

Planning and Strategic Housing

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WEST OXFORDSHIRE
DISTRICT COUNCIL

Peter Day
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Your Ref : X:\SPED\15.1.2\4\14\14
Our Ref :
Date : 20 March 2017

Dear Peter

Proposed Main Modifications to Oxfordshire Minerals and Waste Local Plan: Part I Core Strategy and Sustainability Appraisal Report Update, February 2017

Thank you for the opportunity to comment on the Proposed Main Modifications to the Oxfordshire Minerals and Waste Local Plan - Part I Core Strategy. You will be aware that we submitted a response to the proposed submission draft plan in October 2015 and we welcome the fact that a number of the concerns we raised have been taken into account in the proposed modifications. Our specific comments are set out below.

Policy M1: Recycled and Secondary Aggregate (MM6 and MM8)

The District Council previously raised concerns about the exclusion of a specific target for the production and/or supply of recycled and secondary aggregates. We therefore welcome the reintroduction of a specific target of at least 0.926 million tonnes of secondary and recycled aggregates per annum. However, the Council questions the decision to remove the list setting out the type of materials to the recycled which provides greater certainty in identifying the methods of meeting the minimum target. It is not clear why this element of the policy has been removed.

Policy M2: Provision for Working Aggregate Minerals (MM12, MM13, MM14)

The Council supports in principle the proposed changes made to Policy M2 and the supporting text. It is noted that the policy now establishes an overall level of provision for aggregate minerals to 2031 with reference to the 2014 local aggregate assessment (2014) but emphasises that regard will need to be had to the most recently available assessment in maintaining an appropriate landbank and determining any planning applications.

This approach is sensible, striking a balance between the need to provide a degree of certainty regarding the overall level of provision, whilst allowing for the most recently available information to be taken into account.

Policy M3: Principal locations for Working Aggregate Minerals (MM16, MM17, MM20)

The District Council has previously supported the proposed shift in emphasis in sand and gravel working from northern Oxfordshire (including West Oxfordshire District) to southern Oxfordshire but has previously raised concerns that this overall aim wasn't given sufficient emphasis or support through the policies and core objectives of the plan.

The Plan presents a genuine opportunity to shift the focus to other locations close to major growth areas and the District Council therefore strongly supports the proposed changes which clearly state that approximately 25% of the additional tonnage requirement for sand and gravel will be in northern Oxfordshire and approximately 75% will be in southern Oxfordshire. This is a clear statement of intent that is supported by the Council.

The Council also supports the amendment to paragraph 4.30 which emphasises that the requirement should primarily be met in southern Oxfordshire **particularly** over the first part of the plan period. It is however essential that the objective of achieving a 25%/75% split between northern and southern Oxfordshire is properly reflected in the allocation of any sites in the subsequent site allocations DPD and also taken into account in determining any planning applications in the interim.

The Council supports the proposed exclusion of land at Bampton and Clanfield from the defined strategic resource area in line with the findings of the accompanying Sustainability Appraisal (SEA) report.

The District Council previously requested that the creation of 'buffer zones' to protect the local communities and other community facilities/ grounds should be implemented and the extent of these buffer zones should be clearly detailed. Whilst the District Council welcomes the exclusion of larger settlements in establishing the strategic resource areas for working mineral deposits, we are disappointed that buffer zones have not been incorporated.

Policy M4: Sites for working aggregate minerals (MM21)

Whilst the District Council appreciates that Policy M3 deals with the broad location for working aggregate minerals and for the majority of additional production to be provided in southern Oxfordshire, we consider it pertinent to include this approach within this policy so that the criteria in Policy M3 can be effectively applied by ensuring the balance in production is adhered to and can be monitored. As such, we object to the removal of criteria b) within this policy.

We also have reservations regarding the amended wording which requires proposals to 'take into account' rather than 'accord to' the criteria listed. This wording significantly weakens the requirements of this policy and the original text should be reinserted to ensure the criteria are adhered to in the interests of the environment.

Policy M5: Working of Aggregate Minerals (MM22)

The Council did not previously comment on Policy M5 but support in principle the proposed changes to the policy which make it clear how planning applications will be dealt with until the proposed site allocations DPD is adopted.

This approach appears sensible and pragmatic but it will be essential that any such application is carefully scrutinised against the locational requirements of Policy M3 in particular the stated intention to achieve a 25%/75% split between northern and southern Oxfordshire.

Policy M10 – Restoration of Mineral Workings (MM29)

The District Council is disappointed that the wording within the policy simply requires after-use proposals to take the criteria listed into account, rather than to ensure the proposal is appropriate and sympathetic. This concern was previously raised but no amendments have been made. It is also disappointing to note that the previous suggestions made by the District Council, including the potential transfer of land to community land/wildlife trusts as a possible mechanism for securing long-term management arrangements and the need for a holistic and inclusive approach to restoration have not been inserted into this policy.

We are however encouraged that the need for local communities to be consulted on the options for after-use has been incorporated into the policy text and the requirement to restore best and most versatile agricultural land has been reintroduced.

Policy W4 – Locations for facilities to manage the principal waste streams (MM51)

The District Council's concerns regarding the Waste Key Diagram at Figure 12 are still relevant and we are disappointed that this has not been revised. As previously stated, much of the indicative area shown for Oxford that crosses the River Thames into the area east of Stanton Harcourt is within Flood Zone 2 and has relatively poor access to Oxford. As such we consider that the area notated '*Locations for Strategic Waste Facilities (Policy W4)*' that lies beyond the outer boundary of the Green Belt in West Oxfordshire should be removed.

Policy C8 – Landscape (MM68)

The District Council is concerned that the policy has been amended to state that only **significant** adverse impacts will need to be offset through compensatory environmental enhancements. Any adverse impacts resulting from minerals and waste development which cannot be avoided or adequately mitigated should make compensatory environmental enhancements to offset the residual landscape and visual impacts. As such, the District Council objects to this amendment.

However, we welcome the revised wording within this policy which makes clear that major development in the AONB will only be permitted in exceptional circumstances.

Policy C10 – Transport

We note that no proposed changes have been made to Policy C10 – Transport. Whilst appreciating that we are only able to comment on proposed changes at this stage I nonetheless wish to re-state our previous comments regarding the Oxfordshire Lorry Route Map at Figure 13 remain relevant. The District Council previously requested the following amendments:

- *Removal of the local access routes shown at Newbridge and Radcot to reflect the heritage value of the bridges and their unsuitability for Heavy Goods Vehicle traffic.*

- *Addition of an 'Environmentally sensitive area: avoid if at all possible' notation at Bladon on the A4095 to reflect the limited width of the carriageway, the close proximity to listed buildings, and the impact of heavy vehicles on the amenity and heritage value of the area.*

Without these amendments, the District Council retains its objection to this policy.

Please note that West Oxfordshire wishes to reserve its right to appear at any further hearing sessions.

If you have any queries or require additional information, please do not hesitate to contact me.

Yours sincerely

Giles Hughes
Head of Planning and Strategic Housing