

Planning

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Dear Sir/Madam

West Berkshire Minerals and Waste Local Plan: Proposed Submission November 2020

Thank you for providing the opportunity for the Council to comment on the proposed submission West Berkshire Minerals and Waste Local Plan ('the Plan').

Addressing the climate emergency

The Council supports your vision to plan for the delivery of mineral resources and waste management capacity in locations which meet the needs of West Berkshire in the most sustainable way.

Could this be reflected more strongly in the Plan's objectives? Particularly in terms of mineral resource? We note that the objectives seek to minimise the distances that waste is transported, however that there is not a similar commitment to minimise the distances that minerals are transported; and the overarching spatial strategy refers to consideration of the proximity to the sources of waste arisings but not to the sources of minerals. We recognise that reducing distances associated with mineral resources can be difficult as minerals development can only take place where the resources are found. However, we note that there is no mention of the climate emergency in the Plan's vision or objectives and, while we support the inclusion of *Policy 25: Climate Change*, climate change mitigation and adaptation do not appear to be a fundamental part of the spatial strategy.

The Council welcome *Policies 20: Biodiversity and Geodiversity*, *22: Transport* and *25: Climate Change*. It is clear from the explanatory text that the Plan has admirable aspirations to tackle the climate emergency, including minimising carbon emissions. However, these have not, on all occasions, been successfully translated into policy.

We would also encourage the inclusion of more specific monitoring indicators relating to climate change mitigation/reducing carbon emissions, such as monitoring the number of miles currently required to supply minerals and dispose of waste in order to identify whether the Plan is minimising/reducing these distances.

Soft sand requirements

The Plan sets out that for West Berkshire to meet its soft sand requirements there needs to be a formal agreement with Oxfordshire County Council to continue to make provision for supplying West Berkshire with soft sand as well as addressing its own needs. It is for Oxfordshire County Council to come to a formal agreement with you regarding this. However, we note that a signed copy of the Statement of Common ground does not appear to be available. While we recognise that the Oxfordshire Minerals and Waste Core Strategy includes a commitment to make available a sufficient supply of aggregate materials to meet the development needs of the county and make an appropriate contribution to wider needs; and that the provision figures identified for allow Oxfordshire to continue to be a net exporter of soft sand recognising that it is a less common material, it should also be noted that the Core Strategy is until 2031 and not 2037 and so does not take into account this longer timescale of movement.

We would encourage the further exploration of appropriate soft sand sites in West Berkshire, as the Plan demonstrates through the Chieveley Services allocation (Policy 31) that there are appropriate sites available and a pressing need for soft sand within West Berkshire. We welcome *Policy 4: Location of Development: Construction Aggregates* that includes a criteria-based policy to allow construction aggregate proposals to come forward.

Extracting soft sand from West Berkshire would have the added benefit of reducing the distance the mineral resource is transported, subsequently reducing carbon emissions and helping to address the climate emergency.

Non-inert, non-hazardous waste

It is encouraging to see an objective highlighting your commitment to achieve net self-sufficiency in waste management. However, we note that there is no non-hazardous landfill capacity within the authority meaning that such wastes destined for landfill will have to be exported, and that a significant amount of this waste is exported to Sutton Courtenay in South Oxfordshire.

We support the strategy to drive waste up the waste hierarchy and welcome the requirement set out in *Policy 3: Net Self-Sufficiency in Waste Management* for waste development proposals to demonstrate that the waste being managed cannot reasonably be managed higher up the waste hierarchy than that proposed. We also note that Policy 7 provides a criteria-based policy with a presumption in favour of land filling but consider the criteria to be relatively restrictive.

As with soft sand extraction, we would encourage the further exploration of appropriate landfilling sites for non-inert, non-hazardous waste in West Berkshire to help address the climate emergency and to meet your objective to minimise the distances that waste is transported.

Kind regards,



Emma Baker
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South Oxfordshire and Vale of White Horse District Councils