concern regarding impact of development of wildlife	Consultation with the Council's ecologist and Natural England has taken place regarding the sites and the comments taken into account in the site assessments. All sites wishing to apply for planning permission would need to have regard to policy 20 (Biodiversity and Geodiversity) of the plan which seeks to "maximise opportunities to achieve net gains in biodiversity and geodiversity". Further ecological work will be carried out to support the submission version of the plan.
	Site within Cowpond Piece and Gibbet Piece LWS, and close to a number of other LWS.	It is noted that the site is within the LWS. This has been taken into account when assessing the site. Any proposals for development on the site would need to have regard to policy 20 (Biodiversity and Geodiversity).
	Approx. 300m from ancient woodland.	The proximity to the ancient woodland has been considered in the site assessment. Typically a buffer of at least 15m is required to ancient woodland and therefore, it is considered unlikely there would be an impact on the ancient woodland. Further ecological assessment work is to be undertaken to determine the suitability of the site and any mitigation measures that would be required.
	Given the site is within a LWS containing areas of priority habitat (acid grassland and relict heathland) the allocation	Minerals can only be dug where they exist, and sites can only be considered for allocation where they have been identified to the Council. Therefore, while the potential impacts on

	cannot be compatible with NPPF requirements to prefer land of least environmental value.	biodiversity/ecology have been taken into account, a number of other factors are also considered when assessing the site's suitability for allocation.
	Any extraction proposals must be accompanied by a full suite of ecological surveys to determine the impact on habitats and species.	Comment noted. Details of the requirements for planning applications will be included within the site specific policies.
	Extraction must minimise fragmentation of existing habitat and maintain habitat links.	Comment noted. This is reflected in policy 20 (Biodiversity and Geodiversity) of the plan.
	Restoration must achieve a net gain taking into account the targets of the Burghfield to Tadley Plateau BOA.	Comment noted. This is reflected in policy 20 (Biodiversity and Geodiversity) of the plan.
	Potential hydrological impact of extraction on nearby ancient woodland must be avoided to ensure no negative impact on habitat	Comment noted. Site specific factors, such as the presence of protected species, environments and/or designations, will be taken into account when assessing the acceptability of the proposed sites and where appropriate, mitigation measures such as buffers and standoffs will be identified.
	Opportunities for enhancement of biodiversity	Comment noted. Extraction of minerals and subsequent restoration does provide opportunities for enhancements to biodiversity in an area.
Highways	Access is close to a bend which has poor sight-lines Access further south, onto a straight piece of Camp Road would be preferable.	Comment noted. The access point shown on the plan is indicative. The final access point to the site will be determined by the site promoter following transport assessment work.
Heritage	Scheduled monument of Round barrow lies to the north of the site (190m south-west of Island Farm Cottage). Assessment should be made of the contribution of the proposed site to the significance of the monument as part of its setting and likely implications of mineral extraction on the significance.	It is noted that there are scheduled monuments close to the site. The Council's archaeology and conservation teams have been consulted and their responses will feed into the site assessments for the site. In addition, consideration of the local heritage assets close to the site will be required by policy 27 (Historic Environment) of the plan.
	HER should be consulted for possible non-scheduled archaeological remains, in particular potential of sands and gravel for Palaeolithic archaeology. Evidence may not exist on HER due to depth and lack of past investigation Advice should be sort form Archaeological Advisor	The Council's archaeology and conservation teams have been consulted and their responses will feed into the site assessments for the site. The HER has been consulted and the relevant information added to the site assessment forms.

	<p>Criteria should be introduced into the allocation policy to conserve the significance and settings of heritage assets and access the potential for archaeological remains.</p>	<p>Comment noted. Sites coming forward for development would need to comply with all policies in the plan, including the Historic Environment policy (Policy 27).</p> <p>The NPPF confirms that where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation (para 189) This requirement will be included in the site policy where appropriate.</p>
Restoration/Aftercare	<p>Disappointed with the proposal to return the site to agricultural use.</p> <p>Lowland heathland is a primary for nature conservation because of rare/threatened habitat has seen significant decline. The site is in/adjacent to areas of 'heathland potential' identified by RSPB and priority should be given to creation of heathland habitat.</p> <p>Restoration should focus on priority habitats (heathland) rather than forestry.</p> <p>Opportunity should be taken to restore heathland here and enhance it by introducing permanent wet areas.</p>	<p>The Council will seek net biodiversity improvements through the restoration of a site through the site specific policy, and this could include creation of some areas of heathland.</p>
	<p>Restoration/aftercare should be of a sufficient timescale (not less than 25 years) to ensure priority habitat created is delivered successfully.</p>	<p>Comments noted. The statutory aftercare period (as defined in the Town and Country Planning Act 1990) is 5 years. Longer aftercare periods could be requested depending on the specific circumstances and restoration of the site.</p>
Site Promoter	<p>Support allocation of the site</p> <p>It may be beneficial to import a quantity of inert reclamation material. To be decided at detailed design stage, but would like this option/flexibility to be noted under the proposed</p>	<p>Support for the site noted.</p> <p>Comment noted.</p>

	restoration. Based on experience of the restoration of Mortimer Quarry (adjacent site, in Hampshire)	
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1.3 Firlands

Firlands		
Topic	Summary of Consultation Responses	Council Response
General	Sulhamstead and Nufton Nervet Parish Councils strongly oppose this development due to proximity to residential property in Ufton Nervet and proposed new development in Burghfield Common.	Objection to the site is noted.
	Burghfield Parish Council object due to proximity to existing residential properties	National planning guidance acknowledges that minerals can only be worked where they naturally occur (Paragraph: 001 Reference ID: 27-001-20140306). The NPPW requires that planning authorities assess the suitability of sites against a variety of criteria, including proximity of sensitive receptors, including ecological as well as human receptors, and the extent to which adverse emissions can be controlled. The plan will include policies to protect public health, environment and amenity and require any sites coming forward to demonstrate that the development would not result in unacceptable impacts. Where appropriate, planning conditions can be imposed for all sites taken forward to ensure amenity impacts are limited to an acceptable level. This can include restricting working hours and measures to reduce dust and noise levels. Such an approach is endorsed by the NPPF, para 204.
	The site is close to previous workings and therefore, is supported.	Support for the site is noted.
Heritage	The site is not near any designated heritage assets	Comments noted. The HER will be consulted.
	The HER should be consulted for possible non-scheduled archaeological remains. In particular the potential for Palaeolithic archaeology	Further historic heritage assessment may be required on sites and this will be done to support the submission version of the plan where required.

	If there is any archaeology the site area should be amended and/or criteria introduced to the allocation policy to assess the potential for and conserve any archaeological remains.	The Council will consider including site specific allocation criteria which will require relevant sites to submit a Heritage/Archaeology Assessment/Statement as part of their planning application and any further archaeological work that is necessary. The NPPF confirms that where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation (para 189).
Ecology	Proposal must be accompanied by a full suite of ecology surveys	Comments noted. Relevant ecological work will be undertaken to support the allocation of the site and will support the site specific policy.
	Proposals must minimise fragmentation between habitats and maintain habitat links as well as ensure biodiversity restoration to achieve a net gain in accordance with the targets of the Burghfield to Tadley Plateau BOA.	Proposals will need to take into account the existing ecology and ensure there is no fragmentation between habitats.
	Hydrological impact on nearby priority habitats needs to be considered.	Comment noted. The hydrological impacts will need to be considered and information provided at planning application stage.
Highways	Unclear where/how HGVs would exit the site onto Padworth Road Concerns regarding access onto Padworth Road. Should access need to be provided the straight section just outside Burghfield may be most suitable.	The access depicted on the map is indicative of where access could be, however, the site promoter has indicated that access may not be possible as they do not own the land. The site promoter has indicated that the access option included in the preferred options as well as access to Padworth Road via Island Farm Road with improvements) will be considered.
	Safety concerns regarding traffic already using Padworth road especially at the bend at Four Houses Corner.	Specific details of site access, including consideration of road safety, would be considered at planning application stage through a Transport Assessment/Statement.

Aftercare and Restoration	<p>Disappointed with the restoration proposals to return the site to agricultural use.</p> <p>The site should be restored to lowland heathland because it is a rare and threatened habitat which has declined significantly over time.</p> <p>Restoration should include appropriate habitat links between woods and heathland</p>	<p>The Council will seek net biodiversity improvements through the restoration of a site through the site specific policy, this could include creation of some areas of heathland.</p>
	<p>Restoration and aftercare should be of sufficient timescales (at least 25 yrs) to ensure priority habitat created is successfully delivered and net gain legacy is achieved.</p>	<p>Comments noted. The statutory aftercare period (as defined in the Town and Country Planning Act 1990) is 5 years. Longer aftercare periods could be requested depending on the specific circumstances and restoration of the site.</p>
Site Promoter	<p>Subject to a Promotion and Option Agreement between the Trust and HDD Burghfield Common Ltd.</p>	<p>Comments noted.</p>
	<p>Would like to work with WBC to examine the potential for extraction of construction aggregates on the site.</p>	<p>Comments noted.</p>

	<p>The following constraints will be further examined</p> <p>Access The Trust does not control the access proposed by the Preferred Options document. Therefore, would consider this access along with other possible alternatives (inc. improvement to Island Farm Road and its junction with Padworth Road)</p> <p>Water Table There is a high water table in the area (highlighted through planning permission 14/01730/OUTMAJ – other area of land within the Trusts ownership.</p> <p>Hydrological regime would need to be considered</p> <p>Proximity to residential properties</p> <p>Quality of the deposit, composition and thickness of overburden.</p>	<p>Comments noted.</p>
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1.4 Manor Farm

Manor Farm		
Topic	Summary of Consultation Responses	Council Response
Need	Need for additional site has not been proven, particularly in the light of increased recycled aggregate use and declining virgin sand and gravel extraction. Therefore, there is no requirement for additional extraction, as existing sites would be enough to meet the need, in addition to recycled aggregates.	The most recent Local Aggregates Assessment considers the demand and supply issues around land won sand and gravel and recycled aggregates, including relevant local information as required by the NPPF. Although sales of recycled aggregates have increased they have generally remained at approximately 23 – 28% of market share in recent years. It is currently estimated by the Mineral Products Association that the extent to which recycled aggregates can substitute for primary aggregates based on current technologies is 28-29%. Recycled materials cannot, at present, replace all applications for which primary aggregates are used, and therefore there will still be a need for some land won aggregates.
	Why in a county the size of West Berkshire is gravel extraction concentrated into a very small geographical footprint immediately around Brimpton and other small villages.	The revised NPPF (para 203) acknowledges that minerals can only be worked where they are found. In West Berkshire, sharp sand and gravel is predominantly found along the Kennet river valley and in river terrace deposits (also called 'plateau gravels').
	West Berkshire has 20yrs of reserve and is only required to have 7yrs. Therefore there is no need for further gravel production in the area.	The provision in the plan will be based on the most up to date assessment of need provided in the LAA. This will be a calculation of the annual requirement rate multiplied by the number of years left in the plan period, taking into account already permitted reserves.
	The plan seems to be generated by personal greed rather than the genuine and real need for more gravel.	NPPF (para 207) states, inter alia, that minerals planning authorities should plan for a steady and adequate supply of aggregates by maintaining landbanks of at least 7 years for sand and gravel. The provision in the plan will be based on the most up to date assessment of need provided in the LAA.
	Do not want to be in a position where additional extraction within the county leads to exporting sand and gravel to other authorities.	There are cross boundary movements of sand and gravel and of soft sand to ensure that the types of aggregates available to the local construction industry are in line with the types of aggregates that the construction industry needs, at the time it is needed and

		<p>in the quantity required. The authority is required to maintain a steady and adequate supply of aggregate minerals, which is based on the average of 10 years sales data and other relevant local information. Hence, the 10 year average of sales data will include an element of cross boundary movement that the authority is required to plan for, on the assumption that other planning authorities are also planning for the movement of aggregate minerals into West Berkshire.</p>
	<p>No need for additional sand and gravel extraction, as it can be readily moved from wharves in the Thames Estuary by rail to Theale for local use. Spare capacity at Theale Railhead, so additional need could be accommodated here.</p>	<p>The revised NPPF (para 207) confirms that mineral planning authorities should make provision for the land-won and other elements of their LAA in mineral plans, and that LAAs should be based on the average of 10 years sales data, other relevant local information and an assessment of all supply options. The 10 year average of sales data will include an element of land-won sand and gravel extraction that the authority is required to plan for. The authority is also required to give consideration to other supply options, and this has been done in the LAA.</p> <p>The revised NPPF (para 204) also confirms that mineral planning authorities should aim to source mineral supplies indigenously. Therefore to rely solely on imported minerals may not comply with the NPPF and is less sustainable.</p>
Mineral Resources	<p>No survey of the type and depth of minerals seems to have been done.</p>	<p>British Geological Survey (BGS) data indicates that the site is underlain by sand and gravel. It is for the site promoter to demonstrate that the sand and gravel is of a volume and quality to be extracted. At this stage they have estimated that there is approximately 600,000 tonnes of sand and gravel. It is unlikely that the site would have been promoted for development if the site promoter did not consider the mineral resource to be viable. Further information has been sought from the site promoters to confirm the likely viability of the site.</p>
Landscape	<p>Highly polluting and environmentally damaging open cast mining activities over many years is NOT consistent with WBC's stated aims of maintaining the rural environment. See policy (CS 19 and supporting text 5.131 and 5.132).</p>	<p>The revised NPPF (para 203) acknowledges that minerals can only be worked where they are found. Any application coming forward will be required to consider the potential impacts and set out relevant mitigation measures at the planning application</p>

		stage. Restoration will return the land to an appropriate land use within the rural environment.
	Changing the landscape from arable agriculture to grassland is a significant change to the landscape, probably the first since the woods were cleared for agriculture circa 3,000 years ago. This is inconsistent with SA objective 4.	The site is proposed to be returned to agriculture within the developable area. Restoration to flood plain grassland would only be appropriate along the river, which is not now proposed to be developed.
	Uncertainty over the green infrastructure areas in the Landscape and Visual Assessments.	The 'indicative green infrastructure' areas are required for landscape mitigation within the site area and will be included in the in the site specific policy for the submission version of the plan.
	Should relocate the green infrastructure areas (assuming these are bunds or areas where excess soils are stored) from the fields between the excavation and Brimpton Road Houses to another location to avoid the visual effects of bunds on the properties on Brimpton Road. Alternatively the red line boundary should be re-located to the other side of the green infrastructure or confirmation that no works will be undertaken in the green infrastructure area.	The 'indicative green infrastructure' areas are required for landscape mitigation within the site area and will be included in the site specific policy for the submission version of the plan. The Landscape and Visual Assessment suggests that 'A wide buffer is recommended west of the village to prevent visual intrusion during extraction. The eastern boundary would be a good location for soil bunds to screen the works but on restoration the developable area and buffer should be returned to one field. Tree planting is not recommended as permanent tree screening along the eastern edge would result in the loss of attractive views over the wider Kennet valley from the village and to Brimpton Church from the footpath.'
	Concerns over the Landscape and Visual Assessment: <ul style="list-style-type: none"> - The full extent of impacts on public rights of way from the site have not been fully acknowledged. - Report does not satisfactorily explain how mitigation will ensure visual amenity will not be affected. Bunds will not be effective for sites with views down onto the site. - Assessments should be taken from affected properties. - The report is internally inconsistent about buffers used on each of the sites – Manor Farm seems to have the least extent of these. 	<p>The Landscape Assessment of site options was undertaken by an independent consultancy and assessment of site options is expected to be consistent within this report, as the same methodology is followed and the same professional has undertaken all site assessments.</p> <p>Any site being taken forward for allocation will also be required to carry out a Landscape and Visual Impact Assessment (LVIA) which will consider the potential landscape and visual impacts and set out relevant mitigation measures at the planning application stage. Restoration will return the land to an appropriate land use within the rural environment.</p>

	<ul style="list-style-type: none"> - Photographs are only taken in early summer, when the trees and hedgerows are in leaf, leading to incorrect conclusion about views into the site. - Viewpoint photograph 3 is taken from further north than indicated on the map. - The stream coming out of East Field Copse, bisecting the site is not mentioned, even though it is significant in the context of gravel extraction activity, draining the site into the Kennet SSSI. - Visual and landscape sensitivity of the site should be HIGH – quiet, remote rural corner of West Berkshire. - The site is surrounded on three sides by public Rights of Way, with good visibility of the site. - Bridleway is “well used” not just by walkers but by horseriders, mountain bikers etc. - Tree planting mitigation is not appropriate as this will destroy the views - Consultant lists no landmark features. This is incorrect (several are suggested). - Many factors are not mentioned in the report, or no evidence was sought (several are suggested). - Assessment states that there are no cultural features nor a historic landscape nor Scheduled Ancient Monuments, and so conclusions are based on erroneous information. 	<p>The Landscape Assessment considers the historic environment where it relates to the landscape character of the area. Heritage is considered separately through the site assessment process, where these factors will be taken into account.</p> <p>The methodology section of the Landscape and Visual Assessment sets out how the assessment process has been undertaken, based on the Guidance for Landscape and Visual Impact Assessment (2013).</p>
	<p>Concerns over impacts on the open countryside and rural landscape, and views into the site from surrounding areas. Other less prominent sites should take priority.</p>	<p>The revised NPPF (para 203) acknowledges that minerals can only be worked where they are found. Any site being taken forward for allocation will be required to carry out a Landscape and Visual Impact Assessment (LVIA) and, where necessary, Environmental Impact Assessment (EIA) which may consider the potential landscape and visual impacts, and set out relevant mitigation measures at the planning application stage. Restoration will return the land to an appropriate land use within the rural environment.</p>

Restoration	Recommendation is that the area should be restored to arable land, however creation of lower floodplain grassland is also mentioned in relation to restoration of the site. Different restoration schemes are mentioned in relation to different benefits – inconsistent.	The site is proposed to be returned to agriculture within the developable area. Restoration to flood plain grassland would only be appropriate along the river, which is not now proposed to be developed.
	Grassland returns are significantly lower than arable, therefore the conclusion of SA objective 14 in relation to the site is wrong, as there would be a negative economic effect.	The site is proposed to be returned to agriculture within the developable area. Restoration to flood plain grassland would only be appropriate along the river, which is not now proposed to be developed.
	There are already enough lakes in the area due to previous gravel extraction.	The site is proposed to be restored to agriculture within the developable area.
	Concern that restoration would not re-instate the land to its former agricultural quality.	Policy 21, Agricultural Land, states that restoration of mineral extraction sites to agricultural land will be permitted where the restoration proposals demonstrate that the quality of the agricultural land will be conserved or enhanced as part of the restoration. It can be reasonably assumed that the landowner would want their land restored to as high a productive use as possible and is content with the restored use they have suggested.
Ecology	<p>The site is close to many designated wildlife sites, including:</p> <ul style="list-style-type: none"> - The Lynch LWS - Eastfield Copse & Stone House Gully LWS - River Kennet SSSI - Ancient Woodlands <p>In addition, the site lies within the West Berkshire Living Landscape.</p> <p>The site and surrounding areas also include many important water courses, habitats, and species, sensitive to changes.</p>	<p>Consultation has taken place with the Council’s ecologist, Natural England and Tree Officers in respect of the promoted sites. The outcome of these consultations, and any further discussions will be taken into account as part of the site selection process. All sites being taken forward for development are likely to require at least an extended phase 1 habitat assessment as part of their planning applications. Relevant ecological work will be undertaken to support the allocation of the site and will support the site specific policy.</p> <p>All sites wishing to apply for planning permission would need to have regard to policy 20 (Biodiversity and Geodiversity) of the plan which seeks to “maximise opportunities to achieve net gains in biodiversity and geodiversity”.</p>

	<p>Concern over impacts on these areas including changes in water levels/hydrology, impacts from dust, noise, air pollution, water quality, and impacts on soil structure.</p> <p>Further investigation such as ecological and hydrological should be undertaken to determine impacts.</p>	<p>Any site being taken forward for allocation will be required, where necessary, to undertake Environmental Impact Assessment (EIA) which will consider the potential impacts and set out relevant mitigation measures, including buffer zones where appropriate, at the planning application stage.</p>
	<p>Extraction should be phased to minimise habitat fragmentation. Restoration should achieve net gains in biodiversity and align with the strategic targets of the Greenham to Crookham Plateau BOA and restores habitat links. The greatest possible area should be restored to nature conservation purposes. If there is any restoration to agriculture, this should be High Nature Value agriculture.3.</p>	<p>Mineral extraction operations, and associated restoration, provide many opportunities for biodiversity and ecological gains and improvements. Policy 20 (biodiversity and geodiversity) requires that developments seek to achieve net gains in biodiversity, and the Council will consider making this an explicit requirement for restoration in policy 17 (restoration). The Council will also consider including reference to strategic priorities for biodiversity in policy 17. Restoration requirements can also be specified in a site specific policy.</p>
	<p>Restoration and aftercare should be of sufficient timescale (and not less than 25 years) to ensure priority habitat to be created is actually delivered successfully and a net gain legacy is achieved.</p>	<p>The statutory aftercare period (as defined in the Town and Country Planning Act 1990) is 5 years. Longer aftercare periods could be required depending on the specific circumstances and restoration of the site. The supporting text refers to a “minimum of 5 years” so there would be scope for the Council to negotiate with individual promoters for a longer aftercare period where this is considered appropriate. It is acknowledged that a longer time period can be required to fully allow the restoration to bed in.</p>
	<p>This site is prime farming land.</p>	<p>Comment noted. The revised NPPF acknowledges that minerals can only be worked where they are found (para 203). Policy 21, Agricultural Land, states that restoration of mineral extraction sites to agricultural land will be permitted where the restoration proposals demonstrate that the quality of the agricultural land will be conserved or enhanced as part of the restoration.</p>
	<p>The proposal is contrary to the Wildlife and Countryside Act (1981) and the Conservation of Habitats and Species Regulations (2010) protects wildlife in particular badgers bats, otters, water vole and greater crested newts.</p>	<p>All sites wishing to apply for planning permission would need to have regard to policy 20 (Biodiversity and Geodiversity) of the plan which applies protection to designated habitats and species.</p>
	<p>Welcome that the restoration proposals for Manor Farm now reflect its proximity to designated sites and include</p>	<p>Policy 20 (biodiversity and geodiversity) requires that developments seek to achieve net gains in biodiversity, and the</p>

	<p>provision for biodiversity enhancements. However, it is essential that restoration results in a larger area of priority habitat in a better condition.</p>	<p>Council will consider making this an explicit requirement for restoration in Policy 17 (restoration). The Council will also consider including reference to strategic priorities for biodiversity in Policy 17. Restoration requirements can also be specified in a site specific policy.</p>
	<p>This application does not meet the requirements of the National Planning Policy Framework 2012 paragraph 118.</p>	<p>The revised NPPF acknowledges that minerals can only be worked where they are found (para 203). All sites wishing to apply for planning permission would need to have regard to Policy 20 (Biodiversity and Geodiversity) of the plan, which applies the mitigation hierarchy in paragraph 118 of the NPPF (revised NPPF para 175).</p>
Highways / Transport	<p>Concern over the unsuitability of the existing road network with regard to:</p> <ul style="list-style-type: none"> - Damage to roads by lorries. Road infrastructure not suitable for lorries and already in need of repair. - Vibrations from the vehicles will affect building structures and road surfaces - Impact on local traffic/additional transport load on already busy and dangerous road with existing congestion at peak times - HGV traffic in close proximity to primary school – hazard to children and parents picking up/dropping off. - HGV traffic in close proximity to Pineapple field – recreational space and hazard to children. - Road Safety <ul style="list-style-type: none"> o Road traffic accidents - hotspot o Vehicles parked on Brimpton Road – less space for traffic o Blind bends/unsafe corners o Narrow roads and bridges o Poor visibility - winding roads, hedges o Mud on the road - Inappropriate access. 	<p>The Council's highways department and transport policy officers have been consulted on all the sites and have provided initial comments regarding the likely traffic impact of each site. This information will be used to assess the initial impact of each site, with further transport assessment work being undertaken prior to consultation on the submission version of the plan.</p> <p>All sites applying for planning permission will be required to submit a Transport Assessment/Statement as part of their planning application. This will consider the potential impact on and access to the highway network and set out relevant mitigation measures.</p> <p>The 7.5 Tonne vehicle restriction on Brimpton Road is an environmental weight restriction. Environmental restrictions can be applied to individual routes or a defined area of roads that have been determined as unsuitable for use by vehicles over a certain width or weight. They can be used in preventing heavy goods vehicles from using minor roads as inappropriate short-cuts between main routes, and they do not prevent access from the road. Therefore, bridges in the area can be used by HGV vehicles accessing and exiting the Manor Farm site, which could turn left in a northerly direction avoiding Brimpton village.</p>

	<ul style="list-style-type: none"> - No pavements or pedestrian crossings on local road network – danger to pedestrians. - No access from site to a main road. The A4 is 1.5km to the north. Other sites have better access. - Current speed restrictions are inadequate. - Unsuitable bridges – <ul style="list-style-type: none"> o Only King’s Bridge has any form of safe pedestrian crossing. o Any damage to bridges would close Brimpton Road, leading to unacceptable diversions and delays. - 7.5 Tonne weight restriction on local roads and bridges. These are already being ignored. - The local roads are not fit for purpose for HGV traffic. 	
	<p>Previous sites (Kennetholme) have not been permitted access via Brimpton Road and there can be no reason to change this. Other sites do not use mitigation for transporting gravel (i.e. underground tracks, conveyors, water dowers) and continue to use roads. Brimpton roads will suffer the same effects. Concern over lack of control of contractors using the highways. Wheel wash facilities are not used and there is no road cleaning. It is unclear who would pay for damage to the roads.</p>	<p>As planning permission runs with the land, and it is not unusual for site operators to change over the life of a site, the history of a site or track record of a particular operator is not a planning consideration.</p> <p>Damage to the highway can be reported to the Council using the ‘report a problem’ link on the Council’s website. Concerns regarding compliance with planning conditions should be reported to the Council, and details regarding planning enforcement can be found https://info.westberks.gov.uk/planningenforcement</p>
	<p>Need to consider cumulative effects of lorries along with other operational sites.</p>	<p>Transport assessment work will be undertaken by the Council prior to consultation on the submission version of the plan which would consider these issues. A Transport Statement / Assessment submitted as part of a planning application will be required to consider the cumulative effects of traffic in conjunction with other relevant development.</p>
	<p>The preferred access to the site is not suitable, and it appears to partially include a public bridleway. A</p>	<p>All sites applying for planning permission will be required to submit a Transport Assessment/Statement as part of their</p>

	<p>temporary diversion would need to be applied, with mitigation for users from lorries.</p>	<p>planning application. This will consider the potential impact on and access to the highway network and set out relevant mitigation measures.</p>
	<p>If demand is outside West Berks or even for export then local sites should not be progressed due to transportation issues.</p>	<p>There are cross boundary movements of sand and gravel and of soft sand to ensure that the types of aggregates available to the local construction industry are in line with the types of aggregates that the construction industry needs, at the time it is needed and in the quantity required. The authority is required to maintain a steady and adequate supply of aggregate minerals, which is based on the average of 10 years sales data and other relevant local information. Hence, the 10 year average of sales data will include an element of cross boundary movement that the authority is required to plan for, on the assumption that other planning authorities are also planning for the movement of aggregate minerals into West Berkshire.</p>
	<p>Additional traffic will not achieve aims in the Local Transport Statement 2011 - 2026 and West Berkshire Partnership Climate Change Strategy 2014 about Carbon Reduction and Climate Change.</p>	<p>The authority is required to maintain a steady and adequate supply of aggregate minerals, and the revised NPPF (para 203) acknowledges that minerals can only be worked where they are found. The sustainability appraisal includes assessment of all options against the objectives relating to climate change and traffic, and the plan includes Policy 25 (Climate Change), which requires minerals and waste proposals to demonstrate how they will minimise their impact on the causes of climate change.</p>
	<p>The proposal has not taken into account the West Berkshire Local Transport Plan Freight Strategy, particularly <i>'formalising agreed routes with companies as part of planning consents (including for construction traffic)'</i>, the Local Transport Plan Environment Report 2010, which states that <i>'The presence of traffic – and still more, growth in traffic levels – can contribute to a perceived reduction in townscape quality in both urban and rural areas. It is desirable that the LTP should seek where possible to minimise or even eliminate any such reduction in townscape quality and value'</i> and Policy 22 in the Preferred Options Plan - Transport.</p>	<p>The freight strategy seeks to balance the requirement for efficient distribution of goods around the district with the social and environmental effects of freight movement. It recognises a need to transport freight, but seeks to find more sustainable modes of transport where this is possible. Sand and gravel extraction is required to meet the Council's need and therefore there will be a need to transport these minerals within and outside the district. Sites coming forward for development will be required to demonstrate that they have considered all modes of transport.</p> <p>The Council's highways department and transport policy officers have been consulted on all the sites and have provided initial</p>

		<p>comments regarding the likely traffic impact of each site. Further transport assessment work will be carried out prior to the submission of the plan.</p> <p>All sites applying for planning permission will be required to submit a Transport Assessment/Statement as part of their planning application. This will consider the potential impact on and access to the highway network and set out relevant mitigation measures. Routing agreements may be agreed at planning application stage, where it is necessary to ensure that amenity and traffic impacts will not result in unacceptable detriment to the efficient and effective operation of the relevant transport network, road safety, local amenity, or the environment.</p>
	Should link up to the Haulage road already at Kennetholme.	Comment noted. This option will be investigated.
	Should include a Transport Assessment demonstrating impacts and mitigation measures in line with WBC Development Control Process 5.2.4.	All sites applying for planning permission will be required to submit a Transport Assessment/Statement as part of their planning application. This will consider the potential impact on and access to the highway network and set out relevant mitigation measures.
	The problems this road presently causes means that Hampshire Highways or the police should be consulted.	The Council will engage with Hampshire County Council through the Duty to Cooperate to consider cross boundary traffic/transport issues
	WBC are unable and unwilling to enforce the vehicle movement conditions laid down regarding the Manor Farm Solar Farm installation, similar concerns if this proposal goes ahead.	
Public Health / Amenity	<p>Concerns over:</p> <ul style="list-style-type: none"> - Noise - Dust - Pollution from traffic and air quality impacts. - Impacts on views - General disruption to village life - Proximity to village - Water quality/water supply 	<p>Consultation has taken place with the Council's Environmental Health Officers and the Environment Agency in respect of the promoted sites. The outcome of these, and any further, consultations will be taken into account as part of the continuing site selection process. The Council's Environmental Health Department have not suggested that any environmental effects resulting from the proposal should prevent development taking place. The plan includes Policy 26 on Public Health, Environment</p>

	<ul style="list-style-type: none"> - Inert fill - Structural impacts on properties 	<p>and Amenity which requires any sites coming forward to demonstrate that the development would not result in unacceptable impacts on air quality, water quality or from noise or pollution. The relevant planning permission and Environment Agency permit where appropriate would ensure that amenity and environmental impacts including noise and air pollution would be within acceptable parameters at the planning application stage. Such an approach is endorsed by the NPPF para 204. In addition, a local community liaison group could be established to bring any issues that the local population do not feel are being addressed to the operators attention.</p> <p>Planning does not protect an individual's right to a private view.</p>
	<p>Proposal is contrary to Policy 26 in preferred options (Public Health, Environment and Amenity).</p>	<p>The Council's Environmental Health Department have not suggested that any environmental effects resulting from the proposal should prevent development taking place. Where appropriate, planning conditions can be imposed for all sites taken forward to ensure amenity impacts are limited to an acceptable level. This can include restricting working hours and measures to reduce dust and noise levels. Such an approach is endorsed by the NPPF para 204.</p>
	<p>Moving plant and material away from the Brimpton Road properties will assist in reducing the problem as will reducing the hours of operation from 8am to 5pm with no weekend working.</p>	<p>Comment noted. Where appropriate, planning conditions can be imposed for all sites taken forward to ensure amenity impacts are limited to an acceptable level. This can include restricting working hours and measures to reduce dust and noise levels. Such an approach is endorsed by the NPPF, paragraph 143 (revised NPPF para 204).</p>
	<p>The plan is not consistent with national policy on sustainable development – development is only sustainable if economic, environmental and social community concerns are addressed equally. This plan only favours economic concerns.</p>	<p>The revised NPPF acknowledges that minerals can only be worked where they are found (para 203), and to give great weight to the benefits of mineral extraction, including to the economy. The plan includes policies to ensure that social and environmental effects are not unacceptable.</p>
	<p>The hedge at the end of the field will serve as a summer time visual screen. A 4-6 m high bund adjacent the hedge row on the side highlighted for extraction would</p>	<p>Comments noted.</p>

	<p>help reduce the noise and visual impact during the winter months when the native hedge row will lose its leaves.</p>	
	<p>Limiting operating hours does not limit impact and extends the number of years the site is open, thereby extending the loss of amenity.</p>	<p>Responses have been received for limiting and also not limiting the opening hours of any potential development. A balance between extracting the mineral in an expedient manner whilst minimising the level of disruption to local residents can be achieved through planning conditions.</p>
	<p>The area surrounding the farm to the west is described as 'one of the quietest, most charming, and most salubrious spots in Berkshire' (Barfield Samuel, 1829-1899 Thatcham, Berks and its Manors).</p>	<p>Comment noted. The plan includes a policy (Policy 26) to protect public health, amenity and the environment. This requires any sites coming forward to demonstrate that the development would not result in unacceptable impacts from noise.</p>
<p>Flooding</p>	<p>Previous unprecedented flooding in 2014 can be attributed to the inappropriate and poor quality infill materials used to restore other quarries in the area. Gravel extraction permanently alters the subsoil structure, leading to changes in the ability of the ground to hold water. Infill material will never act in the same way. Additionally, during excavation there is no sub-soil and therefore an increased flood risk.</p>	<p>The NPPW confirms that "For landfill or land-raising, geological conditions and the behaviour of surface water and groundwater should be assessed both for the site under consideration and the surrounding area. The suitability of locations subject to flooding, with consequent issues relating to the management of potential risk posed to water quality from waste contamination, will also need particular care." The plan includes Policy 24 on flooding, which requires that minerals and waste proposals must demonstrate that the development would not increase the risk of flooding, both to the site and the surrounding area. The developable area of the site does not include flood zones 2 or 3.</p>
	<p>The assessment of flooding and run off takes no account of the Stonehouse Gully stream through the site, nor the fact that the whole of the site area is in a Catchment Sensitive Farming Area. The farmland has to be managed to minimise and mitigate run off from the land. Gravel extraction is not compatible with managing the land in Catchment Sensitive manner. This is neglected in the Landscape Assessment and there are other water courses that have not been picked up in the information provided.</p>	<p>The Strategic Flood Risk Assessment produced to support the plan has been updated, and will be published as part of the Regulation 19 (proposed submission) consultation.</p> <p>In addition, the Environment Agency and Council officers as the Lead Local Flood Authority are responsible for flooding and drainage have been consulted in respect of the promoted sites, the outcome of these, and any further, consultations will be taken into account as part of the site selection process.</p> <p>Catchment Sensitive Farming relates to reducing agricultural water pollution and therefore it is not relevant in the context of</p>

		mineral extraction with inert infilling. Planning permission would not be granted where it would result in water pollution.
	Much has been made about flooding matters in the SA/EIA report for this site, but as only the main field and not the northern extension are proposed for excavation, seem to have little relevance.	Comment noted.
	The statement that restoration can be made to a better state than its current state and that flood risk could be improved is unsubstantiated.	Extraction and restoration to a lower level, or restoration to water could help to increase flood water storage capacity, therefore, potentially reducing flood risk in a specific area.
Consultation	Would have preferred the Council to have consulted through a more open means through a face to face forum with officers.	Sentiment is noted. The public consultation for the Preferred Options in 2017, was an optional period of consultation. Face to face events were held in 2014 in support of the Issues and Options consultation.
	Too much information and incorrect documentation provided.	The Council is required to provide a proportionate evidence base, in line with NPPF para 31, in order to consider whether the plan is justified as the most appropriate strategy.
	Consultation should have included corresponding with local residents. Failing to do this has resulted in locals not having the opportunity to respond in a proper and timely fashion.	Sentiment is noted. It is acknowledged by the Authority that it was not possible, or indeed practical, to seek to notify every resident, landowner, or other interested party, in the authority of this consultation. However, despite being a voluntary consultation, it was carried out in accordance with the Council's adopted Statement of Community Involvement. We have a database of individuals, groups and organisations who we contact with respect to the development plan making process. Any individual or organisation can register themselves on the Council's consultation portal by visiting the following website: http://consult.westberks.gov.uk/portal . In addition the consultation was advertised on the Councils website.
	It is noted that a number of the Preferred Site Allocations are in close proximity to the Hampshire County Council boundary, notably: 1.1 – Boot Farm, 1.2 – Cowpond Piece and 1.3 – Firlands. Hampshire County Council would welcome further liaison regarding these sites, particularly with regard to vehicle movements etc.	The Council will engage with Hampshire County Council through the Duty to Cooperate to consider cross boundary issues.

<p>Consultation fatigue – local residents continually responding to different consultations and then an eventual planning application. Therefore the Council should use all of the previous consultation responses and include them in any final consultation and planning process.</p>	<p>The Council has used previous responses to consultations to inform the preparation of the preferred options Minerals and Waste Local Plan. While the preferred options consultation was an optional period of consultation, it is the Council's view that it is an important stage because it provides the opportunity for the community and interested parties to comment on the draft plan, and also enable the Council to take views into account before final decisions on the WBMWLP are made.</p>
<p>Can the Council be assured they are progressing this consultation with due diligence in mind, apparently no site visits have been made to see the area which will be affected.</p>	<p>Site visits have been made to all of the sites put forward as preferred options and relevant information has fed into the site assessments.</p>
<p>The website keeps crashing while downloading documents.</p>	<p>Comment noted. This will be fed back and monitored in the next round of consultation.</p>
<p>Too much public money and time has been spent on the process without the promoter having to provide verified information about the volume of gravel on the site. This is vulnerable to an investigation about waste of public funds.</p>	<p>The Council is required to provide a proportionate evidence base, in line with paragraph 182 of the NPPF (revised NPPF para 35), in order to consider whether the plan is justified as the most appropriate strategy.</p>
<p>Baughurst Parish Council, although in Hampshire, has not been consulted about the Boot Farm proposal, which is close to both the parish and County boundaries.</p>	<p>All adjacent District, County and Parish Councils were notified of the consultation along with all statutory/specific consultees. All parties and individuals who have commented on the MWLP to date have been included on to the Council's consultation database. There will be other opportunities to comment on the MWLP as it evolves.</p>
<p>Council responses to sites consultation only include general comments which do not deal with the concerns – they only defer the points to later in the planning process. Therefore, the conclusion that 'all of the issues have been addressed' is wrong – they have been deferred, not addressed.</p>	<p>The Council's responses to the sites consultation reflected the early stage in preparation the Minerals and Waste Local Plan was at. The consultation was not a statutory requirement, and the main purpose was to advise the public, landowners, industry and all interested parties of the minerals and waste sites that have been promoted and invite comments at this stage using the site-specific information that has been provided by the site promoters.</p>

	<p>Would like to be kept informed and notified when the plan is to be discussed by Councillors at a public meeting as I may wish to speak</p>	<p>The proposed submission version of the plan will be discussed at Council in due course. Details of Council meetings are published on the Council's website five clear working days in advance and the Council will publish the date of the meeting on the Planning Policy News page of the website (http://info.westberks.gov.uk/planningpolicynews). There will be a further period of consultation on the proposed plan prior to submission of the plan to the Planning Inspectorate. The timetable for publication of the plan is set out in the Local Development Scheme available on the Council's website.</p>
	<p>Would like to be notified if/when a formal planning application is made for the site</p>	<p>When a formal planning application is received and validated the Council will put up orange notices on the boundary of the site to notify the local community that an application is being considered, giving members of the public 21 days to comment on the application.</p>
<p>Historic Environment</p>	<p>Concern over impacts from the site on many important historical features, including:</p> <ul style="list-style-type: none"> - Brimpton Mill – mentioned in the Domesday book. - Manor Farm (including moat) - St. Leonards Chapel (has a 'watching brief') - Brimpton Conservation Area. - AD944 documented Right of Way (eastern boundary of site). - Ancient Woodlands (East Field Copse) - Ancient byway (12th Century) Manor Lane – including ancient fish ponds - Moated manor - Crookham Manor house (Scheduled Monument). - Ancient manor way (northern boundary of site) - Roman road 	<p>Consultation has taken place with the Council's conservation officer, archaeological officer, and Historic England in respect of the promoted sites. The outcome of these, and any further, consultations will be taken into account as part of the site selection process. Further heritage assessment may be required on sites and this will be done to support the submission version of the plan.</p> <p>The Council will consider including site specific allocation criteria which will require relevant sites to submit a Heritage/Archaeology Assessment/Statement as part of their planning application and any further archaeological work that is necessary. The revised NPPF (para 189) confirms that where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate</p>

		<p>desk-based assessment and, where necessary, a field evaluation.</p> <p>Policy 27, Historic Environment, will only permit development where proposals conserve and enhance the historic environment and heritage assets. The policy also states that where there is an overriding need for the mineral and no reasonable alternative, proposals should demonstrate any impact has been satisfactorily mitigated.</p>
	No research of the historical significance of the site has been undertaken. Information has been supplied previously which should have alerted the Council to undertake further investigation, but this has not happened.	Consultation has taken place with the Council's conservation officer, archaeological officer, and Historic England in respect of the promoted sites. The outcome of these, and any further, consultations will be taken into account as part of the site selection process. Further heritage assessment may be required on sites and this will be done to support the submission version of the plan.
	This proposal goes against guidance set out to preserve historical sites and ancient woodland in the WBDC Historic Environment Action Plan (HEAP).	<p>The Historic Environment Action Plan sets out these actions in relation to the 'Development and the planning System':</p> <ul style="list-style-type: none"> - Ensure that appropriate policies and supporting evidence is included in local planning policy documents. - Ensure that the most significant elements of the historic environment are protected from inappropriate development. <p>The Minerals and Waste Local Plan will include appropriate policies on the Historic Environment, to ensure that the most significant elements of the historic environment are protected from inappropriate development. No designated heritage assets are directly impacted by the proposed site, however the settings of relevant designated assets will need to be taken into account.</p>
	It is a criminal offence to damage Scheduled Monument.	No Scheduled Monuments are directly impacted by the proposed development.
	Scheduled Monuments are designated as being of national importance and West Berkshire Archaeology service should be consulted.	The Council's archaeology and conservation teams have been consulted and their responses will feed into the site assessments. Further heritage assessment may be required on sites and this will be done to support the submission version of the plan.

	There is a registered Monument (Historic England List Entry 1013188) that has been excluded from the survey information.	
	The site does not accord with (CS19) 5.131 'The high quality diverse landscape character with its rich cultural and natural heritage contributes to the enjoyment and overall quality of life of everyone in the District.'	The statement in the Core Strategy is referring to the district as a whole. The revised NPPF (para 203) acknowledges that minerals can only be worked where they are found. Restoration should take into account landscape character so the site can be returned to an appropriate use / landform following extraction.
	The statement: " <i>It is not considered that there would be an impact on the local heritage assets as long as the setting is considered</i> ", is not correct. The rich historical setting that has shaped Brimpton means that the development would have a very significant negative impact.	The Council's archaeology and conservation teams have been consulted and their responses will feed into the site assessments. Further heritage assessment may be required on sites and this will be done to support the submission version of the plan.
	Crookham Manor site (Manor Ash Moats) has not been excavated yet. Historic England state that it is imperative that oxygen is not allowed to harm any hidden artefacts or building remains in an unexcavated site. The water level must remain constant to prevent this. Gravel extraction would lower the water table, resulting in damage to the site remains.	The Council will consider including site specific allocation criteria which will require relevant sites to submit a Heritage/Archaeology Assessment/Statement as part of their planning application and any further archaeological work that is necessary. The revised NPPF confirms that where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation (paragraph 189).
	The fields between the two Scheduled Monuments (the proposed extraction site) are of historic importance for future archaeological investigation.	The revised NPPF confirms that where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation (paragraph 189).
Agricultural Land	Too much land in the local vicinity has already had gravel extracted. Restoration has led to the land being left in a poor state, only just able to support grass for grazing, let alone growing arable crops. The assertion that agricultural land can be restored to existing levels is not	The plan includes a policy (21) on Agricultural Land, which requires sites involving areas of best and most versatile (BMV) agricultural land, to be restored such that there is no net loss in BMV land, and for sites being restored to agriculture, that the quality of the agricultural land will be conserved or enhanced as

	backed up by evidence. Soil structures, are never the same after “restoration” and the land is permanently degraded.	part of the restoration. Proposals will need to demonstrate how soils will be stripped, stored and re-instated so as to ensure that its inherent quality and long term potential to support agriculture is safeguarded.
	Site is Grade 3 – mainly in the developable area (confirmed by Natural England). Using Grade 3 farmland is contrary to objective 4 of the SA, so the conclusion as regards impact on the agricultural land is wrong.	Only a small part of the developable area in the southern corners are classified as Grade 3 land. Natural England confirms that Grade 3 land is present on the site, which is acknowledged by the Council, but does not confirm the location or quantity.
	SA - Reinstated agricultural land does not perform as well, therefore in the short to medium term there is likely to be a negative impact on agricultural land. However, in the longer term and given the quality of the land, it is agreed that a neutral score is appropriate.	Comment noted.
	The loss of the agricultural land would mean the end of the farm, and the end of a family’s livelihood.	The site is in private ownership and has been promoted for development on behalf of the landowner. Issues relating to tenant /landlord relationships are private matters between individuals and are not considered a planning matter. Economic/employment impacts will be assessed through the sustainability appraisal.
Rights of Way	<p>The rights of way will be permanently downgraded and will not be pleasant places to walk if this project goes ahead.</p> <ul style="list-style-type: none"> - Manor Way, an ancient by-way, leads from Crookham Manor House ruins (Scheduled Ancient Monument) to the listed Hospitaliers’ Chapel at Manor Farm, Brimpton. The people of Brimpton and have enjoyed this green lane, for over a 1000 years. Royalty have ridden along this lane many times. - The footpath leading from Crookham Common Road to Brimpton Road / King’s Bridge was mentioned in the 944AD charter of Brimpton. Diversion will destroy the historical context, which needs to be maintained. 	<p>The Council’s rights of way team have been consulted and the comments received have been used as part of the site assessment process. Where rights of way are likely to be impacted upon as part of the development of a site this will be a consideration as part of the site allocation process.</p> <p>The public rights of way now form the northern and eastern part of the developable area, and therefore will not be directly affected by the proposal. The revised NPPF (paragraph 98) states that planning policies should protect and enhance public rights of way and access. The plan also includes Policy 23 on public rights of way, which requires proposals no demonstrate that they will not adversely affect a public right of way. This could include screening and buffering through landscaping works to protect the users from any nuisance aspects of the working. The</p>

		policy also requires consideration of opportunities for improved access to the countryside.
	A right of way passes through the proposed extraction site, which takes walkers from the top of Brimpton (Crookham Common Rd) to the bottom (Manor View). There are many rights of way passing through or close to the site.	Comment noted. The public rights of way now form the northern and eastern part of the developable area, and therefore will not be directly affected by the proposal.
	Previous approved sites have stipulated a 25m buffer between this site and rights of way. No such buffer has been included on the plans, contrary to what is suggested on p.2 of the assessment form. A minimum 25m buffer should be used, however, given the historical significance it should be closer to the Historical Parks buffer of 500m.	The plan includes Policy 23 on public rights of way, which requires proposals no demonstrate that they will not adversely affect a public right of way. This could include screening and buffering through landscaping works to protect the users from any nuisance aspects of the working. The policy also requires consideration of opportunities for improved access to the countryside. Where appropriate this could be included in a site specific policy.
	Apart from the historical significance of the rights of way, local residents use these to avoid the roads with no pavements. Now the rights of way will be highly unattractive with air, noise and visual pollution.	The plan includes Policy 23 on public rights of way, which requires proposals no demonstrate that they will not adversely affect a public right of way. This could include screening and buffering through landscaping works to protect the users from any nuisance aspects of the working. There would potentially be opportunities for the enhancement of public rights of way as part of any scheme that came forward on the site.
General	<p>Concern over cumulative effects from the three preferred sites Boot Farm, Manor Farm and Wasing Lower Farm in close proximity. Nearly half of the total extraction would come from these sites and to take this from such a small area is not justified because it is not evidenced as a suitable or appropriate strategy.</p> <p>In the context of cumulative impacts the successive operation of existing and proposed mineral sites in such close location to the village is clearly contrary to the emerging policy. Existing sites have already been operational for a long time.</p>	The revised NPPF (para 203) acknowledges that minerals can only be worked where they are found. In West Berkshire, sharp sand and gravel is predominantly found along the Kennet river valley and in river terrace deposits. The plan includes Policy 29 on cumulative impacts. This requires minerals and waste proposals to demonstrate that they would not result in an unacceptable cumulative adverse impact on the environment or amenity of an area.

	<p>More appropriate sites were available, but not chosen.</p>	<p>The Council is required, by the revised NPPF, to ensure that the most appropriate strategy is chosen, when considered against reasonable alternatives, based on proportionate evidence (paragraph 35). The site was chosen as a preferred alternative, as it was considered that constraints on the site were not significant in terms of sustainability, and only likely to be short-medium term associated with the extraction/restoration phases. Reducing the developable area excludes most of the sensitive parts of the site.</p>
	<p>Once Manor Farm is lost, the Estate will be able to provide evidence that the Farm is not viable, and force a change of use and submit a residential application.</p>	<p>Minerals development in an area would not act as a precursor, or set a precedent for other development in the area. This is because the land would ultimately be restored, and in planning policy terms the effect would be to return the site to 'greenfield' status.</p>
	<p>Proposal should be refused.</p>	<p>The Council is required, by the NPPF, to ensure that the most appropriate strategy is chosen, when considered against reasonable alternatives, based on proportionate evidence. The site was chosen as a preferred alternative, as it was considered that constraints on the site were not significant in terms of sustainability, and only likely to be short-medium term associated with the extraction/restoration phases. Reducing the developable area excludes most of the sensitive parts of the site.</p>
	<p>The three sites Boot Farm, Manor Farm and Wasing Lower Farm should be removed from the plan. Failing this, only extraction should occur at Lower Farm, Wasing.</p>	<p>The NPPF acknowledges that minerals can only be worked where they naturally occur. In West Berkshire, sharp sand and gravel is predominantly found along the Kennet river valley and in river terrace deposits. The number of sites to be taken forward in the plan will be based on the most up to date assessment of need provided in the LAA.</p>
	<p>To include the site would not be:</p> <ul style="list-style-type: none"> - Positively prepared – there are gaps in local intelligence and a failure to recognise the importance of this site. - Justified –WBC have a duty of care to all residents to ensure that they do not suffer any unreasonable harm or loss. The site will impact on all the residents due to 	<p>Paragraph 35 of the revised NPPF states that, to be sound, a Local plan should be:</p> <p>Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements</p>

	<p>10 years of noise, dust, pollution, additional traffic, risk to health, damage to the local community and a reduction in the value of houses.</p> <ul style="list-style-type: none"> - Effective –There is no evidence to show how much gravel will be extracted and therefore whether the plan will be deliverable. - Consistent with national policy – The proposed site goes against some of the NPPF and other local and national policies. 	<p>from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.</p> <p><i>The number of sites to be taken forward in the plan will be based on the most up to date assessment of need provided in the LAA.</i></p> <p>Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.</p> <p><i>The site was chosen as a preferred alternative, as it was considered that constraints on the site were not significant in terms of sustainability, and only likely to be short-medium term associated with the extraction/restoration phases. Reducing the developable area excludes most of the sensitive parts of the site.</i></p> <p>Effective – the plan should be deliverable over its period and based on effective joint-working.</p> <p><i>The Site promoters have given an indication of the likely reserves and borehole data has been requested to support the allocation of the sites.</i></p> <p>Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</p> <p><i>The policies in the plan will ensure that sites are demonstrated to be consistent with national policy.</i></p>
	<p>Concern over reduction of property values in the area. There should be compensation from the estate to the people most directly affected and also to those who live along proposed transport routes. Otherwise residents whose property values have been lowered would be able to sue WBC and Wasing Estate for financial loss and loss to standards of living.</p>	<p>Reference has been made to a potential loss in property values as a result of allocating this site for mineral extraction/inert infilling. Case law has established that the potential for a reduction in property values is not a material planning consideration and is therefore outside the remit of the Minerals and Waste Local Plan.</p>
	<p>Historic use of planning conditions has not worked, as they are not enforced by the Council. Therefore no confidence in the use of conditions and therefore the proposal will have a significant impact and WBC will have failed in its duty of care to the people of Brimpton.</p>	<p>As planning permission runs with the land, and it is not unusual for site operators to change over the life of a site, the history of a site or track record of a particular operator is not a planning consideration.</p>

<p>The 'Call for Sites' form is incorrect, as no legal, operational, ownership or other constraints are stated. This is incorrect, as there are shooting rights from adjoining landowners over the estate.</p>	<p>The Call for Sites forms were completed by parties wishing to put forward sites to be considered for inclusion in the Minerals and Waste Local Plan. The site is in private ownership and has been promoted for development on behalf of the landowner. Where appropriate, further information will be required in order to determine whether particular issues will affect the sites deliverability.</p>
<p>132kV line passes through Manor Farm – SEPD is proposing to install a new cable, following this route. It is unclear what impact the plan would have. Further work with SEPD is required.</p>	<p>Further discussions will be undertaken regarding this issue and potential to impact on the plan.</p>
<p>Over the last 30 years West Berkshire Council has overridden the objections raised by gravel extraction on the outskirts of the village in almost every case.</p>	<p>The revised NPPF (para 203) acknowledges that minerals can only be worked where they are found. In West Berkshire, sharp sand and gravel is predominantly found along the Kennet river valley and in river terrace deposits.</p>
<p>With other sites available that do not impact on quality of life, traffic or countryside, it seems these the Brimpton sites are unnecessary. Manor Farm is the closest site to a village.</p>	<p>The site was chosen as a preferred alternative, as it was considered that constraints on the site were not considered significant in terms of sustainability, and only likely to be short-medium term associated with the extraction phase. Reducing the developable area excludes most of the sensitive parts of the site.</p> <p>The plan will include policies to protect public health, environment and amenity and require any sites coming forward to demonstrate that the development would not result in unacceptable impacts. Where appropriate, planning conditions can be imposed for all sites taken forward to ensure amenity impacts are limited to an acceptable level. This can include restricting working hours and measures to reduce dust and noise levels. Such an approach is endorsed by the NPPF, paragraph 143 (revised NPPF para 204).</p>
<p>Third generation tenant farmers on Manor Farm. The acreage has been constantly reducing and is now only low grade land. The remaining productive fields are those proposed for extraction. This would make the farm</p>	<p>The site is in private ownership and has been promoted for development on behalf of the landowner. Issues relating to tenant /landlord relationships are private matters between individuals and are not considered a planning matter.</p>

	<p>unsustainable and too small to be financially viable and would ruin a local business.</p>	<p>Economic/employment impacts will be assessed through the sustainability appraisal.</p>
	<p>No evidence has been provided as to the sites viability.</p>	<p>Additional mineral resource assessment work will be undertaken to support the selection of sites for inclusion in the plan.</p>
	<p>The Council has been misleading with information, such as with Kennetholme: “the promoter has also suggested that the site could replace the existing site at Kennetholme”. What the promoter actually said was: “the site could be worked as an extension to Kennetholme”.</p>	<p>The original call for sites was in 2014, and at the time to work the site as an extension may have reflected the wish of the site promoter. Given the timeframes now involved, extraction is expected to have ceased at the Kennetholme site before extraction work at Manor Farm or Boot Farm commences.</p>
	<p>English tort law, an individual may owe a duty to another to ensure they do not suffer any unreasonable harm/loss (case law shows this extends to local councils) – impact on quality of life (noise, vibration, dust, traffic). The council would be failing in its duty of care to people in Brimpton and would be liable for any adverse effect on property values in the area.</p>	<p>The Council will take reasonable care to avoid acts or omissions which can reasonably be foreseen would cause harm and could not be mitigated to an acceptable level in accordance with the NPPF.</p>
	<p>Many residents wish to be notified if at any stage the outcome of the consultation is discussed by Councillors at a public meeting or becomes the subject of a planning application.</p>	<p>The proposed submission version of the plan will be discussed at Council in due course. Details of Council meetings are published on the Council’s website 5 clear working days in advance and the Council will publish the date of the meeting in the planning policy news page of the website (http://info.westberks.gov.uk/planningpolicynews).</p>
	<p>This Site Assessment Form contains errors, conclusions with are contrary to the evidence, lack of evidence in other areas:</p> <ul style="list-style-type: none"> - Developable area. This is stated as 15Ha. However, it measures 14.7Ha, before areas are taken out for mitigation. - Site Area. This is stated as 20Ha. However, it measures 32.5Ha using mapping software. - Extraction Volume. This is stated as 0.6m tonnes which cannot be correct, as this was original amount which was for the larger area. The volume must be $0.6m \times 14.7/32.5 = 0.27m$ tonnes, BEFORE volumes 	<p>The site assessment forms will be updated and amended where applicable in preparation of the submission version of the plan.</p>

	<p>are reduced for mitigation. This is a fundamental error.</p> <ul style="list-style-type: none"> - Availability. This is stated as within next 1-5 years. This land is NOT available at all, as legal shooting rights cover 70% of the developable area. The High Court has ruled that such rights override the right of landlords to develop their land. 	
	<p>The response in the December 2016 Consultation report that “tenant / landlord relationships are private matters between individuals” misses the point that this is an employment issue not a legal tenancy matter.</p>	<p>Economic/employment impacts will be assessed through the sustainability appraisal.</p>
	<p>Contradiction between putting the site forward as a preferred option, and refusing other housing related applications in the area. The effects of a quarry would be worse.</p>	<p>The revised NPPF (para 203) acknowledges that minerals can only be worked where they are found. Applications for housing development would be assessed in line with the West Berkshire Core Strategy 2012, and housing site allocations DPD 2017, as to whether they are in accordance with the relevant policies. Applications for minerals related development are assessed in line with relevant minerals and waste policy, including the Replacement Minerals Local Plan for Berkshire, saved policies of the West Berkshire District Local Plan, and once adopted, the West Berkshire Minerals and Waste Local Plan.</p>
	<p>There needs to be evidence of what extra employment will be provided locally. The proposed development will destroy more jobs than it creates. The SA mentions bringing employment to the area, (mainly everyday jobs like lorry driving) but no mention of loss of more specialised farm jobs.</p>	<p>Economic/employment impacts will be assessed through the sustainability appraisal. The SA is an iterative process and will be refined and updated in preparation of the submission version of the plan.</p>
	<p>The terms 'temporary', 'short', 'medium' or 'long' term are ambiguous. Once planning permission is granted, extensions to time or area are likely. To anyone in retirement, even temporary periods of 5 – 10 years can be significant.</p>	<p>The Council will consider defining the terms 'short', 'medium' and long term. The consideration of a planning application can only take into account the facts presented at the time, and not whether an extension to time is likely.</p>
	<p>The stated 600,000 tonnes 'Extraction volume', is the same figure given as 'Estimated reserve' before the development area was reduced.</p>	<p>The site nomination form submitted by the site promoter states that the area suitable for development is approximately 15 ha.</p>

		The 600,000 tonnes has always referred to this developable area, which is still 15ha.
	Need more clarity on the basis for selecting the seven preferred options from the original long list. It appears that sites with far more appropriate infrastructure and far less environmental damage were available, yet they have been rejected on the basis of false information. The decision must be based on accurate information and through a fair and open selection process.	The Council will produce a site selection methodology in preparation of the submission version of the plan.
	Advice given is that the works will reduce the water table by up to 5m. The Council needs to clarify if this is the case, and if it will it have any further structural impacts on local properties?	Where a planning application comes forward the impacts of the development would need to be assessed and relevant mitigation measures set out. Where necessary, Environmental Impact Assessment (EIA) would be undertaken.
Sustainability Appraisal	The assessment conclusion for the site should be Significantly Negative, not Negative, as there are a number of facts wrong in the assessment.	The SA/SEA is carried out on a consistent bases for all sites, The SA/SEA assesses each site and then takes into account scope for mitigation measures to reduce any likely negative impacts.
	Conflicting statements about the proposed restoration.	The SA is an iterative process and will be refined and updated in preparation of the submission version of the plan.
	Local risk assessment has been carried out which suggests that the site should not be allocated.	The SA/SEA is a tool used to assess a plan, it does not show which site(s) should or should not be allocated. It may be in some circumstances that sites with negative impacts are taken forward where they meet an identified need. In these cases mitigation measures and a good restoration strategy will be necessary to ensure no long-term negative impacts.
	SA Objective 1, question 2: The RAG rating for this should be RED (Significantly Negative), as evidenced by the statement “the extraction of mineral and infilling of the void with inert waste would permanently alter the geodiversity of the site”. However, it has been assessed as Yellow (Uncertain). The SA/SEA continues in this biased vein.	The statement that mineral extraction and infilling would permanently alter geodiversity does not suggest that effects would be predominantly positive or negative. The removal of material for extraction can be viewed as having a negative impact on geodiversity if rare or interesting formations are removed. However, mineral extraction also has the potential to improve understanding of geodiversity by exposing faces of geological structures, and leaving these faces exposed can be included in restoration proposals. It is unlikely that sand and

		gravel working either has the potential to either remove rare formations or expose geological faces, which is usually associated with rock working. However, until such time as this is determined, it is considered that the 'uncertain' score is appropriate.
	How the Council plan to mitigate air pollution, damage to vegetation, ecosystems, impacts on wildlife and impacts on climate change is not clear within the SA/SEA Appendices.	The sustainability appraisal is a supporting technical document, and does not (and is not required to) include policy or mitigation measures. The main body of the plan includes policies to protect and mitigate effects on air quality, biodiversity and climate change.
	Given the error of assessment for Objective 11 (Conservation of Minerals), which should be listed as negative, it is unclear how an overall SA score could be anything but negative.	The intention of SA Objective 11 is to conserve mineral resources by ensuring they are not lost to non-mineral development. Conserving minerals in this way, is not about ensuring that minerals are not worked, it is about ensuring that they are available for future needs, in line with sustainable development. Working of mineral resources where they occur will not impact on whether the resources would be safeguarded from non-mineral development and therefore it is considered that the 'neutral' score is appropriate.
	<p>Alternative SA of the site given:</p> <p><u>Objective 1: Biodiversity & Geodiversity</u> Current score is negative, but this should be significantly negative due to proximity to SSSIs, Local Wildlife Sites and Woodlands, disruption to water environment, detriment to green habitat corridors and impacts on geodiversity.</p> <p><u>Objective 2: Water Resources</u> Current score is negative, and agree with this score. However, the sensitivity of Wasing Woods Ponds SSSI needs a full assessment prior to the completion of the SA. It may not be possible to viably mitigate the impacts to this area, which would result in a significantly negative</p>	Comments noted. The SA is an iterative process and will be refined and updated in preparation of the submission version of the plan.

<p>effect. In the absence of such an assessment the potential impact is largely unknown.</p> <p><u>Objective 3: Flood Risk</u> Neutral score is supported.</p> <p><u>Objective 4: Agricultural Land</u> Neutral score supported in the longer term. In the short – medium term there is likely to be a negative impact on agricultural land.</p> <p><u>Objective 5: Historic Environment</u> Current score is uncertain, however this should be significantly negative as the site is surrounded by heritage assets and has a high chance of archaeological potential. An archaeological find would end the productivity of an allocation and call the deliverability of the plan into question. In the current situation and with a lack of available evidence the SA should err on the side of caution and therefore this should be considered to be significantly negative until proven otherwise.</p> <p><u>Objective 6: Landscape and Townscape</u> Negative score is supported. Care needs to be taken to ensure that the areas of medium/high landscape are treated with due diligence.</p> <p><u>Objective 7: Air Quality</u> Negative score is supported. Mitigation measures would need to ensure no harm to sensitive receptors.</p> <p><u>Objective 8: Energy Efficiency</u> Neutral score is supported.</p> <p><u>Objective 9: Waste and Recycling</u></p>	
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	<p>Neutral score is supported.</p> <p><u>Objective 10: Sustainable Transport</u> Current score is uncertain, however this should be significantly negative. Sites located on the Strategic Road Network itself should be given a greater priority.</p> <p><u>Objective 11: Conservation of Minerals</u> Current score is neutral, however this should be negative. To identify potential new sites for land-won extraction, with no promotion of recycled materials is contrary to the objective of safeguarding minerals.</p> <p><u>Objective 12: Public Amenity</u> Negative score is supported.</p> <p><u>Objective 13: Public Nuisance</u> Current score is negative, however this should be significantly negative. Proposed mitigation measures needed as a minimum. Cumulative impacts need to be considered, and multiple proposed sites along with existing sites in this location is contrary to policy.</p> <p><u>Objective 14: Economy</u> Positive score is accepted.</p> <p>The alternative assessment concludes an overall negative effect on sustainability, with a number of significant negative effects likely. Therefore the site is unsustainable, and its allocation unjustified.</p>	
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1.5 Tidney Bed

Tidney Bed		
Topic	Summary of Consultation Responses	Council Response
General	Development likely to be considered major development, therefore would need to satisfy the tests set out in para 16 of the NPPF. Unlikely that these tests could be met, questioning the deliverability of the site.	Tidney Bed is not within the AONB, although it does lie adjacent to it. Therefore paragraph 116 (revised NPPF paragraph 172) does not apply although effects on landscape are still a consideration. Based on the Landscape and Visual Assessment produced to support the plan, only the area north of the railway line has been put forward as the potential developable area.
Agricultural Land	Grade 3.Loss of reasonable quality agricultural land. Should ensure no grade 3A is lost.	Comments noted. The plan includes a policy requiring mineral sites to ensure no net loss of best and most versatile agricultural land.
Need	There is no need for this site from the information provided.	The number of sites to be taken forward in the plan will be based on the most up to date assessment of need provided in the LAA.
	Only one site in the area should be developed at a time.	Based on the Landscape and Visual Assessment produced to support the plan, only the area north of the railway line has been put forward as the potential developable area.
Transport	Important conditions are adhered to regarding access to the site onto the A4. Concerns over safe and adequate access to the A4.	Further transport assessment work will be carried out by the Council prior to the submission of the plan. All sites applying for planning permission will be required to submit a Transport Assessment/Statement as part of their planning application. This will consider the potential impact on and access to the highway network and set out relevant mitigation measures.
	The NPPF clearly requires LPs to undertake assessment of Transport matters at site selection not just at planning application stage.	The Council's highways department and transport policy officers have been consulted on all the sites being considered for allocation and have provided comments regarding the likely traffic impact of each site. Further transport assessment work will be carried out by the Council prior to the submission of the plan.
	No plant is proposed on the site, meaning all material would need to be transported by road – nearest is at Aldermaston which would add to traffic using the	The Council's freight strategy sets out the routes that are recommended for freight. This includes the A340 through Aldermaston which is considered to be a "district access route to key destinations". Impacts on sustainability, including potential to

	Aldermaston/ Tadley Road and increase carbon footprint because of double-hauling.	impact on climate change are assessed in the Sustainability Appraisal.
	Narrow/hydraulic bridge at Aldermaston Wharf already gets congested.	All sites applying for planning permission will be required to submit a Transport Assessment/Statement as part of their planning application. This will consider the potential impact on and access to the highway network and set out relevant mitigation measures.
	Good access to A4.	Comment noted.
	There is no evidence to support statement that rail/canal use is not viable.	It is for the site operator to determine whether it is financially viable to use alternatives to road based transport as part of a development proposal. There are no rail sidings to service the site and therefore use of rail directly from the site is not immediately achievable. To include sidings as part of the development would likely affect the viability of the site. The feasibility of Canal use would depend on a range of factors including land ownership, economics, and where the material would be transported to.
Landscape	The site is adjacent to the AONB, and will affect the landscape of the valley (photo – Beenham Parish Council). Overlooked from hilltop footpaths in the AONB.	Landscape and Visual Assessment work has been carried out for all sites under consideration and this information has informed the site selection process. Based on the landscape assessment, only the area north of the railway line has been put forward as the potential developable area.
	Location adjacent to the AONB does not seem to have been taken into account.	The Landscape Assessment undertaken to inform the preferred options consultation has taken designated landscapes into account as outlined in the methodology on page 15.
	Great weight should be given to conserving and enhancing the landscape and scenic beauty of the AONB.	The Council are aware of the policy 172 of the revised NPPF in relation to provision for designated landscapes.
	LVA states no processing on site due to landscape impact.	Any site being taken forward for allocation will be required to carry out a Landscape and Visual Impact Assessment (LVIA) and, where necessary, Environmental Impact Assessment (EIA) which

		will consider the potential impacts and set out relevant mitigation measures at the planning application stage.
	Restoration will not result in the site going back to its natural form.	The site is proposed to be restored to agriculture and therefore restoration will be to the existing land use. Although flood mitigation measures and biodiversity enhancements will also need to be considered.
	The NPPF requires LPs to consider conservation/enhancement of the natural environment in allocating sites as set out in section 11.	The Council are aware of the policies in section 11 of the NPPF in relation to the natural environment (revised NPPF section 15). Consultation with the Council's ecologist and Natural England has taken place regarding the sites and the comments taken into account in the site assessments. All sites wishing to apply for planning permission would need to have regard to policy 20 (Biodiversity and Geodiversity) of the plan which seeks to "maximise opportunities to achieve net gains in biodiversity and geodiversity". Further ecological work will be carried out to support the submission version of the plan.
Ecology	The site is within a BAP habitat, as the restoration of the site is unknown the impact on biodiversity remains unknown. Within Kennet Valley East BOA.	The parcel to the south of the railway line is listed as a 'priority habitat' for coastal and floodplain grazing marsh. Based on the Landscape and Visual Assessment produced to support the plan, only the area north of the railway line has been put forward as the potential developable area, and therefore no priority habitat will be affected. The proposed restoration for the site is to agriculture, which is the existing landuse. Biodiversity enhancements would need to be considered as part of restoration.
	Adjacent to Ufton Bridge Meadow LWS and River Kennet. Close to other LWSs.	Consultation with the Council's ecologist and Natural England has taken place regarding the sites and the comments taken into account in the site assessments. All sites wishing to apply for planning permission would need to have regard to policy 20 (Biodiversity and Geodiversity) of the plan which seeks to "maximise opportunities to achieve net gains in biodiversity and geodiversity". Further ecological work will be carried out to support the submission version of the plan.

	Site includes good quality semi-improved grassland, deciduous woodland and hedgerow (although the site for development does not include the woodland/grassland).	Based on the Landscape and Visual Assessment produced to support the plan, only the area north of the railway line has been put forward as the potential developable area, which mainly includes agricultural fields.
	Need full suite of ecology surveys, inc. the surrounding area.	Relevant ecological work will be undertaken to support the allocation of the site and will support the site specific policy. It is likely that further ecological work would be undertaken as part of any planning application which comes forward on a site
	Suitable habitat buffer with the woodland/river would need to be implemented during works to prevent adverse impacts.	Based on the Landscape and Visual Assessment produced to support the plan, only the area north of the railway line has been put forward as the potential developable area. This area is not proximate to woodland or the river.
	Hydrological impact needs to be avoided.	The plan includes policies to protect the environment and amenity and address flooding (Policy 24 and Policy 26). It requires any sites coming forward to demonstrate that the development would not result in unacceptable hydrological impacts. The NPPW requires that planning authorities assess the suitability of sites against a variety of criteria, including protection of water quality and resources and flood risk management. The NPPW confirms that “For landfill or land-raising, geological conditions and the behaviour of surface water and groundwater should be assessed both for the site under consideration and the surrounding area. The suitability of locations subject to flooding, with consequent issues relating to the management of potential risk posed to water quality from waste contamination, will also need particular care.”
Amenity	Impact on the Spring Inn and Cricket Pitch of dust and infilling operations.	Where appropriate, planning conditions can be imposed for all sites taken forward to ensure amenity impacts are limited to an acceptable level. This can include restricting working hours and measures to reduce dust and noise levels. Such an approach is endorsed by the revised NPPF, paragraph 204.
Water	Water extraction site at Ufton is at a lower level than the proposed site. There is an agricultural exclusion	The area south of the railway line is within Source Protection Zone 1, however, based on the landscape assessment, only the area

	<p>zone for applying sludge and waste, therefore, could the site be infilled?</p> <p>A stream runs off the hills drains through agricultural land of the site. Blocking up of the stream would result in serious flooding.</p>	<p>north of the railway line has been put forward as the potential developable area. The northern part of the site is separated from the area in SPZ1 by the railway line and therefore, there are unlikely to be flow paths between the two areas of the site. Therefore land reclamation through the infilling of this site with inert material would potentially be acceptable where restoration plans ensure that there would be no unacceptable pollution and that there would be a reduction in flood risk.</p> <p>The plan includes Policy 24 (Flooding), which requires that minerals and waste proposals demonstrate that the development would not increase the risk of flooding, both to the site itself and surrounding area.</p>
	<p>Local properties have private groundwater drinking water supplies, need to show there would be no adverse impacts.</p>	<p>The plan includes a policy to protect the environment and amenity and address flooding. It requires any sites coming forward to demonstrate that the development would not result in unacceptable hydrological impacts, specifically referring to water quality.</p>
	<p>No hydrological assessments have been done.</p>	<p>The Strategic Flood Risk Assessment produced in support of the plan has assessed flood risk in the plan area, in order to apply the sequential test required by the NPPF. Where relevant, sites applying for planning permission will be required to submit a Hydrological Assessment/Statement as part of their planning application. This will consider the potential impact on hydrology of the site and surrounding area and include mitigation measures.</p>
Heritage	<p>Close to several historic houses, including listed buildings and the Tyle Mill Conservation Area lies to the east of the site.</p>	<p>The Council's archaeology and conservation teams have been consulted and their responses will feed into the site assessments. Further heritage assessment may be required on sites and this will be done to support the submission version of the plan.</p>
	<p>Grade II listed boundary stone and milepost are within/adjacent to the north-west boundary of the site.</p>	<p>See above response.</p>

	Council's conservation officer should be consulted regarding the impact on the Conservation Area and listed structures.	See above response.
	HER should be consulted for possible non-scheduled archaeological remains, particularly for possible Palaeolithic archaeology.	See above response.
	The SA/SEA concludes that further assessment is required, but no evidence of further assessment having been done.	See above response.
	The outcomes of further assessment may mean that alternations to the site area are required. Criteria should be introduced into the allocation policy to conserve the significance and settings of the heritage assets and to assess the potential for archaeological remains (construction of a geoarchaeological deposit model would be beneficial).	Further heritage assessment may be required on sites and this will be done to support the submission version of the plan. The Council will consider including site specific allocation criteria which will require relevant sites to submit a Heritage/Archaeology Assessment/Statement as part of their planning application and any further archaeological work that is necessary. The revised NPPF confirms that where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation (paragraph 189).
	Little visual impact on the locality.	Comment noted.
	If the area to the south of the railway was to be developed (currently not included) there would need to be consideration of deeply buried archaeology within the floodplain alluvium.	Based on the Landscape and Visual Assessment produced to support the plan, only the area north of the railway line has been put forward as the potential developable area.
SA/SEA	Identifies a number of uncertainties and negative effects <ul style="list-style-type: none"> o Water quality (EA indicate the site lies in area of "High Risk Ground Water" o Conservation area o AONB o Air quality 	Comments are noted. Sustainability Appraisal identifies the likely effects of a proposal which are then taken into consideration when weighed up against all other reasonable alternatives. The SEA/SA process is iterative and will continue to evolve and be updated as the development plan progresses.

	<ul style="list-style-type: none"> o Transport <p>No specific benefits arise from the site.</p>	
	No economic impact assessment has been undertaken for any of the sites.	The Sustainability Appraisal includes an assessment of the likely impacts on the economy and employment. In general, mineral extraction is likely to be beneficial for the local and wider economy providing direct and indirect employment in the medium term.
	Conclusion that the long term impacts of development would be neutral are unsupported by any evidence.	The overall SA of a site is a result of combining the assessments for each objective/criterion. An overall negative assessment means that there are generally more negative effects, an overall positive assessment means that there are generally more positive effects, and an overall neutral assessment means that there are predominantly neutral impacts.
	No assessment of overall carbon impact of the use and restoration of the site.	The Sustainability Appraisal includes an assessment of the likely impacts on climate change.
	Sites should be located where they minimise the need to travel.	As part of the emerging minerals and waste local plan consideration will be given to alternative transportation methodologies and reducing travel distances. The Sustainability Appraisal will also consider effects on traffic and impacts on climate change. However it has to be recognised that minerals can only be worked where they naturally occur.
	The proposed allocation fails to satisfy the requirements of para 7 of the NPPF regarding sustainable development.	All sites being considered for allocation have been subject to Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) which considers environmental, social and economic factors in relation to the overall sustainability of the site.
Restoration	Concern over infill with inert waste.	Land reclamation through the infilling of this site with inert material would potentially be acceptable where restoration plans ensure that there would be no unacceptable pollution and that there would be a reduction in flood risk.
	Inert landfill is problematic in terms of sustainable development as landfilling is at the bottom of the waste hierarchy.	Landfill is at the bottom of the waste hierarchy. However, where infill is required to secure an environmental benefit, such as restoration of the site, then it can be viewed as waste recovery.

<p>Successful mitigation measures and restoration are essential to the acceptability of the site for mineral extraction.</p>	<p>Comments noted. As part of any planning application that comes forward adequate information would be required in order that the decision-maker would be aware of the likely impacts of the development. This would feed into mitigation and restoration requirements in terms of the specific scheme. Where necessary, Environmental Impact Assessment (EIA) would be undertaken at the planning application stage. The site is proposed to be restored to agriculture, with a degree of inert infill. Biodiversity and flood risk management enhancements would also need to be considered.</p>
<p>With increasing recycling of material, material for restoration can be increasingly difficult to source (this is acknowledged in the Council's response report 2016 (pg. 19)).</p>	<p>The availability of infill material for the restoration of extraction sites will be a consideration that will be taken into account. However it is recognised that the information available on the availability of inert fill materials for the use in the restoration of minerals sites is often difficult to obtain.</p>
<p>Landfilling raise further issues relating to transport, greenhouse gas emissions, pollution of air and water and long term monitoring.</p>	<p>Land reclamation through the infilling of this site with inert material would potentially be acceptable where restoration plans ensure that there would be no unacceptable pollution and that there would be a reduction in flood risk. Where necessary it may be possible to obligate the monitoring of the water quality through planning conditions or a planning obligation.</p>
<p>If restoration is to include agriculture, this should be high nature value agriculture providing maximum biodiversity benefits for species.</p>	<p>The site is proposed to be restored to agriculture, with a degree of inert infill. Biodiversity and flood risk management enhancements would also need to be considered.</p>
<p>Restoration/aftercare needs to be of a sufficient timescale (not less than 25 years) to ensure habitat created is delivered successfully and net gain legacy is achieved.</p>	<p>The statutory aftercare period (as defined in the Town and Country Planning Act 1990) is 5 years. Longer aftercare periods could be required depending on the specific circumstances and restoration of the site. The supporting text refers to a "minimum of 5 years" so there would be scope for the Council to negotiate with individual promoters for a longer aftercare period where this is considered appropriate. It is acknowledged that a longer time period can be required to fully allow the restoration to bed in.</p>

Development Management Policies	Without detailed assessments the site would appear to conflict with many of the draft policies, which raises concerns as to whether the site would gain planning permission.	As part of any planning application that comes forward adequate information would be required in order that the decision-maker would be aware of the likely impacts of the development. This would feed into mitigation and restoration requirements in terms of the specific scheme. Where necessary, Environmental Impact Assessment (EIA) would be undertaken at the planning application stage.
Site promoter	Support the allocation of the site, but with the removal of the area to the south/east of the railway restoration options are considerably limited in terms of biodiversity and flood mitigation. The remaining area would be returned to farmland with some biodiversity.	Comments are noted.

1.6 Wasing Lower Farm

Wasing Lower Farm		
Topic	Summary of Consultation Responses	Council Response
General	<p>Development of the site (particularly area D) would represent encroachment towards the urban area and should not be allowed.</p> <p>Too close to Brimpton Village, 3 sites all close to Brimpton. Impacts on the village from concurrent development as well as successive developments in the area.</p> <p>Development not consistent with national policy on sustainable development. This only favours economic concerns. Why extend the permitted area in a way that would diminish the well-being of local people?</p>	<p>The revised NPPF acknowledges that minerals can only be worked where they naturally occur (para 203). The NPPW requires that planning authorities assess the suitability of sites against a variety of criteria, including proximity of sensitive receptors, including ecological as well as human receptors, and the extent to which adverse emissions can be controlled. The plan will include policies to protect public health, environment and amenity and require any sites coming forward to demonstrate that the development would not result in unacceptable impacts. Where appropriate, planning conditions can be imposed for all sites taken forward to ensure amenity impacts are limited to an acceptable level. This can include restricting working hours and measures to reduce dust and noise levels. Such an approach is endorsed by the revised NPPF, paragraph 204.</p>
	Impact on the airstrip near Lower Farm.	Brimpton airstrip is within the site area. The site promoter has indicated that, should the site be allocated and developed, the airstrip would be relocated to elsewhere on the estate.
	The existing permission has not been implemented.	The existing planning permission at Wasing Lower Farm has been implemented, although it is accepted that currently extraction is not being undertaken. This is not directly relevant however, to whether the proposed areas are suitable for allocation in the emerging plan, notwithstanding issues related to timing and cumulative impacts. The already permitted areas at Lower Farm are still expected to be worked and the aggregate reserves are included in West Berkshire's landbank calculations. Further sites are still needed in order to meet the expected level of demand for construction aggregates within the plan area until 2036.
	English tort law, an individual may owe a duty to another to ensure they do not suffer any	The Council will take reasonable care to avoid acts or omissions which can reasonably be foreseen would cause harm and could

	unreasonable harm/loss (case law shows this extends to local councils) – impact on quality of life (noise, vibration, dust, traffic). The council would be failing in its duty of care to people in Brimpton and would be liable for any adverse effect on property values in the area.	not be mitigated to an acceptable level in accordance with the NPPF. The Council are legally bound to consider whether otherwise unacceptable development could be made acceptable through the use of planning conditions.
Amenity	Noise pollution. Subsidence to neighbouring properties. Damage to local properties.	Comments noted. The plan includes Policy 26 on Public Health, Environment and Amenity to protect public health, amenity and the environment. This requires any sites coming forward to demonstrate that the development would not result in unacceptable impacts on air quality, water quality or from noise or pollution. Appropriate planning conditions can be put in place to regulate any noise or air pollution within legal limits at a planning application stage. This can include restricting working hours and measures to reduce dust and noise levels. Such an approach is endorsed by the NPPF para 204.
Restoration	Previous sites have not been restored as originally proposed, there is no confidence this site would be done properly either. Kennet Valley has become one large lake.	The history of a site or track record of a particular operator is not a planning consideration. The plan includes a policy requiring timely and high quality restoration of temporary sites, and would be required in this case.
Landscape	This is an area of natural beauty, well used by the local community.	The Landscape and Visual Assessment produced to support the plan identifies the site as an area of medium or medium/high landscape sensitivity, and only areas A, B and D are recommended for development, with access only coming through area C (as per the existing planning permission). A Landscape and Visual Impact Assessment will be required in support of any future planning application, and landscape mitigation in accordance with the Council's Landscape and Visual Assessment.
Flooding	The site currently acts as a flood defence, which would be lost if the site became a gravel pit and then restored to a lake.	Extraction and restoration to a lower level, or restoration to water could help to increase flood storage, therefore, reducing flood risk in a specific area.

	Impact on the water table would affect the natural environment.	The plan includes policies to protect the environment and amenity, and address flooding (Policy 24 and Policy 26) and requires any sites coming forward to demonstrate that the development would not result in unacceptable hydrological impacts.
Transport	Additional haulage does not meet the guidance of the WB Local Transport Plan Freight Strategy 2014 or WB Partnership Climate Change Strategy 2014. Development will not help to reduce transport based carbon emissions.	The revised NPPF acknowledges that minerals can only be worked where they are found (para 203). As part of the emerging minerals and waste local plan consideration will be given to alternative transportation methodologies and reducing travel distances, however it has to be recognised that minerals can only be worked where they naturally occur.
	Local roads/bridges area not appropriate for the expected volume of HGV traffic.	All sites applying for planning permission will be required to submit a Transport Assessment/Statement as part of their planning application. This will consider the potential impact on and access to the highway network and set out relevant mitigation measures.
	A340 is already over-used.	The Council's freight strategy sets out the routes that are recommended for freight. This includes the A340 through Aldermaston which is considered to be a "district access route to key destinations". Impacts on sustainability, including potential to impact on climate change are assessed in the Sustainability Appraisal.
	ROW would be affected by additional traffic.	The Council's rights of way team have been consulted and the comments received have been used as part of the site assessment process. Where rights of way are likely to be impacted upon as part of the development of a site this will be a consideration as part of the site allocation process. The plan also includes Policy 23 on public rights of way, which requires proposals to demonstrate that they will not adversely affect a public right of way. This could include screening and buffering through landscaping works to protect the users from any nuisance aspects of the working. The policy also requires consideration of opportunities for improved access to the countryside.

Agricultural land	Grade 1, 3a, 3b	Comments noted. Policy 21, Agricultural Land, states that restoration of mineral extraction sites to agricultural land will be permitted where the restoration proposals demonstrate that the quality of the agricultural land will be conserved or enhanced as part of the restoration.
Heritage	Lower Farm and granary and The Old Malthouse (grade II listed buildings) and Wasing Park (grade II registered historic park and garden) are located to the south of the site. Advice from the conservation officer should be sort.	The Council's archaeology and conservation teams have been consulted and their responses will feed into the site assessments for the site. Further work may be required on sites and this will be done to support the submission version of the plan.
	HER should be consulted, and advice from archaeological advisor sort in relation to Palaeolithic archaeology.	See above response.
	The outcomes of assessment should be reflected in the allocation and criteria should be introduced to the policy to conserve the significance and settings of the heritage assets and assess the potential for any archaeological remains.	Further work may be required on sites and this will be done to support the submission version of the plan. The Council will consider including site specific allocation criteria which will require relevant sites to submit a Heritage/Archaeology Assessment/Statement as part of their planning application and any further archaeological work that is necessary.
	The assessment could benefit from the construction of a geo-archaeological deposit model.	The revised NPPF confirms that where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation (paragraph 189). This would be done at the planning application stage.
Ecology	Within Kennet Valley East BOA. Part of site within West Berkshire Living Landscape. Adjacent to LWS/ Close to SSSIs. Impact on wildlife.	Consultation with the Council's ecologist and Natural England has taken place regarding the sites and the comments taken into account in the site assessments. All sites wishing to apply for planning permission would need to have regard to policy 20 (Biodiversity and Geodiversity) of the plan which seeks to "maximise opportunities to achieve net gains in biodiversity and

	Appears to be a mosaic of wet ditch tributaries and floodplain grassland to River Kennet and River Enborne.	geodiversity". Further ecological work will be carried out to support the submission version of the plan. The site is proposed to be restored to agriculture with biodiversity enhancements to the lower lying north eastern area. Biodiversity enhancements would need to be considered as part of restoration and could be incorporated into priority habitat aims.
	Extraction proposals should be accompanied by a full suite of ecological surveys, including of adjacent LWS.	Relevant ecological work will be undertaken to support the allocation of the site and will support the site specific policy.
	Significant habitat buffer would be required between any extraction work and the river and LWS.	Site specific factors, such as the presence of protected species, environments and/or designations, will be taken into account when assessing the acceptability of the proposed sites and where appropriate, mitigation measures such as buffers and standoffs will be identified.
	Phasing of the extraction would be required to minimise fragmentation between habitats.	As part of any planning application that comes forward adequate information would be required in order that the decision-maker would be aware of the likely impacts of the development. This would feed into the phased working scheme. Where necessary, Environmental Impact Assessment (EIA) will consider the potential impacts and set out relevant mitigation measures at the planning application stage.
Restoration	Welcome the restoration proposed for the site.	Comments noted.
	Proposals reflect the proximity to designated ecological sites and include provision for biodiversity enhancements to compliment the nearby SSSIs and reduce flood risk.	The site is proposed to be restored to agriculture with biodiversity enhancements to the lower lying north eastern area. Biodiversity enhancements and flood mitigation measures would need to be considered as part of restoration and could be incorporated into the priority habitat aims.
	Restoration should result in a large area of priority habitat in better condition.	See above comment.
	Greater part of the site should be restored to nature conservation purposes.	See above comment.

	If restored to agriculture this should be High Nature Value agriculture to provide maximum biodiversity benefits.	See above comment.
	Restoration/aftercare need to be of a sufficient timescale (not less than 25 years) to ensure priority habitat created is delivered successfully and a net gain legacy is achieved.	The statutory aftercare period (as defined in the Town and Country Planning Act 1990) is 5 years. Longer aftercare periods could be required depending on the specific circumstances and restoration of the site. The supporting text refers to a “minimum of 5 years” so there would be scope for the Council to negotiate with individual promoters for a longer aftercare period where this is considered appropriate. It is acknowledged that a longer time period can be required to fully allow the restoration to bed in.
Site Promoter	Supports allocation of the site, no changes are proposed.	Comments noted.

1.7 Waterside Farm

Waterside Farm		
Topic	Summary of Consultation Responses	Council Response
General	No economic assessment has been made. Other assessments do not address the viability of the site.	Additional mineral resource assessment work will be undertaken to support the selection of sites for inclusion in the plan. Viability will be a factor in assessing sites for allocation.
	Consideration of colocation is supported by the NPPF – there are no advantages over other proposed sites for this site.	Comments are noted.
Reserves	Reserves likely to be significantly less than that estimated in the Council's plan. This has been implied by the operator.	The operator has been requested to provide further details regarding the viability of the deposit.
	Site has high density saturated peat which would need to be removed and restored prior to extraction – may make the site unviable.	It is recognised that the developable area of the site may not be viable on its own but the rest of the site is not considered acceptable for development in landscape terms.
	<p>Even without this site the Council has enough reserve.</p> <ul style="list-style-type: none"> • Primary aggregate demand has dropped by 71% in last 10years. Recycled aggregate use has increased since 2010, outselling primary aggregates 2:1. • Using a 10 year average overstates usage by +100% • Using current uses levels there are about 20 years reserves left and no requirement for more sites <p>Small site area unlikely to be commercially viable and too far from processing plant.</p>	The Council's need for minerals is set out in the Local Aggregate Assessment and is based on the last 10 years sales as set out in the NPPF.
Proposed Allocation	Assume the other areas outlined in red could not be added in at a later date.	Only part of the site is considered suitable for allocation in landscape terms and therefore, will not be proposed for allocation through the Local Plan. If the remainder of the site was to be put forward it would be considered on its merits against the policies in the plan. However, there would be a presumption against development of the wider site if it was not allocated in the plan and therefore, exceptional circumstances would have to be demonstrated for it to be considered favourably.

	Motivation is commercial, money can be saved if the operator can continue to use the processing plant at Colthrop rather than moving it elsewhere	The location of the processing plant is not taken into account when assessing the suitability of the site for development.
	Just because there is gravel there, does not mean it has to be extracted.	Gravel can only be extracted where it lies and sites can only be considered for allocation to meet the Council's need where they have been submitted to the council for consideration.
	The developable area of the site is the furthest from the processing plant	Comment noted, the area proposed as the developable area is the only part of the site considered suitable for development in landscape terms.
	Do not trust operator to honour commitments made.	The proposed operator of a site is not taken into account when considering the suitability of a site for development.
Agricultural Land	Grade 1	The data available to the Council indicates that the site is grade 2 agricultural land.
Flooding/Water	Concern regarding the impact on the natural floodplain resulting in flooding issues (following floods in 2014 this area was used as natural flood storage).	The concerns regarding flooding are noted, however, mineral extraction is a water compatible activity and can, in the long term, result in reduced flood risk as restored sites can provide flood storage.
	Restoration of the site will not result in the same environment for flooding	Where a site is at risk from flooding the restoration proposals need to take into account the water environment and ensure there is no longer term change in the way the water flows through the site.
	High water table in the area (1m or less in some places). Plumps would be required to run 24/7 to be effective	This is not unusual for mineral sites as they are often located within flood risk areas.
	Impact on River Kennet SSSI would need to be considered and water levels and flows maintained in line with the requirements of the SSSI status.	Noted. Any development on the site would need to take into account the River Kennet SSSI.
	SFRA should have been undertaken.	The Council's SFRA has been completed and takes into consideration the flood risks on all the sites. The outcomes of this assessment will be transferred into the site assessments and SA/SEA.
Landscape	This is an area of natural beauty which would be destroyed for up to 12 years	The site has been subject to a landscape assessment which identifies only one area as being suitable for development.

Transport	<p>Concerns over traffic</p> <p>Impact of lorries on local roads</p> <p>Impact on Thatcham level crossing</p> <p>Access to the processing plant could be achieved without using the local road network.</p>	<p>The site does benefit from being close to the Colthrop Processing plant which may be able to be accessed without using the road network.</p>
	<p>Crookham Hill is closed to HGVs</p>	<p>It is noted that Crookham Hill has a weight restriction. It is likely that the extracted material would be transported via conveyer to Colthrop Processing Plant, and therefore, would not use the road network.</p>
	<p>Impact on bridleway passing through the site</p> <p>If gravel was to be moved within the site the track would cross the bridleway and footpath spoiling the amenity value of both.</p>	<p>Where rights of way are likely to be impacted the development of a site, diversions or new routes can be provided, the details of which would be determined at planning application stage. Requirements to protect rights of way will be included in the site policy for any sites allocated.</p>
	<p>Creation of a track within the site would require a bridge over the River Kennet</p>	<p>It is noted that a bridge would be required over the River Kennet, however, a bridge has already been provided over the river to the east of the site and therefore, it is not considered that this would be a showstopper. It is recognised that all relevant ecological work and mitigation would be required to ensure there would be no negative impact on the SSSI.</p>
Ecology	<p>Concerns over impact on wildlife</p> <p>A number of 'at risk' species have been identified (otter, water vole, kingfisher, cetti's warbler)</p>	<p>Consultation with the Council's ecologist and Natural England has taken place regarding the sites and the comments taken into account in the site assessments. All sites wishing to apply for planning permission would need to have regard to policy 20 (Biodiversity and Geodiversity) of the plan which seeks to "maximise opportunities to achieve net gains in biodiversity and geodiversity". Further ecological work will be carried out to support the submission version of the plan.</p>

	<p>Within 250m of Greenham and Crookham Commons SSSI and adjacent to River Kennet SSSI</p> <p>Adjacent to Waterside Farm Reedbed LWS and a number of other LWSs</p> <p>Significant buffer would be required between the site and the SSSI (greater than the standard minimum 15m buffer)</p> <p>Access crossings across the SSSI should not be considered to maintain the function of the river as a wildlife corridor</p>	<p>The proximity of the site to the SSSI and LWS is noted. Hydrological assessment work alongside ecology assessments would be required to show how development of the site would ensure no negative impacts on these sensitive areas.</p>
	<p>Developable area on Natural England's Priority Habitat Inventory as priority habitat coastal and floodplain grazing marsh – contrary to NPPF requirement to prefer land of least environmental value, unless field survey of the site have assessed the habitat differently – no evidence provided.</p>	<p>Minerals can only be dug where they exist, and sites can only be considered for allocation where they have been identified to the Council. Therefore, while the potential impacts on biodiversity/ecology have been taken into account, a number of other factors are also considered when assessing the site's suitability for allocation.</p>
Amenity	<p>Close to Thatcham which already suffers from poor air quality</p> <p>Impact on air quality</p>	<p>An Air Quality Management Area (AQMA) has been declared for an area of the A4 in Thatcham, however, it is not considered that this area would be impacted on as a result of development of this site. The Council's Environmental Health team have been consulted and have not raised any significant concerns regarding development of the site.</p>
	<p>Impact on bridleway</p>	<p>Where rights of way are likely to be impacted the development of a site, diversions or new routes can be provided, the details of which would be determined at planning application stage. Requirements to protect rights of way will be included in the site policy for any sites allocated.</p>
	<p>Noise pollution</p> <p>Dust generation</p>	<p>The Council's Environmental Health team have been consulted and have not raised any significant concerns regarding development of the site. It is not considered that works on the site would result in unacceptable impacts.</p>

		Mitigation measures would need to be provided to reduce the noise and dust generated from the site.
Heritage	The site is not near any designated heritage assets	Comments noted.
	The HER should be consulted for possible non-scheduled archaeological remains	Further historic heritage assessment, including consulting the HER may be required on sites and this will be done to support the submission version of the plan.
	<p>Consideration should be given to potential for late upper Palaeolithic and Mesolithic remains</p> <p>If the site is to go forward the site should be amended and/or criteria introduced to the allocation policy to assess the potential for and conserve any archaeological remains.</p> <p>Any assessment is likely to benefit from the construction of a geoarchaeological deposit model</p>	The Council will consider including site specific allocation criteria which will require relevant sites to submit a Heritage/Archaeology Assessment/Statement as part of their planning application and any further archaeological work that is necessary. The NPPF confirms that where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation (para 189).
Infrastructure	<p>A 132kV electricity line passes between the Colthrop Processing Plant and Waterside Farm. SEPD is proposing to install a new cable along this route. It is unclear what impact the LP would have on this.</p> <p>Due to on-going load growth further reinforcement of the supply is needed in the near future</p> <p>Need constructive cooperation with SEPD prior to the adoption of the Plan.</p>	The presence of the electricity line is noted. Further discussions with SEED will be required to determine the potential impact on the plan should the site be taken forward for allocation.
Restoration	Restoration will mean the site does not drain properly and will be useless as good quality grazing or land for crops	Comments are noted. Restoration will need to return the site to the same or better quality.
	Welcome the restoration proposals, which recognise the proximity to designated sites and include provision for biodiversity enhancements to compliment the nearby SSSIs and reduce flood risk.	Comments are noted.
	Part of the site should be restored to nature conservation purposes.	The restoration proposed for the site includes some nature conservation.

<p>Site Promoter</p>	<p>Consider the landscape assessment inconsistent and fails to appreciate the development proposed and its phasing would limit the potential impact.</p> <p>Only one area of the site would be worked at a time, with another being restored (14 areas in all), which would mean only 15% of the area would be impacted at any one time.</p> <p>Average duration of each phase is 9 months.</p> <p>Landscape features (watercourse, woodland, PROW) would be retained.</p> <p>Site would be progressively restored back to agricultural use at existing ground levels.</p> <p>Measures would comply with LCA landscape strategy/guideline criteria.</p> <p>Characteristic of the site is not untypical of the Kennet Valley, therefore the entire valley should be considered of equal weight. The LCA implies that the north west area is more suitable for development merely because it is urban fringe, which is considered illogical</p> <p>The SSSI located near to the northern boundary is listed for its water quality, therefore is of no relevant to the landscape assessment.</p> <p>Combined landscape assessment rates the site of medium/low sensitivity, therefore all the site should be acceptable.</p>	<p>Comments are noted. The Landscape assessment considers the site on a consistent basis and assesses the impact any development would have on the landscape character of the area.</p> <p>The Landscape Assessment of site options was undertaken by an independent consultancy and assessment of site options is expected to be consistent within this report, as the same methodology is followed and the same professional has undertaken all site assessments. The site is identified as being of medium/low landscape <i>capacity</i> (not landscape <i>sensitivity</i> as suggested by representor). Phasing of development will not limit impacts in areas where impacts upon landscape are not deemed acceptable.</p>
	<p>The impact on ancient woodland is not a landscape consideration.</p>	<p>The presence of any woodland in the immediate vicinity of the site makes up part of the landscape character of the area</p>

		and therefore, is a consideration when considering the impact on the landscape.
	LVIA of phased development has been commissioned, visibility plans produced.	Comments noted. The Council have some concerns regarding the viability of the site given the small developable area proposed and therefore, information has been requested from the site promoter regarding viability.