



Minerals and Waste Local Plan (Preferred Options)

Ref:
(For official use only)

Please complete online or return this form to:	Online: http://consult.westberks.gov.uk/portal .
	By email: mwdpd@westberks.gov.uk
	By post: Minerals and Waste, Development and Planning, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	Friday 30th June 2017 by 5pm

PART A: Your Details

Please note the following:

- We cannot register your representation without your details.
- Representations cannot be kept confidential and will be available for public scrutiny; however, your contact details will not be published.

	1. Your details	2. Agent's details (if applicable)
Title	Mr	
First Name*	David	
Last Name*	Payne	
Job title <i>(where relevant)</i>	Senior Planning Advisor	
Organisation <i>(where relevant)</i>	Mineral Products Association	
Address* <i>Please include postcode</i>	Gillingham House 38-44 Gillingham Street London SW1V 1HU	
Email address*	David.payne@mineralproducts.org	
Telephone number	07834268407	
Consultee ID <i>(if known)</i>		

**Mandatory Field*

Do you wish to be kept informed on the progress of the Minerals and Waste Local Plan?

Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
<i>If yes, please ensure you have provided an email address above.</i>			

PART B: Comments

Please complete a new form for each representation you wish to make. Each representation, including any comments on the SA/SEA or evidence base, should relate to an individual policy or section of the Minerals and Waste Local Plan (Preferred Options).

The Minerals and Waste Local Plan will be examined by an independent inspector whose role includes assessing whether the plan is sound. For the plan to be sound it should be:

- **Positively Prepared** – the plan should be prepared base on a strategy which seeks to meet objectively assessed development and infrastructure requirements
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
- **Effective** – the plan should be deliverable over its period and based on effective working on cross-boundary strategic priorities
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF

We are therefore seeking your views on the soundness of the Minerals and Waste Local Plan (Preferred Options). Your comments will be published on our Local Plan Consultation Portal and should be planning related. The Council has a duty not to accept comments of a discriminatory nature.

Please indicate which part of the Minerals and Waste Local Plan (Preferred Options) this comment relates to:

Section	4
Policy	2
Appendix	

Do you consider the preferred approach/option to be sound?

(Please select one)

Yes		No	x	Unspecified	
-----	--	----	---	-------------	--

Please give reasons, and if objecting, please indicate what changes you are seeking or what would be your preferred alternative approach or option for allocation.

Comments:

The policy should include the figure from the latest LAA (330,000tpa) as the annual production that it will seek to be maintained, as well as a total to be provided for over the Plan period to maintain a landbank of at least 7 years' supply. It should refer to 'at least' 4 million tonnes, which would reflect para 4.16-4.18 and the additional flexibility provided by identifying all of the allocated sites. Inclusion of the figures in the policy would reflect the recent advice from the Planning Inspectorate eg Oxfordshire Core Strategy Examination and Inspector's Interim Report (October 2016).

It is important that, given the uncertainty over future demand and risks of reliance on the 10 year average of past sales as an accurate indicator of this, that the policy and the Plan as a whole provides a degree of flexibility to enable new reserves to be permitted, and that a landbank of 7 years is not treated as a 'cap' on new permissions (as advised in PPG). Inclusion of an annual production figure in the policy may help to provide for this and to enable additional reserves to be permitted that maintain supply but also competition.

Your completed representations must be received by the Council by 5pm on Friday 30th June 2017.

This is particularly important as demand for construction aggregates is currently increasing and is forecast to grow in the short to medium term (see MPA's recent *Economic Market Briefing and Long Term Aggregates Demand and Supply Scenarios* provided to SEERAWP).

We understand the difficulty of providing for separate landbanks for soft sand and sharp sand and gravel due to the small number of sites and concerns over confidentiality (although MPA members may be content to make sales data publicly available).

Please indicate which part of the Minerals and Waste Local Plan (Preferred Options) this comment relates to:

Section	4
Policy	8
Appendix	

Do you consider the preferred approach/option to be sound?

(Please select one)

Yes		No	x	Unspecified	
-----	--	----	---	-------------	--

Please give reasons, and if objecting, please indicate what changes you are seeking or what would be your preferred alternative approach or option for allocation.

Comments:

We support the safeguarding applied to resources and infrastructure. However, bullet 3 of the 'circumstances' allows development that would prejudice operations of sites that are not operational at the time of the (non minerals) application, or it can be demonstrated it is unlikely to be operational during the plan period. Safeguarding is about the long-term, and so beyond the Plan period. Once the site is lost or future operations prejudiced through development on or incompatible development close to the site, it is lost forever. Thus, this clause doesn't appear consistent with the principle of safeguarding, nor the intention of the policy (reflecting NPPF requirements) of safeguarding 'potential' infrastructure. Given the importance of rock imports into Berkshire, the Plan should ensure safeguarding in the long term of existing, planned and potential infrastructure.

Please indicate which part of the Minerals and Waste Local Plan (Preferred Options) this comment relates to:

Section	4
Policy	19
Appendix	

Do you consider the preferred approach/option to be sound?

(Please select one)

Yes		No	x	Unspecified	
-----	--	----	---	-------------	--

Please give reasons, and if objecting, please indicate what changes you are seeking or what would be your preferred alternative approach or option for allocation.

Your completed representations must be received by the Council by 5pm on Friday 30th June 2017.

Comments:

The first 3 bullets reflect the requirements of the NPPF, and provide for development within the AONB in exceptional circumstances and in the public interest. Bullet 4 introduces the need to conserve and enhance the natural beauty of the AONB. While this of course is desirable, and the NPPF makes it clear that 'great weight' should be given to achieving this objective, it should not be applied as a further test of exceptional circumstances and public interest as meeting the other 3 may mean that this is not achievable.

Signature		Date	30/06/17
------------------	---	-------------	-----------------