

# **Oxfordshire County Council**

## **Submission of Oxfordshire Minerals and Waste Core Strategy October 2012**

**Town and Country Planning (Local Planning) (England)  
Regulations 2012**

**Regulation 22 (1) (c)**

## **Statement on Consultation and Representations**

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## **1. Introduction**

1.1 Oxfordshire County Council is submitting the Oxfordshire Minerals and Waste Plan – Minerals and Waste Core Strategy (the Core Strategy) to the Secretary of State for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004 (the Act). Regulation 22 (1) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the 2012 Regulations) sets out the documents that must be submitted with the plan.

1.2 These documents include, at Regulation 22 (1) (c), a statement setting out:

with regard to the preparation of the plan (prior to May 2012):

- i. the bodies and persons the Council invited to make representations in the preparation of the plan;
- ii. how those bodies and persons were invited to make representations;
- iii. a summary of the main issues raised by representations; and,
- iv. how representations have been taken into account.

with regard to the published plan (Minerals and Waste Core Strategy Proposed Submission Document May 2012):

- v. the number of representations made when the Council published the plan that it intended to submit to the Secretary of State (the Minerals and Waste Core Strategy Proposed Submission Document, May 2012); and
- vi. a summary of the main issues raised in the representations.

1.3 This statement on consultation and representations has been prepared by the Council to meet the requirements of Regulation 22 (1) (c).

## **2. Statement of Community Involvement**

- 2.1 In November 2006 the County Council adopted a Statement of Community Involvement under section 23 of the Act. This sets out the approach the Council will take to public involvement in the preparation of the Minerals and Waste Development Framework – now referred to as the Minerals and Waste Plan (the plan). The Statement of Community Involvement sets out who should be involved in the preparation of the plan, how they will be involved and how they will be kept informed. Appendix 1 is an extract from the Statement of Community Involvement which summarises the position.
- 2.2 Changes to the plan making system have been introduced since the Statement of Community Involvement was adopted and some details are not consistent with the 2012 Regulations. For example, there is no longer a statutory requirement to consult with government departments; and some regional organisations have been abolished and so it is no longer possible to comply with the Statement of Community Involvement's intention that they be consulted. Some stages in the plan making process have been changed. Where there has been inconsistency between the Statement of Community Involvement and legislative requirements, the Council has followed the current legislative requirements.

### **3. Bodies and Persons consulted**

- 3.1 Opportunity for statutory bodies, other organisations and local residents and businesses to be involved in the preparation of the Core Strategy is provided by Regulation 18 of the 2012 Regulations.
- 3.2 Regulation 18 (2) (a) provides that 'specific consultation bodies' that the Council consider may have an interest in the content of the Core Strategy be notified of the subject of the proposed plan and invited to make representations on what the plan ought to contain. The 'specific consultation bodies' that were notified and invited to make comment on the Core Strategy are identified in Appendix 2. These bodies are included on a minerals and waste plan consultation database that has been maintained since work commenced on the preparation of the Core Strategy.
- 3.3 Regulation 18 (2) (b) provides that other 'general consultation bodies' that the Council consider appropriate be notified of the subject of the Core Strategy and invited to make representations on what it ought to contain. These are defined in the 2012 Regulations as:
  - a) voluntary bodies;
  - b) bodies representing the interests of different racial, ethnic or national groups;
  - c) bodies representing the interests of different religious groups;
  - d) bodies representing the interests of disabled persons;
  - e) bodies representing the interests of businesses.
- 3.4 Appendix 3 lists the 'general consultation bodies' on the minerals and waste plan consultation database.
- 3.5 Regulation 18 (2) (c) requires the Council to consider which residents and persons carrying on business in the county are appropriate to be notified of the subject of the Core Strategy and invited to make representations on what it ought to contain. The Core Strategy does not allocate specific sites for minerals or waste development so specific residents have not been identified for consultation. However, a large number of individuals have expressed an interest and made comment during the preparation of the Core Strategy and they have been added to the minerals and waste plan consultation data base. Each individual has then been notified of subsequent consultations. The number of individuals on the consultation database currently stands at 1,030.
- 3.6 The Council has identified appropriate businesses including, in particular, companies involved in mineral working and supply and waste management in Oxfordshire. They have been notified and invited to make representations at each relevant stage in the preparation of the Core Strategy. The number of companies on the minerals and waste plan consultation database currently stands at 221, as set out in the list of businesses in Appendix 4.
- 3.7 Bodies and persons on the minerals and waste plan consultation database have been notified and invited to comment on draft documents published at particular stages of plan preparation. These stages are set out in section 4

with details as to the bodies and persons consulted. The method of notification has been by letter or, where agreed, by email. In some cases a copy of the draft document has been sent directly with the notification. Where the relevant document has not been provided with the notification, advice has been given that:

- copies could be accessed on the Council's website;
- copies could be accessed at district council offices and/or libraries;
- copies of documents would be provided on request.

## **4. Consultation on plan preparation**

### **Background**

- 4.1 Decisions on the content of the Core Strategy have been taken by the Council's Cabinet and/or full Council, as appropriate. Work has also been steered by a politically balanced Member Working Group – the Minerals and Waste Plan Working Group (MWP Working Group), chaired by the Cabinet Member for Growth and Infrastructure (previously Sustainable Development), which has no decision making power but made recommendations to the Cabinet when appropriate. The MWP Working Group met on 23 occasions in the period leading to the approval of the Core Strategy Proposed Submission Document by Council on 3 April 2012. Reports on preparation of the Core Strategy were also made to the relevant Scrutiny Committee of the Council at key stages.
- 4.2 The stages at which participation has been sought in the preparation of the Core Strategy are set out in chronological order below. This sets out the purpose of the consultation, the main issues that were raised and the parties who were invited to participate. This chronology includes consultations on minerals and waste sites since, whilst the Core Strategy does not include site allocations, the work carried out on site options for the proposed separate Site Allocations Document has informed the preparation of the Core Strategy. Section 5 looks in particular at the issues that were raised in the final consultation in September 2011 and how those representations were taken into account in the proposed submission document. Section 6 looks at the issues that were raised in representations on publication of the proposed submission document in May 2012.
- 4.3 Throughout the process, work has been on-going to assist in the environmental assessment of options and the final strategy, in particular:
- Sustainability Appraisal;
  - Strategic Environmental Assessment;
  - Habitats Regulations Assessment;
  - Strategic Flood Risk Assessment.
- 4.4 This work has involved close liaison with statutory agencies identified as 'specific consultation bodies' and with whom the Council is also required to engage under the 'Duty to Co-operate' requirement introduced in the Localism Act 2011. This is also covered in a separate statement on how the Council has approached its 'Duty to Co-operate'.

### **Minerals and Waste Stakeholder Forum 2005 – 2007**

- 4.5 At the commencement of work on the Minerals and Waste Plan, a stakeholder group was formed – the Minerals and Waste Forum (the Stakeholder Forum). This met seven times between May 2005 and January 2007. In particular, it considered and provided input to the preparation of the Core Strategy on aims and objectives, identifying issues and options, developing locational strategies



for minerals and waste developments and criteria for site selection. The Forum included representatives from the Oxfordshire District Councils, minerals and waste operators, Parish Councils and local amenity groups. Meetings were chaired by an independent facilitator from Proteus Public Relations, who prepared a written report of each meeting. Appendix 5 sets out the membership of the Stakeholder Forum and lists the meetings held.

### **Site Nominations (First Invitation) October 2005**

- 4.6 The Council wrote to local minerals and waste operators, local planning agents and interested landowners in October 2005 inviting nominations of sites for consideration for possible future minerals or waste development. Sites were put forward using a standard form that gave key information. These sites formed the subject of later consultation (as outlined below). This call for sites was primarily for the proposed Minerals and Waste Site Allocations Documents but work on identifying site options has also informed the preparation of the Core Strategy.

### **Sustainability Appraisal Scoping Report June 2006**

- 4.7 Sustainability Appraisal (SA) of development plan documents is required by the 2004 Act. The Council has carried out SA incorporating the requirements of the Strategic Environmental Assessment Directive (EC/2001/42) for environmental assessment of plans. The SA Scoping Report sets the context, draft plan objectives and SA process; reviews other relevant policies, plans and programmes and establishes the baseline environmental conditions and sustainability issues and objectives; and sets out the proposed sustainability assessment criteria and indicators to be used to assess the Core Strategy.
- 4.8 An initial SA Scoping Report was prepared in 2005 and reviewed and updated in June 2006 following consultation in September 2005. This review also took account of the final version of ODPM Guidance on Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents November 2005. The consultation extended to a period of five weeks and involved the four statutory bodies referred to in Regulation 12(5) of the Environmental Assessment of Plans and Programmes Regulations 2004 viz. the Environment Agency, Countryside Agency, English Heritage and English Nature. Neighbouring and South East Mineral and Waste Planning Authorities were also consulted, as well as the Oxfordshire District Councils, the South East Regional Assembly and the South East England Development Agency.
- 4.9 A group formed from representatives of the Minerals and Waste Stakeholder Forum met in September 2005 to discuss the sustainability objectives and did so again in September 2006. Views were taken into consideration and fed into a subsequent revision of the Scoping Report in 2009 (see paragraphs 4.34 – 4.35 below).

## **Core Strategy: Issues and Options Consultation June 2006**

- 4.10 The Minerals and Waste Core Strategy – Minerals and Waste Issues and Options Consultation Paper was published in June 2006. Consultation on this document took place over a period of six weeks in June/July 2006 under Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004 (the 2004 Regulations). All of the bodies included on the consultation database were notified and invited to comment and required notices published in the local press. A summary of the responses received on each issue was included in the Preferred Options Consultation Paper, February 2007 (see paragraphs 4.15 – 4.18 below). The responses were used to inform the preferred options and policies put forward to deliver the options set out in that document.
- 4.11 The consultation paper set out strategic aims and objectives for minerals and waste, the issues that needed to be considered and the possible options for addressing them, on which it posed a series of questions. The key issue was how to meet the needs for both minerals and waste development that were set out in regional policy.
- 4.12 Responses generally supported the aims and objectives that were put forward.
- 4.13 With regard to minerals, it was recognised that provision for aggregates should accord with regional strategy but there was also support for increasing the amount of aggregate brought into the county by rail. Views were divided on the areas that should be worked but many preferred a strategy of dispersed working, to include a new strategic working area(s) in the south of the county. Notwithstanding this, the majority of respondents favoured the identification of specific sites now rather than identifying broad areas of search with site allocation being left to a later stage. There was a strong preference for restoring worked quarries back to land (as opposed to water).
- 4.14 For waste, there was strong support for the county being self-sufficient in meeting its own waste management needs. There was recognition that cross-boundary movements were inevitable, but the majority felt that Oxfordshire should not be a net importer of waste and there were particular concerns about the county continuing to dispose of waste from London. There was strong support for diverting more waste from landfill than intended in the regional strategy: most felt it not important to impose a rigid cap on the amount of recycling capacity provided. Most also felt that unless there were good reasons otherwise, waste facilities should be in, or close to, urban areas; and that locations in Areas of Outstanding Natural Beauty (AONB) and Green Belt should be avoided. There was a preference for identifying specific sites for waste development, but no clear agreement on what scale those facilities might be.

## **Core Strategy: Preferred Options Consultation February 2007**

- 4.15 The Minerals and Waste Core Strategy – Preferred Options Consultation Paper was published in February 2007. Consultation on this document took place over a period of seven weeks in February/March 2007 under Regulation 26 of the 2004 Regulations. All of the bodies included on the consultation database were notified and invited to comment and required notices published in the local press.
- 4.16 A summary of the 737 responses received was produced and published on the Council's website.
- 4.17 By far the greatest level of interest was in the areas put forward for mineral working and views were divided about this. But most significantly, the Government Office for the South East advised that the Core Strategy did not take a sufficiently spatial approach and that the strategy was not clearly set out or explained in a Key Diagram. The Council was advised that without significant changes, the strategy as presented was likely to be found unsound. Further work on the Core Strategy was put on hold pending discussion with the Government Office on a way forward and also awaiting the outcome of changes by the Government to the plan making system.
- 4.18 In parallel with this consultation for the Core Strategy, two further consultations were undertaken on Waste and Minerals Sites Proposals and Policies.

## **Waste Sites Proposals and Policies: Issues and Options Consultation February 2007**

- 4.19 The Waste Sites Proposals and Policies Document – Issues and Options Consultation was published in February 2007. (This consultation document was prepared for the County Council by consultants ERM.) Consultation took place over a period of six weeks in February/March 2007 under Regulation 25 of the 2004 Regulations. All of the bodies included on the consultation database were notified and invited to comment and required notices published in the local press.
- 4.20 A summary of the responses received was produced (by consultants ERM) and published on the Council's website.
- 4.21 Responses were received from 75 bodies and persons. The greatest interest related to the criteria suggested for future site assessment, but the consultation also raised more detailed issues about site location and selection that were not covered in the Core Strategy e.g. appropriate scale of facilities in AONB; and use of industrial land for waste facilities. Responses were generally mixed and no clear conclusions could be reached, but there was very little support for the use of industrial land for waste facilities despite the clear encouragement given to this in government guidance on waste planning (Planning Policy Statement 10: Planning for Sustainable Waste

Management). A number of useful comments were made on many of the sites that had been put forward as possible options.

- 4.22 This consultation was primarily for the proposed Waste Site Allocations Document but work on site options has also informed the preparation of the Core Strategy.

### **Minerals Site Proposals and Policies: Issues and Options Consultation April 2007**

- 4.23 The Minerals Site Proposals and Policies Document – Issues and Options Consultation was published in April 2007. Consultation took place over a period of six weeks in April/May 2007 under Regulation 25 of the 2004 Regulations. All of the bodies included on the consultation database were notified and invited to comment and required notices published in the local press.
- 4.24 A summary of the responses received was produced and published on the Council's website.
- 4.25 Responses were received from 636 bodies and persons. General comments were made about the environmental criteria to be used in site selection. By far the majority of comments were made in relation to the perceived merits of the individual sites being put forward, in particular those for sand and gravel working. The document also included a strategic assessment of mineral resource areas, but few comments were made about these. A concern was that the strategic assessment did not take adequate account of the cumulative effect of working minerals in a single area over a significant period of time – in particular in West Oxfordshire: also that the Strategic Environmental Assessment was not adequate. It appears that most responses focussed on individual sites as the relevance of the strategic resource areas then identified was not clear. Some respondents queried why some of the sites put forward were in resource areas which the document suggested should not be explored further.
- 4.26 This consultation was primarily for the proposed Minerals Site Allocations Document but work on site options has also informed the preparation of the Core Strategy.

### **Sites for Strategic Waste Management Facilities July – December 2007**

- 4.27 Following the consultation on Waste Sites Proposals and Policies Issues and Options, the consultants ERM were commissioned to undertake a more detailed analysis of site options to assess which might be suitable to accommodate a strategic waste management facility. This was defined as a facility that could treat up to 300,000 tonnes of waste per annum, for which a need had been assessed.

- 4.28 The consultants produced the following three reports in 2007, which were published on the Council's website for information. No specific consultation was undertaken on these reports but the website advised that comments would be welcome. No comments were received by the Council specifically on these reports.
- Interim Report on Site Selection for Strategic Waste Management Facilities – Stage 1 Report: Shortlist of Sites, July 2007;
  - Interim Report on Site Selection for Strategic Waste Management Facilities – Stage 2 Report: Detailed Assessment Report, September 2007;
  - Site Selection for Strategic Waste Management Facilities: Additional Sites Report, December 2007.

### **Waste Needs Assessment January 2008**

- 4.29 Also in 2007, the consultants ERM were commissioned to undertake an assessment of waste needs for Oxfordshire. Their report – Waste Arisings, Capacity & Future Requirements Study, Final Report – was produced in January 2008 and published on the Council's website for information. No specific consultation was undertaken on this document but the website advised that any comment would be taken into account in on-going work. No comments were received by the Council specifically on this report. (This report has since been superseded by revised Waste Needs Assessments produced by the County Council in May 2011 and May 2012.)

### **Waste Facilities Capacity Estimate 2008 onwards**

- 4.30 In 2008 work commenced on preparing profiles for all waste facilities – both temporary and permanent – with a view to clarifying the planning status of the site, the type of facility being operated, the type of waste managed and the potential capacity of the facility. This work has been undertaken with a view to establishing the existing total waste management capacity in the county and assessing the amount of additional waste management capacity the Core Strategy should make provision for over the plan period. Each profile also undertook a basic assessment of the suitability of the site in planning terms.
- 4.31 Draft waste profiles were developed and sent to operators for comment at least once. In some cases the process of drafting went through several iterations and in some cases is still on-going. Only the waste operator responsible was consulted on the profile, but the results of these capacity assessments have been included in two subsequent Waste Needs Assessments undertaken by the Council and referred to below.

### **Site Nominations (Second Invitation) November 2008**

- 4.32 The Council wrote to local minerals and waste operators, local planning agents and interested landowners in November 2008 to invite nominations of

sites for consideration for possible future minerals or waste development. Sites could be put forward using a standard form that asked for key information. Operators were asked to complete a fresh nomination even if a site had been put forward in the earlier exercise in 2005, to ensure that interest in sites was still current. For waste sites, operators were also asked to provide information on existing facilities that could help with the drafting of waste site profiles (paragraphs 4.30 – 4.31 above).

- 4.33 This call for sites was primarily for the proposed Minerals and Waste Site Allocations Documents but work on identifying site options has also informed the preparation of the Core Strategy.

### **Sustainability Appraisal Scoping Report 2009 and 2011**

- 4.34 Review of the 2006 Scoping Report took place in 2009 and involved consultation on a draft revision with the Environment Agency, Countryside Agency, English Heritage and Natural England. Oxfordshire District Councils and neighbouring County Councils were also consulted together with stakeholders who had expressed interest in the earlier consultation (September 2005). The consultation extended to a period of five weeks between April and May 2009.
- 4.35 Comments were received from ten of the bodies consulted, including the Environment Agency, English Heritage and Natural England. The responses were included in a consultation report that was published on the Council's website and which confirmed the council's intended actions. The Scoping Report was revised accordingly in July 2009 and also published on the website. Further updating was carried out in 2011 and a revised Scoping Report May 2011 was published on the Council's website.

### **Engagement Meeting with Neighbouring Authorities on Cross-Boundary Minerals and Waste Issues November 2009**

- 4.36 On 27 November 2009 the County Council hosted a meeting with adjoining Minerals and Waste Planning Authorities to discuss common issues, particularly those relating to the movement of minerals and waste materials into and out of Oxfordshire. Invitations to the meeting were accompanied by a questionnaire requesting certain information about minerals and waste facilities in adjoining areas.
- 4.37 This identified some movement of sand and gravel into Oxfordshire from authorities to the west of the county and that this may be due to certain quarries in Oxfordshire not being worked or permissions not being commenced. It was thought this may be a short term situation, since figures for 2005 indicated that Oxfordshire exported some 75% of the aggregate produced in that year, but it was agreed this needed to be kept under review. The largest movement of waste into Oxfordshire was from London, but similar

amounts had been imported in recent years from Berkshire and this needed further investigation.

### **Minerals Spatial Strategy Options 2010 onwards**

- 4.38 The Council developed a set of spatial strategy options for mineral working during 2009, involving discussions with the MWP Working Group on 23 February, 14 April, 31 July and 29 September 2009 and 18 January 2010. Strategy options for working sharp sand and gravel, soft sand and crushed rock were developed, with a view to selecting broad locations for future working within which specific sites for working could subsequently be identified. In 2010 the Council carried out two stages of focused engagement and consultation with key stakeholders on the strategy options.
- 4.39 A preliminary meeting was held with the Environment Agency, Natural England and English Heritage on 23 November 2009 to discuss the emerging strategy options. The three bodies were asked to provide their views on the options following the meeting so that any fundamental issues could be taken into account prior to wider consultation.
- 4.40 An initial set of minerals strategy options was presented to a series of workshops that were held at different locations for different groups of stakeholders in February and March 2010 (see table 1).

**Table 1  
Minerals Spatial Strategy Options Meetings**

<b>Workshop Date</b>	<b>Stakeholder Group</b>	<b>Location</b>
03.02.2010	District Council and County Council Members & Officers	Town Hall, Oxford
9.02.2010	Minerals Industry Operators and Agents and Landowners	Town Hall, Oxford
23.02.2010	Parish Councils for Sand and Rock areas of Oxfordshire	Stanford-in-Vale Village Hall
25.02.2010	Environmental Groups – national & local environmental and local action groups	County Hall, Oxford
02.03.2010	Parish Councils for West & North Oxfordshire sand & gravel areas	Standlake Village Hall
17.03.2010	Parish Councils for Southern Oxfordshire sand & gravel areas	Benson Village Hall

- 4.41 Each workshop was independently facilitated by Proteus Public Relations to encourage free and frank discussion. The facilitators produced a report on the output from the six workshops which was published on the Council's website and the participants notified.

- 4.42 In addition to the responses to the minerals strategy options from the consultation workshops, views were received from the the Highways Agency, Environment Agency and Natural England; jointly from a group of national and local biodiversity interest organisations (including the RSPB, the local Wildlife Trust and the Council's ecology planner); and from the Council's archaeology and transport officers.
- 4.43 The initial minerals strategy options were:  
Sharp Sand and Gravel:  
 1a – concentration to the west / north west of Oxford;  
 1b – concentration to the south / south east of Oxford;  
 1c – concentration in both areas in 1a and 1b;  
 2 – dispersal across resource areas close to markets;  
 3 – phased approach moving from existing areas during plan period to a new area beyond the plan period;  
Soft Sand:  
 A single extensive area in the south west of the county;  
Crushed Rock:  
 Two areas in the north / west and one in the south west of the county.
- 4.44 The output from the consultation workshops and other responses received were considered by the MWP Working Group at meetings on 29 March, 26 May and 28 June 2010. The options for sharp sand and gravel were of most concern to stakeholders and generated most comment. The consultation responses were taken into account by the Council to produce a refined set of mineral strategy options. The refinements included reducing the number and making them more distinctive (to better distinguish between existing and new working areas and between concentration and dispersal); dropping location of demand as a factor in defining options and instead using it in assessment of options; removing an option that extended beyond the plan period; reducing the extent of the strategy areas; and introducing an additional soft sand area in the north of the county.
- 4.45 The refined minerals strategy options were:  
Sharp Sand and Gravel:  
 1 – concentration on existing working areas (4 areas);  
 2 – concentration on new working areas (5 potential areas);  
 3 – dispersed working (across 12 areas);  
Soft Sand:  
 Smaller areas - two in the south west of the county and one area in the north;  
Crushed Rock:  
 Smaller areas – two in the north / west and one in the south west of the county.
- 4.46 This refined set of options was discussed at two further consultation workshops in July 2010 for representatives from Parish and District Councils; national and local environmental and local action groups; and County Councillors. This time the invited stakeholders were mixed at each meeting, rather than being split into interest groups as previously. These workshops



were held at Benson Village Hall (in the south of the county) on 7 July and Standlake Village Hall (in the west of the county) on 12 July.

- 4.47 Each workshop was again independently facilitated by Proteus Public Relations. In addition to discussing and being asked for views on the minerals strategy options, stakeholders were asked to comment on the criteria to be used in assessing the options and strategy areas. The facilitators produced a report on the output from the two workshops which was published on the Council's website and the participants notified.
- 4.48 A separate meeting was held with minerals industry operators and agents on 29 July 2010, and a note of this meeting was produced by Council officers.
- 4.49 The output from these consultations was reported to the MWP Working Group on 27 September 2010 together with an officer assessment of the options. In addition, a sustainability appraisal of the minerals strategy options had been carried out by consultants Scott Wilson. Taking these considerations into account, the Working Group recommended to the Cabinet as a starting position a strategy for sharp sand and gravel of concentration on existing areas (the 4 areas in the July consultation option 1 plus Caversham) but that this be reviewed when the requirement for sand and gravel has been established (in January 2011), with the possibility of new areas of working being included if necessary, taking into account proximity to markets. The Working Group also endorsed the July 2010 consultation options for soft sand and crushed rock and recommended to Cabinet that consultation on a preferred strategy for mineral working be combined with consultation on the need for aggregate supply in Spring 2011.
- 4.50 Following consideration by the Council's Growth & Infrastructure Scrutiny Committee on 6 October 2010, the Council's Cabinet on 19 October 2010 agreed a preferred approach for mineral working in the short to medium term as had been recommended by the MWP Working Group.
- 4.51 The MWP Working Group on 24 January 2011 considered a paper that assessed the deliverability of the sand and gravel part of that agreed preferred strategy approach, in the light of the report on aggregates supply requirements by Atkins (paragraphs 4.54 – 4.61 below), taking into account a preliminary assessment of site options. This concluded that a new strategy area for sharp sand and gravel working is needed in southern Oxfordshire and it recommended the Cholsey area as being the best option. This was accepted by the Working Group for recommendation to the Cabinet. On 16 February 2011 the Cabinet agreed the Council's preferred spatial strategy approach for mineral working for consultation as:
- i. sand and gravel – concentration of working in existing areas of working, at Lower Windrush Valley, Eynsham/ Cassington/Yarnton, Sutton Courtenay, Cholsey and Caversham;
  - ii. soft sand – working in three existing areas: south east of Faringdon; Tubney/Marcham/Hinton Waldrist; and Duns Tew;

- iii. crushed rock – working in three existing areas: north of Bicester to the east of the River Cherwell; south of the A40 near Burford; and south east of Faringdon.

and that consultation on the preferred spatial strategy approach for mineral working be combined with consultation on a preferred waste spatial strategy, in June/July 2011.

- 4.52 The Cabinet's decision was called in for consideration by the Growth and Infrastructure Scrutiny Committee on 9 March 2011 but the Committee decided not to refer the decision back to the Cabinet.
- 4.53 In the event, consultation on the preferred minerals spatial strategy was deferred, awaiting preparation of the preferred waste spatial strategy. The Cabinet on 19 July 2011 agreed the Council's draft minerals planning strategy for consultation.

#### **Local Assessment of Aggregates Supply Requirements (Atkins) January 2011**

- 4.54 On 6 July 2010 the Chief Planner at the Department for Communities and Local Government issued a letter to English Local Planning Authorities about the Secretary of State's announcement of the revocation of Regional Strategies (subsequently quashed by the Courts). Guidance attached to that letter included that planning authorities in the South East should work from the aggregates apportionment in the March 2010 Proposed Changes to South East Plan Policy M3 but that they can 'choose to use alternative figures for planning purposes if they have new or different information and a robust evidence base'.
- 4.55 In the light of this, the Council decided to commission consultants to undertake a local assessment of aggregate supply requirements to inform the level of provision to be made in the Core Strategy. In November 2010 Atkins were appointed to carry out this work.
- 4.56 A meeting was held on 9 September 2010 with representatives from the CPRE and 7 local residents' action groups having an interest in potential areas for future working of sand and gravel. This meeting discussed the remit and brief for the consultant's work and what information should be used in the study. Points made at the meeting and in separate submissions from the participants and also from the Minerals Products Association were taken into account in finalising the consultant's brief.
- 4.57 On 26 November 2010 Atkins and Council officers held separate meetings with
- Representatives of local minerals industry operators and the Mineral Products Association;
  - Representatives of the CPRE and two of the local groups that attended the meeting on 9 September.
- Notes of these meetings were produced and provided to the consultants. (They are included as an appendix to the consultant's final report.)

4.58 The consultants produced a draft final report in January 2011 and this was reported to the MWP Working Group on 24 January 2011. The Working Group considered the four methods of predicting future aggregates demand in Oxfordshire and agreed to recommend the following figures (being the average of the two most robust methods) to Cabinet as a basis for progressing work on the Minerals and Waste Core Strategy and for testing through consultation:

Sand and gravel	1.26 million tonnes per annum
Crushed rock	0.63 million tonnes per annum
Secondary & recycled	0.67 million tonnes per annum

4.59 The final report by Atkins, dated January 2011, was received at the beginning of February 2011. It was published on the Council's website with an invitation for comments to be made to the Council. It was reported to the Cabinet on 16 February 2011. As recommended by MWP Working Group, the Cabinet agreed to adopt the following figures for aggregate supply requirement as the basis for the Council's preferred spatial strategy approach for mineral working:

Sand and gravel	1.26 million tonnes per annum
Crushed rock	0.63 million tonnes per annum

with the sand and gravel being subdivided:

Sharp sand and gravel	1.01 million tonnes per annum
Soft sand	0.25 million tonnes per annum

4.60 Comments on the published report by Atkins report were received from five mineral operators and agents, the Mineral Products Association, the CPRE and one of the local residents' action groups. These comments were summarised in a report that was published on the Council's website and they were reported to the MWP Working Group on 9 May 2011. The following four actions were proposed in response to the comments, which were endorsed by the Working Group:

- i. In the event that the national Managed Aggregates Supply System is abolished, the County Council should review the findings of the Atkins report in the light of any new arrangements for aggregates planning put in place by the Government.
- ii. A review of the findings of the Atkins report should be undertaken when the full data from the 2009 aggregates monitoring survey is published by the Government.
- iii. The County Council should aim to make provision for supply of secondary and recycled aggregates of at least 0.9 mtpa (the South East Plan apportionment level), which exceeds the provision figures in the Atkins report.
- iv. The County Council should liaise with other mineral planning authorities and the minerals industry to consider how to improve the timeliness and accuracy of data on sales and movements of aggregates.

4.61 The comments on the Atkins report and the proposed actions to address key points raised (as endorsed by the MWP Working Group) were reported to the Council's Cabinet on 19 July 2011, together with a recommended draft

minerals planning strategy for consultation. The report also commented on the results of the 2009 aggregates monitoring survey, which had been published by the Government at the end of May 2011, and advised that no change needed to be made to the minerals provision figures in the draft strategy. The Cabinet agreed the draft minerals strategy for consultation, including the previously agreed aggregates provision figures.

### **Waste Spatial Strategy Options April 2010**

- 4.62 A paper on draft spatial strategy options for waste, also including estimated waste capacity requirements and waste objectives, was considered by the MWP Working Group on 29 March 2010. The Working Group endorsed the estimated waste capacity requirements and draft spatial strategy options for waste as a basis for initial discussions and consultation with key statutory and technical consultees on the development of a waste spatial, strategy. The Working Group also endorsed the waste objectives for use in guiding further preparation of a waste spatial strategy.
- 4.63 In April 2010, the Council consulted key government bodies on a discussion paper setting out spatial strategy options for waste. This paper also contained a set of aims and objectives for future waste management in Oxfordshire. The bodies consulted were:
- Government Office for the South East
  - Highways Agency
  - Environment Agency
  - Natural England
  - English Heritage
- 4.64 Responses were received from all except English Heritage
- 4.65 In the responses, a specific concern was raised about the scale of any waste facilities that may be allowed in the AONBs. There was general acknowledgement of the advantage of options where waste would be managed in larger facilities close to the larger towns, and for facilities to be co-located if possible. But some types of facilities (including crushing or composting) need to be located a reasonable distance from areas of housing. Facilities sited immediately adjacent to the strategic road network could also give rise to safety and environmental issues. Whilst it was appropriate to focus on Oxford as the main source of waste arising, Didcot and Bicester were also considered important locations as they will accommodate significant growth.
- 4.66 In addition, internal consultation was carried out on the draft waste options with technical specialists within the County Council, on transport, ecology, archaeology and waste management.
- 4.67 The programme for preparing the waste part of the Core Strategy was considered by the MWP Working Group on 26 May 2010. The Working Group endorsed the recommended approach that consultation on waste strategy

options and assessment of options to select a preferred strategy should be deferred until a decision had been made by the Secretary of State on the appeal on the proposed Energy From Waste (EFW) plant at Ardley; but that technical work on preparing the evidence base should continue, including on-going engagement with technical and statutory consultees. (The Secretary of State allowed the Ardley EFW appeal on 17 February 2011.)

- 4.68 Comments received as a result of statutory and technical consultations were taken into consideration in the further work that was carried out leading to preparation of the draft waste strategy, on which public consultation took place in September 2011 (below). In particular, they were reported to the MWP Working Group on 24 January 2011 when it considered a further paper on draft spatial strategy options for waste.

### **Habitats Regulations Assessment 2007 – 2012**

- 4.69 The 1992 European Habitats Directive (92/43/EEC) designates sites that are of international importance for their habitats, flora, or fauna (Special Areas of Conservation) (SACs), or for the species of birds they support (Special Protection Areas). The Directive requires that land use plans are subject to Habitats Regulations Assessment (HRA) where they might have a significant effect on such sites. Information gathering to 'scope' the work that may be required took place in conjunction with Natural England from 2007 onwards.
- 4.70 In February 2011 the Council consulted Natural England on an initial screening report which concluded there would be no likely effect on six of the SACs in Oxfordshire but that likely significant effects on the Oxford Meadows SCA could not be ruled out. Natural England provided comments on the initial screening report. The Council addressed these comments and in August 2011 submitted a revised screening report to Natural England. This report assessed the potential impact of the Draft Planning Strategies for Minerals and Waste and it was published as one of the documents that supported consultation on those draft strategies in September 2011 (section 5 below).
- 4.71 Natural England advised that a significant effect from proposed mineral working on Cothill Fen and Oxford Meadows SACs could not be ruled out and requested that the evidence base be improved. A more detailed study focussing on the effects of the draft minerals planning strategy on the Cothill Fen and Oxford Meadows SACs was carried out by consultants (LUC and Maslen Environmental) and their report (January 2012) was published as a technical supplement to the August 2011 screening report. Further discussion with Natural England in the light of this report led to revisions being made to the minerals planning strategy in the Core Strategy Proposed Submission Document (section 6) to address the concerns that had been raised previously.

## **5. Consultation on Draft Planning Strategies for Minerals and Waste**

- 5.1 All of the work described in section 4 led to the preparation of separate documents for consultation on a Draft Minerals Planning Strategy and a Draft Waste Planning Strategy. Both documents included a set of Core Policies that were relevant to both strategies. Responses to the consultations were taken into account in the preparation of the Proposed Submission Document (section 6 below).

### **Minerals Planning Strategy Consultation Draft September 2011**

- 5.2 The Minerals Planning Strategy Consultation Draft was published in September 2011. The consultation period ran for eight weeks, from 5 September 2011 to 31 October 2011. All of the bodies and persons included on the consultation database were notified and invited to comment. The consultation document was published on the Council's website and copies were placed in County and District Council Offices and public libraries across the County.
- 5.3 Responses to the consultation could be made through the Council's on-line consultation portal. In addition, standard response forms were also made available for any responses to be made by email or post; and open email or letter responses were also accepted.
- 5.4 A half-day consultation meeting for key stakeholders was held on 29 September, independently facilitated by Proteus Public Relations. This was attended by representatives from the Oxfordshire district councils, parish councils and local action groups from areas affected by the draft strategy, mineral operating companies, the Environment Agency, CPRE and the RSPB; they are listed in the report of the meeting. Following a presentation of the draft strategy by the Council, the attendees split into small groups to discuss and make comments on key aspects of the strategy. The facilitator produced a report of the meeting, summarising the views of the participants, and this was published on the Council's website.
- 5.5 The consultation generated considerable interest, particularly from areas proposed for sand and gravel working. Individual representations were received from 719 bodies and persons, of which 548 responded to the proposal to identify a new area for sand and gravel working at Cholsey (in South Oxfordshire). Many of the remaining representations made comment on more than one aspect of the strategy.
- 5.6 The responses to the consultation and the main issues raised in them were reported to and discussed by the MWP Working Group on 21 December 2011. At a further meeting of the Working Group on 24 February 2012, changes to policies were considered in the light of the consultation responses; further work on Habitats Regulations Assessment that had been carried out by consultants in response to concerns raised by Natural England; and a landscape assessment of the impact of mineral working on the Cholsey and

Caversham areas that the Council had carried out in response to concerns raised by the North Wessex Downs and Chilterns AONB Boards and others. The Working Group endorsed the draft proposed changes to policies as a basis for the Minerals and Waste Core Strategy proposed submission document for recommendation to Cabinet.

- 5.7 Following consideration by the Growth and Infrastructure Scrutiny Committee on 27 February 2012, the Council's Cabinet considered a report on a Minerals and Waste Core Strategy Proposed Submission Document on 13 March 2012. The report set out the main issues raised in responses to the consultations on both the Minerals and Waste Consultation Draft Strategies. This report is included at Appendix 6. Paragraphs 7 – 12 set out the key minerals issues raised and paragraphs 13 – 16 set out the actions taken in response to these issues. The Cabinet agreed the amended minerals, waste and core policies and amended minerals and waste vision and objectives as the basis of the Minerals and Waste Core Strategy Proposed Submission Document for recommendation to the full County Council to approve for publication and submission.
- 5.8 A more detailed report summarising all the comments made in the responses to the Consultation Draft Minerals and Waste Planning Strategies, with the Council's responses to each one, was published on the Council's website in May 2012.

### **Waste Planning Strategy Consultation Draft September 2011**

- 5.9 The Waste Planning Strategy Consultation Draft was published in September 2011. The consultation period ran for eight weeks, from 5 September 2011 to 31 October 2011. All of the bodies and persons included on the consultation database were notified and invited to comment. The consultation document was published on the Council's website and copies were placed in County and District Council Offices and public libraries across the County.
- 5.10 Responses to the consultation could be made through the Council's on-line consultation portal. In addition, standard response forms were also made available for any responses to be made by email or post; and open email or letter responses were also accepted.
- 5.11 A half-day consultation meeting for key stakeholders was held on 29 September, independently facilitated by Proteus Public Relations. This was attended by representatives from the Oxfordshire district councils, parish councils from areas potentially affected by the draft strategy, waste management companies, the Environment Agency and Friends of the Earth; they are listed in the report of the meeting. Following a presentation of the draft strategy by the Council, the attendees split into small groups to discuss and make comments on key aspects of the strategy. The facilitator produced a report of the meeting, summarising the views of the participants, and this was published on the Council's website.

- 5.12 The consultation generated less interest than the concurrent consultation on the Draft Minerals Planning Strategy. Individual representations were received from 72 bodies and persons, although many made comment on more than one aspect of the strategy.
- 5.13 The responses to the consultation and the main issues raised in them were reported to and discussed by the MWP Working Group on 21 December 2011. Further selected consultations took place on key policy areas in January and February 2012 and are described further in Appendix 7. At a further meeting of the Working Group on 24 February 2012, changes to policies were considered in the light of the consultation responses. The Working Group endorsed the draft proposed changes to policies as a basis for the Minerals and Waste Core Strategy proposed submission document for recommendation to Cabinet.
- 5.14 Following consideration by the Growth and Infrastructure Scrutiny Committee on 27 February 2012, the Council's Cabinet considered a report on a Minerals and Waste Core Strategy Proposed Submission Document on 13 March 2012. The report set out the main issues raised in responses to the consultations on both the Minerals and Waste Consultation Draft Strategies. This report is included at Appendix 6. Paragraphs 17 – 30 set out the key waste issues raised and proposals for addressing them. The Cabinet agreed the amended minerals, waste and core policies and amended minerals and waste vision and objectives as the basis of the Minerals and Waste Core Strategy Proposed Submission Document for recommendation to the full County Council to approve for publication and submission.
- 5.15 A more detailed report summarising all the comments made in the responses to the Consultation Draft Minerals and Waste Planning Strategies, with the Council's responses to each one, was published on the Council's website in May 2012.

### **Background Papers and Preliminary Minerals Site Assessment September 2011**

- 5.16 Alongside the Minerals and Waste Planning Strategy Consultation Draft documents published in September 2011, the Council published background papers on Environment; Flooding; Restoration; Mineral Safeguarding; and a Preliminary Minerals Site Assessment; and a draft Waste Needs Assessment (May 2011). Comments were invited to be made on these documents. Comments were also received on the Sustainability Appraisal / Strategic Environmental Assessment of the Draft Minerals Planning Strategy. The comments received on these documents were collated and published on the Council's website. They were taken into account by the Council in making revisions to the background papers and the waste needs assessment and the next iteration of the sustainability appraisal / strategic environmental assessment.



## **6. Publication of the Minerals and Waste Core Strategy Proposed Submission Document May 2012**

### **Background**

- 6.1 On 3 April 2012 the full County Council considered a draft Minerals and Waste Core Strategy Proposed Submission Document and the recommendation from the 13 March Cabinet meeting. The report referred to the responses to the consultations on the draft Minerals and Waste Planning Strategies (and the responses were made available to County Council members) but advised that overall the consultation had not lead to any new substantive issues being put forward that call into question the principles on which the draft strategies were prepared; although changes to strategy policies were proposed in response to a number of more detailed issues that had been raised. The Council resolved to approve the Minerals and Waste Core Strategy Proposed Submission Document (subject to any necessary editorial changes) for publication and submission to the Secretary of State for independent examination.
- 6.2 The Minerals and Waste Core Strategy Proposed Submission Document was published on 25 May 2012, for representations to be made by 16 July 2012 (a seven week period), under Regulation 19 of the 2012 Regulations. All of the bodies and persons included on the consultation database were notified and provided with the opportunity to make representations; and a notice was published in the local press. The Core Strategy Proposed Submission Document, together with revised and additional supporting documents, were published on the Council's website and made available for inspection at the Council's offices in Oxford. Copies of the Core Strategy Proposed Submission Document were also made available for viewing at District Council Offices and public libraries across the County.

### **Representations**

- 6.3 Representations were submitted within the prescribed period by 104 bodies and persons. Respondents were asked to use a standard representation form which allowed for specific comment to be made on an individual policy or a particular part of the plan, but representations not made on this form were also accepted. A total of 400 individual representations have been registered. The breakdown of these is shown in table 2.

**Table 2**  
**Summary of all representations**

<b>Comment</b>	<b>Support</b>	<b>Unsound</b>	<b>Legal and Unsound</b>	<b>Total</b>
<b>General Issues</b>	10	11	42	63
<b>Minerals Strategy</b>	50	101	52	203
<b>Waste Strategy</b>	19	44	8	71
<b>Core Policies</b>	29	30	4	63
<b>Total</b>	<b>108</b>	<b>186</b>	<b>106</b>	<b>400</b>
<b>Percentage (%)</b>	<b>(27%)</b>	<b>(46%)</b>	<b>(27%)</b>	<b>(100%)</b>

6.4 More than a quarter of the representations express a level of support for the Core Strategy, nearly three quarters make some form of objection. Appendix 8 provides a summary of the issue raised by each representation.

6.5 The following sections outline the main issues that have been raised in the representations.

### **General Issues**

6.6 Table 3 summarises the main issues raised on the introductory part of the plan. Analysis of representations made on specific parts of the plan also showed concerns on several general issues and these were also recorded as follows.

**Table 3**  
**Summary of representations on General Issues**

<b>Comment</b>	<b>Support</b>	<b>Unsound</b>	<b>Legal and Unsound</b>	<b>Total</b>
<b>Consultation arrangements</b>	1	2	16	19
<b>Conformity with National Planning Policy Framework</b>	0	4	9	13
<b>Engagement with other local authorities (Duty to Cooperate)</b>	1	4	10	15
<b>Sustainability Appraisal/Strategic Environmental Assessment</b>	2	0	5	7
<b>Habitats Regulations</b>	0	0	1	1
<b>Other</b>	6	1	1	8
<b>Total</b>	<b>10</b>	<b>11</b>	<b>42</b>	<b>63</b>
<b>Percentage (%)</b>	<b>(16%)</b>	<b>(17%)</b>	<b>(67%)</b>	<b>(100%)</b>

## **Consultation Arrangements**

- 6.7 Insufficient account has been taken of comments made in response to previous consultations. In some cases points have not been acknowledged in the Council's response to the consultation, or very little alteration made to the plan subsequently. This gives the impression that minds have been made up in advance of the consultation and that the aspirations of the Statement of Community Involvement (to listen and respond to views expressed) has been ignored.
- 6.8 Publication of the Core Strategy Proposed Submission Document did not appear on the consultations page of the County Council website, making it difficult to make comment.
- 6.9 The Council's decision making process was flawed. The process through which the minerals strategy emerged was not at all transparent and, in particular, inadequate consultation took place before the decision to include the Cholsey area for sand and gravel working was made.
- 6.10 Further consultation should take place on several issues before the Core Strategy is submitted to the Secretary of State.

## **Conformity with National Planning Policy Framework**

- 6.11 The National Planning Policy Framework (NPPF) was published in March 2012, replacing most of the previous Planning Policy Statements. This must be taken into account in the preparation of local and neighbourhood plans, but there is little evidence of this.
- 6.12 Several of the Background Papers have been 'partially reviewed' to take account of the NPPF but none confirm that they are fully compliant with the NPPF. No changes appear to have been made to the content of these Background Papers and they were first published before the NPPF. The Council approved the Core Strategy for submission within days of the publication of the NPPF and no changes have been made to the document since then. There is no evidence of the extent to which the Core Strategy is compliant with NPPF.
- 6.13 Comments on the extent to which specific policies are not considered compliant with the NPPF are covered separately.

## **Engagement with other local authorities (Duty to Co-operate)**

- 6.14 The Localism Act requires local authorities to co-operate in plan making. The NPPF (paras 178 – 181) contains guidance on what is required and confirms that co-operation between authorities is particularly important for strategic priorities: this includes provision for waste management and minerals development. For Oxfordshire there is evidence of significant cross-boundary

movement of minerals (in particular with Gloucestershire) and waste (in particular with London and Berkshire).

- 6.15 Local planning authorities are expected to demonstrate evidence of having effectively co-operated with other bodies when their plans are submitted for examination. This should be a continuous process of engagement resulting in a final position where plans are in place. There is no evidence that the County Council has fulfilled this 'Duty to Co-operate' or the extent to which it has engaged with other authorities on plan making. There has been only limited joint working in the preparation of the plan and it appears there are still a number of objections from other authorities.

### **Sustainability Appraisal/Strategic Environmental Assessment**

- 6.16 Environmental Assessment of the preferred areas for mineral working has been undertaken at a strategic level. This is not a suitable approach where choice of site is limited (as is the case with the preferred area of working sand and gravel at Cholsey) to effectively one site. The consequences are either:
- that at detailed assessment, the operator will argue that the site has already been assessed as acceptable; or,
  - that a full Environmental Impact Assessment will reveal various inadequacies and the site will fail the tests set by the Core Policies.
- 6.17 The appraisal suggests that the Cholsey area is no more suited to mineral working than some other areas (e.g. Culham), and it is not sufficiently well explained why the Cholsey area has been chosen over other areas that perform no better or worse in environmental terms.
- 6.18 The minerals strategy will result in West Oxfordshire producing up to 80% of the County's aggregate supply, whereas the level of demand in that area will be little more than 25% of that required. This is inadequately reflected in the SA/SEA assessment.
- 6.19 Government policy supports the increased use of recycled aggregate – perhaps for as much as 70% of primary use. It is unclear how secondary and recycled aggregate has been taken into account in assessing the primary aggregate requirement. This should feature more prominently as an issue.
- 6.20 The plan's approach to managing low level radioactive waste relies too heavily on the availability of facilities in areas outside Oxfordshire and the SA/SEA fails to appraise this adequately.
- 6.21 There are no arrangements for monitoring the effect of the strategy on the historic environment. The summary of findings makes no reference to the archaeological interest of the Lower Windrush Valley notwithstanding that this is referred to in the full assessment.

## Habitats Regulations Assessment

- 6.22 There is no evidence that assessment has been undertaken of the impact of nitrogen deposition from minerals and waste traffic on protected habitat. This is particularly relevant to Oxford Meadows Special Area of Conservation which adjoins the A34 and A40.
- 6.23 The assessment does not adequately support the exclusion of the area to the east and north east of the River Evenlode from the Cassington/Yarnton/Eynsham area of mineral working. There is insufficient evidence to suggest this will harm the Oxford Meadows Special Area of Conservation.

## Other

- 6.24 The strategy conflicts with several parts of the West Oxfordshire Community Strategy.

## Main Issues on Minerals

- 6.25 Just over half of the representations made comment on the minerals part of the Core Strategy, with a quarter being supportive of the approach. Nearly half of the representations made comment on the locations for working minerals (policy M3): most of these (88%) raised objection to one or more aspects of the policy. The breakdown of representations is shown in table 4.

**Table 4**  
**Summary of representations on minerals**

Comment	Support	Unsound	Legal and Unsound	Total
<b>General</b>	1	0	0	1
<b>Aims &amp; Objectives</b>	8	9	0	17
<b>Policy M1</b>	3	5	6	14
<b>Policy M2</b>	6	18	12	36
<b>Policy M3</b>	11	51	27	89
<b>Policy M4</b>	4	2	1	7
<b>Policy M5</b>	4	0	0	4
<b>Policy M6</b>	3	2	0	5
<b>Policy M7</b>	10	10	5	25
<b>Implementation &amp; Monitoring</b>	0	4	1	5
<b>Total</b>	<b>50</b>	<b>101</b>	<b>52</b>	<b>203</b>
<b>Percentage (%)</b>	<b>(25%)</b>	<b>(50%)</b>	<b>(25%)</b>	<b>(100%)</b>

## **Aims and Objectives**

- 6.26 The aims are not sufficiently positive in terms of supplying locally won aggregate to support the anticipated level of growth. Relying solely on 'locally determined requirements' risks an under supply of local aggregate and a higher level of supply should be aimed for. When assessing what this should be, the NPPF requires that other issues are taken into account, including an assessment of all supply options, advice from the local Aggregate Working Party and national/sub-national guidelines on future provision. As currently expressed the stated aim will be to the detriment of adjoining counties.
- 6.27 It is implied that secondary and recycled aggregate will increasingly meet the overall aggregate requirement, and this could contribute to setting targets for locally won aggregates that are too low. Conversely, the intention to increasingly rely on secondary and recycled aggregates is welcome, but the aim does not go far enough: it should be coupled with an aim to reduce the extent to which needs are met by locally won primary aggregate.
- 6.28 An aim to encourage transport of materials by rail 'where possible' is not sensible. It is not always the case that transport of materials by road is less sustainable. Multiple handling of material is necessary when transported by rail and this may actually result in a higher carbon footprint.
- 6.29 The aims fail to address the extent to which mineral development can assist in managing the impact of climate change; in particular through restoration for biodiversity.

## **Provision for secondary and recycled aggregates (Policy M1)**

- 6.30 The intended level of provision (0.9 million tonnes per annum) is not appropriate. Some believe that a higher target should be set: others believe the target is not achievable.
- 6.31 In support of the view that the intended level of provision is not sufficiently ambitious, attention is drawn to the National and Sub National Guidelines on aggregate provision. Recent advances in recycling technology (in particular integrated wash plant) will result in much higher rates of recycling and enable a larger proportion of secondary and recycled aggregate to be produced than before. Moreover, the recycled aggregates and sands produced from such plant are of the same quality as primary materials and have the same level of end uses – including higher specification aggregates such as Type 1. The plan should be a lot clearer on the extent to which these materials have influenced the amount of primary aggregate to be extracted (policy M2).
- 6.32 Conversely, the amount of secondary and recycled aggregate currently produced (measured by recorded sales) is less than 300,000 tonnes per annum and a 300% increase would be necessary to achieve the target. This is unrealistic, particularly with the expected loss of secondary materials produced at Didcot A Power Station. To achieve the plan's intended recycling

target of 60% (policy W3) some 1.5 million tonnes of waste material would be required and this is far more than is produced in Oxfordshire. Achievement of the target would therefore require waste to be imported into the county; this would result in the movement of heavy materials over excessive distances by lorry and would not be sustainable. In any event, the contribution that secondary and recycled aggregates can make to development needs is limited by the quality of the product: it should not significantly influence the amount of primary aggregate required (policy M2).

### **Provision to be made for primary aggregate (Policy M2)**

- 6.33 As with secondary and recycled aggregate provision, views on proposed rates of extraction for primary aggregate fall into two broad camps:
- those who believe the rates of extraction are too low (largely mineral operators and their representative body);
  - those who believe that the rates of extraction are too high (largely organisations and individuals who are opposed in some way to the locations for mineral working identified in policy M3).
- 6.34 Both groups raise concerns about the methodology used in calculating the proposed levels of provision.

#### The intended level of provision is too low.

- 6.35 The intended level of provision is below that set out for Oxfordshire in the South East Plan. South East Plan policy M3 requires that provision be made for 1.82 million tonnes per annum of sand and gravel and 1.0 million tonnes per annum of crushed rock. The intended provision (Core Strategy policy M2) is 0.56 million tonnes per annum below that of the South East Plan for sand and gravel; and 0.37 million tonnes per annum lower for crushed rock.
- 6.36 The intended level of provision in the Core Strategy uses a methodology that is not compliant with the National Planning Policy Framework (NPPF). This requires that assessment be based on a rolling average of 10 years sales, also taking account of relevant local information and an assessment of all supply options (including secondary and recycled sources). The intended level of provision is based on 10 year sales data, but the methodology relies on working sites and rail heads operating at full capacity. This cannot be relied upon. There is also a risk if any reliance is placed on supplies of secondary and recycled aggregate (as a substitute for primary aggregate) as this has a less flexible range of uses. Oxfordshire is already a net importer of aggregates, and reducing provision for indigenous production to the level proposed will only increase the rate at which aggregates are imported. This would be unsustainable. Other areas would need to produce higher levels of aggregate than they do at present and this should not be relied on.
- 6.37 The intended level of provision should be agreed with adjoining and 'supplier' authorities, and there is no evidence that this has been attempted or achieved. A level of contingency should be introduced to allow response to be

made to future fluctuations in demand. A buffer of 10% could usefully be applied to the 10 year sales average: this would give an intended level of provision for sharp sand and gravel of around 1.35 million tonnes per annum. There could be justification for the contingency to be as high as 20% (providing for an additional 0.6 million tonnes of sharp sand and gravel per annum and 0.12 million tonnes of soft sand). There is also a case for splitting the soft sand provision 50/50 by sand type.

The intended level of provision is too high.

- 6.38 Oxfordshire should seek to provide only for its own development needs; it should not seek to make an appropriate contribution to the needs of a wider area as well (the earlier draft plan did not seek to do this).
- 6.39 Insufficient account has been taken of the steady decline in the consumption of gravel nationally. This trend had begun before the drop in construction caused by the current recession. Figures for the South East suggest that over the last 10 years there has been a fall in consumption of some 9% per annum, and that changes to building techniques will reduce still further the need for concrete products.
- 6.40 Further evidence that the levels of provision are too high is provided by the fact that there is a 7.5 million tonne landbank (reserves permitted to be extracted) for sharp sand and gravel. The amount of sharp sand and gravel extracted each year has now fallen to some 455,000 tonnes. The existing landbank therefore provides sufficient reserve for at least 16 years and extends well into the plan period. Other information also demonstrates that the intended level of provision is too high and could be as much as 275% higher than is required to meet reasonable needs. It may be that the provision for sharp sand and gravel should be no more than 600,000 tonnes per annum; and for soft sand 150,000 tonnes per annum.

**Locations for working aggregate minerals (Policy M3)**

Sand and Gravel

- 6.41 The strategy does not envisage working outside of the preferred areas identified and this is inflexible. It will not be known until much later whether these areas have been able to provide the required level of material: by then it will be too late to know whether working outside these areas should have been considered. The intention to not allow extraction from Areas of Outstanding Natural Beauty in any circumstances is again inflexible and is not supported by national policy.
- 6.42 It is not clear how the amount of mineral to be worked from each of the preferred areas has been worked out; also how this will be monitored and achieved. The strategy recognises that further working in the Lower Windrush Valley and Eynsham/Cassington/Yarnton areas should 'not lead to an increase in the overall level of mineral extraction or mineral lorry traffic above



past levels within these areas combined'. But it provides no baseline figures to allow for an assessment to be undertaken and to know whether this has been achieved. There is a danger that more mineral will be extracted than envisaged by this statement.

- 6.43 Harm will arise from working sand and gravel from the preferred areas as follows.

#### Lower Windrush Valley

- 6.44 The area has provided the majority of Oxfordshire's sand and gravel supply for many years and insufficient consideration has been given to the cumulative effect on the local community – in particular the disruption and environmental impact of heavy lorry movements. There has been significant impact on the local landscape, both temporary and longer term, with an emphasis on restoration to wetland habitat. This has transformed the agricultural character of the area and more of the same would be even more harmful. There should be no further working from this area or, at the very least, a reduction in the level of production.
- 6.45 The plan seeks to ensure that extraction from this area will not increase above 'past levels' (see also above) but it is not clear how this will be measured. There is therefore a risk that the stated aim of not increasing traffic on the A40 or A34 will not be realised. The area is likely to produce a disproportionately high level of mineral relative to the need of the local area: it is being wrongly used to provide minerals to satisfy more significant levels of growth in the area south of the River Thames. This is unsustainable, as river crossings are inadequate and minerals will have to travel excessive miles via A40/A34 to reach that market. There will be far more growth in the south of the county but the provision made in the Core Strategy for mineral extraction in that area is not adequate to meet those needs. Given the harmful impacts identified, it is wrong to expect the area to supply these needs as well as any development that takes place north of the Thames.

#### Eynsham/Cassington/Yarnton

- 6.46 The views expressed on harmful impacts of continued working in the Lower Windrush Valley also apply to this area, in particular the cumulative impact of mineral working and the strain placed on the A40 by lorry traffic in supplying markets in the south of the county.
- 6.47 Mineral working in this area also risks harm being caused to the Oxford Meadows Special Area of Conservation as a result of additional mineral traffic using A40 and A34 and the effect of lowering ground water levels on habitat. On the other hand Natural England supports the approach taken to defining the area that could reasonably be worked without causing harm to Oxford Meadows. Furthermore, insufficient evidence has been produced to justify excluding gravel bearing land closer to the Special Area of Conservation. (See also comments on Habitats Regulations Assessment, paragraphs 6.22 – 6.23 above.)

### Sutton Courtenay

- 6.48 The area of working needs to be defined in a way that makes clear that it does not extend to land east of the main line railway. If worked for minerals, this would compromise the strategic housing area at North East Didcot (identified in the South Oxfordshire Core Strategy).

### Caversham

- 6.49 Much of the area likely to be worked for mineral has been identified in a site nomination and is almost entirely in the functional flood plain. Further mineral working in this area will increase the level of flood risk to existing property and would not comply with national flooding policy. Flood risk will be generated from working the site (plant and stock piles will displace flood water). The intended after use would also involve the importation of waste with a view to returning the area to agriculture. This landfill would affect ground water flow. The NPPF confirms that landfill operations should not take place in the functional flood plain.
- 6.50 Mineral working in this area will also have an adverse effect on the character and setting of the nearby Chilterns Area of Outstanding Natural Beauty.

### Cholsey

- 6.51 The intended area of working covers the open area that separates Wallingford and Cholsey: these provide homes for some 10,000 people. Mineral working would have a significant impact on the two communities. Harm will be caused to the environment generally and roads will be badly affected by heavy lorry movements. The landscape setting of the settlements will be adversely affected, and there will also be an effect on local tourism and wildlife. Restoration to wetland could compromise air safety at RAF Benson by increasing bird strike risk. In order to avoid this, significant amounts of waste material would need to be imported and this would further extend the period of disruption well beyond the timescales suggested. (See also comments on Sustainability Appraisal/Strategic Environmental Assessment above.)
- 6.52 Mineral working in this area will have an adverse effect on the character and setting of the adjoining North Wessex Downs and Chilterns Areas of Outstanding Natural Beauty: the views of the respective Conservation Boards have not been adequately considered. Assessment of the impact of development on the area has been generally inadequate and the potential impact on local archaeology and groundwater largely ignored. Recent work has emphasised the archaeological significance of the area.
- 6.53 The suitability of the area to supply local markets has been exaggerated and insufficient consideration given to the quality of the mineral, which will prove generally inadequate for intended development needs. The Cholsey resource is controlled by an operator who will also continue to work in the Lower Windrush Valley area: this provides for limited competition between operators and raises questions as to the deliverability of the strategy.

## Soft Sand

- 6.54 Although there may be advantage in making use of existing infrastructure, insufficient evidence is provided to justify the strategy's preference for soft sand to be extracted from extensions to existing quarries rather than from new sites. The preliminary site assessment does not provide the evidence, and gives an inadequate justification for any conclusion reached. The Sustainability Appraisal actually draws attention to the harm that can be caused from meeting soft sand need through extensions to quarries (cumulative impact on small areas) and points out that this can only be assessed through detailed assessment. Rather than supporting a preference for extensions, the Sustainability Appraisal does exactly the opposite.
- 6.55 The plan has had regard to previous Government policy and has wrongly concluded that it gave a preference for extensions to quarries over new workings. In any event this has been withdrawn. The NPPF emphasises that account should be taken of the cumulative effect of multiple impacts from individual sites and/or a number of sites in a locality and there is no evidence this has been considered. The strategy wrongly forecloses on the possibility of any such assessment being undertaken in the Site Allocations Document.
- 6.56 Despite this there is some support for the preference given to extensions, but the suitability of proposals should not have regard to whether or not there is a proven need for the material (as measured through the availability of a 7 year land bank). Extensions should be seen as an opportunity to respond flexibly to fluctuations in local demands and should be determined on their merits: productive capacity is not a measure that should be applied in these circumstances. In any event, no details of productive capacity are given in the plan. If this is to be relevant to the consideration of proposals for site extensions this should be made clear and better background information of land banks provided.

## **Aggregates rail depots (Policy M4)**

- 6.57 The approach to safeguarding railheads is not sufficiently robust; it is also not compliant with NPPF. Although the Core Strategy looks to safeguard existing and planned rail heads, the NPPF requires that safeguarding should also apply to *potential* rail heads: this term needs to be used in the policy and defined.
- 6.58 Allowing a rail head to be lost so long as a suitable alternative is provided, does not provide for adequate safeguarding. Development that would result in the loss of a rail head should only be allowed if there are exceptional circumstances.
- 6.59 The rail head at Kidlington should not be safeguarded. The operations taking place there do not have planning permission. There is also a risk of nitrogen deposition on the Oxford Meadows Special Area of Conservation caused by

lorry traffic from this freight depot, and there is no evidence that this has been adequately assessed.

### **Non-aggregate mineral working (Policy M5)**

6.60 No issues of significance raised.

### **Minerals Safeguarding Areas (Policy M6)**

6.61 The Core Strategy does not show the intended Minerals Safeguarding Areas on a map. The NPPF requires that when preparing local plans, local authorities define such areas and adopt appropriate policies. Policies that will identify how the safeguarded areas should be managed might be appropriately included in a subsequent Development Plan Document, but definition of the safeguarding areas should be made in the Core Strategy: this is the document that provides the long-term strategic direction and the context for future development plan documents.

6.62 Mineral operators should be involved in the delineation of Minerals Safeguarding Areas. The Core Strategy should also say how these areas will be monitored and reviewed.

### **Restoration and after use of mineral workings (Policy M7)**

6.63 The approach taken to restoration is too inflexible for some but for others it should be clearer and more prescriptive. It is described in one case as “unimaginative” and in another as “confused”. In the latter case, this is because the policy requires that “Restoration and after use should accord with any restoration strategy for the area concerned in a site allocations development plan document”, whereas the supporting text (para 4.44) explains that restoration of each site should be determined on its individual merits and circumstances.

6.64 The intention that restored workings should be managed for a period extending beyond that which can be prescribed by planning condition is neither fair nor appropriate, particularly where there is a requirement for financial contribution. This goes beyond the position set out in national policy - the NPPF (para 144) which states that ‘Bonds or other financial guarantees to underpin planning conditions should only be sought in exceptional circumstances’.

6.65 But on the other hand communities can reasonably claim that they should be better compensated for the disruption they suffer from mineral working over a prolonged period of time. At the very least, improved public access and (possibly) the passing of land to community ownership should be a reasonable expectation.

- 6.66 In low lying areas mineral working usually leads to the establishment of large water filled areas for waterfowl when restored. One view is that the statutory bodies are all too willing to go along with this approach, notwithstanding the impact these lakes have on the established landscape character of a particular area. The Environment Agency normally prefers this approach as it can increase flood water storage capacity in the floodplain and reduce flood risk, but this is not necessarily the only consideration. There is normally a need to import some waste material to bring about satisfactory restoration, and for sites in the flood plain this must be done in a way that is consistent with the national categorisation of flood risk. The Core Strategy should explain this in a clearer and more consistent way.

### **Implementation and Monitoring**

- 6.67 The minerals strategy will be implemented by identifying sites for new working from within the strategy areas in policy M3. The Core Strategy recognises that operators may bring forward proposals to extract aggregate from locations outside these broad areas, but this will not be allowed unless the required level of provision is not being met. During the plan period it is not clear how it will be determined whether the required level of provision is likely to be met from the selected areas. It may only be possible to identify a possible problem towards the end of the plan period when it is too late to consider alternatives. The process of identifying sites for aggregates can take up to 10 years, and more flexibility is required to respond to potential shortfalls if suitable sites are brought forward outside the selected areas.
- 6.68 The strategy relies too much on the only identified area of new working at Cholsey. Many problems have been identified in delivering aggregate from this area (see representations on policy M3). The strategy should be made more flexible, especially as the sustainability appraisal suggests that the Cholsey area is no better than one or more of the other areas e.g. Culham.
- 6.69 Arrangements to ensure that development is undertaken to a satisfactory standard are not adequately set out. Regular monitoring of sites is required, together with arrangements for investigating alleged breaches of planning control and when enforcement action may be taken. This should be spelled out.

### **Main issues on Waste**

- 6.70 The number of representations on the waste part of the Core Strategy was less than for minerals, but significant issues were raised on most of the policies, as shown in table 5.

**Table 5**  
**Summary of representations on waste**

<b>Comment</b>	<b>Support</b>	<b>Unsound</b>	<b>Legal and Unsound</b>	<b>Total</b>
<b>General</b>	0	1	0	1
<b>Aims &amp; Objectives</b>	1	2	0	3
<b>W1</b>	0	5	0	5
<b>W2</b>	1	8	0	9
<b>W3</b>	3	1	1	5
<b>W4</b>	3	2	2	7
<b>W5</b>	3	10	1	14
<b>W6</b>	2	9	0	11
<b>W7</b>	2	0	0	2
<b>W8</b>	2	2	2	6
<b>W9</b>	2	3	1	6
<b>W10</b>	0	1	1	2
<b>Total</b>	<b>19</b>	<b>44</b>	<b>8</b>	<b>71</b>
<b>Percentage (%)</b>	<b>(27%)</b>	<b>(62%)</b>	<b>(11%)</b>	<b>(100%)</b>

### **Aims and Objectives**

- 6.71 There should be a stronger commitment to reducing waste imports, whether this is for disposal by landfill or for treatment. Specific targets should set the level to which imports should have dropped at key dates throughout the plan period.
- 6.72 The aim to ‘keep to a minimum’ the distance waste is moved within the county is not sufficiently ambitious; it should be replaced with a commitment to reduce the distances that waste is currently transported.
- 6.73 The aim to secure the satisfactory restoration of landfill sites and other temporary waste management facilities does not adequately reflect the need to ensure that the character of the surrounding landscape is respected.

### **The amount of waste to be provided for (Policy W1)**

- 6.74 The levels of waste to be managed do not take adequate account of waste from neighbouring authorities. The Waste Needs Assessment suggests that the plan should add 10% to the amounts of waste arising in Oxfordshire, but this is not provided for in the amounts of waste to be managed and set out in the policy. In any event, the plan fails to generate any confidence in the levels of waste that are put forward (para 5.4 – “the amounts needing to be managed *could* increase over the periods to 2030...”).

- 6.75 Inadequate consideration is given to the hazardous waste stream. Specific provision should be made for this in the policy - in the order of 50,000 tonnes per annum. Reference is made in supporting text to there being a likely increase in hazardous waste, but it is more likely this will decrease following the decommissioning of the Atomic Energy Research facility at Harwell.
- 6.76 Analysis of landfill data provided by the Environment Agency suggests that commercial and industrial waste estimates are too low. There has been too much reliance on the national survey undertaken recently by Defra; this significantly underestimates waste arisings and fails to take sufficient account of the effects of the recession. Provision should be made for commercial and industrial waste at a rate of 980,000 tonnes per annum by 2030 (not 640,000 tpa as intended).

### **Imports of residual non-hazardous waste (Policy W2)**

- 6.77 Provision should not be made for waste from other areas – either for disposal in landfill or for management in treatment facilities. This will increase traffic and give rise to other adverse environmental impacts for any area hosting such facilities. It could be argued that this approach should be taken for all types of non-hazardous waste management facility. The plan has actually over-estimated the amounts of waste to be imported in any event, failing to acknowledge that a contract that previously resulted to large amounts of waste being imported from West London has not been renewed.
- 6.78 Conversely, the plan fails to adequately reflect the amount of waste that may need to be managed from other areas. It specifically fails to acknowledge a long term contract for the disposal of municipal waste from Berkshire at the Sutton Courtenay landfill site. The municipal waste management strategies of some of the Berkshire Unitary Authorities are dependent on landfill and do not envisage that waste for disposal in landfill will decline. There are no landfills in Berkshire to accept this waste.
- 6.79 The approach to assessing whether waste from other areas should be treated in Oxfordshire is also too restrictive and is not compliant with Government policy. The distance that waste has to travel is not the sole criterion when assessing the suitability of a site to host a waste management facility. A rail-linked site may also provide for a more sustainable transport solution than a non-rail served site closer to the source of waste (with poor road access). Trying to assess whether there is “no prospect of a site nearer to the source of waste being identified” is impractical, particularly as a facility may take in waste from multiple sources and these will, in any event, change over time.

### **Waste management targets (Policy W3)**

- 6.80 Targets for the management of municipal and commercial and industrial waste do not accord with the South East Plan or the Waste Strategy for England and are over ambitious. Targets for recycling should be reduced,

particularly for commercial and industrial waste. Studies have found that little more than 78% of this waste stream can be recovered and Oxfordshire is likely to be sending as much as 60,000 tonnes of C&I waste to landfill in 2030. Landfill diversion targets need to be increased accordingly.

- 6.81 Alternatively, municipal recycling rates in Oxfordshire have already reached 68%, and recycling targets do not appear sufficiently ambitious.

#### **Provision of additional waste management capacity (Policy W4)**

- 6.82 More recovery capacity is required for commercial and industrial waste. Although the plan is over ambitious in the proportion that can be diverted from landfill, it has badly underestimated the amount of waste to be managed. The Ardley energy from waste plant will not provide sufficient capacity to treat Oxfordshire's residual waste (that which cannot be recycled, composted or treated in some other way). It is likely that the recycling capacity required is excessive and a requirement for further residual waste treatment overlooked: there could be a need for capacity to treat a further 100,000 tonnes of this waste.
- 6.83 Conversely, the amounts of waste to be managed have been over estimated and there has been a consequent over-estimation of capacity gaps and the need for additional plant. The Waste Needs Assessment lacks credibility as there is no means of checking the estimates of current capacity to measure whether there are shortfalls, even if the waste estimates themselves are accepted. It also appears that the plan is not doing enough to prevent waste from being produced in the first place.
- 6.84 The Waste Needs Assessment suggests a higher level of provision for construction, demolition and excavation waste than included in the Core Strategy. It cannot be assumed that recycling capacity will continue to be provided through temporary facilities (as at present) or that facilities with planning permission will be built. The capacity required to recycle the amounts of waste being produced has been underestimated. This is compounded by the fact that the capacity already available has been overestimated by as much as 30%. Actual levels of recycling at sites are often much lower than the capacities that have been allocated to those sites.

#### **Strategy for provision of waste management facilities (Policy W5)**

- 6.85 The intention that strategic facilities should only be located in a narrow area linking Bicester, Oxford, Abingdon and Didcot will be difficult to achieve. Much of this area is Green Belt and land for waste development is notoriously difficult to find in Oxford. The type of business parks located at the north and south of the area are also not welcoming of waste type activities. It would be more sensible for strategic facilities to be allowed in any of the larger towns, thus extending possibilities to Banbury, Witney or Wantage/Grove). There could also be a role for small towns in accommodating waste facilities.



- 6.86 Two of the larger construction waste recycling facilities are located beyond the boundary of the strategic area as currently defined. Another facility of strategic significance (Chilton Waste) is located near Didcot in AONB but outside the strategic area. Although temporary, the owner wishes to make this a permanent facility. The strategic area should be adjusted to accommodate these strategic sites.
- 6.87 It is difficult to understand what is meant by a strategic facility and how many of these facilities are to be provided for. 50,000 tonnes per annum is too low as a threshold for such facilities. An earlier draft of the waste strategy made provision for a residual waste treatment plant in the Didcot/Abingdon area, but this is no longer envisaged. The need for a strategic area at all is questioned. It is difficult to make such judgement without knowing how many facilities are to be provided and where the actual sites might be. The Core Strategy should be identifying sites for waste management facilities and not leaving this for a subsequent Development Plan Document.
- 6.88 Not a lot is being said about locations for medium and small scale facilities and how these might be defined. Some sites may handle multiple waste streams and whilst the amounts of each may be relatively small, collectively the tonnage may be relatively large. Such facilities would be more suitable in any of the larger or smaller towns. Yet there is no mention made of the potential of the smaller towns e.g. Faringdon, although these were previously part of the earlier draft waste strategy.
- 6.89 The strategy makes much of the fact that communities should take more responsibility for their own waste. But it seeks to make provision for large facilities that will encourage waste to travel longer distances to be managed. The area within which such facilities should be located includes several large areas of population where sites are likely to be compromised by nearby housing. Also, the plan looks to do nothing for those communities that may have to put up with the undesirable consequences of a large waste facility that will serve the needs of a much larger area.

#### **Sites for waste management facilities (Policy W6)**

- 6.90 Giving priority to the use of previously developed land, industrial sites and redundant farm buildings over green field land is consistent with national policy, but the test to be applied before a green field site is released is too stringent. Many waste facilities, in particular those managing construction and demolition wastes, are of low value and find it difficult to afford industrial rents. Greater flexibility is needed, as has already been shown in allowing development of green field land at New Wintles Farm (Eynsham). Green field sites should be allowed to be considered if there are no previously developed sites available on economic or commercial terms. Some Business Parks may not be well suited to waste management facilities and it should be made clear that waste uses are only considered acceptable on B2 'industrial' land or closely related sui generis uses.

- 6.91 Mineral workings and landfill sites can provide appropriate locations for waste management facilities for the duration of quarrying or landfill operations. It is not necessary to require that a facility be related to the nature of the mineral or landfill operation. Any type of waste management facility ought to be able to benefit from the location and the infrastructure already provided. There may, however, be a case for strengthening the policy to make clear that such facilities should not remain after the mineral or landfill operations have ended.
- 6.92 The approach to the Green Belt is confused. Policy W5 suggests that the broad area of search for strategic facilities has been widely drawn to help meet the needs of Oxford and accommodate the fact that sites in Oxford are hard to find. But policy W6 also allows for a strategic facility serving other large towns, or even much of Oxfordshire, to be accommodated in the Green Belt. In such circumstances sites anywhere other than the Green Belt should be used. There is a legitimate view that the Green Belt should only accommodate waste facilities as a last resort and the circumstances where this might apply should be made much clearer: it might even be appropriate to say that waste facilities should not be allowed in the Green Belt at all, even on previously developed land. But PPS10 does not support this, and the approach taken in the policy is, if anything, too restrictive – particularly in suggesting that sources of waste to facilities that are allowed in the Green Belt be restricted.
- 6.93 In Areas of Outstanding Natural Beauty, restricting waste management facilities to those that are ‘small scale’ may be consistent with national policy, but attempting to restrict this to facilities that handle no more than 20,000 tonnes per annum is quite arbitrary and unhelpful. There would be no greater impact on the landscape from a building providing for 30,000-40,000 tonnes per annum. The threshold for requiring an Environmental Impact Assessment for such development is 50,000 tonnes per annum. The proposed threshold would rule out many waste operations, including small scale skip operators. Decisions should be taken on their merits based on an assessment of landscape impact. Conversely, no waste operations should be allowed in the Areas of Outstanding Natural Beauty – even if use is being made of previously developed land.

### **Landfill (Policy W7)**

- 6.94 No issues of significance raised.

### **Hazardous and radioactive waste (Policy W8)**

- 6.95 The South East Plan (policy W15) requires that opportunities for hazardous waste facilities are identified in Development Plan Documents and the Core Strategy fails to do this. Waste management facilities are identified as a strategic priority in the NPPF, but there is no evidence that opportunities for hazardous waste facilities – which often need to serve a very wide area to be

viable – have been discussed with other Waste Planning Authorities or capacity requirements identified.

- 6.96 Hazardous waste sites need to be in more isolated positions (rural areas), away from built areas. They carry a perception of harm to people and there are often difficulties in obtaining planning permission for sites. This should be adequately accommodated in the spatial strategy (policy W5). Otherwise there is an expectation that facilities be located in or close to towns.
- 6.97 The policy purports to relate to radioactive waste, but this is also covered in policy W9. This is confusing. If radioactive waste is also covered by policy W8 it should be specifically referred to throughout the policy, alongside hazardous waste.

### **Management of radioactive waste at Harwell and Culham (Policy W9)**

- 6.98 The plan does not make positive provision for the management of radioactive waste, particularly for the disposal of low level radioactive waste (LLW). Too much reliance is placed on the willingness of other parts of the country to provide facilities to manage waste that will arise from decommissioning facilities in Oxfordshire. This is not consistent with PPS10 which expects that communities take more responsibility for their own wastes.
- 6.99 The plan is not clear on the consultation that has taken place in the development of the intended approach. Assumptions are made about sending some LLW to Cumbria. Although there has been some engagement, it has tended to be late rather than early. It is not clear what liaison has been held with other Waste Planning Authorities.
- 6.100 The policy should deal with all aspects of this waste, not just the amounts that are created by the nuclear industry (in Oxfordshire's case the research establishments at Harwell and Culham). Policy W8 largely deals with hazardous waste but also deals with radioactive waste and this is confusing.
- 6.101 The plan does not adequately differentiate on the different levels of radioactivity associated with LLW arisings and the management opportunities available other than burial. For waste that has to be disposed in landfill, controlled burial of certain types of LLW (up to 200 Bq/g) in conventional landfill may be made. Oxfordshire has substantial landfill capacity. It is not clear that options for disposal of this waste in conventional landfill locally have been adequately explored.
- 6.102 Most of the waste arising in Oxfordshire is being generated from the Harwell facility, and the plan relies on an option study undertaken by the site operator that contains somewhat surprising conclusions as to the best environmental option (off-site disposal as opposed to disposal in a bespoke facility on site). It also appears to rely on the availability of facilities in Cumbria and Northamptonshire for the disposal of LLW, and these cannot be relied on. The Northamptonshire facility is subject to an undetermined application for a

Development Consent Order and Cumbria will have considerable difficulty in providing for the wastes arising from its own nuclear sites. The plan only makes provision for the temporary storage of LLW if required. This is wholly inadequate and should make positive provision for its final disposal also.

- 6.103 The position on intermediate and higher level wastes (ILW and HLW) is different as this is dependent on the development of Government policy (Managing Radioactive Waste Safely – MRWS) and plans for final disposal of this type of waste are still being made. The plan makes adequate provision for the storage of the higher level waste (ILW) arising in Oxfordshire, but fails to make adequate provision for the possibility that such facilities as are needed to store this waste could also provide beneficial opportunity for the storage of waste from other areas. This would be consistent with Government policy for the storage of this waste, as expressed by the Nuclear Decommissioning Authority in its Integrated Waste Management Strategy Development Programme and Annual Plans. Oxfordshire is aware of the potential for storage of ILW from Winfrith at Harwell, to enable the early restoration of the Winfrith site, but the plan fails to make positive provision for this possibility.
- 6.104 Provision for the disposal of LLW could conflict with a policy in the South Oxfordshire Core Strategy (CSEM3) that supports the redevelopment and intensification of the Culham Science Centre to create 1,000 new jobs.

### **Safeguarding waste management sites (Policy W10)**

- 6.105 The approach to safeguarding permanent waste sites is too strong in its protection of waste uses. It will be very difficult to re-designate land once it has been safeguarded for waste use. This may be contrary to the presumption in favour of sustainable development that is introduced in the NPPF.
- 6.106 It is not clear whether safeguarding will automatically apply to land that has been granted planning permission for waste development. This would again be contrary to the principles introduced in the NPPF. Circumstances can conspire (e.g. changes in land ownership) to make difficult the implementation of a waste management permission. Safeguarding in these circumstances could sterilise the land and make it unavailable for other potentially useful development purposes.
- 6.107 Any safeguarding policy should apply to temporary waste management facilities as well as permanent facilities, so that capacity is not reduced earlier than expected. Some temporary waste management facilities are developed under temporary planning permissions with a long time span (e.g. the Ardley energy from waste plant which is permitted until 2035) and it seems inappropriate not to safeguard these facilities just because they have been described as temporary.
- 6.108 It is not sufficiently clear how the safeguarding policy will apply and the circumstances in which land would be safeguarded and/or safeguarding

relaxed. This clarification should not be left for a subsequent Development Plan Document, as intended, but should be spelled out in the Core Strategy.

## Main issues on Core Policies

6.109 Nearly half of the comments made on the core policies part of the Core Strategy are supportive, with several making mention of significant changes made to the earlier draft. On the other hand some comment is made on the extent to which some of the policies are compliant with the NPPF. The breakdown of representations is shown in table 6.

**Table 6**  
**Summary of representations on the core polices**

<b>Comment</b>	<b>Support</b>	<b>Unsound</b>	<b>Legal and Unsound</b>	<b>Total</b>
<b>General</b>	1	0	0	1
<b>Policy C1</b>	4	7	1	12
<b>Policy C2</b>	5	0	0	5
<b>Policy C3</b>	4	3	1	8
<b>Policy C4</b>	1	1	0	2
<b>Policy C5</b>	4	11	0	15
<b>Policy C6</b>	5	0	0	5
<b>Policy C7</b>	0	2	1	3
<b>Policy C8</b>	2	4	0	6
<b>Policy C9</b>	3	2	1	6
<b>Total</b>	<b>29</b>	<b>30</b>	<b>4</b>	<b>63</b>
<b>Percentage</b>	<b>(46%)</b>	<b>(48%)</b>	<b>(6%)</b>	<b>(100%)</b>

## Flooding (Policy C1)

6.110 The NPPF classifies sand and gravel working as ‘water compatible’ development that can take place in the flood plain (FZ3b): other minerals and waste development is not allowed in the flood plain. The policy does not adequately differentiate sand and gravel working from other minerals and waste development. The benefit of working sand and gravel from the flood plain should be further emphasised. Exhausted workings that are restored to water based uses (or at lower level) are likely to increase flood water storage capacity and reduce flood risk in the longer term. The strategic flood risk assessment (SFRA) has already established that working sand and gravel from the floodplain cannot be avoided, and the policy should make clear that sequential testing of sites in the flood plain should not be necessary.

- 6.111 But the Environment Agency emphasises that the sequential testing of sites for sand and gravel working in the flood plain must be undertaken. The work on flood risk that has supported the development of the Core Strategy has only been undertaken at a strategic level: this is not sufficient to inform the identification of preferred sites. Sand and gravel operations in the flood plain raise the potential of flood risk to nearby property, particularly during the operational phase, and related development – stockpiles, plant etc – displaces flood water. Mineral working in the flood plain should always be avoided if possible: the sequential test is designed to achieve this.
- 6.112 Careful consideration should also be given to restoration when assessing the level of flood risk from mineral workings. Use of inert fill to restore sand and gravel sites in the flood plain is often required in the creation of a desirable after-use, including where workings are restored to wetland habitat. The NPPF classifies landfill as ‘more vulnerable development’ in terms of flood risk. This is not allowed in the flood plain and applies equally to non-hazardous and inert waste. But the NPPF is not clear on whether inert material imported to restore workings should be regarded as a landfill operation, or whether it should be seen as part of the extraction operation. For sand and gravel this is important because such workings are allowed in the flood plain where other type of mineral extraction is not. The policy could be clearer on this point and give greater clarity to the type of restoration that can take place where workings are located in the flood plain.
- 6.113 Flood risk management is important and schemes should be prepared and agreed before any development takes place in the flood plain. This requirement is not included in the Core Strategy.

### **Water Environment (Policy C2)**

- 6.114 No issues of significance raised.

### **Environmental and amenity protection (Policy C3)**

- 6.115 The policy is too vague and provides insufficient information about the likely adverse effects of development on the environment, residential amenity and other sensitive receptors: in particular, at what level such impacts may become unreasonable. A particular example concerns the gap that should be maintained between mineral workings and sensitive receptors, particularly residential property. Whilst there may be merit in assessing the extent of a buffer zone on a case by case basis, this also leaves uncertainty to those most likely to be affected and clearer guidance should be provided in the Core Strategy.
- 6.116 The overlap between planning and the environmental permitting regime should be better explained. Difficulties can arise if the scope of these regimes is not understood: for example, it is often not clear how the harmful effects of emissions from incinerators should be assessed and monitored.

## **Agricultural land and soils (Policy C4)**

6.117 The position on the use of high quality land in the NPPF is not definitive, but previous government policy sought to restore high grade land to agriculture use. The Core Strategy seeks to apply a sequential test with a view to ensuring that sites involving best and most versatile land are not worked for minerals unless sites involving lower grade soils are not available. There is no support for this in the NPPF. The aim should be to make sure that after minerals have been worked, sites covered by the best and most versatile land are restored to agricultural use (using those original soils).

## **Biodiversity and geodiversity (Policy C5)**

6.118 The policy fails to adequately differentiate between the level of protection appropriate to nationally designated sites and sites recognised for their local significance. This applies to sites valued for nature conservation and also for their geological features. This is illustrated in the approach to Sites of Special Scientific Interest (SSSIs), which may be considered to be given inadequate protection. Significant harm to SSSIs is potentially allowed for in the policy, and such harm is unlikely to be capable of mitigation in the period normally allowed for aftercare.

6.119 Although the NPPF makes reference to the possibility of allowing development that may cause 'significant' harm to biodiversity, it is not appropriate to apply this principle to national designations. That said, the NPPF does allow for exceptions to be made, so it may not be appropriate to attempt to apply a blanket rule even to sites designated for their national importance. The policy tries to provide flexibility but in doing so it is not sufficiently clear what test should apply to the different levels of designation. It also does not give adequate protection to unexpectedly rare finds that are difficult to classify e.g. the dinosaur footprints found at Ardley Quarry.

6.120 It is not clear whether the policy expects all mineral and landfill developments to contribute to the enhancement of local habitat. This may not be possible in some cases and should therefore not be a pre-requisite to allowing development. As an alternative, a financial contribution may not be a fair solution, particularly where a developer is already being required to contribute to the improvement of other public infrastructure e.g. roads.

## **Landscape (Policy C6)**

6.121 No significant issues have been raised.

## **Historic environment and archaeology (Policy C7)**

6.122 The policy is not in conformity with NPPF, which requires that authorities set out environmental criteria to assess proposals for their impact on the historic

environment (as defined in NPPF). The policy contains no such criteria and only addresses heritage assets.

- 6.123 The policy implies, through the supporting text, that the purpose of assessing a heritage asset is to determine the appropriate means of mitigation. It should be to inform whether or not proposals affecting that asset should be allowed to proceed.
- 6.124 The policy appears to suggest that the ability to record evidence of the past is a factor in deciding whether the loss of a heritage asset should be allowed. The NPPF specifically says this should not be a consideration.
- 6.125 The NPPF differentiates between the weight to be given to the loss of a designated heritage asset and a non-designated heritage asset. The policy is not strong enough in its defence of designated assets and fails to recognise that account should be taken of the significance of non-designated assets when assessing proposals which could involve their loss.

### **Transport (Policy C8)**

- 6.126 It is unreasonable to expect that further minerals and waste development should not only maintain, but should also lead to an improvement in, the safety of road users, the efficiency and quality of the road network and residential and environmental amenity. Minerals and waste development generates heavy lorry traffic and for such development the policy should concentrate on measures that provide for safe and convenient access to the highway. The test by the policy is too rigorous and is unlikely to be capable of being met.
- 6.127 It is not reasonable to expect operators to make financial contributions to on-going day to day highway maintenance. Financial contributions may only reasonably be sought where a specific upgrade to highway infrastructure is required to accommodate added traffic movements. Again the policy is not realistic in its expectations.
- 6.128 The River Thames could act as a highway for the transportation of minerals, reducing the need for heavy lorry road traffic. The policy should look for better use to be made of the river than it presently does.

### **Rights of way (Policy C9)**

- 6.129 Encouraging public access to former mineral workings can be costly and onerous to landowners, particularly if they are to be required to maintain newly created rights of way beyond the normally accepted aftercare period. Such a requirement is implied in the policy and may prove counter-productive to the creation of public rights of way. Reference in the policy to financial contributions would be better deleted.



6.130 Conversely, it can reasonably be said that local communities see very little by way of compensation for the daily inconvenience of mineral extraction over a prolonged period. The intention to only 'encourage' increased public access to restored sites is not adequate: this should be a routine requirement of any after-care scheme and should be included in the policy.

## APPENDICES

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## Oxfordshire Statement of Community Involvement (extract)

Stages in the production of minerals and waste development documents and main community involvement methods to be used (minimum statutory requirements are shown in bold text).

Stage of Document Preparation	Level of Involvement	Main Methods of Involvement
Initial evidence gathering to identify issues and options	Technical consultation with statutory bodies; Consultation with key stakeholders	Letters or emails to and meetings with specific organisations; Stakeholder group meetings
Consultation on issues and options	Information, consultation and participation for all community groups	<b>Letters to consultation bodies</b> and people on consultation list; Publication on website; Documents available for inspection and comment; Newsletter published
Development of preferred options and proposals	Technical consultation with statutory bodies; Consultation with key stakeholders	Letters or emails to and meetings with specific organisations; Stakeholder group meetings
Consultation on preferred options and proposals	Information, consultation and participation for all community groups	<b>Send documents to consultation bodies;</b> Notify people on consultation list; <b>Publication on website;</b> <b>Newspaper notices;</b> <b>Documents available for inspection and comment;</b> <b>6 week consultation period;</b> Newsletter published
Preparation of submission document	Technical consultation with statutory bodies; Consultation with key stakeholders	Letters or emails to and meetings with specific organisations; Stakeholder group meetings
Submission of document to Secretary of State	Information, consultation and participation for all community groups	<b>Send documents to consultation bodies;</b> Notify people on consultation list; <b>Publication on website;</b> <b>Newspaper notices;</b> <b>Documents available for inspection and comment;</b> <b>6 week consultation period;</b> Newsletter published

Consultation on any alternative sites proposed in representations	Information, consultation and participation for all community groups	<b>Publication on website;</b> <b>Newspaper notices;</b> Letters or emails to consultation bodies and people on consultation list; <b>Representations made available for inspection and comment;</b> <b>Formal 6 week consultation period</b>
Independent examination	Opportunity for participation for all community groups	<b>Planning Inspector carries out independent examination and if required holds examination sessions</b> (round table discussions or hearings); sessions will be open to all interested parties to observe; <b>Publicise examination sessions on website and in newspapers ;</b> <b>Notify persons who made representations</b>
Receipt of inspector's report and adoption of document	Information for all interested parties	Letters to consultation bodies and people on consultation list; <b>Notify people who requested notification;</b> <b>Publication on website;</b> <b>Newspaper notices;</b> <b>Documents available for inspection;</b> Newsletter published

Notes:

- (i) For supplementary planning documents the main methods of involvement will be as for the first four stages of document preparation shown in this table.
- (ii) The methods of involvement listed in this table also cover consultation on sustainability appraisal / strategic environmental assessment at relevant stages in the process.

## Specific Consultation Bodies

<b>National Bodies</b>	<b>Consulted?</b>
The Coal Authority	Yes
Environment Agency	Yes
English Heritage	Yes
The Marine Management Organisation	No
Natural England	Yes
Network Rail Infrastructure Limited	Yes
Highways Agency	Yes
<b>Relevant Authorities (Oxfordshire)</b>	
District Councils	
Cherwell District Council	Yes
Oxford City Council	Yes
South Oxfordshire District Council	Yes
Vale of White Horse District Council	Yes
West Oxfordshire District Council	Yes
Parish Councils	
All (list available if required)	Yes
Policing bodies	
Thames Valley Police Authority	Yes
<b>Relevant Authorities (Adjoining Oxfordshire)</b>	
County Councils	
Buckinghamshire County Council	Yes
Gloucestershire County Council	Yes
Northamptonshire County Council	Yes
Warwickshire County Council	Yes
District Councils	
Aylesbury Vale District Council	Yes
Cotswold District Council	Yes
South Northamptonshire District Council	Yes
Stratford-on-Avon District Council	Yes
Wycombe District Council	Yes
Unitary Councils	
Reading Borough Council	Yes
Swindon Borough Council	Yes

West Berkshire Council	Yes
Wokingham Borough Council	Yes
Adjoining Parish Councils	
Adlestrop Parish Meeting	Yes
Aldworth Parish Council	Yes
Barton Hartshorn Parish Council	Yes
Bishopstone and Hinton Parva Parish Council	Yes
Bledington Parish Council	Yes
Boarstall Parish Council	Yes
Boddington Parish Council	Yes
Brill Parish Council	Yes
Chaddleworth Parish Council	Yes
Chaddleworth Parish Council	Yes
Chetwode Parish Council	Yes
Compton Parish Council	Yes
Cottisford Parish Meeting	Yes
Croughton Parish Council	Yes
Earley Town Council	Yes
East Garston Parish Council	Yes
East Ilsley Parish Council	Yes
Eastleach Parish Council	Yes
Edgcote Parish Meeting	Yes
Evenley Parish Council	Yes
Evenlode Parish Council	Yes
Great Rissington Parish Council	Yes
Haddenham Parish Council	Yes
Hambleton Parish Council	Yes
Highworth Town Council	Yes
Ibstone Parish Council	Yes
Ickford Parish Council	Yes
Icomb Parish Council	Yes
Inglesham Parish Council	Yes
Kingsey Parish Council	Yes
Lambourn Parish Council	Yes
Langford Parish Council	Yes
Lechlade on Thames Town Council	Yes
Little Compton Parish Council	Yes
Long Compton Parish Council	Yes
Long Crendon Parish Council	Yes
Longwick cum Ilmer Parish Council	Yes
Ludgershall Parish Council	Yes
Moreton in Marsh Town Council	Yes
Oakley Parish Council	Yes
Pangbourne Parish Council	Yes
Purley on Thames Parish Council	Yes
Radnage Parish Council	Yes
Shabbington Parish Council	Yes

South Marston Parish Council	Yes
Southrop Parish Council	Yes
Stokenchurch Parish Council	Yes
Tingewick Parish Council	Yes
Turweston Parish Council, Clerk	Yes
Twyford Parish Council	Yes
Tysoe Parish Council	Yes
Wargrave Parish Council	Yes
Water Stratford Parish Council	Yes
West Ilsley Parish Council	Yes
Westbury Parish Council	Yes
<b>Adjoining Policing bodies</b>	
Gloucestershire Police Authority	Yes
Northamptonshire Police Authority	Yes
Warwickshire Police Authority	Yes
Wiltshire Police Authority	Yes
<b>Persons to whom the electronic communications code applies</b>	No
<b>Owners or controllers of electrical communications apparatus</b>	No
<b>Primary Care Trust established under section 18 of the National Health Service Act 2006</b>	
Oxfordshire Primary Care Trust	Yes
<b>Licence holder under section 6 (1) (b) or (c) of the Electricity Act 1989</b>	
NPower	Yes
<b>License holder under section 7(2) of the Gas Act 1986</b>	No
<b>Sewerage/Water Undertakers</b>	
Anglian Water	Yes
Severn Trent Water Ltd	Yes
Thames Water Utilities	Yes
<b>Homes and Communities Agency</b>	Yes
<b>For London, the Mayor of London</b>	n/a

## General Consultation Bodies

<b>Voluntary Bodies</b>	
Age Concern	Oxford & District Trades Union Council
(AGGROW) Anti Gravel Group Residents in Oxfordshire West	Oxford Fieldpaths Society
Burcot and Clifton Hampden Protection of the River Thames (BACHPORT)	Oxford Friends of the Earth
Bampton Environmental Watch Group (BEWG)	Oxford Green Belt Network
Berks, Bucks and Oxon Wildlife Trust	Oxford Ornithological Society
Bicester Friends of the Earth	Oxford Preservation Trust
Burford Quarry Liaison Group	Oxfordshire Architectural and Historical Society (OAHS)
Campaign for Sustainable Didcot	Oxfordshire Federation of Women's Institutes
Campaign to Protect Rural England (CPRE)	Oxfordshire Gardens Trust
Caversham & Districts Residents Association	Oxfordshire Geology Trust
Caversham GLOBE Group	Oxfordshire Green Party
Chinnor & Thame Friends of the Earth	Oxfordshire Nature Conservation Forum
Cholsey 1000 Plus	Oxfordshire Playing Fields Association
Cholsey Community Library	Oxfordshire Ramblers Association
Communities Against Gravel Extraction (CAGE)	Oxfordshire RIGS Group
Dorchester Historical Society	Oxfordshire Rural Community Council
Dorchester-on-Thames Society	Oxfordshire Women's Institute
Earth Trust	Parishes Against Gravel Extraction (PAGE)
ENOUGH	River Thames Society
Eynsham and Cassington Gravel Committee	River Users Society
Eynsham Society	Royal Society for the Protection of Birds (RSPB)
Eynsham Womens Institute	Shotover Preservation Society
Friends of the Earth	Sonning and Sonning Eye Society
Friends of South Hinksey	Sonning Eye Action Group
Friends of South Hinksey & South Hinksey Flood Group	The Bensington Society
Hardwick with Yelford and Ducklington Charity	The British Association for Shooting & Conservation
Hurst Water Meadow Trust	The Carter Institute
Iffley Fields Residents' Association	The National Cyclists' Organisation
Inland Waterways Association	The National Trust



Land not Sand Community Group	The Wallingford Historical & Archaeological Society
Lower Windrush Garden Club	The Warren and District Residents Association
Lower Windrush Valley Project	Transition Eynsham Area (Green Tea)
National Federation of Womens Institutes	Trust for Oxfordshire's Environment
Oxford Upper Thames Residents Against Gravel Extraction (OUTRAGE)	Tubney Wood Preservation Group
Oxford Civic Society	Wallingford Museum
Oxford Community Foundation, Director	Wilts & Berks Canal Trust
Open Spaces Society	Witney and District Historical and Archaeological Society
Oxford Council for Sport & Recreation	Wolvercote Commoners Committee
Oxford Federation of Community Associations, Secretary	Woodland Trust
	Wroxton & Balscote Action Group
<b>Racial Ethnic National Groups</b>	
Indian Union	Oxfordshire Chinese Community & Advice Centre
National Federation of Gypsy Liaison Groups	Asian Cultural Centre
Traveller Law Reform Project	African Caribbean Community Action Network
Oxfordshire Ethnic Minorities Business Services	
<b>Religious Groups</b>	
Oxford Mosque	Oxford Diocesan Board of Finance
<b>Local Business Groups</b>	
Abingdon on Thames Chamber of Commerce	Mineral Products Association
ACTVaR	NFU - The Voice of British Farmers
Airport Operators Association	Oxfordshire Economic Partnership
Banbury & District Chamber of Commerce	Oxfordshire Investment Opportunity Network
Bicester & District Chamber of Commerce	Rail Freight Group
Carterton & District Chamber of Trade & Commerce	Road Haulage Association
CBI West Midlands	Summertown Trade & Business Association
Chemical Business Association	Thame Chamber of Trade & Commerce
Chipping Norton Guild of Commerce	Thames Valley Chamber of Commerce
Didcot Chamber of Commerce	The Mineral Planning Group

Didcot Development Agency Limited	Wallingford Business 2000
Faringdon Chamber of Commerce	Wantage & District Chamber of Commerce
Farming & Wildlife Advisory Group	Witney & District Chamber of Commerce
Freight Transport Association	Woodstock Chamber of Commerce
Henley Chamber of Trade & Commerce	
Institute of Directors	
<b>Government Departments/Agencies</b>	
Advantage West Midlands (RDA for the West Midlands)	Nuclear Decommissioning Authority
Defence Estates	Nuclear Directorate
East Midlands Development Agency	Secretary of State for Transport
East of England Development Agency	South West of England Regional Development Agency
HSE - Health and Safety Executive	
<b>Non-Government Organisations</b>	
British Geological Survey	Forestry Commission
BBC / Channel 4	General Aviation Awareness Council
Canal & River Trust (formerly British Waterways)	High Speed Two (HS2) Ltd
Centre for Ecology & Hydrology	Mendip Rail Ltd
Chilterns Conservation Board	National Grid Company
Citizens Advice Bureau	National Playing Fields Association
Cotswold Conservation Board	National Power plc
Crown Estate Commissioners	North Wessex Downs Area of Outstanding Natural Beauty
DB Schenker Rail (UK) Ltd	Post Office Property Holdings
Defence Infrastructure Organisation	South East Tourist Board
Direct Rail Services	Sport England
Environmental Services Association	The National Trust
Equality and Human Rights Commission	Youth Information Service - Wise-up
<b>Local Authorities/Associated Groups</b>	
Bedfordshire County Council	Oxfordshire Association of Local Councils
City of London	Oxfordshire Emergency Planning Unit
Dorset County Council	Oxfordshire Fire & Rescue Service
East London Waste Plan	Royal Borough of Windsor and Maidenhead
East Sussex County Council	South East England Aggregates Working Party (SEEAWP)
Hampshire County Council	Slough Borough Council
Hertfordshire County Council	South East Waste Planning Advisory Group (SEWPAG)
Isle of Wight Council	South London Waste Plan

Kent County Council	Surrey County Council
London Borough of Lewisham	West London Waste Plan
Milton Keynes Council	West Northamptonshire Joint Planning Unit
North London Waste Plan	West Sussex County Council
Nuclear Legacy Advisory Forum	

**Businesses consulted**

Aasvogel Recycling	Hills Quarry Products
Abingdon Car Breakers	Hives Planning Limited
Abingdon Consulting	Inchcape Estates Ltd
Aggregate Industries UK Limited	IngPro Limited
Agrivert Limited	J B Stevens & Son
Alliance Planning	J James Ltd
Alumini Holdings	J. Curtis & Sons Limited
Amity Insulation Services	John Drake and Co.
Arena Leisure plc	Johnston Quarry Group
ASM Auto Recycling Ltd	K J Millard (Plant Hire & Sales) Limited
Auto Storage and Recovery Ltd	K Miller (Old Brickworks Farm)
AWC Amor	K W C Amor (Kelmescott)
B & E Transport	Kemp and Kemp
Banbury Motor Spares	Kilbride Group
Barton Willmore Planning Consultancy	L C Hughes Partnership
Bidwells	Lafarge Aggregates
Boshers (Cholsey)	Lakeside Industrial Estate
Boxon Composting Company	Lambert Smith Hampton
Brasenose College	Land and Mineral Management Limited
Brett Group	Leda Properties Ltd
Brook Consulting	LSM Partners
Bury's Farm	Mains Motors Limited
Buscot and Coleshill Estate	Malary Oils Ltd
Cadena Holdings Limited	Marriotts
Carter Jonas LLP	Marshall and Galpin
CEMEX Materials UK Limited	Martineau
CEMEX UK	May Gurney Ltd
CEMEX UK Operations Limited	Mains Motors Ltd
Charlett Tyres	McDowell Trading Ltd
Chartered Landscape Architects Ltd	McKenna Plant Hire (Oxford) Ltd
Childrey Quarry	Metal Salvage Ltd
Chilton Waste Services	Michael Severin
City Insulation Contractors	Micks Skips Limited
Claridge's Car Breakers	Mid-Counties Co-operative
Cluttons	Midland Pig Producers Ltd
Cokethorpe School	MJCA Technical Advisors
Colas Group	Morston Assets Limited
Coleshill Community Composting	Multi - Agg Limited
College Motors	NAP Grab Hire Ltd
Colliers CRE	Old Railway Halt Scrapyard
Collins Dryland & Thorowgood LLP	Onsyany Skip Hire Ltd
Companions Rest (Pet Home)	Oxford Airport
Corpus Christi College	Oxford Brookes University

Corus UK Limited	Oxford Wood Recycling Ltd
Cory Environmental	Pannozzo & Grossi
Corylus Planning and Environment Limited	Peter Bennie Ltd
Cotswold Wood Fuels	PGW & A
Croudace Homes	Phillips Tyres Ltd
Crowmarsh Battle Farms Limited	Premier Aggregates Ltd
Culham Centre for Fusion Energy	Price Waterhouse Coopers LLP
Culham Science Centre	Primepark Limited
D.K. Symes Associates	Private Environmental Scientist
David Hackett	Property Vision
David Jarvis Associates Ltd	Proteus Public Relations
David L Walker (Chartered Surveyors)	R Hazell Recycling Waste
David Lewis	R. Partridge (Cassington) Limited
David Hackett Recycling	Radcote Bridge House
David McDowell Limited	Raymond Brown Construction Limited
David Wilson Homes (Southern)	Reading University
Direct Farm Eggs	Recycle-lite
DMH Stallard	Research Sites Restoration Ltd (RSRL)
Downs Stone Co	RMC Materials Ltd
DPDS Consulting Group	Rockwood Absorbents Ltd
Earthline Ltd	Rogers Concrete
East & South East	Rollits
Edgars Limited (Chartered Surveyors)	RPS Planning Development
EJSR Farms	S J Farrant & Sons Limited
Elton Partners	Savills Limited
Energy Gap UK Limited	Sheehan Haulage and Plant Hire Ltd
Enstone Limited	Shine Consulting Limited
Enviros Consulting Limited	Simmons & Sons
Enzygo Environmental Consultants	Sita (UK) Ltd
ERM UK	SLR Consulting Limited
Eskmuir Properties Ltd	Smith Brothers (Crawley)
Ethos Recycling Ltd	Smith Stuart Reynolds
Exeter College	Smiths & Sons (Bletchington) Limited
EWS	Smiths of Bloxham
FCC Environment (formerly Waste Recycling Group Limited)	Sotwell Hill House Residential Home
Farntech Construction Ltd	St John's Primary School
Fergal Contracting Co. Ltd	Stansgate Planning LLP
Framptons	Stanton Harcourt Estate
Freight Liner Limited	Stanton Harcourt S F C
Frobisher Renewables	Stephen Bowley Planning
FTMINS	Steve Claridge Motors
Fusion Online Ltd	Stewart Ross Associates
Future Fuels (International) Limited	Strutt & Parker
GBRf	Summerleaze Ltd
G D Parker Contractors	Suzi Coyne Planning
GE Medical Healthcare	T & B Motors

GP Planning Limited	Tarmac Southern Limited
Grabloader Ltd	Thames Valley Energy
Greenwoods of Garsington	The Bell Cornwell Partnership
Grundon Waste Management Limited	The Bosley Trust
GW Minerals	Tribal Malcolm Judd & Partners
GWP Consultants LLP	Turley Associates
H Tuckwell & Sons Ltd	UKAEA Technology
Halletec Associates Ltd	University of Oxford
Hanson Aggregates	Verdant Group Ltd
Hansteen Land Ltd	Viridor Waste Management Limited
Hardwick Parks	W Breakspear and Sons Ltd
Hayne's of Challow	West Waddy ADP
Hazell and Jefferies	Weymouth & Sherborne Recycling
HBF Regional Planner (Southern Region)	Wolf Bond Planning
Health Systems Solutions Ltd	Worton Farms Limited
Heaton Planning Ltd	Younis Ali (Scrap Metal)
Henry Mead	
Hickman Brothers Ltd	
High Cogges Farm Partnership	

## **Minerals and Waste Forum**

### **List of Members (2005→)**

Cherwell District Council  
Oxford City Council  
South Oxfordshire District Council  
Vale of White Horse District Council  
West Oxfordshire District Council  
Environment Agency  
Oxfordshire Minerals Producers Group  
Hanson Aggregates  
Smith & Sons (Bletchington) Ltd  
Waste Recycling Group  
Grundon Waste Management Ltd  
Country Land and Business Association  
CPRE Oxfordshire  
Friends of the Earth  
Sutton Courtenay Parish Council  
Eynsham Parish Council  
Stanford in the Vale Parish Council  
Middleton Stoney Parish Council  
Wroxton Parish Council  
OUTRAGE (Oxon Upper Thames Residents Against Gravel Extraction)  
PAGE (Parishes Against Gravel Extraction)

### **Additional Members (2011)**

Banbury Town Council  
Stanton Harcourt Parish Council  
Sheehan Group  
Viridor Ltd  
Agrivert Ltd  
Didcot Town Council  
Longworth Parish Council  
Hills Quarry Products  
Lafarge Aggregates  
Royal Society for the Protection of Birds  
Earthline Ltd  
Eye and Dunsden Parish Council  
CAGE (Communities Against Gravel Extraction)  
AGGROW  
BaCHPoRT (Burcot and Clifton Hampden Protection of the River Thames)

## **Dates of Meetings**

20<sup>th</sup> May 2005

23<sup>rd</sup> June 2005

4<sup>th</sup> May 2006

4<sup>th</sup> July 2006

12<sup>th</sup> September 2006

29<sup>th</sup> November 2006

30<sup>th</sup> January 2007

29<sup>th</sup> September 2011 (Minerals only)

29<sup>th</sup> September 2011 (Waste only)



Report to Cabinet 13 March 2012

**CABINET – 13 MARCH 2012**

**OXFORDSHIRE MINERALS AND WASTE PLAN:  
MINERALS AND WASTE CORE STRATEGY – PROPOSED SUBMISSION  
DOCUMENT**

**Report by Deputy Director (Growth & Infrastructure)**

**Introduction**

1. The County Council is preparing a new Oxfordshire Minerals and Waste Plan. The purpose of this report is to seek Cabinet approval to submit the revised policies for the Minerals and Waste Core Strategy to the full County Council on 3 April with a view to then submitting the Core Strategy to the Government.
2. The Core Strategy will set out the vision and strategic objectives together with the spatial strategy, core policies and implementation framework for the supply of minerals and management of waste in Oxfordshire over the period to 2030. Detailed site allocations will be identified in a subsequent document.
3. Draft Minerals and Waste Planning Strategies were agreed by Cabinet on 19 July 2011 and were published for consultation in September. Responses were received from 779 individuals and organisations. Most of these were on minerals, including 548 objections to a proposed new mineral working area at Cholsey. The responses have been published in full on the Council's website and are available in the Members' Resource Centre.
4. Overall the consultation has not led to any new substantive issues being put forward that call into question the principles on which the draft strategies were prepared. A number of more detailed issues have been raised, in response to which some changes to the strategy policies are proposed.
5. A summary of the consultation was reported to the member Minerals and Waste Plan Working Group on 21 December 2011. Possible changes to policies in response to issues raised were considered at a further meeting of the Working Group on 24 February 2012, when it endorsed the proposed changes as the basis for consideration by the Cabinet.
6. The key issues and proposed changes arising out of the consultation were considered by the Growth and Infrastructure Scrutiny Committee at its meeting on 27 February 2012. The recommendations of the Scrutiny Committee are set out later in this report.

## **Key Minerals Issues and Changes to Policies**

### *Policy M2 – Provision for Mineral Working*

7. There was a mix of objections received with regard to the use of locally-derived figures for primary aggregates provision. Some respondents argued the proposed figures were too low; others that they were too high. Some respondents suggested there was insufficient consideration given to the potential for secondary/recycled aggregates to reduce the need for primary aggregates. Finally, there was concern expressed that insufficient consideration had been given to cross-boundary movements and the needs of adjoining areas.
8. The figures in the draft strategy were based on a report prepared by consultants Atkins. That report has been reviewed further in light of the comments made; at the same time account has been taken of 2009 data on inter-authority movements which shows that Oxfordshire was a net importer of sand and gravel. Notwithstanding the concerns expressed, no other figures were put forward through the consultation that can be demonstrated as being more soundly based than the figures in the draft strategy.
9. We have written to other mineral planning authorities in response to their comments explaining the reasoning underpinning the figures in the draft Plan. Some authorities have accepted our position, whilst others continue to express their concern.
10. On balance we consider that the figures in the draft strategy (including 1.26 million tonnes a year for sand and gravel) remain a sound basis for the Plan and that as a consequence there is no need to change policy M2. These figures have sufficient flexibility to allow production to increase to meet local needs and reduce the need for material to be imported.
11. Whilst actual production is currently at a lower level, the Plan needs to provide a framework for the long-term. But the Plan will be monitored and reviewed on a regular basis and this will provide the opportunity to take account of changes in local circumstances (for example an increase in economic activity) and the implications this may have on the requirement for aggregates supply.

### *Policy M3 – Strategy for the Location of Mineral Working*

12. The key issues raised through the consultation in respect of this policy can be summarised as being:
  - General comments – the distribution of sand and gravel areas was considered by some to have over-reliance on working in west Oxfordshire; concerns were expressed that the identification of only one new area (Cholsey) meant that the Plan lacked flexibility; and the level of assessment undertaken in respect of potential sand and gravel areas was considered by some to be inadequate (particularly in relation to Cholsey).

- Habitats Regulations Assessment – Natural England expressed concern about the possible impact of working on Oxford Meadows and Cothill Fen Special Areas of Conservation.
- Archaeology – English Heritage expressed concern about the potential for further loss of important archaeology in parts of the Lower Windrush Valley.
- Areas of Outstanding Natural Beauty (AONBs) – the North Wessex Downs and Chilterns AONB Boards expressed concerns about the potential impact of mineral working at Cholsey and Caversham on the adjacent AONBs.
- Flooding – there were objections to the Caversham area on the basis that national policy on flooding had not been correctly applied.
- Groundwater – the Environment Agency questioned whether an assessment of groundwater vulnerability had been undertaken.
- Birdstrike – there were objections (particularly at Cholsey) that the feasibility of extracting and restoring sand and gravel workings within airfield safeguarding areas in a way acceptable to the MoD had not been adequately assessed.
- Cholsey area – the objections submitted suggested that there had been inadequate consultation on the proposal; expressed concern that the draft Plan was site-specific and lacked the detailed assessment that would be expected to support such a proposal; expressed concern as to the impact the proposal would have on residents in Cholsey and Wallingford (including the new proposal for housing at Winterbrook); and expressed concern as to the potential impact of mineral workings on the local economy and tourism.

13. In response to these issues the following actions have been undertaken:

- The proposed distribution of sand and gravel supply between west and southern Oxfordshire has been reviewed in relation to the expected locations of demand across the county and the availability of least constrained resources. 55% of growth over the next 15 years is expected to be in the southern part of the county, with 45% in the northern part, based on population forecasts. Planned economic development is almost evenly divided between the northern and southern parts of the county.
- We have checked our approach to the assessment of sand and gravel areas; this review has confirmed that the assessment methodology has been consistently applied and all relevant strategic issues have been covered, including groundwater vulnerability.

- Consultants have undertaken further work on Habitats Regulations Assessment, the scope of which was agreed with Natural England. This has concluded that, subject to the exclusion of parts of the Eynsham / Cassington / Yarnton area and the inclusion of appropriate safeguards in the policy, the Special Areas of Conservation should not be adversely impacted.
  - Clarification has been received from English Heritage as to the areas in the Lower Windrush Valley that they wish to see protected from mineral working: we have established that the remainder of the area could provide the sand and gravel required without important archaeology being affected.
  - A landscape assessment of the Cholsey and Caversham areas has been undertaken, in consultation with AONB Officers: this has concluded that mineral working could be carried out in those areas without adversely impacting on the AONBs.
  - Confirmation has been received from the Environment Agency that national flooding policy has been correctly applied in the assessment of mineral working areas.
  - The MoD has confirmed they have no fundamental concerns about the proposed strategy and that any issues they might have with regard to the potential for birdstrike can be addressed as part of specific planning applications.
  - We have reviewed the consultation process to date and consider it has been appropriate and has met procedural requirements; we have reconsidered the suitability of the Cholsey area for inclusion within the Plan as a strategy area and have concluded that it is; we have looked again at our assessment of the Cholsey area in the light of the objections, including the new housing proposal at Winterbrook, and we have concluded that there are potential local impacts from mineral working but that these can be addressed as part of specific planning applications, and that Cholsey is the most appropriate location for a new area for sand and gravel working.
14. As a result of the work set out above, we have concluded that the strategy for mineral working set out in the draft Plan is soundly based and forms an appropriate base for submitting the Plan for examination. Consequently no substantive change is proposed to policy M3.
15. The only changes proposed to this policy are to take out part of the Eynsham / Cassington / Yarnton area and to include requirements to safeguard the Oxford Meadows and Cothill Fen Special Areas of Conservation, to reflect the outcome of the further work on Habitats Regulations Assessment. We are satisfied that neither these changes nor the need for issues such as affect on water levels and birdstrike risk to be addressed through specific planning applications are likely to prevent delivery of the minerals strategy.

16. An addition to policy M3 is proposed to preclude aggregates working within AONBs.

### **Key Waste Issues and Changes to Policies**

#### *Policy W2 – Waste Imports*

17. Representations made through the consultation suggested that the proposals for dealing with the provision for waste from elsewhere were inflexible, gave insufficient consideration to the needs of other areas and were not compliant with national policy.
18. In light of the comments received we have reviewed the draft policy in consultation with the Environment Agency and have sought the views of other waste planning authorities.
19. As a result of this work we have concluded that the policy should be amended. The proposed revised policy wording emphasises the need for any proposal for a new facility to treat waste from outside the county (including London) to be able to demonstrate that there is no prospect of a site nearer to the source of the waste.

#### *Policies W3 & W4 – Waste Management Targets and Provision of Additional Waste Management Capacity*

20. Representations on the draft policies argued that the recycling targets were too low and that the landfill reduction targets were unrealistically high. Objections were received suggesting that the need for additional residual waste treatment facilities (e.g. waste to energy or mechanical biological treatment) was overstated. There were also concerns that inadequate consideration had been given to the implications of non-delivery of already permitted facilities.
21. The recycling targets have been reconsidered in the light of proposals emerging through the review of the Joint Municipal Waste Management Strategy and in consultation with the Environment Agency.
22. As a result we have concluded that the recycling and composting targets for municipal waste and also for commercial and industrial waste should be increased, to 70% by 2025; and that the maximum landfill target should be changed to 5%. This reduces the residual waste treatment target to 25%.
23. As a consequence of these changes there is a need to increase the provision to be made for additional recycling capacity (particularly for commercial and industrial waste). This in turn removes the need to make provision for additional residual waste treatment capacity.

#### *Policy W5 – Provision for Waste Management*

24. Objections to the draft policy highlighted concerns that the strategy was too prescriptive and lacked flexibility with regard to the location of facilities (particularly for recycling) and to allowing for provision to be made for contingencies. Representations also highlighted the need for more focus on facilities to serve Oxford and that the need for a waste treatment plant in southern Oxfordshire was not proven.
25. We have reconsidered the strategy for provision of waste facilities in the light of the amended requirements for new capacity; the locations of existing and planned facilities in relation to where waste will arise; and the likely delivery of facilities that already have planning permission.
26. As a consequence it is proposed that policy W5 is amended so that it sets out a broad approach to the provision of strategic facilities, with emphasis given to serving the Bicester-Oxford-Abingdon-Didcot area and other facilities being provided to serve the other main towns and small-scale facilities elsewhere.
27. It is proposed that a statement be included that gives general encouragement to the provision of additional recycling and composting facilities; and that the provision made in the draft policy for a treatment plant in the Abingdon-Didcot-Wantage/Grove area be replaced by a more general requirement that the need for any new residual waste treatment facility has to be demonstrated on a case-by-case basis.

#### *Policies W8 & W9 – Hazardous and Radioactive Waste*

28. Objections were received that the draft policies were too restrictive and placed too much reliance on facilities outside Oxfordshire, contrary to national policy. In particular concerns were expressed that the policies failed to appreciate the need to consider the storage, management and disposal of radioactive waste in the wider context of national policy.
29. We have reviewed the draft policies in consultation with the Nuclear Decommissioning Authority – the Government agency responsible for the management of nuclear waste. This work has reconsidered the expected types and quantities of these wastes and their management requirements, together with the availability of facilities in Oxfordshire and elsewhere in the Country, in the light of national policy.
30. The proposed changes to policies W8 and W9 provide for Oxfordshire's waste management needs to be met within the county insofar as this is appropriate; and would enable facilities to accommodate waste from outside the county only where it can be demonstrated that there is no adequate provision elsewhere.

## Other Issues and Changes to Policies

31. We have considered all the other issues that were raised in the consultation responses and as a consequence a number of other changes to policies are proposed:
- Policy M3 – Locations for mineral working: The parts covering non-aggregate minerals are moved to a new policy, leaving policy M3 to cover aggregates only.
  - Policy M5 – Safeguarding: This policy should cover mineral deposits only; the parts on rail depots and recycled aggregate facilities are moved to policies M4 and W10.
  - Policy M6 – Restoration of mineral workings: The provisions for securing long-term management of restored sites are strengthened; and a requirement for restoration to provide flood storage capacity is added.
  - Policy W6 – Sites for waste management facilities: The policy is amended to accord better with national green belt policy; and to link temporary development as an exception at mineral working and landfill sites with general policy on green field sites.
  - Policy W7 – Landfill: It is clarified that this policy does not cover hazardous or radioactive waste; and greater emphasis is given to use of inert waste in restoring quarries, with landfill only being permitted elsewhere if there would be environmental benefit.
  - Policy C1 – Flooding: Reference to the sequential test and exceptions test, from national policy, is included.
  - Policy C4 – Biodiversity and geodiversity: The policy is amended to accord better with legislation and national policy on designated sites; and to clarify policy on the contribution developments should make to maintenance and enhancement of habitats, biodiversity and geodiversity.
  - Policy C5 – Landscape: Clearer reference is made to landscape character and assessments; and a section on proposals affecting Areas of Outstanding Natural Beauty is added.
  - Policy C6 – Historic environment and archaeology: The policy is amended to accord better with national policy.
  - Policy C7 – Transport: The term ‘primary road network’ is replaced by ‘advisory lorry routes’; and a requirement for financial contributions towards infrastructure improvements is included.

- Policy C8 – Rights of way: A requirement for provision to be made for improvements to rights of way and public access, including financial contribution, is included.
  - An additional policy is proposed on development affecting high grade agricultural land and management of soils.
32. Policy C7 seeks to minimise the distance minerals need to be transported by road and, together with policy M4, encourages and enables the use of rail to transport minerals where this is practicable. The proposed strategy for mineral working is consistent with these policies, taking into account the distribution of mineral resources in relation to locations of demand and the limited realistic opportunities for transporting minerals by rail.

### **County Council Response to Consultation Responses**

33. A summary of the comments made in the responses to the September 2011 consultation on the draft Minerals and Waste Planning Strategies consultation, with proposed County Council responses, has been prepared and is available in the Members' Resource Centre.
34. The proposed changes to policies, including additional minor amendments to policy wording, are set out in Annex 1 to this report.
35. Related to the changes to policies, some changes are proposed to the vision and objectives for both waste and minerals planning. These proposed changes are set out in Annex 2 to this report.
36. We have prepared a series of background papers to explain and support the strategy policies. These have been updated since they were published alongside the consultation draft strategies in September 2011, and are available in the Members' Resource Centre.
37. The proposed changes to the policies will require related changes to be made to the supporting text of the Core Strategy. In addition, the text needs to be updated in places; and the separate minerals and waste strategy consultation documents need to be brought together as a single Proposed Submission Document and the text amended to reflect the changed status of the Plan. It is proposed that authority to make these changes to the text be delegated to the Cabinet Member for Growth and Infrastructure.

### **Sustainability Appraisal**

38. Sustainability appraisal (incorporating strategic environmental assessment) has been carried out as an integral part of preparation of the Core Strategy. A sustainability appraisal of the proposed changes to the policies has been carried out by consultants and is available in the Members' Resource Centre. This does not raise any fundamental issues necessitating further changes to policies.



## Recommendations of Scrutiny Committee

39. The Growth and Infrastructure Scrutiny Committee recommended five aspects of the Core Strategy on which it considered the Cabinet should satisfy itself:
- i) That the proposed figure for sand and gravel provision of 1.26 million tonnes per annum is sufficiently robust;
  - ii) That the proposed strategy is sufficiently robust as to be deliverable;
  - iii) That the process of preparing the Core Strategy had been undertaken in a way that enables the views of local communities to engage in it: specifically that the residents of Cholsey had had sufficient opportunity to have their views considered adequately;
  - iv) That sufficient encouragement is given to the need to reduce the amount of lorry miles;
  - v) That sufficient encouragement is given to the use of rail facilities as a means of transporting material.
40. The proposed figure for sand and gravel provision is based on advice commissioned by the County Council to provide an evidence base to replace that used to prepare the South East Plan (which set a much higher level of provision for Oxfordshire).
41. The role of a strategic long-term framework is to provide the context within which planning for the supply of minerals can take place. It is inevitable that over the life-time of this planning framework that the demand for minerals will vary – with the level of material provided in any one calendar year being potentially higher or indeed lower than the longer term average. Inherent within the planning system is the requirement to monitor delivery of any long-term planning framework and to undertake regular reviews as appropriate.
42. The deliverability of the proposed strategy has been tested throughout its preparation. As a long-term planning framework it is not the role of the strategy to consider in detail matters pertinent to individual planning applications. At this stage, the evidence indicates that the strategy is robust and deliverable.
43. The proposal to include the Cholsey area within the core strategy was considered at length in preparing the consultation document. The need to identify a new area in the southern part of the County and the basis for identifying the Cholsey area is documented. The points raised in respect of this issue through the consultation have been fully considered and the proposed response set out earlier in this report.
44. The proposed strategy seeks to encourage a reduction in lorry miles and use of the rail network. However, it is important to remember that the timescale associated with mineral workings is by its very nature longer-term. The

location of existing mineral workings by and large dictates current patterns of movement. In addition, as a commercially driven industry travel patterns are in part dictated by market considerations that are beyond the scope of a planning framework.

### **Next Steps**

45. Subject to approval by full Council on 3 April, the Minerals and Waste Core Strategy Proposed Submission Document will be published in May, to enable formal representations to be made on the soundness of the Plan, and will be submitted to the Government in July, for independent examination by a planning inspector. Public examination hearings would be expected to be held in the autumn and the Inspector's report received in spring 2013. Subject to a favourable report, the Council would then be able to adopt the Core Strategy.
46. It should be noted that the core strategy policies have been prepared within the context of the current national planning policy framework. The working assumption is that the publication of the Government's National Planning Policy Framework later this spring will not substantially change the national context in so far as it is relevant to the Minerals and Waste Core Strategy.

### **Corporate Policies and Priorities**

47. The Minerals and Waste Plan will contribute to the Council's strategic objectives of world class economy, healthy and thriving communities and environment and climate change.

### **Financial and Staff Implications**

48. The programme of work for the Minerals and Waste Plan is included within the Directorate work priorities and funding for this project is included in the medium term financial plan. This report does not raise any additional financial or staffing implications.

### **Legal Implications**

49. The County Council is required to prepare a minerals and waste plan under the Planning and Compulsory Purchase Act 2004 (as amended). The effect of the European Waste Framework Directive, 2008 (2008/98/EC) is to require waste planning authorities to put in place local waste plans. The requirements of the Waste Framework Directive, as clarified in the Waste (England and Wales) Regulations 2011, will be met by the Minerals and Waste Core Strategy and the proposed subsequent site allocations document.

## **Risk Management**

50. The complexity of the Minerals and Waste Plan process and the potential implications for major mineral working and waste management proposals emphasise the importance of good project management and regular reporting on risk management.

## **RECOMMENDATION**

51. **The Cabinet is RECOMMENDED to:**
- (a) **Agree the amended minerals, waste and core policies in Annex 1 and the amended minerals and waste vision and objectives in Annex 2 as the basis of the Minerals and Waste Core Strategy – Proposed Submission Document for approval by the full County Council.**
  - (b) **Delegate authority to finalise the Minerals and Waste Core Strategy – Proposed Submission Document, including amendments to the supporting text, to the Cabinet Member for Growth and Infrastructure.**
  - (c) **Delegate authority to finalise the County Council’s responses to the comments made in response to the Minerals Planning Strategy and Waste Planning Strategy Consultation Drafts, September 2011 to the Cabinet Member for Growth and Infrastructure.**
  - (d) **Recommend to the full County Council that the Minerals and Waste Core Strategy – Proposed Submission Document as finalised by the Cabinet Member for Growth and Infrastructure be approved and be published to enable representations to be made and submitted to the Secretary of State for independent examination.**

Martin Tugwell  
Deputy Director (Growth & Infrastructure)

Background papers:

- i. Minerals and Waste Plan Working Group 21 December 2011 – Paper MW1 – Responses to Consultation on Draft Minerals and Waste Strategies and Main Issues Raised.
- ii. Minerals and Waste Plan Working Group – Note of Meeting 21 December 2011.
- iii. Minerals and Waste Plan Working Group 24 February 2012 – Paper MW1 – Oxfordshire Minerals and Waste Plan: Core Strategy: Changes to Policies for Proposed Submission Document.

- iv. Oxfordshire Minerals and Waste Core Strategy – Background Paper on Provision for Aggregates Supply, February 2012.
- v. Oxfordshire Minerals and Waste Core Strategy – Provision for Aggregates Supply: Summary of Engagement with other Mineral Planning Authorities, January / February 2012.
- vi. Oxfordshire Minerals and Waste Core Strategy – Preliminary Assessment of Minerals Site Nominations, revised February 2012.
- vii. Oxfordshire Minerals and Waste Development Framework – Habitats Regulations Assessment: Screening report for mineral and waste strategy options, August 2011.
- viii. Land Use Consultants & Maslen Environmental – Habitats Regulations Assessment for Oxfordshire Minerals Planning Strategy: Technical Supplement, January 2012.
- ix. Oxfordshire County Council – Strategic Landscape Assessment of potential minerals working at Cholsey and Caversham: impacts on Protected Landscapes, February 2012.
- x. English Heritage – Letter 17 January 2012 to Oxfordshire County Council on Minerals Plan Consultation 2011.
- xi. Correspondence between Oxfordshire County Council and the Ministry of Defence on draft minerals planning strategy and birdstrike, October and December 2011.
- xii. Environment Agency – Emails 20 December 2011 and 20 January 2012 to Oxfordshire County Council on mineral working, flooding and groundwater issues.
- xiii. Correspondence between Oxfordshire County Council and the Environment Agency on waste issues, December 2011 to February 2012.
- xiv. Oxfordshire Minerals and Waste Core Strategy – Background Paper No. 1: Environmental and Community Protection and Planning for Mineral Working, revised February 2012.
- xv. Oxfordshire Minerals and Waste Core Strategy – Background Paper No. 2: Flooding and Minerals Development in Oxfordshire, revised February 2012.
- xvi. Oxfordshire Minerals and Waste Core Strategy – Background Paper No. 3: Quarry Restoration, revised February 2012.
- xvii. Oxfordshire Minerals and Waste Core Strategy – Background Paper No. 7: Heritage assets and archaeology, February 2012.

- xviii. URS – Oxfordshire Minerals and Waste Development Framework: Sustainability Appraisal incorporating Strategic Environmental Assessment of the Pre Submission Minerals and Waste Core Strategy: Sustainability Appraisal Report, March 2012.

All the above documents are kept in the Minerals and Waste Policy Team, Speedwell House, Oxford.

Contact Officer: Peter Day, Tel 01865 815544

March 2012

## **Further Consultation on preparation of the Proposed Submission Document**

The drafting of the Proposed Submission Document took into account the comments made on the draft Minerals and Waste Planning Strategy documents and involved further consultation and discussion with key stakeholders on some issues.

### **Capacity gap for residual waste treatment (MSW and C&I waste)**

Some comments on the draft Waste Planning Strategy questioned why some of the capacity provided by the Ardley Energy from Waste facility was not being considered as available to meet Oxfordshire's residual waste needs. In order to consider this further, a Paper was produced to review the amount of residual waste to be managed: this took account of adjustments to waste management targets and other up to date information.

In January 2012 this Paper was sent to adjoining Waste Planning Authorities with a request for information that would allow some assessment to be made of the progress being made to manage residual waste in those areas. Responses were received from Gloucestershire County Council, Warwickshire County Council, Buckinghamshire County Council, Milton Keynes Council, Swindon Borough Council and Wiltshire Council. It appeared that there was merit in revising the position on Oxfordshire's residual waste needs in line with the paper that had been prepared and this was reflected in the drafting of the Proposed Submission Document.

### **Waste Imports (MSW and C&I waste)**

Some comments on the draft Waste Planning Strategy questioned the approach being taken to the management of imported waste and, in particular, the amount of waste being imported from London. To assess this issue, a Paper was prepared which set out the basis for the estimates that had been prepared and adjusting these in the light of waste information in the London Plan and recent information on the rate at which waste was being imported from other areas – in particular Berkshire. The Paper also considered the effect of imported waste on Oxfordshire's landfill capacity and whether there was a case for ceasing to accept imported waste in large quantities sooner than hitherto envisaged.

In February 2012 this Paper was sent to adjoining Waste Planning Authorities, the London Waste Planning Partnerships, the City of London and the South East Waste Planning Advisory Group. Responses were received from the South London Waste Planning Partnership, the West London Waste Planning Partnership and four of the Berkshire Unitary authorities. Although there was some concern expressed by the Berkshire authorities at the estimates and intended policy approach, it was decided that the revised position be included in the revised Waste Needs Assessment and

that the approach taken to waste imports in the draft Waste Planning Strategy be continued.

At the same time separate liaison took place with Surrey County Council on the re-drafting of policy W2 (waste imports) in view of concerns that had been expressed about the approach to the possible treatment in Oxfordshire of waste from London and elsewhere.

### **Management of radioactive waste**

Some comments from authorities with facilities that manage radioactive waste and/or with facilities that produce such waste questioned the approach being taken to the management of radioactive waste in Oxfordshire. Comment on the approach had also been made by the operator decommissioning the former research facility at Harwell - the largest generator of radioactive waste in Oxfordshire.

Policies W8 and W9 and supporting text were re-drafted to take account of these comments and prior to finalisation were the subject of consultation in February 2012 with Cumbria County Council, Northamptonshire County Council, Dorset County Council and Surrey County Council. Comment was also invited from the Executive Director of the Local Government Association's Nuclear Legacy Advisory Forum (NuLeAF). Comment was received from all of these bodies. Discussion also took place with the operators of both of the nuclear energy research establishments in Oxfordshire – Harwell and Culham. Amendments to the approach were made.

### **Waste management targets and waste data**

Some comments questioned the waste management targets that were being put forward: also the basis for the waste estimates provided in the Oxfordshire Waste Needs Assessment, which supported the draft Waste Planning Strategy. Although no concerns on these issues had been received from the Environment Agency, discussion took place with Agency on these and a number of other waste data issues. This led to an exchange of correspondence in December 2011 which helped inform the preparation of a revised Waste Needs Assessment in May 2012. This supported the Proposed Submission Document.

**Proposed Submission Document May 2012: Summary of issues raised by each representation  
(in plan order)**

Rep No.	Respondent	Part of Plan	Summary of Issue	Remedy suggested by respondent
094/1/S	Aylesbury Vale District Council	General	No comment to make.	
095/1/S	Appleton Parish Council	General	No comment to make.	
067/5	Mrs E Bickley	Para 1.6	Material not available on consultation section of county council website.	
019/2	Cllr L Atkins	Para 1.9	Adequacy of consultation during plan preparation.	
043/2	Prof & Mrs J Dowling	Para 1.9	Adequacy of consultation during plan preparation and process for council decision making.	
044/3	Mr E. Vaizey MP	Para 1.9	Adequacy of consultation during plan preparation.	
046/7	Ms L Castell	Para 1.9	Failure to take due account of earlier comments.	Make more substantive changes.
049/3	Communities Against Gravel Extraction (CAGE)	Para 1.9	Adequacy of consultation during plan preparation.	
049/5	Communities Against Gravel Extraction (CAGE)	Para 1.9	Process for county council decision making.	
053/3	Mr M and Mrs V Ryan	Para 1.9	Failure to take due account of earlier comments.	
058/4	Kemp & Kemp	Para 1.9	Adequacy of consultation during plan preparation.	
060/1	Oxford Upper Thames Residents Against Gravel Extraction (OUTRAGE)	Para 1.9	Adequacy of consultation during plan preparation.	
062/3	Cllr. P Greene	Para 1.9	Adequacy of consultation during plan preparation.	
062/5	Cllr. P Greene	Para 1.9	Process for county council decision making.	
065/2/S	Parishes Against Gravel Extraction (PAGE)	Para 1.9	Support. Comment on level of consultation in plan preparation.	



069/2	Eynsham & Cassington Gravel Committee	Para 1.9	Failure to take due account of earlier comments.	
083/2	Brightwell-cum-Sotwell Parish Council	Para 1.9	Adequacy of consultation during plan preparation.	
103/3	Cholsey Parish Council	Para 1.9	Adequacy of consultation during plan preparation.	
103/5	Cholsey Parish Council	Para 1.9	Process for county council decision making.	
104/3	Wallingford Town Council	Para 1.9	Adequacy of consultation during plan preparation.	
104/5	Wallingford Town Council	Para 1.9	Process for county council decision making.	
036/1/S	English Heritage	Para 2.2	Support comment on heritage assets.	Include reference in plan.
078/6/S	Environment Agency	Para 2.2	Support.	
006/1	Thames Water Utilities Ltd	Para 2.8	Sewage sludge wrongly referred to as hazardous waste.	Delete reference.
078/7/S	Environment Agency	Para 2.16	Support. Comment on relevance of landscape character in site restoration.	Detailed wording suggested.
032/1	Mr V. Goodstadt	Para 2.20 – 2.28	Plan not shown as being compliant with NPPF.	
013/4	Cumbria County Council	Para 2.21	Plan not shown as being compliant with NPPF.	
019/3	Cllr L Atkins	Para 2.21	Plan not shown as being compliant with NPPF.	
030/2	Hills Quarry Products Ltd	Para 2.21	Plan not shown as being compliant with NPPF.	Withdraw the document and re-submit.
044/2	Mr E. Vaizey MP	Para 2.21	Plan not shown as being compliant with NPPF.	
046/6	Ms L Castell	Para 2.21	Plan not shown as being compliant with NPPF.	
049/2	Communities Against Gravel Extraction (CAGE)	Para 2.21	Plan not shown as being compliant with NPPF.	
052/3	Eynsham Society	Para 2.21	Plan not shown as being compliant with NPPF.	Take due account of para 144 of NPPF.
058/2	Kemp & Kemp	Para 2.21	Plan not shown as being compliant with NPPF.	
062/1	Cllr. P Greene	Para 2.21	Plan not shown as being compliant with NPPF.	
098/4	Mr P Emery	Para 2.21	Plan not shown as being compliant with NPPF.	
103/1	Cholsey Parish Council	Para 2.21	Plan not shown as being compliant with NPPF.	
104/1	Wallingford Town Council	Para 2.21	Plan not shown as being compliant with NPPF.	
078/8/S	Environment Agency	Para 2.26	Support. Comment on reference to waste hierarchy.	
032/8	Mr V. Goodstadt	Para 2.32	Non-conformity with West Oxfordshire Community	

			Strategy.	
005/1	Gloucestershire County Council	Para 2.33	Failure to show that Duty to Co-operate is met.	Detailed suggestion on further work required.
013/3	Cumbria County Council	Para 2.33	Failure to show that Duty to Co-operate is met.	
016/3	Minerals Products Association	Para 2.33	Failure to show that Duty to Co-operate is met.	
029/4	Hanson Aggregates	Para 2.33	Failure to show that Duty to Co-operate is met.	
038/2	Research Sites Restoration Ltd	Para 2.33	Failure to show that Duty to Co-operate is met.	
046/1	Ms L Castell	Para 2.33	Failure to show that Duty to Co-operate is met.	
049/6	Communities Against Gravel Extraction (CAGE)	Para 2.33	Failure to show that Duty to Co-operate is met.	
056/1	West Oxfordshire District Council	Para 2.33	Failure to show that Duty to Co-operate is met.	Show any work undertaken.
061/1/S	Cherwell District Council	Para 2.33	Support for co-operation on plan making.	
062/6	Cllr. P Greene	Para 2.33	Failure to show that Duty to Co-operate is met.	
068/3	Councillor C Mathew	Para 2.33	Failure to show that Duty to Co-operate is met.	Reject the strategy.
073/1	Mr P Rogers	Para 2.33	Failure to show that Duty to Co-operate is met.	
098/3	Mr P Emery	Para 2.33	Failure to show that Duty to Co-operate is met.	
103/6	Cholsey Parish Council	Para 2.33	Failure to show that Duty to Co-operate is met.	
104/6	Wallingford Town Council	Para 2.33	Failure to show that Duty to Co-operate is met.	
076/1	Wolvercote Commoners Committee	Para 2.36 – 2.40	Adequacy of Habitats Regulations Assessment.	Assess impact of nitrogen deposit from minerals and waste traffic on Oxford Meadows.
036/8/S	English Heritage	Para 2.42	Comment on para 5.4.3 of SA/SEA.	Detailed suggestion.
036/9/S	English Heritage	Para 2.42	Comment on para 6.2 of SA/SEA.	Detailed suggestion.
049/4	Communities Against Gravel Extraction (CAGE)	Para 2.42	Reliability of Sustainability Appraisal / Strategic Environmental Assessment.	
058/3	Kemp & Kemp	Para 2.42	Reliability of Sustainability Appraisal / Strategic Environmental Assessment.	
062/4	Cllr. P Greene	Para 2.42	Reliability of Sustainability Appraisal / Strategic Environmental Assessment.	
103/4	Cholsey Parish Council	Para 2.42	Reliability of Sustainability Appraisal / Strategic Environmental Assessment.	

104/4	Wallingford Town Council	Para 2.42	Reliability of Sustainability Appraisal / Strategic Environmental Assessment.	
007/1/S	Burcot and Clifton Hampden Protection of the River Thames (BaCHPoRT)	Section 3	Support for minerals objectives.	
018/1	Smiths of Bletchington	Section 3	Inadequate recognition of level of growth planned.	
070/1	Royal Society for the Protection of Birds	Para 3.5v	Relevance of mineral strategy to climate change.	Suggested re-wording.
021/1	Ms S. Chapman	Para 3.4	Inadequate reference to impact of mineral working on local areas.	
039/1	Mrs B Guiver	Para 3.4	Inadequate reference to impact of importing materials for restoration of mineral working.	
074/1	South Oxfordshire District Council	Para 3.4	Reduced level of ambition relative to earlier consultation draft.	
087/1	Vale of White Horse District Council	Para 3.4	Reduced level of ambition relative to earlier consultation draft.	
075/1	Dr G Shelton	Para 3.4b	Consistency between vision and objectives.	
078/9/S	Environment Agency	Para 3.4b	Support for vision.	
078/10/S	Environment Agency	Para 3.4c	Support.	
030/1	Hills Quarry Products Ltd	Para 3.5	Adequacy of objectives in several areas.	Suggested re-wording.
036/2/S	English Heritage	Para 3.5	Support. Comment on objectives (ii) and (v).	
045/1	Mrs G Salway	Para 3.5	Objective (iii) contradictory.	
065/1/S	Parishes Against Gravel Extraction (PAGE)	Para 3.5	Support. Comment on objectives being met by strategy.	
078/11/S	Environment Agency	Para 3.5	Support. Comment on use of secondary aggregate.	
070/2/S	Royal Society for the Protection of Birds	Para 3.5 vii	Support.	
070/3/S	Royal Society for the Protection of Birds	Para 3.5 viii	Support.	
074/2	South Oxfordshire District Council	Para 3.9	Reduced level of ambition relative to earlier consultation draft.	Suggested re-wording.
087/16	Vale of White Horse District Council	Para 3.9	Reduced level of ambition relative to earlier consultation draft.	Suggested re-wording.

036/3/S	English Heritage	Para 3.10	Support. Comment on consistency of terminology.	
007/2/S	Burcot and Clifton Hampden Protection of the River Thames (BaCHPoRT)	Section 4	Support. Particular support for Policies M1, M2, M3 and M7.	
016/1	Minerals Products Association	Policy M1	Deliverability of proposed level of production.	Adopt a lower target.
018/2	Smiths of Bletchington	Policy M1	Deliverability of proposed level of production.	Increase level of primary aggregate.
029/2	Hanson Aggregates	Policy M1	Deliverability of proposed level of production.	Adopt a lower target.
030/3	Hills Quarry Products Ltd	Policy M1	Deliverability of proposed level of production.	Research further.
031/1	Sheehan Haulage & Plant Hire Ltd	Policy M1	Acceptability of proposed level of production.	Provide for an increased level of material.
032/3	Mr V. Goodstadt	Policy M1	Question the proposed level of production.	Keep under review.
056/2	West Oxfordshire District Council	Policy M1	Deliverability of proposed level of production.	Suggested re-wording.
064/1	Lafarge Aggregates UK	Policy M1	Adequacy of evidence to support proposed level of production.	Base target on current level of production (0.5 mtpa).
065/3/S	Parishes Against Gravel Extraction (PAGE)	Policy M1	Support.	
066/1	Cllr. S Good	Policy M1	Inadequate provision for secondary and recycled aggregate.	
067/1	Mrs E Bickley	Policy M1	Inadequate provision for secondary and recycled aggregate.	Use secondary and recycled aggregate in place of primary aggregate.
074/3/S	South Oxfordshire District Council	Policy M1	Support.	
087/2/S	Vale of White Horse District Council	Policy M1	Support.	
093/2	Mr C Allison	Policy M1	Relevance of proposed level of production to need for primary aggregate.	
018/4/S	Smiths of Bletchington	Para 4.13 - 4.15	Support – in particular for separate land banks for soft sand and sharp sand and gravel.	
002/1	Earthline Ltd	Policy M2	Level of provision not in conformity with South East Plan.	Clarify the role of quarry extensions.
005/2	Gloucestershire County	Policy M2	Adequacy of assessment of proposed level of	Undertake further work

	Council		supply for aggregate.	before submission.
008/1	Mr R Waterfall	Policy M2	Deliverability of proposed level of production.	Provide for wider site choice.
016/2	Minerals Products Association	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	Increase target sands and gravel to 1.35 mtpa.
018/3	Smiths of Bletchington	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	Increase target for sands and gravel to 1.35 mtpa.
027/1	Grundon Ltd	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	Increase target for sands and gravel by 0.72 mtpa.
029/3	Hanson Aggregates	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	Increase target for sands and gravel to 1.5 mtpa.
030/4	Hills Quarry Products Ltd	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	Re-assess in line with NPPF and South East Plan.
032/2	Mr V. Goodstadt	Policy M2	Failure to take adequate account of likely secondary and recycled aggregate production.	
032/5	Mr V. Goodstadt	Policy M2	Inconsistency between policy and supporting text.	
033/1	Campaign to Protect Rural England	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	Reduce target for sands and gravel to 0.75 mtpa.
034/1	Transition Eynsham Area (Green TEA)	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	Re-check calculations.
037/1	Surrey County Council	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	Increase total provision to 2.1 mtpa.
042/2	Mrs S Moyes	Policy M2	Failure to take adequate account of likely secondary and recycled aggregate production.	
045/2	Mrs G Salway	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	
046/4	Ms L Castell	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	Take better account of level of provision from secondary and recycled aggregate.
052/1	Eynsham Society	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	Reduce the areas allocated for extraction.
055/2	Dr L Elphinstone	Policy M2	Failure to take adequate account of likely secondary and recycled aggregate production.	
057/1	Mr A and Mrs M Boer	Policy M2	Adequacy of assessment of proposed level of supply for aggregate (too high).	

064/2	Lafarge Aggregates UK	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	Re-calculate based on 10 year rolling sales average.
065/4/S	Parishes Against Gravel Extraction (PAGE)	Policy M2	Support.	
066/2	Cllr. S Good	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	
067/2	Mrs E Bickley	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	Reduce amount of sand and gravel required.
068/2	Councillor C Mathew	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	Reject the strategy.
073/2	Mr P Rogers	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	
074/4/S	South Oxfordshire District Council	Policy M2	Support. Comment on need for conformity with NPPF methodology.	
075/2	Dr G Shelton	Policy M2	Adequacy of assessment of proposed level of supply for aggregate.	Reduce amount of sand and gravel required.
080/1	Mr M Leopold	Policy M2	Failure to take adequate account of likely secondary and recycled aggregate production.	
087/3/S	Vale of White Horse District Council	Policy M2	Support. Comment on need for conformity with NPPF methodology.	
088/1	Mrs J Thompson	Policy M2	Failure to take adequate account of likely secondary and recycled aggregate production.	
093/3	Mr C Allison	Policy M2	Failure to take adequate account of likely secondary and recycled aggregate production.	Appraise the impact of increased use of secondary and recycled aggregate.
096/1/S	Oxfordshire County Council Liberal Democrat Group	Policy M2	Support. Comment on impact of likely secondary and recycled aggregate production.	
098/2	Mr P Emery	Policy M2	Failure to take adequate account of likely secondary and recycled aggregate production.	
099/1/S	Natural England	Policy M2	Support.	
039/2	Mrs B Guiver	Para 4.19	Impact of importing waste materials for use in quarry restoration.	
051/2	Northmoor Parish Council	Para 4.19 – 4.20	Adequacy of baseline used to assess level of extraction required in specific areas.	Review strategy to make more compatible with aims

				and objectives.
017/1	Colonel T Kirkpatrick	Para 4.20	Adequacy of baseline used to assess level of extraction required in specific areas.	Provide for wider site choice.
053/2	Mr M and Mrs V Ryan	Para 4.20	Adequacy of baseline used to assess level of extraction required in specific areas.	Extract mineral closer to areas of need.
073/3	Mr P Rogers	Para 4.20	Adequacy of baseline used to assess level of extraction required in specific areas.	
098/6	Mr P Emery	Para 4.20	Clarity of text.	
039/3	Mrs B Guiver	Para 4.21	Adequacy of evidence to justify identification of areas for extraction.	
029/5	Hanson Aggregates	Para 4.22	Definition of boundary for Eynsham/Cassington/Yarnton preferred area.	Include land to the east and north east of the Evenlode.
036/4/S	English Heritage	Para 4.23	Support. Comment made on joint working.	
002/2	Earthline Ltd	Policy M3	Relevance of quarry extensions to calculation of land banks.	Suggested re-wording.
016/4	Minerals Products Association	Policy M3	Adequacy of evidence to justify identification of areas for extraction.	Identify further working areas with greater flexibility for working outside those areas.
027/2	Grundon Ltd	Policy M3	Approach to working minerals in AONB.	Suggested re-wording.
032/4	Mr V. Goodstadt	Policy M3	Contribution of preferred areas of working to the level of provision required for aggregates.	
032/6	Mr V. Goodstadt	Policy M3	Adequacy of evidence to justify identification of areas for extraction.	
033/2	Campaign to Protect Rural England	Policy M3	Contribution of preferred areas of working to the level of provision required for aggregates.	Reduce number of working areas.
034/2	Transition Eynsham Area (Green TEA)	Policy M3	Impact of working aggregate at Eynsham.	Better match supply areas to areas of demand.
057/2	Mr A and Mrs M Booer	Policy M3	Inadequate assessment of working further mineral in West Oxfordshire.	
078/12/S	Environment Agency	Policy M3	Support. Comment on need for sequential testing of flood risk at site allocation.	
099/2/S	Natural England	Policy M3	Support.	
018/5/S	Smiths of Bletchington	Policy M3 s & g	Support for strategy areas as identified.	

029/6	Hanson Aggregates	Policy M3 s & g	Adequacy of evidence base to justify selection of preferred areas of working.	Areas at Shillingford and Clanfield should not be ruled out at this stage.
030/5	Hills Quarry Products Ltd	Policy M3 s & g	Adequacy of evidence base to justify selection of preferred areas of working.	Area at Culham and Clifton Hampden should not be ruled out at this stage.
041/1	Dr D Chapman	Policy M3 s & g	Level of provision from individual areas not well equated to areas of demand.	Suggestions made about transport of materials.
042/1	Mrs S Moyes	Policy M3 s & g	Impact of strategy on A34 and A40.	
046/2	Ms L Castell	Policy M3 s & g	Impact of strategy on West Oxfordshire.	Take better account of contribution from secondary and recycled aggregate.
050/1	Aston, Cote, Shifford & Chimney Parish Council	Policy M3 s & g	Impact of strategy on West Oxfordshire.	Better match supply areas to areas of demand.
051/1	Northmoor Parish Council	Policy M3 s & g	Ability of strategy to meet the aims and objectives.	Review the strategy.
053/1	Mr M and Mrs V Ryan	Policy M3 s & g	Ability of strategy to meet the aims and objectives.	Better match supply areas to areas of demand.
055/1	Dr L Elphinstone	Policy M3 s & g	Level of provision from individual areas not well equated to areas of demand.	Extract more mineral from the south of the county.
056/3	West Oxfordshire District Council	Policy M3 s & g	Level of provision from individual areas not well equated to areas of demand.	Suggested re-wording.
065/5/S	Parishes Against Gravel Extraction (PAGE)	Policy M3 s & g	Support.	
066/3	Cllr. S Good	Policy M3 s & g	Transport impact of working in West Oxfordshire.	Extract more mineral from the south of the county.
068/1	Councillor C Mathew	Policy M3 s & g	Impact of working in West Oxfordshire. Adequacy of baseline used to assess level of extraction required in specific areas.	Reject the strategy.
071/1	Corpus Christi College	Policy M3 s & g	Level of provision from individual areas not well equated to areas of demand.	Identify further reserves in south of county, including Berinsfield/Drayton St Leonard/ Stadhampton area.
072/1	Exeter College	Policy M3	Level of provision from individual areas not well	Identify further reserves in



		s & g	equated to areas of demand.	south of county, including Berinsfield/Drayton St Leonard/ Stadhampton area.
073/4	Mr P Rogers	Policy M3 s & g	Level of sand and gravel to be provided from West Oxfordshire..	
075/3	Dr G Shelton	Policy M3 s & g	Excessive level of extraction from West Oxfordshire.	Better match supply areas to areas of demand.
076/2	Wolvercote Commoners Committee	Policy M3 s & g	Impact of strategy on Oxford Meadows SAC.	
080/2	Mr M Leopold	Policy M3 s & g	Level of provision from individual areas (West Oxfordshire) not equated to areas of demand.	
088/2	Mrs J Thompson	Policy M3 s & g	Level of provision from individual areas (West Oxfordshire) not equated to areas of demand.	
096/2	Oxfordshire County Council Liberal Democrat Group	Policy M3 s & g	Level of provision from individual areas not well equated to areas of demand.	
097/1	Mr S Ward	Policy M3 s & g	Level of provision from individual areas (West Oxfordshire) not equated to areas of demand.	Take the mineral from the south of the county.
098/1	Mr P Emery	Policy M3 s & g	Level of provision from individual areas (West Oxfordshire) not equated to areas of demand.	
018/6	Smiths of Bletchington	Policy M3 LWV	Methodology used in assessing levels of extraction from Lower Windrush Valley.	Delete this part of the policy.
045/3	Mrs G Salway	Policy M3 LWV	Excessive level of extraction from Lower Windrush Valley.	
047/1	Mr & Mrs P V Basil	Policy M3 LWV	Impact of working in Lower Windrush Valley.	Remove Lower Windrush Valley from policy.
060/2	Oxford Upper Thames Residents Against Gravel Extraction (OUTRAGE)	Policy M3 LWV	Impact of working in Lower Windrush Valley.	Decrease rate of extraction from West Oxfordshire.
067/4	Mrs E Bickley	Policy M3 LWV	Impact of working in Lower Windrush Valley.	Reduce level of mineral required.
079/1	Standlake Parish Council	Policy M3 LWV	Impact of working in Lower Windrush Valley.	Remove Lower Windrush Valley from policy.
081/1	Mrs J West	Policy M3 LWV	Impact of working in Lower Windrush Valley.	Identify no new sites in West Oxfordshire.

082/1	Mr M West	Policy M3 LWV	Impact of working in Lower Windrush Valley.	Identify no new sites in West Oxfordshire.
093/1	Mr C Allison	Policy M3 LWV	Excessive level of extraction from Lower Windrush Valley.	
012/1	Eynsham Parish Council	Policy M3 ECY	Impact of working at Eynsham.	Remove Eynsham from policy.
043/1	Prof & Mrs J Dowling	Policy M3 (4.30i) ECY	Impact of working at Eynsham. Level of provision from individual areas not well equated to areas of demand.	Remove Eynsham from policy.
048/3	Mrs M Fletcher	Policy M3 ECY	Impact of working at Eynsham.	Remove Eynsham from policy.
052/2	Eynsham Society	Policy M3 ECY	Impact of working at Eynsham.	Remove Eynsham and Cassington from policy.
060/3	Oxford Upper Thames Residents Against Gravel Extraction (OUTRAGE)	Policy M3 ECY	Impact of working in Eynsham/Cassington/Yarnton area.	Decrease rate of extraction in West Oxfordshire.
067/3	Mrs E Bickley	Policy M3 ECY	Impact of working in Eynsham/Cassington/Yarnton area.	Reduce level of mineral required.
069/1	Eynsham & Cassington Gravel Committee	Policy M3 ECY	Impact of working in Eynsham area.	Remove reference to Eynsham from policy.
081/2	Mrs J West	Policy M3 ECY	Impact of working in Eynsham/Cassington/Yarnton area.	Identify no new sites in West Oxfordshire.
082/2	Mr M West	Policy M3 ECY	Impact of working in Eynsham/Cassington/Yarnton area.	Identify no new sites in West Oxfordshire.
028/1	Croudace + Reading University	Policy M3 Sutton Courtenay	Impact of working on North East Didcot strategic housing area.	Suggested re-wording.
074/6/S	South Oxfordshire District Council	Policy M3 Sutton Courtenay	Support. Comment on boundary of area.	
087/4/S	Vale of White Horse District Council	Policy M3 Sutton Courtenay	Support. Comment on boundary of area.	
026/1	Chilterns Conservation Board	Policy M3 Caversham	Impact of working on setting of AONB.	Undertake further landscape assessment.

059/1	Sonning Eye Action Group (SEAG)	Policy M3 Caversham	Impact of working on Sonning Eye area.	Delete Caversham from policy.
063/1	Henley-on-Thames Town Council	Policy M3 Caversham	Impact of working – in particular traffic.	
001/1	North Wessex Downs AONB	Policy M3 Cholsey	Impact of working on setting of AONB.	Undertake more thorough assessment of alternatives.
003/1	Mrs E Hardy	Policy M3 Cholsey	Impact of working on Cholsey area.	Allocate sites with less impact.
008/2	Mr R Waterfall	Policy M3 Cholsey	Ability of Cholsey area to provide the level of aggregate expected by the strategy.	Relax the approach to site selection in other areas.
010/1/S	The Bosley Trust	Policy M3 Cholsey	Support. Comment on deliverability of the area.	
019/1	Cllr L Atkins	Policy M3 Cholsey	Impact of working on Cholsey area.	Remove reference to Cholsey (and Wallingford) from policy.
026/2	Chilterns Conservation Board	Policy M3 Cholsey	Impact of working on setting of AONB.	Undertake further landscape assessment to remove Cholsey from policy.
044/1	Mr E. Vaizey MP	Policy M3 Cholsey	Impact of working on Cholsey area.	Remove reference to Cholsey (and Wallingford) from policy.
049/1	Communities Against Gravel Extraction (CAGE)	Policy M3 Cholsey	Inappropriate identification of Cholsey area for working. Impact on area.	Remove Cholsey from plan.
058/1	Kemp & Kemp	Policy M3 Cholsey	Inappropriate identification of Cholsey area for working. Impact on area.	Remove Cholsey from plan.
062/2	Cllr. P Greene	Policy M3 Cholsey	Inappropriate identification of Cholsey area for working. Impact on area.	Remove Cholsey from plan.
074/5	South Oxfordshire District Council	Policy M3 Cholsey	Inappropriate identification of Cholsey area for working. Impact on area.	Remove Cholsey from plan.
083/1	Brightwell-cum-Sotwell Parish Council	Policy M3 Cholsey	Inappropriate identification of Cholsey area for working. Impact on area.	Remove Cholsey from plan.
089/1	Mrs C Tustian	Policy M3 Cholsey	Impact of working on Cholsey area.	Undertake more thorough assessment of alternatives.
090/1	Mr T Hardy	Policy M3 Cholsey	Undertake more thorough assessment of alternatives.	Allocate sites with less impact.

091/1	Mr D West	Policy M3 Cholsey	Adequacy of evidence base, in particular assessment of water table, to justify identification of Cholsey area for working.	Re-visit evidence base.
101/1	Mrs L Moody	Policy M3 Cholsey	Impact of working on Cholsey area.	Remove reference to Cholsey from policy.
102/1	Mr B Walden	Policy M3 Cholsey	Impact of working on Cholsey area.	
103/2	Cholsey Parish Council	Policy M3 Cholsey	Inappropriate identification of Cholsey area for working. Impact on area.	Remove Cholsey from plan.
104/2	Wallingford Town Council	Policy M3 Cholsey	Inappropriate identification of Cholsey area for working. Impact on area.	Remove Cholsey from plan.
018/7/S	Smiths of Bletchington	Policy M3 soft sand	Support. Comment made on approach to soft sand.	
029/1	Hanson Aggregates	Policy M3 soft sand	Adequacy of evidence base to support preference for extensions over new workings.	Delete para 5 from policy.
040/1/S	G W Minerals	Policy M3 soft sand	Support. Comment on preference for extensions to existing quarries.	
018/8/S	Smiths of Bletchington	Policy M3 rock	Support. Comment made on approach.	
016/5	Minerals Products Association	Policy M4	Conformity with NPPF.	Refer to <i>potential</i> railheads.
018/9/S	Smiths of Bletchington	Policy M4	Support. Comment made on approach.	
029/7/S	Hanson Aggregates	Policy M4	Support. Comment made on approach.	
074/7/S	South Oxfordshire District Council	Policy M4	Support.	
076/3	Wolvercote Commoners Committee	Policy M4	Impact of Kidlington Railhead on Oxford Meadows SAC.	Undertake further analysis.
087/5/S	Vale of White Horse District Council	Policy M4	Support.	
100/1	Gosford & Water Eaton Parish Council	Policy M4	Question planning status of Kidlington Railhead.	Remove Kidlington from policy.
036/5/S	English Heritage	Para 4.34	Support.	
018/10/S	Smiths of Bletchington	Policy M5	Support. Comment on clay working.	
078/13/S	Environment Agency	Policy M5	Support. Comment on flood risk on clay working.	
087/19/S	Vale of White Horse District	Policy M5	Support.	

	Council			
016/6	Minerals Products Association	Policy M6	Conformity with NPPF.	Identify MSA(s) in Policies Map.
018/11	Smiths of Bletchington	Policy M6	Process for identifying areas and review.	Include a plan in the Core Strategy.
030/6/S	Hills Quarry Products Ltd	Policy M6	Support. Comment on level of detail required.	
074/8/S	South Oxfordshire District Council	Policy M6	Support.	
087/6/S	Vale of White Horse District Council	Policy M6	Support.	
070/4/S	Royal Society for the Protection of Birds	Para 4.43	Support.	
070/5	Royal Society for the Protection of Birds	Para 4.44	Relevance of original land use to choice of restoration.	Re-wording suggested.
070/6/S	Royal Society for the Protection of Birds	Para 4.45	Support.	
070/7/S	Royal Society for the Protection of Birds	Para 4.46	Support.	
078/1/S	Environment Agency	Para 4.46	Support. Comment on appropriateness of using inert fill to restore quarries in the flood plain.	Provide better text to clarify.
070/8/S	Royal Society for the Protection of Birds	Para 4.47	Support.	
070/9/S	Royal Society for the Protection of Birds	Para 4.48	Support.	
016/7	Minerals Products Association	Policy M7	Conformity with NPPF.	Delete reference to 'appropriate financial contributions'.
018/12	Smiths of Bletchington	Policy M7	Reliance on financial contributions to achieve appropriate outcomes.	Re-wording suggested.
027/3	Grundon Ltd	Policy M7	Lack of consistency between support text and policy. Conformity with NPPF.	Delete reference to 'area wide strategy' and financial contributions.
030/7	Hills Quarry Products Ltd	Policy M7	Conformity with NPPF.	Delete reference to 'appropriate financial

				contributions’.
032/7	Mr V. Goodstadt	Policy M7	Flexibility of preferred approach.	
045/4	Mrs G Salway	Policy M7	Inadequate commitment to achieving public access to restored areas.	
055/3	Dr L Elphinstone	Policy M7	Failure to adequately identify a suitable approach for the restoration of preferred areas of working.	Avoid wet restoration in Standlake and Stanton Harcourt area.
056/4	West Oxfordshire District Council	Policy M7	Failure to identify a structured approach to restoration of working areas (with community involvement).	Re-wording suggested.
060/6	Oxford Upper Thames Residents Against Gravel Extraction (OUTRAGE)	Policy M7	Adequacy of commitment to community involvement in restoration.	
064/3	Lafarge Aggregates UK	Policy M7	Inappropriate expectation for long-term maintenance and after-care.	Delete part of policy.
066/4	Cllr. S Good	Policy M7	Failure to adequately identify a suitable approach for the restoration of preferred areas of working.	
070/10	Royal Society for the Protection of Birds	Policy M7	Approach to best and most versatile agricultural land.	Suggested re-wording.
074/9/S	South Oxfordshire District Council	Policy M7	Support. Comment made on community involvement.	
076/4	Wolvercote Commoners Committee	Policy M7	Requirement to monitor the adequacy of mitigation measures..	Further wording suggested.
078/14/S	Environment Agency	Policy M7	Support. Comment made on Background Paper.	
087/7/S	Vale of White Horse District Council	Policy M7	Support. Comment made on community involvement.	
088/3	Mrs J Thompson	Policy M7	Approach to restoration unimaginative.	
099/3/S	Natural England	Policy M7	Support.	
035/1	Oxford City Council	Para 5.3	Need for conformity with District Local Plans.	Re-wording suggested.
085/1	Sutton Courtenay Parish Council	Paras 5.4 - 5.5	Adequacy of evidence base to support waste estimates.	
008/3	Mr R Waterfall	Policy W1	Unrealistic expectation that estimated levels of waste can be managed through the strategy as currently put forward.	Cholsey area cannot be relied on to contribute any waste capacity.

024/1	Wokingham Borough Council	Policy W1	Failure to take adequate account of the needs of adjoining areas.	
027/4	Grundon Ltd	Policy W1	Adequacy of evidence base to support estimates. Failure to estimate hazardous waste arisings.	Plan for 0.98 mtpa of C&I waste and 0.05 mtpa of hazardous waste.
077/1	Mr R Draper	Policy W1	Adequacy of evidence base to support estimates.	
077/2	Mr R Draper	Para 5.15	Insufficient emphasis on the expectation that communities will take more responsibility for their own waste.	
009/1	Middleton Stoney Parish Council	Policy W2	Inappropriate commitment to accepting waste from outside Oxfordshire.	Do not accept imported waste.
024/2	Wokingham Borough Council	Policy W2	Failure to recognise long term contract for disposal of Berkshire waste at Sutton Courtenay.	
033/3/S	Campaign to Protect Rural England	Policy W2	Support. Comment on the approach to treating waste from other areas.	
037/2	Surrey County Council	Policy W2	Unrealistic approach to the treatment of waste from outside Oxfordshire.	Re-wording suggested.
074/10	South Oxfordshire District Council	Policy W2	Inconsistency in approach between supporting text and policy.	Strengthen policy to accord with text.
077/3	Mr R Draper	Policy W2	Waste imports over-estimated and misunderstood.	Review estimates in light of up to date information on waste contracts.
085/3	Sutton Courtenay Parish Council	Policy W2	Unrealistic approach to the treatment of waste from outside Oxfordshire.	Re-wording suggested.
087/8	Vale of White Horse District Council	Policy W2	Inconsistency in approach between supporting text and policy.	Strengthen policy to accord with text.
027/5	Grundon Ltd	Policy W3	Deliverability of waste management targets.	Revert to regional / national targets.
033/4/S	Campaign to Protect Rural England	Policy W3	Support. Comment made on fortnightly collections.	
074/11/S	South Oxfordshire District Council	Policy W3	Support.	
077/4	Mr R Draper	Policy W3	Recycling targets takes insufficient account of current performance.	

087/9/S	Vale of White Horse District Council	Policy W3	Support.	
027/6	Grundon Ltd	Policy W4	Inadequate assessment of C&I waste needs.	Apply adjusted targets to higher levels of waste.
031/2	Sheehan Haulage & Plant Hire Ltd	Policy W4	Inadequate assessment of CDE waste needs.	Improve evidence base and increase contingency to 30%.
033/5/S	Campaign to Protect Rural England	Policy W4	Support. Comment made on benefits of anaerobic digestion.	
074/12/S	South Oxfordshire District Council	Policy W4	Support.	
077/5	Mr R Draper	Policy W4	Assessment based on inadequate waste estimates.	
085/4	Sutton Courtenay Parish Council	Policy W4	Assessment based on inadequate waste estimates.	
087/10/S	Vale of White Horse District Council	Policy W4	Support.	
085/2	Sutton Courtenay Parish Council	Para 5.35	Strategy fails to meet aims and objectives.	
100/2	Gosford & Water Eaton Parish Council	Para 5.41	Langford Lane unsuitable for waste management facilities.	Remove any reference to Langford Lane.
035/2	Oxford City Council	Para 5.46	Failure to adequately recognise the difficulty of finding sites in the City limits.	Re-wording suggested.
006/2	Thames Water Utilities Ltd	Para 5.48	Failure to deal adequately with waste water treatment.	Include new policy – wording suggested.
022/1	Raymond Brown Minerals and Recycling Ltd	Policy W5	Definition of area for strategic waste management facilities and need to consider existing facilities.	Adjust boundary to include existing facility at Chilton.
023/1	Kidlington Parish Council	Policy W5	Definition of area for strategic waste management facilities and need to consider existing facilities.	Suggested adjustments to boundary. Select sites in tandem with Core Strategy
025/1	Morston Assets Ltd	Policy W5	Comment on suitability of a specific site.	Include site in Core Strategy.
027/7	Grundon Ltd	Policy W5	Definition of area for strategic waste management facilities. Inadequate definition of strategic facilities and strategy for smaller facilities.	Apply different thresholds to define scale of facility and broaden the spatial strategy.
031/3	Sheehan Haulage & Plant Hire	Policy W5	Broad area for strategic facilities not compatible	Include all land within 15k of



	Ltd		with transport aims and policy.	Oxford.
035/4/S	Oxford City Council	Policy W5	Support.	
074/13/S	South Oxfordshire District Council	Policy W5	Support. Comment made on the adjustment made to the earlier draft of the strategy.	
077/6	Mr R Draper	Policy W5	'Strategic facility' inadequately defined.	Remove need for strategic facilities in view of revised Need Assessment.
086/1	Turley Associates	Policy W5	Failure to recognise the relevance of small towns. Supporting text conflicts with objectives.	Identify a role for small town(s) in strategy.
087/11/S	Vale of White Horse District Council	Policy W5	Support. Comment made on the adjustment made to the earlier draft of the strategy.	
078/15/S	Environment Agency	Para 5.52	Support. Comment made on relevance of flood vulnerability to future site selection.	
004/1	Summerleaze Ltd	Policy W6	Suitability of quarries to accommodate waste facilities not associated with quarry activity.	Relax policy wording.
011/1	Aasvogel Ltd	Policy W6	Suitability of approach to use of green field land.	Relax policy wording.
022/2	Raymond Brown Minerals and Recycling Ltd	Policy W6	Failure to adequately address the future of temporary facilities.	Re-wording suggested.
023/2	Kidlington Parish Council	Policy W6	Ambiguous approach to waste development in the Green Belt.	Clarify para 5.56.
027/8	Grundon Ltd	Policy W6	Excessive restriction on waste development in Green Belt and AONB.	Relax policy.
033/6	Campaign to Protect Rural England	Policy W6	Failure to adequately control development in Green Belt and AONB.	Tighten policy.
035/3	Oxford City Council	Policy W6	Suitability of commercial land to accommodate waste facilities.	Restrict to B2 or sui generis industrial use.
074/14	South Oxfordshire District Council	Policy W6	Failure to adequately control temporary activities in quarries and development in Green Belt.	Re-wording suggested.
078/16/S	Environment Agency	Policy W6	Support. Comment made on adequacy of approach to waste water treatment.	
087/17	Vale of White Horse District Council	Policy W6	Failure to adequately control temporary activities in quarries and development in Green Belt.	Re-wording suggested.
078/17/S	Environment Agency	Policy W7	Support. Comment made on flood risk associated with waste brought in to restore quarries in the	

			flood plain.	
087/20/S	Vale of White Horse District Council	Policy W7	Support.	
005/3	Gloucestershire County Council	Policy W8	Excessive reliance on facilities in neighbouring areas.	
013/2	Cumbria County Council	Policy W8		
014/1	Northamptonshire County Council	Policy W8	Lack of clarity as to the scope of the policy.	Make reference in policy to low level radioactive waste.
015/1/S	Dorset County Council	Policy W8	Support. Comment made on flexibility of approach adopted.	
027/9	Grundon Ltd	Policy W8	Inadequate provision made for hazardous waste, as required by the South East Plan.	Make provision for hazardous waste facilities in spatial strategy.
078/18/S	Environment Agency	Policy W8	Support. Comment that Nuclear Regulatory Team involved in consideration of the strategy.	
038/1	Research Sites Restoration Ltd	Paras 5.65 - 5.84	Inadequate consideration given to national policy on interim level radioactive waste.	Broader policy wording suggested.
013/1	Cumbria County Council	Policy W9	Excessive reliance on facilities to manage low level radioactive waste in neighbouring areas.	Make more positive provision for facilities in Oxfordshire.
015/2/S	Dorset County Council	Policy W9	Support. Comment made on flexibility of approach adopted.	
074/15	South Oxfordshire District Council	Policy W9	Suitability of Culham Science Centre for disposal of low level radioactive waste.	Delete reference to Culham Science Centre.
078/19/S	Environment Agency	Policy W9	Support. Comment that Nuclear Regulatory Team involved in consideration of the strategy.	
087/18	Vale of White Horse District Council	Policy W9	Suitability of Culham Science Centre for disposal of low level radioactive waste.	Delete reference to Culham Science Centre.
023/3	Kidlington Parish Council	Policy W10	Suitability of authorised/established waste sites for safeguarding.	Expand on the approach to be taken to safeguarding.
027/10	Grundon Ltd	Policy W10	Adequacy of approach to temporary waste facilities.	Extend safeguarding to temporary sites.
007/3/S	Burcot and Clifton Hampden Protection of the River Thames (BaCHPoRT)	Section 6	Support. Comment on specific policies.	

078/2/S	Environment Agency	Para 6.9	Support. Comment on flood risk associated with waste brought to restore quarries in flood plain.	Amend wording to avoid ambiguity.
078/20/S	Environment Agency	Para 6.11	Support. Comment on relevance of sequential and exceptions tests.	Consider adding policy.
016/8	Minerals Products Association	Policy C1	Inadequate coverage of flood risk associated with specific types of development, including waste brought to restore sites in the flood plain.	Re-wording suggested.
029/8	Hanson Aggregates	Policy C1	Inadequate coverage of flood risk associated with specific types of development, including waste brought to restore sites in the flood plain.	Re-wording suggested.
030/8	Hills Quarry Products Ltd	Policy C1	Inadequate coverage of flood risk associated with specific types of development.	Re-wording suggested.
046/5	Ms L Castell	Policy C1	Inadequate reference to impact of disturbing local water table.	Make content more convincing.
048/2	Mrs M Fletcher	Policy C1	Conflict with the proposal to allow further mineral working at Eynsham.	Remove Eynsham from policy M3.
064/4	Lafarge Aggregates UK	Policy C1	Inadequate coverage of flood risk associated with specific types of development.	Re-wording suggested.
074/16	South Oxfordshire District Council	Policy C1	Inadequate reference to flood risk management.	Add to text.
078/3/S	Environment Agency	Policy C1	Support. Comment made on content of Background Paper.	
087/12	Vale of White Horse District Council	Policy C1	Inadequate reference to flood risk management.	Add to text.
078/21/S	Environment Agency	Para 6.13	Support.	
070/11/S	Royal Society for the Protection of Birds	Policy C2	Support.	
074/17/S	South Oxfordshire District Council	Policy C2	Support. Comment on reference to River Thames.	
078/4/S	Environment Agency	Policy C2	Support.	
087/13/S	Vale of White Horse District Council	Policy C2	Support. Comment on reference to River Thames.	
060/4	Oxford Upper Thames Residents Against Gravel	Para 6.19	Inadequate approach to buffer zones.	

	Extraction (OUTRAGE)			
070/12/S	Royal Society for the Protection of Birds	Para 6.19	Support.	
078/22/S	Environment Agency	Para 6.19	Support. Comment on existing measures to safeguard flood defences and biodiversity.	
008/4	Mr R Waterfall	Policy C3	Inadequate reference to harm from dust and particulates.	Make specific provision in policy.
018/13/S	Smiths of Bletchington	Policy C3	Support. Comment on suitability of approach to buffer zones.	
033/7	Campaign to Protect Rural England	Policy C3	Inadequate reference to control of emissions to air.	
076/5	Wolvercote Commoners Committee	Policy C3	Lack of sufficient detail.	Include reference to levels at which adverse effects become unacceptable.
078/23/S	Environment Agency	Policy C3	Support. Comment on need to be clear on the scope of the planning and environmental permitting regimes.	
002/3	Earthline Ltd	Policy C4	Inadequate approach to restoring sites involving the best and most versatile agricultural land.	Require restoration to agriculture.
099/4/S	Natural England	Policy C4	Support.	
070/13/S	Royal Society for the Protection of Birds	Para 6.29	Support.	
070/14/S	Royal Society for the Protection of Birds	Para 6.30	Support.	
070/15/S	Royal Society for the Protection of Birds	Para 6.31	Support.	
070/16/S	Royal Society for the Protection of Birds	Para 6.33	Support.	
002/4	Earthline Ltd	Policy C5	Inadequate differentiation of protection to be afforded to national and local designations.	Clearly distinguish level of protection appropriate.
016/9	Minerals Products Association	Policy C5	Inappropriate level of protection afforded to SSSI.	Bring policy in line with NPPF
018/14	Smiths of Bletchington	Policy C5	Inappropriate level of protection afforded to locally important geological features.	Delete para 4.
020/1	Berkshire, Buckinghamshire	Policy C5	Inadequate protection given to sites of local	Bring policy in line with NPPF

	and Oxfordshire Wildlife Trust		importance.	
029/9	Hanson Aggregates	Policy C5	Inappropriate level of protection afforded to SSSI.	Bring policy in line with NPPF
030/9	Hills Quarry Products Ltd	Policy C5	Inappropriate level of protection afforded to SSSI and locally important geological features, and requirements to mitigate impact on locally important features.	Bring policy in line with NPPF
060/5	Oxford Upper Thames Residents Against Gravel Extraction (OUTRAGE)	Policy C5	Inadequate differentiation of protection to be afforded to national and local designations.	
070/17	Royal Society for the Protection of Birds	Policy C5	Inadequate protection given to SSSI and sites of local importance.	Bring policy in line with NPPF
096/3	Oxfordshire County Council Liberal Democrat Group	Policy C5	Inadequate protection of features of rare value e.g. dinosaur footprints.	
099/5	Natural England	Policy C5	Inadequate approach to mitigating impact on SSSI.	Remove 'significant' from policy.
056/5/S	West Oxfordshire District Council	Policy C6	Support.	
070/18/S	Royal Society for the Protection of Birds	Policy C6	Support.	
074/18/S	South Oxfordshire District Council	Policy C6	Support.	
087/14//S	Vale of White Horse District Council	Policy C6	Support.	
099/6/S	Natural England	Policy C6	Support.	
036/6	English Heritage	Para 6.40	Conformity with NPPF on terminology.	Re-wording suggested.
036/7	English Heritage	Policy C7	Conformity with NPPF on terminology.	Re-wording suggested.
084/1	Lechlade Town Council	Para 6.47	Impact of mineral traffic on town centre.	Make reference to Gloucestershire Advisory Freight Route map.
009/2	Middleton Stoney Parish Council	Policy C8	Proposals for HWRCs inconsistent with policy C8.	Provide new HWRC at Bicester to compensate for loss of facility at Ardley.
016/10	Minerals Products Association	Policy C8	Assessment criteria excessive. Inappropriate requirements for on-going highway maintenance.	Focus policy on highway safety.

018/15/S	Smiths of Bletchington	Policy C8	Inappropriate requirements for on-going highway maintenance.	Relax requirement.
048/1	Mrs M Fletcher	Policy C8	Conflict with the proposal to allow further mineral working at Eynsham.	Remove Eynsham from policy M3.
066/5	Cllr. S Good	Policy C8	Inadequate commitment to movement of materials by means other than road.	Re-wording suggested.
092/1/S	Benson Parish Council	Policy C8	Support. Comment on impact of traffic from waste facilities.	
054/1/S	Mr C Narrainen	Para 6.50	Support.	
018/16	Smiths of Bletchington	Policy C9	Unreasonable expectation regarding access to restored workings.	Delete reference to financial contributions.
045/5	Mrs G Salway	Policy C9	Inadequate commitment to providing access to restored workings.	
046/3	Ms L Castell	Policy C9	Failure to provide adequate compensation to communities for disruption during excavation.	Commit to providing better access after restoration.
070/19/S	Royal Society for the Protection of Birds	Policy C9	Support.	
099/7/S	Natural England	Policy C9	Support.	
074/19	South Oxfordshire District Council	Section 7	Adequacy of arrangements to monitor quarrying waste activity.	Additional wording suggested.
087/15	Vale of White Horse District Council	Section 7	Adequacy of arrangements to monitor quarrying waste activity.	Additional wording suggested.
030/10	Hills Quarry Products Ltd	Para 7.7 - 7.10	Over dependence on Cholsey to deliver minerals strategy.	Re-visit other option areas.
070/20	Royal Society for the Protection of Birds	Table 6-M7	Consistency of approach (conflict with other policy requirements).	Re-wording suggested.
070/21	Royal Society for the Protection of Birds	Table 6-C5	Consistency of approach (conflict with other policy requirements).	Re-wording suggested.
078/5/S	Environment Agency	Appendix 1 – table A1	Consistency with policy and text for policies M7 and C1.	Adjust wording.
098/5	Mr P Emery	Glossary	No definition given to what is meant by 'quarry extension'.	