

From: Cllr Lynda Atkins
Sent: 19 March 2017 18:47
To: Minerals and Waste Plan Consultation - E&E

Subject: representation on Proposed Main Modifications to Minerals and Waste Local Plan

Firstly, I entirely support the views and proposed changes put forward by OXAGE.

Secondly, I wish to make a separate representation as on the attached form

Regards,

Lynda Atkins
County Councillor for Wallingford, Brightwell-cum-Sotwell and the Wittenhams
01491 839120

Part 1 – Respondent Details

1(a) Personal details	
Title	Councillor
First Name	Lynda
Last Name	Atkins
Job Title (where relevant)	County Councillor
Organisation (where relevant)	Oxfordshire County Council
1(b) Agent details <i>Only complete if an agent has been appointed</i>	
Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
1(c) Contact address details <i>If an agent has been appointed please give their contact details</i>	
Address Line 1	39 Station Road
Line 2	Wallingford
Line 3	
Line 4	
Postcode	OX10 0JX
Telephone No.	01491 839120
Email address	Lynda.atkins@oxfordshire.gov.uk
Are you writing as	<input type="checkbox"/> A county councillor

Please tick the appropriate boxes if you wish to be notified of any of the following:	
Publication of the Inspector's report and recommendations	<input type="checkbox"/>
Adoption of the Oxfordshire Minerals and Waste Core Strategy	<input type="checkbox"/>

Please tick this box if you no longer wish to be notified of any updates regarding the Oxfordshire Minerals and Waste Core Strategy:

Please sign and date the form:			
Signature:	Submitted electronically	Date:	19/3/17

Part 2 – Representation

Please complete this part (Part 2) of the form separately for each separate representation you wish to make.

You can find an explanation of the terms used below in the accompanying guidance on making representations.

2(a) State which Proposed Main Modification you are making a representation about

Proposed Main Modification No.
(and part or policy no. or
paragraph if relevant)

MM 15 to MM 20

2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications is: (tick as appropriate)

(i) Legally compliant? No

(ii) Sound? No

If you have answered **No** to question 2(b)(ii), please continue to question 2(c). In all other cases, please go to question 2(d).

2(c) Do you consider the Oxfordshire Minerals and Waste Core Strategy incorporating the Proposed Main Modifications is unsound because it is not: (tick as appropriate)

- (i) Positively prepared
- (ii) Justified
- (iii) Effective
- (iv) Consistent with national policy

On the following pages, please set out why you think the Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications is legally non-compliant and/or unsound and any changes you are suggesting should be made to it that would make it legally compliant or sound.

Please note your representation should include as succinctly as possible all the information and evidence necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on your representation at this stage.

2(d) Please give details of why you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications is not legally compliant or is unsound. Please be as precise as possible.

If you agree that the Oxfordshire Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications is legally compliant and/or sound and wish to support this, please also use this box to set out your comments.

This policy is neither justified nor effective because the calculations which underlie it are flawed. Unfortunately, the 'distance to market' calculations which are relied on to underpin the modification seem not to be included in the publicly available documents which means they cannot be realistically justified.

The figures were presented to the OCC Cabinet meeting on 24th January (page 638) but which I have been unable to find in the documents published for this consultation were flawed in that they:

- Ignored large areas of development in Oxfordshire, only considering Banbury, Bicester, Oxford, Abingdon, Didcot and Wantage/Grove. This means that the housing growth around Chipping Norton, Witney, Faringdon and Shrivenham, for example, has been ignored and the assessment biased in favour of areas to the south and east of the County
- Ignored the demand for minerals outside the county boundary, although the Plan explicitly provides for production of minerals for export. One key area of growth that has been excluded is Swindon, just over the county boundary, an area with huge planned growth and one which lies to the west of Oxfordshire.
- Treats all growth areas which have been included as of equal weight, despite the fact that differential rates and volumes of growth are planned

These flaws were pointed out at the Cabinet meeting, so it is possible that they were noted and the specific paper not submitted as one of the papers available for scrutiny in this process was because the calculations are so clearly open to challenge.

Continue on a separate sheet or expand the box if necessary

2(e) Please set out the changes(s) you consider necessary to make the Oxfordshire Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications legally compliant or sound, having regard to the reason you have identified at 2(c) above where this relates to soundness. You should say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

As recommended by Oxage:

Policy 3 **MM20** (Principal locations for working aggregate minerals) should therefore be reworded as follows:

The principal locations for aggregate minerals extraction will be within the following strategic resource areas, as shown on the Policies Map:

Sharp sand and gravel in northern Oxfordshire (Cherwell District and West Oxfordshire District):

- The Thames, Lower Windrush and Lower Evenlode Valleys area from Standlake to Yarnton;
- **Bampton/Clanfield Mineral Safeguarding Area should also be a Strategic Resource Area** in southern Oxfordshire (South Oxfordshire District and Vale of White Horse District):
- The Thames and Lower Thame Valleys area from Oxford to Cholsey;
- The Thames Valley area from Caversham to Shiplake.

Specific sites (new quarry sites and/or extensions to existing quarries) for working aggregate minerals will be identified within these strategic resource areas will be allocated in the Minerals & Waste Local Plan: Part 2 – Site Allocations Document, in accordance with policy M4. Specific sites for extensions to existing aggregate quarries (excluding ironstone) outside the strategic resource areas may also be allocated in the Minerals & Waste Local Plan: Part 2 – Site Allocations Document provided they are in accordance with policy M4. ~~Sites allocated for sharp sand and gravel working (including both new quarry sites and extensions to existing quarries, including any extensions outside the strategic resource areas), to~~

~~meet the requirement in policy M2 will be located such that approximately 25% of the additional tonnage requirement is in northern Oxfordshire and approximately 75% of the additional tonnage requirement is in southern Oxfordshire, to achieve an approximately equal split of production capacity for sharp sand and gravel between northern and southern Oxfordshire by 2031.~~

If this last paragraph is not to be deleted then it should be modified as follows:

Sites allocated for sharp sand and gravel working (including both new quarry sites and extensions to existing quarries, including any extensions outside the strategic resource areas), to meet the requirement in policy M2 will be located such that approximately 25% of the additional tonnage requirement is in northern Oxfordshire and approximately 75% of the additional tonnage requirement is in southern Oxfordshire, to achieve an approximately equal split of **reserves of** production capacity for sharp sand and gravel between northern and southern Oxfordshire by 2031.

Consequent changes to associated paragraphs should be as follows:

MM15 para 4.29 - delete because of lack of evidence and justification

MM16 para 4.30 - delete because of lack of evidence and justification. But if not deleted in its entirety then the last sentence should be deleted because reference to 'production capacity' is unworkable for reasons explained in this Report, as this Part 2 of this Plan intends to allocate sites then policy M5 (as amended) states that only reason for granting permission on non-allocated sites would be to otherwise maintain the landbank of reserves.

MM17 para 4.33 - change the following paragraph:

There are also large areas of sharp sand and gravel resource within the part of the Thames Valley to the west of the Lower Windrush Valley, around Bampton and Clanfield, ~~but these are not included within the strategic resource areas in policy M3. This is primarily because these areas are further from the main locations of demand for aggregate in Oxfordshire, in some cases in terms of direct distance but more generally due to the relatively long routes that would be involved using and lack suitable road~~

~~access to the advisory lorry route network and avoiding unsuitable bridges and environmentally sensitive areas (see policy C10 and figure 13). The requirement for further working areas within the plan period can be met from the strategic resource areas that are closer to the main areas of demand and provision should not be made from the areas around Bampton and Clanfield. An assessment undertaken as part of the sustainability appraisal of the plan has shown that excluding the areas around Bampton and Clanfield is the more sustainable option.~~

Continue on a separate sheet or expand the box if necessary.

Please complete Part 2 of the form separately for each separate representation you wish to make, and submit all the Parts 2s with one copy of Part 1 and Part 3.