

Minerals and Waste DPD Issues and Options Response Form

Please continue on a separate sheet if you need more room for your answers

Name	Francis Thompson MRICS, FIQ
Organisation	FTMINS
Address	Meadow Bank, Horsted Lane, ISFIELD, UCKFIELD, TN22 5TU
Tel	01825 750205
Email address	francis.thompson@ftmins.co.uk
As agent for and on behalf of:	The Wasing Estate Wasing Estate Office, The Gardens, Wasing Park, Aldermaston, READING Berkshire, RG7 4NG
Tel:	0118 971 4140
	Email: ian@wasing.co.uk

Please return to **Berkshire JSPU**, St Mary's House, C/o Town Hall, St Ives Road,
Maidenhead, Berkshire, SL6 1RF
Or email to minerals.waste@rbwm.gov.uk by **5 November 2007**.

Chapter 3 – Development Control Issues**ISSUE No.1 Content of Development Control Policies****QUESTION 1**

- a) Is the suggested list of policy topics in paragraph 3.9 of the Minerals and Waste DPD Issues and Options Report appropriate?

Yes No

Please comment

The whole list of twelve bullet point issues are important as stated. There is reference to restoration and beneficial after-use, express or implied throughout. However, there is little open consideration given to whether a particular After-Use as such might form part of other DPDs and as such constitute a 'material factor' in the consideration of any particular site for identification or approval for development of an interim minerals or waste use.

At Wasing Estate where river gravel terrace deposits are available there is potential for beneficial change of use from present day (almost redundant) farming use to provide economically beneficial water based leisure, tourist, local amenity and nature conservation After-Use of land following mineral extraction. For this reason we consider this should be a featured policy requirement.

- b) Please list any other topics which you think require a policy.

Please comment

After-Use: It would be appropriate to enter a bullet point heading of After-Use as a topic heading.. This is to enable this Minerals and Waste DPD to harmonise with and relate more fluently to the other DPDs of Districts where it may be a crucially important consideration in site identification.

ISSUE No.2 Assessing the Effects of Waste Related Development Proposals – Different Types of Waste Facility

QUESTION 2

- a) Do you think that different sets of criteria are needed to assess proposals for different types of waste management facility or setting? Or
- b) Do you think that a single set can be applied to any form of waste related development or setting? Or
- c) No opinion

Please tick which apply

(a) (b) (c)

If answering (a) or (b) please explain the reasons for your answer

Subject to the modification suggested in our response to Question 1, we consider that the specific development proposal should be able to be assessed under the terms listed.

ISSUE No.3 The Location of Waste Facilities – Sites Outside the Preferred Areas

QUESTION 3

The Core Strategy Preferred is to allow waste management facilities in principle outside Preferred Areas:

- a) Do you think an approach which considers sites in terms of their advantages as alternatives to allocated Preferred Area sites (Approach A) is most appropriate?
- b) Do you think that Approach A should be accompanied by an approach involving Preferred Areas of Search (Approach B)?
- c) Do you think that a more flexible approach (Approach C) which allows the consideration of proposals on their individual merits more appropriate?
- d) Do you think allocated sites should be deleted at LDF reviews if comparable “windfall” development has been delivered in the meantime – this could include both waste treatment and disposal facilities?
- e) No opinion.

Please tick which apply

(a) (b) (c) (d) (e)

Please explain the reasons for your answers here
This option presents the most reasonable flexibility in the policy framework and recognises the potential influence of other DPDs.

ISSUE No.4 The Location of Waste Facilities – Waste Management Development in the AONB and Green Belt

QUESTION 4

- a) Do you consider that the policy approach outlined at Paragraph 3.42 is correct? Or
- b) Do you think an approach to waste management development, which does not list the types of development appropriate in the AONB or Green Belt would be preferable?
- c) Should the issue of locating waste management development in the Green Belt and in the AONB, be dealt with in separate policies?
- d) No opinion

Please tick which apply

(a) (b) (c) (d)

Please explain the reasons for your answers here
This option presents the most reasonable flexibility in the policy framework and recognises the potential influence of other DPDs.

ISSUE No.5 Movement of Waste

QUESTION 5

- a) Do you agree that there should be specific policy referring to transport objectives and potential impacts; or
- b) Do you consider that transport can be dealt with in a development control criteria policy as discussed at Issue 1 above?
- c) If you consider a new policy is required, do you agree with the suggested content of a transport-specific policy outlined above? If not please explain why and suggest an alternative.
- d) No opinion

Please tick which apply

(a) (b) (c) (d)

Please explain the reasons for your answers here

ISSUE No.6 Safeguarding of existing waste management facilities and undeveloped Preferred Areas

QUESTION 6.1

- a) Do you agree that a policy is required to safeguard existing waste management facilities and Preferred Areas from competing forms of development?
- b) Do you think such a policy should seek to prevent all loss of waste management capacity? **or**
- c) Do you think that a flexible approach should be taken, which restricts only those proposals which might threaten achievement of Core Strategy objectives?
- d) In the event of loss of a facility to a different use, do you agree that if compensatory capacity were required it should be provided in the same UA as the facility to be lost?
- e) No opinion.

Please tick which apply

(a) (b) (c) (d) (e)

Please explain the reasons for your answers here

This option presents the most reasonable certainty and retains flexibility in the policy framework and recognises the potential influence of other DPDs.

QUESTION 6.2

If you have answered yes to Question 6.1(a):

- a) Do you agree that a list of existing waste management sites would be needed to accompany a safeguarding policy?
- b) Does the bullet list at paragraph 3.31 cover the selection criteria that need to be applied in identifying the existing sites that need to be safeguarded? **or**
- c) Do you have an alternative approach, such as generic criteria?
- d) Do you agree that non-inclusion in a sites list is an appropriate way of indicating that taking the site out of waste management use would be acceptable to the JMWDF objectives?
- e) No opinion

Please tick which apply

- (a) (b) (c) (d) (e)

Please explain the reasons for your answers here

If it is possible to establish a list of existing and potential waste management sites then this should be done and a safeguarding policy applied to them. Each subsequent application for development of such sites which is not for a waste management use would then need to be treated on its merits, with the planning authority holding the benefit of this safeguard policy. This option would then present the most reasonable flexibility in the policy framework and recognises the potential influence of other DPDs.

Chapter 4 – Approach to Selection of Minerals Preferred Areas**ISSUE No.7 Environmental site selection considerations****QUESTION 7**

- a) In the approach to the selection of Preferred Areas for extraction of sharp sand and gravel, do you agree with the suggested list of environmental site selection considerations?

Yes No

Please comment

The whole list of issues associated with site selection are important as stated but appear to be negatively focussed on some of the impacts of mineral working on an existing environment.

There is reference to restoration and beneficial after-use, express or implied throughout. However, there is little open consideration given to whether a particular After-Use of a mineral working site might form part of other DPDs and as such constitute a 'material factor' in the consideration of any particular site for identification or approval for development of an interim minerals or waste use.

Thus, when considering site selection under the new framework policy and document system it will be equally important to consider the proposed After-Use of the particular mineral working and how that proposed After-Use may affect or be affected by those other criteria.

This approach should also allow important Community and Economic factors to be brought into consideration at the earliest stages of the development cycle.

At Wasing Estate where river gravel terrace deposits are available there is potential for beneficial change of use from present day (almost redundant) farming use to provide economically beneficial water based leisure, tourist, local amenity and nature conservation After-Use of land following mineral extraction. For this reason we consider this should be a featured policy requirement.

- b) Please list any other environmental considerations that you think should be taken into account ?

Please list with any comments

After-Use of the land to be subject to a proposed, interim, mineral working scheme.

ISSUE No.8 Resource and Site Considerations**QUESTION 8**

In the selection of Preferred Areas for extraction of sharp sand and gravel in Berkshire, is it appropriate to consider:-

- a) likely yield from the site would justify the disturbance caused?

Yes No

Please comment

In general terms it should usually be more beneficial to the environment, the community, the economy and the spatial development of minerals for those mineral deposits which yield highest in terms of volume or quality to be worked before those which yield lower.

- (b) Whether the size of a site would be likely to justify the costs associated with its establishment, i.e. does it appear commercially viable?

Yes

No

Please comment

It appears to us that applicants will be unlikely to bring forward applications or proposals which will not be viable.

- (c) Whether the site would could only be acceptably worked or its extraction only be viable when worked in conjunction with other mineral operations nearby which are currently approaching the end of their operation?

Yes

No

Please comment

The proposal in each case would be very site specific and the merits of each taken and balanced against the policy framework and the After-Use of the proposal area.

- (d) Any other resource or site considerations?

Please describe

On the Wasing Estate there are extensive resources of river terrace sand and gravel. These have been assessed in the light of the factors referred at Table 4.1. This assessment has produced four target areas which we have identified as potentially workable within the plan period. However, we do not propose to work all of these resources within the plan period.

Accordingly, we have identified each of these to the joint planning unit and the West Berkshire District Planning Authority such that all DPDs might note these proposals which the Estate would like to progress towards.

We should very much like to make early progress to develop one of these sites at Wasing Lower Farm North which we consider is highest yielding and has the lowest affect or impact on the local environment and our neighbours. We would like to see this site identified as a **Proposed Preferred Area for Mineral Extraction**.

There are two adjoining areas, Wasing Lower Farm South and Wasing Lower Farm East, which we should like to offer for consideration for development later in this plan period or perhaps in the next plan period, post 2025. Since we regard these two additional reserves as being material factors we have brought these to the attention for consideration in the context of the whole Minerals and Waste DPD.

Thus, whilst the Estate has no 'Great Scheme' of development it is seeking satisfactory policy identification of the potential it holds to satisfy the requirements in part of this DPD at this time. (It should also be noted that the Estate has contributed to the requirements of the local area for more than fifty years in the past and such development has assisted the maintenance of this part of the Berkshire countryside).

In summary therefore policy should take into account long term and spatially relevant factors surrounding any particular site being considered for identification.

ISSUE No.9 Cumulative Impact**QUESTION 9**

- a) In the selection of Preferred Areas for extraction of sharp sand and gravel in Berkshire, is it appropriate to:
- i. Limit the amount of mineral working in a specific location, or
 - ii. Focus extraction on a 'package' of sites in one location that could be worked in a co-ordinated and phased manner or
 - iii. Select the most appropriate sites based on the environmental considerations, or
 - iv. A combination of the above depending on local circumstances?

Please tick which apply

(i) (ii) (iii) (iv)

Please describe why

The DPD should retain all options open to it in order to ensure that it meets the many, varied and variable requirements for the provision of construction materials throughout the plan period.

- b) Do you think that Supplementary Planning Guidance is needed to guide mineral working in specific locations?

Yes to (b) No to (b)

Please describe why

Planning applications should be prepared in the light of the applicable development plan policies. These latter should be reliable, clear, unambiguous and certain. The application process involves pre-consultation of many consultees on specific proposals. Supplementary Planning Guidance would introduce an area of uncertainty (in spite of its title) which is unnecessary if this DPD is properly formulated.

ISSUE No.10 Extensions or New Sites**QUESTION 10**

- a) In the selection of Preferred Areas for extraction of sharp sand and gravel in Berkshire, do you think it is appropriate to:-
- i. give priority to the extension of existing sites? Or

- ii. give priority to new sites? Or
- iii. not give priority to either and to treat each site on its merits?

(i) (ii) (iii)

Please describe why
 Planning applications should be prepared in the light of the applicable development plan policies, regional plans and government guidance. These should be reliable, clear, unambiguous and certain. These deal already with policy for extensions in general terms but leave consideration of each individual site to be treated on its merits.

- b) Do you agree with continuing the pattern of satellite sites in situations where the impact of transport between sites is less than the impact of processing material where it arises? Please tick which apply

Yes to (b) No to (b)

Please comment
 Such situations arise and circumstances point to the most sustainable and environmentally and economically acceptable solutions.
 At Wasing Estate, together with the Marley company, we have identified material at Manor Farm West which we have brought to attention for identification in this DPD. This material will provide a quality match for the current sharp sand feedstock at the nearby Marley tileworks. The Estate would prefer that no processing plant be established at Manor Farm West and so the ability of Marley to take this material and process it at their factory would provide a sustainable, environmentally and economically acceptable solution to the optimum development of this resource.

ISSUE No.11 Restoration

QUESTION 11

- a) What do you think is the appropriate approach to restoration and afteruse in the Minerals DPD?

The options are

- i. for the plan to contain detailed guidance on the form of restoration and possible afteruse at Preferred Areas, or
- ii. a more flexible approach allowing restoration issues to be decided at the planning application stage.

(i) Detailed guidance (ii) Flexible approach

Please comment

We select neither of the Options given as a complete answer to this question. This is so that we remain constant in our submissions to influence policy.

We would suggest that a crucially important planning consideration in Mineral Planning in West Berkshire when considering the identification of Preferred Areas for Mineral Working is the question of the acceptable or desirable AFTER-USE of the site.

Reasons for this lie in the potential for acceptance of such an After-Use by the land and mineral owner, by the neighbours to the proposed After-Use and by the local community at large, the Parishes, Districts.

They also relate to the nature and character of the mineral extraction and production process to achieve that After-Use, which in turn influence the economics of the production process.

Thus, we would suggest that first the Acceptable After-Use should be determined and then the regulating and controlling features of the restoration of the mineral working to achieve that After-Use should be determined.

By this means the Minerals and Waste DPD could harmonise with and relate more fluently to the other DPDs of Districts where such After-Use may be a crucially important consideration in site identification.

- b) Do you think that the limited landfill material available for restoration should be directed to priority sites, identified say for their potential for restoration to fulfil specific restoration objectives, for example sites on high-grade agricultural land, or with specific ground water characteristics?

Yes

No

Please comment

This suggested policy appears to fall outside land and mineral and waste planning regulation and control abilities and to begin to intrude into the commercial trade in inert waste materials. Whilst such control may be available through the issue of planning permissions it does not appear to fit policy at DPD level.

Chapter 5 – Minerals Site Specific Issues

ISSUE No.12 Preliminary Candidate Mineral Safeguarding Areas

QUESTION 12

- a) Do you have any comments about the suitability of the Candidate Mineral Safeguarding Areas shown in Appendix C (i)? There is no need to comment on all areas.

Please comment

None

Continue on a separate sheet if necessary.

- b) Are there any areas **not included** in the provisional maps in Appendix C (i) that you think should be considered as potential Mineral Safeguarding Areas in the Plan?

Yes

No

If Yes, please provide a map of the site and supporting information.

Continue on a separate sheet if necessary.

ISSUE No.13 Preliminary List of Candidate Preferred Areas for extraction of sharp sand and gravel

QUESTION 13

- a) Do you have any comments about the suitability of any of the Candidate Preferred Areas for extraction of sharp sand and gravel in Table 5.1 and Appendix C (ii).? There is no need to comment on all sites.

Please comment

[We provide our detailed comments on separate sheets in respect of WB M04 and WB M05](#)

Continue on a separate sheet if necessary.

- b) Are there any sites not included in the provisional list that you think should be considered as potential candidate Preferred Areas for extraction of sharp sand and gravel in the DPD?

Yes

No

If Yes, please provide a map of the site and supporting information

ISSUE No.14 Preliminary list of candidate Areas of Search for building sand

QUESTION 14

- a) Do you have any comments about the suitability of the candidate Areas of Search for building sand shown in Appendix C (iii)? There is no need to comment on all areas.

Please comment

None

Continue on a separate sheet if necessary.

- b) Are there any areas not included in the provisional map that you think should be considered as potential Areas of Search for building sand in the Plan?

Yes

No

If Yes, please provide a map of the area and supporting information.

ISSUE No.15 Safeguarding Rail Depots

QUESTION 15

a) Do you think that it is appropriate to safeguard existing rail depots in order to retain their future availability for the handling of minerals?

Yes

No

Please comment

b) Is it appropriate to continue to safeguard sites for mineral rail depots at:

- i. Padworth Sidings
- ii. Pingewood
- iii. Slough Goods Yard
- iv. Poyle?

Please tick those which you think should continue to be safeguarded:

(i) (ii) (iii) (iv)

Please comment

c) Are there any other sites that you think should be considered as potential candidate safeguarded sites for mineral rail depots?

Yes

No

If Yes, please provide a map of the site and supporting information.

d) Do you agree with delineating Rail Depot Buffer Zones?

Yes

No

e) If so, how should they be defined?

Please comment

Chapter 6 – Approach to the Selection of Waste Preferred Areas

ISSUE No. 16 Environmental Site Selection Considerations

QUESTION 16

(a) Do you agree with the suggested priority approach to identifying Waste Preferred Areas?

Yes

No

If not, please comment

(b) Do you agree with the considerations listed in Table 6.2?

Yes

No

If not, please comment

(c) Are there any planning or considerations missing from Table 6.2 that should be taken into account?

Yes

No

If yes, please comment

(d) No opinion

ISSUE No 17 Site Selection – Preliminary List of Waste Preferred Areas

QUESTION 17.1 – Review of Waste Preferred Areas in BWLP98

Please indicate whether you support or object to the proposed approach to each of the existing Berkshire Waste Local Plan Preferred Areas identified in Table 6.3. Please indicate the reason for your answer in respect of each location (use additional pages for comment if necessary).

Preferred Area Ref	Support	Object	Reason
Membury Airfield WB W01	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
Pinchington Lane, Greenham WB W02	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
Greenham Common WB W03	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
Colthrop WB W04	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
Knott Lane, Beenham WB W05	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
Padworth Sidings WB W06	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>
Whitehouse Farm, Aldermaston WB W07	<input type="checkbox"/>	<input type="checkbox"/>	<input type="text"/>

Blue Circle Theale WB W08	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The Hangar, Sheffield Bottom WB W09	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ARC Plant Site, Sheffield Bottom WB W10	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Smallmead, Reading R W01	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Star Works, Knowl Hill W W01	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Longshott Lane, Bracknell BF W01	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Former Timber Yard, Englemere BF W02	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hindhay Quarry, Pinkney's Green RBWM W01	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Braywick, Maidenhead RBWM W02	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plant Site, Monkey Island, Bray RBWM W03	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Riding Court Farm, Datchet RBWM W04	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
North of Horton RBWM W05	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Manor Farm, Slough S W01	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Manor Farm Sewage Works S W02	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Slough Trading Estate S W03	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Farleigh Road, Slough S W04	<input type="checkbox"/>	<input type="checkbox"/>	
Chalvey Waste Transfer Station S W05	<input type="checkbox"/>	<input type="checkbox"/>	
Slough Goods Yard S W06	<input type="checkbox"/>	<input type="checkbox"/>	
Rosary Farm, Poyle S W07	<input type="checkbox"/>	<input type="checkbox"/>	
Colnbrook Rail Depot S W08	<input type="checkbox"/>	<input type="checkbox"/>	

QUESTION 17.2 Site Selection – Preliminary List of Waste Preferred Areas – Potential Candidate Waste Preferred Areas

Please indicate whether you support or object to the proposed approach to each potential candidate Waste Preferred Area identified in Table 6.4.

Please indicate the reason for your answer in respect of each location (use additional pages for comment if necessary).

Preferred Area Ref	Support	Object	Reason
Barton Court, Kintbury WB W11	<input type="checkbox"/>	<input type="checkbox"/>	
Copyhold Farm, Curridge WB W12	<input type="checkbox"/>	<input type="checkbox"/>	
Land South of Bath Road, Colthrop WB W13	<input type="checkbox"/>	<input type="checkbox"/>	
Weirside, Burghfield Road, Reading WB W14	<input type="checkbox"/>	<input type="checkbox"/>	
Reading Quarry WB W16	<input type="checkbox"/>	<input type="checkbox"/>	
Hythe End Landfill, Wraysbury RBWM W06	<input type="checkbox"/>	<input type="checkbox"/>	

Sheephouse Farm, Maidenhead RBWM W07			
Kingsmead Quarry, Horton RBWM W08			
Tanhouse Farm, Colnbrook S W09			
East of Sutton Lane Landfill, Colnbrook S W10			

QUESTION 17.3 Site Selection – INVITATION TO SUBMIT POTENTIAL CANDIDATE WASTE PREFERRED AREAS

Please use this opportunity to make representations about any sites you wish to have considered for inclusion as Preferred Areas for waste management development in the Minerals and Waste DPD.

Please use additional sheets if necessary. Any sites put forward should be accompanied by a location plan and site plan showing site boundaries and proposed means of access, together with details of the proposed waste management activities, types of waste to be handled, and suggested annual capacity in the case of waste treatment facilities, or total capacity and proposed rate of fill in the case of landfill.

WASING ESTATE – EXISTING WOOLHAMPTON PIT PROCESSING SITE

We attach a plan showing the location of this site extending over 12 hectares approximately. It is the site of a former gravel pit processing plant and associated buildings. It is remote from most residential development and is well screened. It has good road access to the arterial routes.

This submission requests that this site be identified as a Preferred Site for Waste Management by the receipt, processing, storage, recycling and resale of inert wastes.

It is ideally located in the rural West Berkshire between Thatcham and Theale and can serve Aldermaston and Tadley inert waste disposal requirements. It is anticipated that actual use of the site would be variable through the year with mobile process plant brought onto the site as and when needed. Please see our supplementary paper detailing our further response.

ANY OTHER FEEDBACK



Do you have any other comments or feedback?

Continue on a separate sheet if necessary.

We thank you for providing comprehensive cover of all the consultation documents and papers on your website.

We will submit our response to consultation to you on pdf documents by email with a signed paper copy via the post.

Thank you for completing this Response Form.

Please return to **Berkshire JSPU**, St Mary's House, C/o Town Hall, St Ives Road,
Maidenhead, Berkshire, SL6 1RF by **5 November 2007**.

Data Protection Statement

Please note the information you provide will be used in accordance with the Data Protection Act 1998, to assist in the preparation of the Berkshire Minerals and Waste Development Frameworks and related minerals, waste and development control planning issues. If you wish to have your address and other contact details removed from the Development Framework database (but not your name because this is needed to maintain an audit trail of the Councils' public consultation) then please tick here