

Minerals Plan Consultation; responses to Executive Summary, Background, Vision and Obj's, M1 & M2

Comments on Executive Summary	
ID No (& name of org)	Comment/issue raised
17 (National Trust)	Support policy rigour at paragraph (4) in respect of high quality environments.
53 (Coal Authority)	<p>Thank you for consulting The Coal Authority on the above.</p> <p>Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage. We look forward to receiving your emerging planning policy related documents; preferably in an electronic format. For your information, we can receive documents via our generic email address planningconsultation@coal.gov.uk, on a CD/DVD, or a simple hyperlink which is emailed to our generic email address and links to the document on your website.</p> <p>Alternatively, please mark all paper consultation documents and correspondence for the attention of Planning and Local Authority Liaison.</p>
206 (Cholsey Parish Council)	<p>Cholsey Parish Council has no specific comments with regard to the current county waste plan, as none of the current proposals directly affect the Parish, but this may change depending on the outcome of the current proposal for gravel extraction in the village. If this were to go ahead this might alter parts of the current waste strategy in the long term as a site for Construction, Demolition and Excavation waste close to the west of Wallingford might become redundant. Our main concern is how this strategy may develop, given proposals within the mineral strategy. Mineral extraction and waste are intimately linked and the strategies have been linked at the county level. The council has felt that it has not been adequately informed about some of the current proposals in the mineral strategy and that the current public consultation regarding possible gravel extraction has been at very short notice. In the future we hope to be given more advanced notice of county level proposals that are likely to affect the parish.</p>
258 (BaCHport)	<p>BaCHPoRT welcomes the proposals in the consultation draft relating to the Council's reduction of the S E Plan appropriation for future sand and gravel production, and the recognition of the proximity principle, of issues associated with restoration and the need to protect the environment and heritage assets.</p> <p>A general concern with the draft, however, is that it does not adequately address the question of how the character of the Thames Valley is to be protected from the consequences of further development of quarries for sand and gravel.</p>

	<p>This, if insufficiently controlled, threatens irreversible loss of amenities and lasting damage to the character of the area. BaCHPoRT would like to see a stronger and more explicit commitment to protecting the character of the River Thames as part of the Council's Minerals and Waste Core Strategy.</p>
269 (Cotswolds Conservation Board)	<p>Thank you for inviting the Cotswolds Conservation Board to respond to the above plan. I can confirm that the Board considers the plan to be sound and has no adverse comments to make regarding the application of the plan with respect to the Cotswolds Area of Outstanding Natural Beauty.</p>
460 (Environment Agency)	<p>Within the Executive Summary, it would be useful to mention the River Thames, its significant tributaries and the floodplains associated with them. This feature has historically been important in developing these mineral reserves which today also presents a constraint. Paragraph 2.2 should also contain a similar reference.</p>
571 (CPRE Oxfordshire)	<p>CPRE welcomes the opportunity to comment on the Planning Strategy draft. We have certain reservations on the document but value the comprehensive nature of the analysis that underlies it. We also acknowledge the helpfulness of staff who have been concerned with the plan's preparation.</p> <p>We welcome the policy that quantities of aggregates should depend on the development needs of the county. CPRE has reservations on the basis for the figure for future supply of sand and gravel (S&G) and we propose a reduction in that figure.</p> <p>In relation to the supply of material to meet the target, we consider that the County should investigate the potential for imports by rail from distant sources of sand and gravel</p> <p>CPRE is concerned with the application of the methodology of assessment of new sites.</p> <p>The commitment to allow no increase in activity in west Oxfordshire is welcome, but we note the contrasting attention given to specifying locations of new quarries in south Oxfordshire and the west Oxfordshire area.</p> <p>We consider that the vision set out in the Executive Summary should be strengthened by deleting the second line of the 2nd bullet point to paragraph 6 and inserting 'harmful consequences of mineral extraction and transportation on the environment and communities'</p> <p>CPRE approves the guidance on restoration and the policy on rights of way</p>

664 (Hills Quarry Products)	It is stated (paragraph 3) that the key challenge is to make provision for construction materials to support planned development in the county. However Oxfordshire's sand and gravel has been used not only in the county but in a regional market. The Strategy must ensure that sufficient materials remain readily available in Oxfordshire to serve its traditional regional market.
	Comments on Background section
ID No (& name of org)	Comment/issue raised
140 (AGGROW)	<p>We felt a 'Time and Events' schedule would be helpful to understanding even if it is only in general terms. There are some words whose meaning we do not understand, probably we should! What is a: Screening report, Scoping report, Sustainability report</p> <p>The interpretations could be added to the Glossary.</p> <p>When is the document expected that will identify specific sites?</p> <p>The impact on local economies such as tourism should be a serious consideration and be included.</p> <p>Enforcement. We understand from discussions with those in existing excavation areas that the enforcement of agreements and licences is one of the major weaknesses in the present system.</p> <p>There is little mention of enforcement and, where it does occur, we propose it should be strengthened. This does need to be resolved and we wondered whether the OCC Legal Department or some other expert has been involved. If not, they should be.</p> <p>We were impressed with the thoroughness of your report. Whilst accepting that we could be charged with bias, we would like to record our wholehearted support for your stand on the following important sand and gravel judgement areas:</p> <ul style="list-style-type: none"> · Maximising secondary and recycled aggregates. · Limiting mineral miles. · Reducing impact of traffic on local communities. · Not using unsuitable roads through settlements. · Safety of road users. · Importance of noise management.

	<ul style="list-style-type: none"> · The worry of birdstrike. · Avoidance of areas liable to flood. · Importance of sustainable drainage systems. · Importance of pollution avoidance. · The importance of landscapes. · Protection for Scheduled Ancient Monuments. · Restoration to contribute to landscape character. · Issuing of licences requiring restoration plans. · Contribution by operators and landowners to aftercare. · Regular monitoring.
331 (Barton Willmore LLP)	<p>2.0 BACKGROUND</p> <p>2.1 Paragraph 2.1 of the Minerals Planning Strategy identifies the need to make provision for mineral working and supply to meet the needs of growth and development in Oxfordshire over the Plan period, which equates to the next 20 years up until 2030.</p> <p>2.2 Paragraph 2.7 states that: 'Over the next 20 years significant population growth, new housing, commercial and related development, investment in infrastructure and related traffic growth are expected in Oxfordshire which has implications for the demand for and supply of minerals.'</p> <p>2.3 The following paragraph, Paragraph 2.8, states that about 40,000 homes could be built in Oxfordshire between 2011 and 2026, which is four years shorter than the Minerals Planning Strategy Plan period. Paragraph 2.9 identifies a number of key locations for development, identifying that large housing developments (1000+) are proposed at Banbury, amongst other locations.</p> <p>2.4 It is therefore evident that there is significant growth planned over the next 15-20 years and a substantial amount of minerals needs to be secured during that time to meet the increased demand.</p> <p>2.5 In addition to the above is the emergence of the Draft National Planning Policy Framework (Draft NPPF), which was out to public consultation from 25 July 2011 to 17 October 2011. The Government has placed a much more positive emphasis on development and growth in the Draft NPPF when compared with previous national guidance.</p> <p>2.6 The first objective of Minerals Planning Statement 1 (MPS1): Planning and Minerals is: 'to ensure, so far as practicable, the prudent, efficient, and sustainable use of minerals and recycling of suitable materials, thereby minimising the requirement for new primary extraction.'</p> <p>2.7 The first objective in the Minerals section in the Draft NPPF, which clearly corresponds with the above objective, is to: 'secure an adequate and steady supply of indigenous minerals needed to support sustainable growth, whilst encouraging the recycling of suitable materials to</p>

minimise the requirement for new primary extraction.'

2.8 Further, The Planning Inspectorate has issued advice stating that:

'It is capable of being a material consideration, although the weight to be given to it will be a matter for the decision maker in each particular case.'

2.9 It is evident that the updated objective in the Draft NPPF is much more positive than the corresponding objective in MPS1, in line with the Government's more positive approach to growth and the planning system overall.

2.10 It is therefore concerning that the Draft NPPF is not mentioned at all in paragraphs 2.14 and 2.15 of the Minerals Planning Strategy, where national policy and guidance is referred to and where it is stated that the 'draft minerals plan has been prepared under the Planning and Compulsory Purchase Act 2004; and has regard to a range of national policy and guidance'.

2.11 Indeed, PPSs, PPGs, MPSs and MPGs are specifically mentioned yet the Draft NPPF is not. It is therefore very concerning that it appears that the Minerals Planning Strategy has not been prepared with regard to the Draft NPPF, and therefore the Visions, Strategies and, ultimately, the policies have been prepared without showing proper regard to emerging national guidance.

2.12 This is especially prevalent given the step change towards a more positive and enabling planning system in this most recent Government guidance. Therefore, there is concern that the Minerals Planning Strategy as prepared is fundamentally unsound from the outset as it has not been predicated on the most up to date available planning guidance.

2.13 As such, there is a concern that there will not be a sufficient supply of minerals within Oxfordshire to meet the high demand that will arise given the development and growth that is envisaged in the Minerals Planning Strategy, and as highlighted in the opening paragraphs of this Section of these representations.

2.14 More specifically in relation to the permission at Shenington and Shutford, this contains approximately 5,000,000 tonnes of marlstone, which is a crushed rock. It is evident from Figure 2 that this lies within the ironstone deposits in Oxfordshire. As can be seen from Figure 2, limestone is the predominant crushed rock in Oxfordshire therefore ironstone deposits need to be protected even more as they are a more scarce resource.

2.15 Further, Figure 3 identifies the location of active mineral workings and sites with planning permission. The above permission is not expressly identified in Figure 3, with the two sites referred to being Alkerton and Wroxton, although only one site is referred to in paragraph 4.23.

2.16 The permission at Shenington and Shutford is in close proximity to the above permissions, and offers a further option for mineral extraction in an area where extraction is already occurring.

2.17 In addition, paragraph 4.23 states that 'Production of crushed rock has fluctuated considerably over past years and, if demand increases, additional permissions may be needed towards the end of the plan period.'

	<p>2.18 The Shenington and Shutford permission has not been identified in the Minerals Planning Strategy as a working site although it is capable of being worked once the ROMP application is approved and the necessary conditions are discharged. It therefore provides a valuable alternative resource for crushed rock to enable Oxfordshire to meet its targets, and would further reduce the need to grant additional permissions towards the end of the plan period if demand increased.</p> <p>2.19 It is therefore important that the permission at Shenington and Shutford is protected as much as possible and that it is specifically referred to in subsequent iterations of the Minerals Planning Strategy and other Minerals and Waste Development Framework documents.</p>
<p>472 (David Wilson Homes Southern)</p>	<p>David Wilson Homes are promoting the development of 22.61ha of land to the north of Carterton to the east and west of Swinbrook Road. This land lies to the north of the existing West Oxfordshire Local Plan allocation (Proposal 15 North East Carterton Development Area (Off Swinbrook Road))for which the Council has resolved to grant planning permission, subject to the completion of a S.106 agreement.</p> <p>We note that paragraph 2.9 of the draft minerals strategy acknowledges that large housing developments are proposed at Carterton (along with other settlements). Fig 5 of the draft strategy identifies growth planned in the county graphically, however it fails to identify that Carterton is to be a location for future growth in contrast with paragraph 2.9. Accordingly, Fig 5 should be amended to identify Carterton as a location for future growth.</p> <p>Para 2.4 of the draft minerals strategy expresses a desire for additional extensions to existing working to be within limestone areas rather than ironstone areas. In contrast, we believe that the minerals strategy should take a holistic view, which takes other matters into account, such as effects of minerals extraction on the landscape and on residential amenity. Accordingly, we consider that the draft strategy should be amended in order to allow the MPA to consider the merits of sites for the extraction of crushed rock materials, regardless of whether they are located in a limestone or an ironstone area.</p> <p>We would be grateful for confirmation that these representations have been acknowledged by OCC and that they have been registered as being duly made. We would be grateful if you could continue to notify us as to future consultation on this document as it progresses.</p>
<p>391 (Hanson)</p>	<p>Para 2.5 is potentially misleading. The requirement for higher strength aggregate is not the sole reason for rail importation into Oxfordshire. Difficulties in obtaining timely mineral planning permissions over the last 5 to 10 years has resulted in the substitution of imported crushed hard rock for indigenous gravel in order to maintain supply to fixed outlets (eg concrete plants) and construction projects within Oxfordshire.</p>

522 (Bucknell Parish Council)	There are a number of references to the local developments around Bicester which are cited as having been agreed (e.g. Para 2.9). I note that the Eco-town as a whole has not yet received planning permission from CDC, and should therefore be referenced as a "potential" development only. This should also be taken into account when the calculations regarding the levels of mineral required are made.
441 (Defence Infrastructure Organisation)	<p>It is evident from Background Paper No 3 that MOD safeguarding interests are clearly identified within the draft plan. Chapter 5 outlines the potential birdstrike risk associated with restoration schemes within an MOD safeguarding consultation zone and acknowledges that mitigation will be necessary to reduce the birdstrike risk.</p> <p>I can therefore confirm that the MOD has no objections to the draft plan however it is crucial that the MOD is invited to comment further once specific sites have been allocated to ensure that the birdstrike risk is appropriately addressed.</p>
849 (John Sheehan Ltd)	<p>There are a some inaccuracies on the diagram at Figure 4 on page 12 of the OMCS which shows active secondary and recycled aggregate facilities:</p> <ul style="list-style-type: none"> - Worton Farm and New Wintles Farm are identified as temporary facilities, but they both now have permanent permissions. - The permission for Wicklesham has expired and it is not an operational site, so should not be shown.
851 (Controlled Reclamation)	<p>There are a some inaccuracies on the diagram at Figure 4 on page 12 of the OMCS which shows active secondary and recycled aggregate facilities:</p> <ul style="list-style-type: none"> - Worton Farm and New Wintles Farm are identified as temporary facilities, but they both now have permanent permissions. - The permission for Wicklesham has expired and it is not an operational site, so should not be shown.
737 (Natural England)	2.22 - 2.24 Will need to be reworded to describe the results of the HRA consultation with NE and the next steps which are currently being undertaken by OCC as a result of this.
449	Structure Plan Policy M2 contains criteria for allocating sites in the MWDF and should be presented in full. Vale Policy N7 is not mentioned.

<p>461 (Environment Agency)</p>	<p>- The European Water Framework Directive may also have implications for minerals working and this should be referenced in the policy context section.</p> <p>- We note the preliminary site assessment work which has been undertaken. Whilst this work took into consideration biodiversity and floodplain constraints, with respect to our remit, groundwater vulnerability of the particular sites was not covered. The sites which have high groundwater vulnerability are SG-04, SG-05, SG-11, SG-33, SG-57, SG-60, SG-47, SG-61, CR-02, CR-03, CR-07, CR-08, CR-09 & CR-10. This would have to be considered if these sites were brought forward.</p>
<p>968</p>	<p>The description of the Oxfordshire Area in sections 2.1 and 2.2 is excessively brief and both here and in following paragraphs of this section establishes a false dichotomy between 'protected areas' and 'mineral resources'. The most notable omissions are agriculture and forestry. This dichotomy is emphasised in Fig 1 and should be removed and a more complete description inserted.</p> <p>In the 'policy context' it is notable that there is no explicit mention of the saved policies from the Vale of White Horse DC Local Plan 2011, in particular paragraph 7.61 and POLICY NE7 governing development in the area of the Corallian Ridge, which is not only an important agricultural area but is central to the area identified later as a soft sand resourcee (section 4 and Fig 7). For these reasons this omission should be corrected and reference to these policies inserted.</p> <p>Para 2.29. It is unclear who the 'stakeholders' referred to here are. From the list of 'implementation partners' in Table 1 they appear to be predominantly the minerals industry; only one voluntary body appears on that list. Have other national and regional bodies had nothing to contribute to this document eg BBOWT, CPRE, RSPB, The Woodland Trust, Open Spaces Society, not to mention bodies representing agriculture and forestry? The overall conclusion is that excessive weight has been given to the proposals of mineral operators. If this is not so, this impression should be corrected by giving a proper list of those 'stakeholders' who have actually been consulted.</p>

Comments on Vision and Objectives	
ID No (& name of org)	Comment/issue raised
112	<p>I approve strongly of the three guiding visions in the strategy:</p> <ul style="list-style-type: none"> - provision of minerals to meet development needs; - minimising the distance minerals are transported by road, to reduce impacts on the environment; and - restoration of mineral workings to enhance the natural environment and the quality of life for Oxfordshire's residents. <p>I would suggest however, that a fourth, if lesser strand should be to provide education for the people and communities in Oxfordshire about the need for mineral extraction, the processes and impacts involved, and the opportunities they provide for permanent landscape and biodiversity enhancement.</p> <p>In Cholsey, the village has awoken to the plan with near hysterical negativity, centred on the understandable and near universal human fear of change. Many ludicrous and often incompatible statements are being made about what evils will befall, including BOTH landfill AND the site left as a massive hole into which our children will tumble. I wish people were better informed about the quite minor impacts involved, and could be given the knowledge to allow them to take a more reasoned approach.</p>
113	<p>I am particularly pleased by the commitment in the third vision strand :</p> <p>c) The restoration of mineral workings will enhance the quality of Oxfordshire's natural environment and the quality of life for Oxfordshire residents by:</p> <ul style="list-style-type: none"> - contributing to the creation of habitats and protection of biodiversity, particularly in relation to the Conservation Target Areas; and - providing access to the countryside and opportunities for recreation. <p>In particular, the ability of river gravel extraction to contribute to the replacement into the landscape of wetland and pond habitats lost for centuries through agricultural drainage is very high, and such habitats will become valued recreational opportunities that can be planned and managed in partnership with the communities involved.</p> <p>This opportunity is expressed well in objectives vii and viii, but it must be acknowledged that arguments on the grounds of biodiversity and potential archaeology can and will be made about every potential site nominated. It is essential that a full Impact Assessment be made on each site, and that community members can be part of this process, so they understand how decisions are made and on what evidence, while also beginning to appreciate how the eventual site re-</p>

	<p>use can often be more exciting than the present. Objectives ii (recognising the need for distinctive local building materials), and iv (recycling of aggregate stock) are also valuable.</p>
259 (BaCHpoRT)	<p>3. Vision and Objectives; 4. Draft Minerals Planning Strategy BaCHPoRT broadly supports the Minerals Planning Vision and Planning Objectives set out in Section 3 of the Consultation Draft, and the Draft Minerals Planning Strategy in Section 4, but has a number of specific concerns, set out below.</p>
270 (Cemex UK)	<p>Vision and Objectives (3.3 - 3.5) It is positive to see the plan recognising the need to make provision for the supply of minerals. Cemex understand Oxfordshire's vision and is in general support but has concerns regarding the interpretation and implementation of the use of recycled aggregate and reduced provision of primary aggregate. The vision does not acknowledge Oxfordshire's responsibility to providing mineral resources for adjoining County and South East Awp. Any concerns the County planning authority have regarding highway standards and safety should be addressed directly with the Highway Authority and any necessary amendments to HGV suitability and speed limits should be implemented under the Highways Act. The vision appears very localised and does not represent Oxfordshire's larger role of aggregate producer in the South East Awp area. Objectives 3.5 i - Locally determined requirements - additional clarification is requested to confirm if this includes cross boundary exportation 3.5ii - This objective should include the expansion of settlements 3.5iii - It is not considered that this objective is deliverable within the vision of reducing locally produced material over the plan period therefore deterring new long term investment. 3.5iv - The desire to replace primary aggregate with secondary recycled material is unrealistic due to quality and grading specifications. 3.5 v - Mineral development can be positive tool in reducing flood and can assist flood alleviation schemes and therefore should not be identified as a negative 3.5 vi - Does this also include distance of imported material. 3.5 vii- The objective should also recognise that mineral permission where appropriate can enhance existing habitats in</p>

	addition to protecting.
235 (Woodland Trust)	<p>3.4b This policy should specify that the MPA will ensure that minerals development will not destroy irreplaceable habitats such as ancient woodland.</p> <p>3.5iv Since 1998, 12.5% of the ancient woods that the Woodland Trust have sought to protect from inappropriate development have been subject to applications for minerals extraction. We welcome any policies that encourage the recycling of aggregates to reduce land take and risk to ancient woodland. As such we support this policy.</p> <p>3.15 Planting trees as part of the restoration of quarries has multiple benefits beyond the locality. Trees and woods have a particular role in mitigating against climate change through the sequestration of carbon. This fundamental wide reaching benefit should be considered alongside alternative options.</p>
333 (Barton Willmore LLP)	<p>3.0 VISION AND OBJECTIVES FOR MINERALS IN OXFORDSHIRE</p> <p>3.1 The Vision of a Core Strategy is a crucial element of the whole document. All of the policies and supporting text flow from these overarching strategic objectives and it is effectively a starting point which ultimately informs the whole Core Strategy.</p> <p>3.2 Notwithstanding representations made in the preceding section in relation to the national guidance that has been used to inform this Minerals Planning Strategy, there are concerns with the vision that is set out in paragraph 3.4 (a).</p> <p>3.3 The second bullet point of paragraph 3.4 (a) states that the supply of aggregate materials will be met by: A reduced proportion of locally produced sand and gravel, soft sand, limestone and ironstone.</p> <p>3.4 This is contrary to the requirement to produce sufficient minerals to meet demand and runs counter to Minerals Planning Objective (vi) which seeks to: 'Minimise the distance minerals need to be transported by road and encourage where possible the movement of aggregates by conveyor, rail and on Oxfordshire's waterways in order to reduce adverse impacts of mineral transportation on local communities and the environment; and minimise the impact of mineral traffic on local communities through implementation and monitoring of routeing arrangements.'</p> <p>3.5 Paragraph 2.5 of the Minerals Planning Strategy already identifies that a survey undertaken in 2009 showed that Oxfordshire imported more sand and gravel and crushed rock than it exported.</p> <p>3.6 It is therefore evident that Oxfordshire is not producing enough mineral of the right type and in the right location, therefore it should not be seeking to reduce its proportion of locally produced sand and gravel, soft sand, limestone and ironstone.</p> <p>3.7 The first bullet point under paragraph 3.4 (b) states that mineral working will be</p>

	<p>located and managed to minimise: The distance that aggregates are transported by road. 3.8 This is accepted as an objective. However, it is difficult to understand how this will be achieved if the Council is seeking to reduce the proportion of locally produced sand and gravel. 3.9 Paragraph 3.5 sets out ten Minerals Planning Objectives which set out the principles which underpin the draft plan. 3.10 The Trustees have no objections with the objectives, notwithstanding their concerns about their potential implementation given that they have been predicated without due regard to the Draft NPPF. 3.11 In relation to the extant permission at Shenington and Shutford, The Trustees have particular support for Minerals Planning Objective (ix) which seeks to 'Safeguard resources of sand and gravel, crushed rock, building stone and Fuller's Earth to ensure that these resources are potentially available for future use and are considered in future development decisions.' 3.12 This objective would help achieve the national objective as set out in the Draft NPPF which is to: 'secure an adequate and steady supply of indigenous minerals needed to support sustainable growth, whilst encouraging the recycling of suitable materials to minimise the requirement for new primary extraction.'</p>
353 (Peter Bennie Ltd)	<p>These are generally supported, although there is concern about the implementation and interpretation of the vision. It is very localised and does not represent Oxfordshire's role within the South East AWP area for aggregate production. The emphasis placed upon secondary / recycled aggregate is unrealistic.</p>
456 (ONCF)	<p>I am writing to inform you of Oxfordshire Nature Conservation Forum's support for Minerals Planning Strategy Consultation Draft produced by Oxfordshire County Council.</p> <p>Oxfordshire Nature Conservation Forum (ONCF) is a partnership organisation that has been working for over 15 years in Oxfordshire. Our remit is to encourage communication and partnership working across the nature conservation sector so that scarce resources are used effectively across the county. This includes co-ordinating the Oxfordshire Local Biodiversity Action Plan (BAP) Partnership.</p> <p>ONCF strongly support the minerals planning vision, as laid out in the Minerals Planning Strategy. Sand and gravel extraction has the greatest potential for enhancement of the natural environment through restoration. In general, the preferred minerals strategy outlining areas for minerals extraction and proposed core policies are supported but suggest that amendments are required for clarification and to ensure the protection and enhancement of Oxfordshire's natural environment. We understand that such amendments have been drafted, in consultation with bodies such as Natural England and the RSPB and we are happy to support those amendments.</p>

523 (Bucknell Parish Council)	The ten planning objectives set out in 3.5 are welcomed, however the order could be re-done to considerably alter the emphasis. E.g. restoration to other uses, and minimisation distance travel are of greater concerns than Enabling Oxon to meet its needs from its own resources, when regional thinking may be more appropriate.
855 (Shenington with Alkerton Parish Council)	<p>OCC should consider itself as an outsourced supplier with responsibility to the public to provide a high level of service. Therefore there should be commitments to increase the frequency of local review meetings, to increase the frequency and visibility of service level information, and operators should be required to provide funds in advance of operation so that separate independent monitoring can be carried out to validate the operator's measurements.</p> <p>The minerals site allocations document has not yet been published. However, it is essential to enable a considered response to this draft. When the site allocations are made known, we anticipate that we will respond further on the proposed minerals planning strategy and we reserve the right to further participation in that document.</p> <p>We expect the County Council to observe their commitment to Community Involvement by taking our views into account - both on the current published draft strategy - and on any further documentation submitted to us after the deadline of October 31st 2011.</p> <p>Minerals Planning Vision</p> <p>We agree with the three points constituting the minerals planning vision.</p> <p>Concerning 3.4 c), please note that we have particular opportunities for recreation that could be compromised by minerals exploitation, ie the Shenington Gliding Club on the airfield and the D'Arcy Dalton Way footpath which passes through our parish.</p>
856 (Shenington with Alkerton Parish Council)	<p>Objective i) This is concerned with Oxfordshire being self-sufficient in meeting local needs for minerals (except hard rock). Yet the objective is silent on the export of minerals out of Oxfordshire. This is an important omission. The objective should be modified to seek to prevent the export of minerals from the county unless it can be justified on transportation grounds (objective vi). This will help safeguard the areas around Shenington and Wroxton from ill-conceived workings of poor quality ironstone that would adversely impact the local environment (objectives vii and viii) without contributing to the county's self-sufficiency.</p> <p>Furthermore, the draft strategy provides no information on the minerals needs of neighbouring counties, which would help us to understand the potential for exports of ironstone. Also, there is no data on Oxfordshire's needs for hard rock over the planning period. Clause 2.20 expects this information to be available and it should be included in the strategy document.</p> <p>Objective iii) This objective is to provide a flexible framework to meet future needs based on existing and planned infrastructure provision. However, Policy M2 includes specific quantities for up to 10 years depending on the mineral and figure 6 includes specific quantities for the whole planning period. The objective and the policy are inconsistent. As quantities are known, we suggest that the notion of flexibility should be struck out from the objective.</p>

	<p>Furthermore, we ask for clarification on the "spatial strategy". This is not now available. We are concerned that this, when received, will not adequately deal with our local circumstances. The objective should specifically include a requirement for local consultation on the provisions of the spatial strategy.</p> <p>Objective vi) This objective includes provision for the monitoring of routing agreements. It should include provision for funding to the local community to carry out monitoring.</p>
565 (Vale of White Horse District Council)	<p>The proposed Vision is considered to adequately reflect sustainable development objectives. We welcome the aspiration to recycle more aggregates and reduce the production of primary aggregates, which should reduce the overall impacts on the county associated with the minerals industry. The safeguarding for the future of minerals reserves and the associated infrastructure such as rail aggregates depots is a well established principle and is supported.</p>
583	<p>In both cases the Vision, Principles and Objectives should be strengthened to ensure that local communities are protected against unnecessary development. In addition to the proximity principle to ensure the minimisation of traffic, it should state that the size of plants is kept to that accurately assessed as necessary for local need and no extra allowance is to be made for commercial benefit. As the authors know this is already indicated in the C&I Recycling paragraph in Annex 1 on the Overall Waste Provision, which states that "facilities should be sized in relation to the quantity of waste expected from that locality" but it needs to be repeated in the C&I Residual waste paragraph, as well as being stressed in the Visions, Principles and Objectives.</p>
657 (BBOWT)	<p>The Trust's comments are focussed only on areas of the strategy where we have either concerns or particular areas of expertise; a number of BBOWT's wildlife reserves are former mineral and aggregate extraction sites which have been restored and are now managed for greatest biodiversity gains. We are supportive of the minerals planning vision which states that the restoration of mineral workings will enhance the quality of Oxfordshire's natural environment and quality of life for Oxfordshire's residents. In general, the preferred minerals strategy outlining areas for minerals extraction and proposed core policies are supported, but some suggestions for clarification are made. We support extending the Lower Windrush Valley Project area approach to cover other strategic areas for minerals extraction in Oxfordshire.</p> <p>Minerals Planning Vision</p> <p>3.4 c) BBOWT welcomes the minerals planning vision which states that the restoration of mineral workings will enhance the quality of Oxfordshire's natural environment by contributing to the creation of habitats and the protection of biodiversity. The mineral industry has enormous potential to meet local and national Biodiversity Action Plan (BAP) targets while also providing an ideal opportunity to enhance the local environment for the benefit of local communities.</p>

	<p>3.5 v. The Trust strongly supports the objective to minimise the effects of mineral development on climate change.</p> <p>3.5 vii. The Trust strongly supports the objective to protect Oxfordshire's important ecological and other natural assets.</p> <p>3.5 viii. The Trust strongly supports the objective of benefiting Oxfordshire's natural environment and local communities through the restoration of mineral schemes by contributing to nature conservation and in particular by enhancing the quality and extent of Conservation Target Areas (CTAs). We also support the intention to engage local communities through well planned restoration schemes.</p>
665 (Hills' Quarry Products)	<p>2. The three strands of the vision for the planning strategy appear to be realistic and pragmatic. However the introduction of 3.4 (a) does not reflect the way that Oxfordshire Minerals are used now or how they may be consumed in future and restricts the use of minerals quarried in the county to consumption within the county. 3.4 (a) should be extended to say; "In the period to 2030 an adequate and steady supply of aggregate materials to meet current and future development needs within and around Oxfordshire will be met by ... etc.". In addition, if the minerals industry's role is to sustain a world class economy, the strategy should explain that role.</p> <p>3. The second bullet point proposes a "reduced proportion" of aggregate in the period to 2030. However, without any yardstick to measure the reduction which is proposed the vision will not be clear. The words "a reduced" should be replaced with "an adequate".</p>
666 (Hills' Quarry Products)	<p>4. The first objective refers to the locally determined requirements. This seems to show that Oxfordshire is moving away from the Managed Aggregates Supply System (MASS) and is unilaterally determining its requirements without consideration of the impact upon the region or adjoining counties. This is of deep concern to us. We suggest that the paragraph should read; "Enable Oxfordshire to meet planned economic growth and social needs through an adequate supply of sand and gravel, soft sand, crushed rock and secondary and recycled aggregates over the plan period".</p> <p>5. We welcome the objective in the third objective for a clear and deliverable and flexible strategy.</p> <p>6. It is clear within the industry, but may not be clear to the general public, that secondary and recycled aggregates cannot always replace primary aggregates. Therefore the fourth objective should be amended to encourage the maximum practical recovery "where possible".</p> <p>7. 3.5 v is laudable but, as minerals can only be worked where they occur, the objective is not often sustainable.</p> <p>8. It is rarely possible (sixth objective) to replace road haulage with water transportation.</p> <p>9. Merely supporting permanent recycling facilities 3.5 (x) may not allow the vision to be achieved. All recycling facilities and particularly those in temporary quarries or landfill sites provided they are in acceptable locations and are sustainable, should be actively supported by the planning authority. There should be a presumption in favour of their development.</p> <p>10. It should be noted that the importation of materials by rail may fly in the face of objective 3.5 v to reduce climate</p>

	<p>change. Due to the need to load and unload minerals, often several times, and to carry them from a rail head to their destination by lorry, imported minerals are likely, in terms of fuel and CO2 emissions, to have a higher carbon footprint than locally produced aggregates.</p>
678 (RSPB)	<p>The RSPB welcomes the third part of the Vision (paragraph 3.4 c) calling for the restoration of mineral workings to aid the creation of habitats and the protection of biodiversity. The mineral industry has enormous potential to meet local and national Biodiversity Action Plan (BAP) targets while also providing an ideal opportunity to enhance the local environment for the benefit of local communities. It has been shown that nationally, mineral sites have the potential to exceed 9 out of 11 BAP targets, including wet reedbed, floodplain grazing marsh and lowland hay meadows¹, all of which are Oxfordshire BAP habitats.</p>
679 (RSPB)	<p>We agree with and support Objective v. relating to minimising the impact of mineral development on climate change. Climate change is the most significant threat we face. To help the UK achieve the Government's challenging carbon reduction targets, all industries and areas of the economy need to strive to maximise carbon reductions.</p> <p>Also relevant to this Objective is the potential of mineral sites to aid climate adaptation through biodiversity restorations. Mineral sites restored to UKBAP habitats can not only act as a carbon sink, but will help wildlife adapt to climate change. Some species' ranges are predicted to shift northwards as the climate warms and as conditions in the southern part of their range change, with evidence that these range shifts are already occurring in a number of species</p> <p>2. Creating new habitat through mineral site restoration will provide 'stepping stones' and enhance the 'permeability' of the landscape, enabling species to move into and colonise new areas.</p> <p>Objective vii The RSPB welcomes this positive Objective 'Protect Oxfordshire's important... ecological ..sites..from harmful impacts of mineral development and transportation'. Given the loss and fragmentation of habitats that has occurred across the country it is important that sites of ecological importance are protected and maintained for the benefit of both wildlife and people.</p> <p>Objective viii</p> <p>We strongly support this Objective and the principle that restoration schemes will make a positive contribution to nature conservation, and in particular enhancing the quality and extent of Conservation Target Areas (CTAs). CTAs are areas identified as those where targeted conservation action will have the maximum benefit and as such their inclusion in this Objective is important.</p> <p>Further, we support the intension to provide local communities with an inspiring, wildlife-rich landscape through sensitively designed restoration schemes.</p>

689 (Lafarge)	<p>The strategy, policies and proposals set out in the Draft Consultation are based on a vision and objectives for minerals planning, which may be summarised as comprising the following principles outlined in paragraph 3.4 of the document: Provision of minerals to meet development needs; Minimising the distance minerals are transported by road, to reduce impacts on the environment; and Restoration of mineral workings to enhance the natural environment and the quality of life for Oxfordshire's residents.</p> <p>2.2.2 Lafarge Aggregates support the vision for minerals planning in Oxfordshire. However, it is submitted that the policies set out in the strategy are not currently sufficient to achieve the vision and objectives and hence, require modification if these objectives are to be realised.</p> <p>2.2.3 With reference to the provision of minerals to meet development needs, it is considered essential that the strategy makes sufficient provision in order to maintain a steady and adequate supply of aggregates and for the differing economic trends and associated market demand that may arise during the plan period.</p> <p>2.2.4 Each authority must make a contribution to supply that reflects the minerals in its area and it is vital that the annual extraction rates for Oxfordshire are sufficient to meet demand.</p> <p>2.2.5 Consideration should also be given to the role of the minerals industry in stimulating economic recovery and in creating and maintaining employment. In addition to providing economic growth, the minerals sector represents sustainable development through the use of local raw materials, recycling, and the restoration of beneficial after-uses such as agriculture and nature conservation.</p>
696 (MPA)	<p>While we generally support the overall Vision and Objectives, we have a number of concerns about the direction that the County Council is planning to take.</p> <p>We support the increased use of recycled and secondary materials, but as is acknowledged in the supporting evidence to the Plan this is close to reaching a maximum level. The increase planned in production and consumption of secondary and recycled materials (from current level of around 300,000 tonnes to 900,000 tonnes) does not appear to be deliverable or realistic, or supported by evidence on the availability and suitability of materials. We are therefore also concerned about the intention to significantly reduce the proportion of locally-produced primary aggregates, and the consequent over-reliance on supply from unproven levels of secondary and recycled materials, and continued levels of imports.</p> <p>Also the vision is parochial and does not adequately reflect or consider Oxfordshire's role within the wider South East (including the current AWP area) for aggregate production.</p>

708 (OMPG)	<p>While we generally support the overall Vision and Objectives, we have a number of concerns about the direction that the County Council is planning to take.</p> <p>We support the increased use of recycled and secondary materials, but as is acknowledged in the supporting evidence to the Plan this is close to reaching a maximum level. The increase planned in production and consumption of secondary and recycled materials (from current level of around 300,000 tonnes to 900,000 tonnes) does not appear to be deliverable or realistic, or supported by evidence on the availability and suitability of materials. We are therefore also concerned about the intention to significantly reduce the proportion of locally-produced primary aggregates, and the consequent over-reliance on supply from unproven levels of secondary and recycled materials, and continued levels of imports.</p> <p>Also the vision is parochial and does not adequately reflect or consider Oxfordshire's role within the wider South East (including the current AWP area) for aggregate production.</p>
725 (Smiths Bletchington)	<p>Smiths have welcomed the opportunities provided by the County Council since 2005 for active engagement and consultation throughout what has been an overly long process of preparing the Oxfordshire Minerals and Waste Development Framework. We believe that there has been effective stakeholder engagement in line with the stated aim of the adopted 2006 SCI. Potential minerals sites have been in the public domain since April 2007 with options for where future workings might take place (2.29) developed from 2009 onwards.</p> <p>1.2 Smiths broadly support the long term spatial Vision for the county and many but not all of the planning Objectives designed to deliver the Vision.</p> <p>1.3 We welcome the commitment by the County in strand one of the vision to MPS1 (2006) for ensuring that "...there is an adequate and steady supply of material to provide the infrastructure, buildings and goods that society, industry and the economy needs". This is key if the planned economic growth and demand for construction aggregates within the County and further afield is to be met sustainably.</p> <p>1.4 We also welcome the acknowledgement that Oxfordshire has extensive sand and gravel resources and the important, albeit obvious, statement that "mineral extraction can only take place where the mineral is found". In hand with this we support the recognition given in the Plan of the importance of protecting mineral resources from development with robust measures for their safeguarding.</p> <p>1.5 We support the principle of the hierarchy of mineral supply proposed in the Vision echoing MPS1 (2006) which as far as practicable should seek to reduce the "intensity of use" of minerals and then place the emphasis on recycled materials ahead of primary aggregates.</p> <p>1.6 We welcome the acknowledgment that mineral workings are temporary developments which have the potential to deliver a long term legacy for local people and the environment. However this is far from being a new concept and as a long established Oxfordshire based company Smiths are committed to the delivery of high quality afteruses be it for</p>

	<p>nature conservation, agriculture or public access. The proposals in the Plan are building on what has already been achieved by the minerals industry within the County and recognition of this should have been included in the background papers. This is disingenuous to an industry which has worked very hard with the County and a wide range of NGOs on restoration and afteruses.</p> <p>1.7 We do not support those elements of the planning Objectives which we believe are fundamentally parochial and inward looking.</p> <p>1.8 As a general point we would welcome clarification of the status and future role of the Background Papers in interpreting the individual policies.</p>
738 (Natural England)	<p>We strongly support the minerals planning vision which states that the restoration of mineral workings will enhance the quality of Oxfordshire's natural environment and quality of life for Oxfordshire's residents. In addition to contributing to biodiversity and access, restored minerals workings can provide ecosystem services such as flood storage, carbon storage and water purification.</p> <p>3.5 Objective v we strongly support objective v relating to minimising the impact of mineral development on climate change. Objective vi we support this objective. Objective vii We support the intention in this Objective, however, we feel all biodiversity assets should be protected, not just designated sites. We suggest this is reworded to be in line with Policy C3 and C4, thus: 'Protect Oxfordshire's important landscapes and ecological, geological, and heritage sites, and archaeological and heritage assets from harmful impacts of mineral development and transportation.' Objective viii we strongly support this objective.</p>
462 (Environment Agency)	<p>Under part c of Paragraph 3.4 we would welcome the inclusion of a bullet point which seeks reduction in flood risk as a part of minerals restoration. Importantly, one of the objectives should also make specific reference to this point, this will support Policy C1 and positively influence longer term objectives of the sustainability appraisal.</p>
546 (SODC)	<p>The proposed Vision is considered to adequately reflect sustainable development objectives. We welcome the aspiration to recycle more aggregates and reduce the production of primary aggregates, which should reduce the overall impacts on the county associated with the minerals industry. The safeguarding for the future of minerals reserves and the associated infrastructure such as rail aggregates depots is a well established principle and is supported.</p>

448	These general objectives are worthy. 3.5.i is especially pertinent to Oxfordshire.
361 (Bampton Parish Council)	Bampton Parish Council strongly supports: 3.4 a), b) and c) and 3.5 iv, v, vi, vii and viii
394 (Bampton Environmental Watch Group)	Bampton Environmental Watch Group (BEWG) strongly supports: 3.4 a), b) and c) 3.5 iv, v, vi, vii and viii
969	<p>While it could be argued that the way these objectives will be achieved is the subject of section 4 (planning strategy) there should nevertheless be some forward references to these means, especially to give some meaning to vague terms like 'encourage' and 'protect'.</p> <p>Para 3.4(a) The idea that 'to help sustain Oxfordshire's world class economy' it is necessary to achieve the following bullet points without anyn indication how these will be achieved seems at best empty. Some pointer to means should be added.</p> <p>Para 3.4(b). To the text beginning 'mineral working will be located to minimise' a bullet point should be added 'damage to the landscape and visual beauty'. Vague terms like 'Oxfordshire's environment and communities' are not sufficient.</p>
OCC; RoW network (dev) officer response	The 'restoration' vision to countryside access and recreation for the minerals policy is fully supported, as is objective vii.

<p>OCC Natural Env team response</p>	<p>3.5 v We strongly support the minerals planning vision which states that the restoration of mineral workings will enhance the quality of Oxfordshire's natural environment and quality of life for Oxfordshire's residents. In addition to contributing to biodiversity and access, restored minerals workings can provide ecosystem services such as flood storage, carbon storage and water purification. Restored minerals sites have the potential to contribute to 9 out of 11 Biodiversity Action Plan (BAP) targets¹, which Oxfordshire County Council have a duty to protect and enhance under the NERC Act.</p> <p>Footnote 9 could include a link to the OCC website which explains how Oxfordshire's Biodiversity Action Plan is delivered through the Conservation Target Areas approach (http://www.oxfordshire.gov.uk/cms/content/oxfordshires-biodiversity-action-plan).</p> <p>Strongly support this objective to minimise the effects of mineral development on climate change. Mineral sites also have the potential for climate change adaptation through restoration to UK BAP priority habitats which will act as carbon sinks and help wildlife adapt to climate change by moving through the landscape.</p> <p>3.5 vii. Suggest amending to clarify that all ecological assets (not just sites) should be protected to be consistent with policies C3 and C4. It is also not enough in policy terms (e.g. European Landscape Convention) to protect important landscapes, but we need to protect/enhance the character of all landscapes, using assessment tools such as Landscape Character Assessment to determine the outcomes 'Protect the character of Oxfordshire's landscapes, and the ecological, geological, and heritage sites, and archaeological and heritage assets within them from harmful impacts of mineral development and transportation.'</p> <p>3.5 viii. Strongly support this objective to provide benefits to Oxfordshire's communities and natural environment through good restoration, in particular enhancing the quality and extent of Conservation Target Areas and providing local communities with a high quality wildlife-rich landscape.</p>
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¹ A M Davies (2006) Nature After Minerals – How mineral site restoration can benefit people and wildlife: the report. RSPB
http://www.sustainableaggregates.com/library/docs/samp/samop_2_38.pdf

Comments on Policy M1: provision for secondary & recycled aggregates	
ID No (& name of org)	Comment/issue raised
35 (Earthline Ltd)	The policy to encourage recycled aggregates is supported. The company operates a major recycling facility in Shellingford Quarry that has consent until 2020 and an application to extend its life will be submitted during the Plan Period. The provision of facilities to supply 'at least 900,000 tonnes per annum' is noted, but in practice the majority of available suitable construction waste is being recycled. Significant increases above the current level of circa 350,000 tonnes may therefore not be deliverable.
114	Policy M1 is logical and commendable, but should perhaps recognise the need for an energy and sustainability assessment of recycling, to ensure that in carbon and pure energy terms, the movement and processing involved make sense in comparison to new aggregate sources.
165(PAGE)	The target to provide for 0.9 million tonnes of secondary and recycled aggregates per annum is supported, in particular the reference to "at least" in the wording of the policy. This is considered to be an ambitious but achievable target and should be encouraged in order to reduce the level of primary aggregate which is required. 3. PAGE urges OCC to be pro-active in requiring the various stakeholders involved in the utilisation of secondary and recycled aggregate to develop an action plan to achieve this challenging target within the next five years.
228 (Woodland Trust)	6. One of the key aims of both the Minerals and Waste Plans should be to promote recycling. The recycling of aggregate is particularly important as it can minimise the land take required for the extraction of primary aggregates. In doing so the environmental affects are minimised.
260 (BaCHpoRT)	4.8 Policy M1: Provision for secondary and recycled aggregates Encouraging the production and supply of secondary and recycled aggregates is welcomed, but the target of 0.9 million tonnes per annum may be achieve difficult, and will require a more proactive stance on the part of the Council. Proposals to achieve this quantity should be set out in more detail here.

271 (Cemex)	<p>The core strategy provides little evidence of secondary / recycled waste sources or conclusive evidence that the waste material would be suitable as a direct replacement for primary aggregate.</p> <p>The use of recycled / secondary aggregate as a direct replacement to primary aggregate is a growing industry with continued research related to quality and strength but at present only 25% of material is deemed appropriate as a substitute. At this time the proportion of recycled / secondary material that can replace primary aggregate is limited and therefore should not be used as mechanism to reduce the proportion of primary aggregate allocated / produced.</p> <p>Quantify figures and forecasts, If 2009 processed 300,000tpa of recycled aggregate / secondary aggregate has the County identified demolition projects and developments that will generate an increased figure of 600,000tpa, what is the waste source? Is this approach/ figure a sustainable means of contributing to the locally aggregate production through the plan period. Has research been undertaken to confirm what % of current C&D waste (300,000t) is suitable as a direct placement for primary aggregates. Should the Council propose to use secondary / recycled aggregate as a direct replacement they would need to find a significantly larger quantity of material if 900,000tpa if only 25% is likely to be suitable.</p> <p>The Atkins report does not provide assurances within section 3.53 - 3.66 that the proposed methodology is achievable or appropriate.</p> <p>M1 - The principles are welcomed but it is doubtful the County could deliver the proposed secondary / recycled aggregate tonnage per annum and therefore the policy could be considered unsound.</p>
284	<p>(i) Although I agree with Policy M1, it is not clear how its target production rate of 0.9 mt/an. for secondary and recycled minerals has been taken into account in determining the scale of new workings that is planned for in Policy M2. In addition because of the increasing importance that needs to be given to the use of recycled and secondary minerals the target in Policy M1 should be kept under review (for example, on a 5 year basis) and the target in Policy M2 for new workings adjusted downward accordingly.</p>
354 (Peter Bennie Ltd)	<p>There is an expectation of using recycled aggregates that bears no relation to the arisings and no assessment has been made of how much of the arisings e.g. concrete and brick, are suitable for use to meet the expected level of supply. A major source is closing, Didcot, early in the Plan period; how will this shortfall in supply be bridged? The core strategy provides little evidence of secondary / recycled waste sources or conclusive evidence that the waste material generated would be suitable for construction projects or direct placement for aggregate. The Plan states that AM2005 showed a balance of supply; it does however rely upon some crude assumptions regarding the destination of 'unknown' sales over 3 sub regions. It states that AM2001 showed a net export, however it is not clear how this can be determined given data is only at a regional level. AM2009 was not used as it was not available but was imminent, so the report is premature, but it is the only one with County level data. It is important to consider at this stage as it shows the County is a net importer. So the Plan is flawed in not using up to date</p>

	and relevant information.
395 (Grundon)	<p>A range of arisings are detailed and it is not clear where a figure of 1,300,000 tonnes has been derived. It is envisaged that 780,000 tonnes will be recycled. Presumably this is a mixture of recycled aggregate and of soils and other products.</p> <p>Policy M1 states that the amount of recycled and alternative aggregates to be supplied amounts to 900,000 tonnes per year. This includes a contribution from Didcot (125,000t) however it is to close in 2015. This may partially be replaced by recycled bottom ash from Ardley EfW (60,000t). This gives a net contribution of recycled aggregates to the amount of 840,000t. This is in excess of the figure in W1 and ignores any contribution that recycled soils etc will also make to that figure. Policy M1 implies that with the addition of recycled soils etc that up to 1,000,000 tonnes would be recycled compared to the 780,000t in W1.</p> <p>Whilst there may be recycled aggregate productive capacity of 800,000t it is not clear if this is a mixture of recycled aggregates and soils etc. There has been no assessment of CD&E arisings in relation to the quantity and suitability for recycled aggregates. Their suitability is dependant upon the amount of brick and concrete generated.</p> <p>Given that historic production of alternative aggregates, including Didcot, was at most 450-500,000 tonnes means that to achieve a figure of 900,000 the output of recycled aggregate needs to more than double. Given that the Atkins report concludes, as have others, that there is little room for increasing output as most suitable material is already captured this means that the targets in M1 are neither realistic nor deliverable and contradict those in W1.</p>
491 (Hinton Waldrist Parish Council)	Policy M1 is supported and encouraged.
526 (CPRE West Oxon)	4.4/4.5 /4.30 Recycled aggregates. CPRE welcomes the increasing part played by the recycling of aggregates. Fig 4 shows that there are currently 8 centres for processing in West Oxfordshire, largely located to take advantage of the sites where mineral working has already taken place. In considering overall impact these should be taken in conjunction with the quarry sites for extraction already in operation. We would urge OCC to locate recycling facilities in future where transport is most convenient , particularly where that may be by rail, rather than extending the working of relatively remote and inconvenient sites because of their past history.

<p>848 (John Sheehan Ltd) & 850 (Controlled Reclamation Ltd)</p>	<p>Paragraph 4.6 of the Oxfordshire Minerals Core Strategy Consultation Draft (OMCS) states that policy M1 provides for additional facilities to support a more ambitious level of secondary and recycled aggregate production, in line with the South East Plan target of 0.9 million tonnes per year.</p> <p>No mention is made in the plan, however, of the current National and regional guidelines for aggregates provision in England, 2005-2020 published in June 2009. According to the government guidance on the abolishment of regional strategies, these guidelines are to be taken into account in making planning decisions and they identify a requirement for the provision of alternative materials of 130 million tonnes within the South East Region over the period 2005 to 2020, which equates to 8.125 million tonnes per annum (mtpa).</p> <p>3. The guidelines indicate at paragraph 3 that the sub-regional apportionment of this figure is the responsibility of the regional assemblies, and in future responsible regional authorities, taking into account advice from the mineral planning authorities (MPAs) and the regional aggregates working party (RAWP). This task of sub-apportioning recycled and secondary aggregate provision for the South East was done as part of the preparation of the South East Plan, and it is evident from South East Plan policy M2 that Oxfordshire's share of the total quantity of secondary and recycled aggregate to be used in the South East amounts to 11.4% of the total to be achieved. Applying this same percentage to the 2005 to 2020 guidelines requirement for alternative materials of 8.125 mtpa, Oxfordshire's apportionment would therefore now amount to 926,000 tpa. In light of these new requirements policy M1 is not quite as ambitious as it should be.</p> <p>4. In addition, as paragraphs 4.9 and 4.10 of the OMCS make clear the County Council is proposing to significantly reduce its primary aggregate apportionment from that required either by the current South East Plan policy M3 or that identified in the Government's proposed changes to Policy M3, which government guidance on the abolishment of regional strategies has said that Mineral Planning Authorities in the South East should be working to.</p> <p>5. The County Council are effectively proposing to reduce their required apportionment to meet the needs of the South East aggregate provision by 40% (i.e. 0.84 million tonnes per annum). In light of this decision, one might have expected some form of compensation by increasing the recycled and secondary aggregate provision proposed for Oxfordshire, so that the burden of making up the overall regional shortfall does not fall so heavily on other neighbouring authorities. However, this is not the case. The County Council have decided to provide for only</p>
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the absolute minimum requirement in terms of recycled aggregate provision.

6. In addition if as suggested at paragraph 4.1 of the OMCS the Council is serious about providing for an adequate and steady supply of minerals over the plan period by encouraging the use of secondary and recycled aggregate as well as by identifying areas for mineral working, then policy M1 must be more specific in encouraging the right kind of aggregate recycling.

7. Significant quantities of inert waste are already recycled for low grade uses, for examples as low level fill. However, this is not the most sustainable use of these materials, and there is significant, as yet largely under-utilised, potential to re-use C&D waste in higher value applications. Conventional dry processing systems generally produce at best two types of product, which meet Government highways works specifications 6F1 (-40mm) and 6F2 (+40mm). These are suitable as general fill on larger applications or for a lower sub-base in road making, but are not suitable for concrete manufacture, or as a road base for laying tarmac on, or for more confined areas, such as bedding smaller drainage pipes. Sands are also not able to be processed effectively into a clean enough product and therefore are considered a waste product.

8. The WS Atkins report confirms at paragraph 3.53 that secondary and recycled aggregates do not currently substitute for primary aggregates in structural uses, only in lower specification construction uses like car parks, that they cannot replace sand and gravel, and therefore the possible contribution that alternative aggregates can make to total consumption needs to be treated with caution.

9. This makes the assumption that aggregate recycling should continue by relying on conventional dry processing systems. However, there is the alternative of new more sophisticated processing plant systems, which involve washing the waste. These plants can produce a range of high quality products that are able to substitute for and compete directly with all grades of local land won primary aggregates in a variety of building uses and applications.

10. Further key benefits of such systems are that they enable:

- the recovery of sand from C, D & E wastes, which is not possible with conventional systems.

40% of the product from the proposed new wash facility at Dix Pit is anticipated to be recycled into two different grades of sand. If more of these wash facilities were available distributed across the County, the distances involved in transporting soft sand (only available at two locations in the County as a primary source) could be reduced.

- the manufacture of high quality Type 1 aggregate, which is not available as a locally won

	<p>material, and has to be imported by road and rail from Leicester and Frome, as acknowledged at paragraph 2.5 of the OMCS. This would be possible, because the plant would be processing waste from sites where Type 1 has been used in previous development of the site, or for example, where concrete has been removed from former structures - local aggregate and cement combined provide the strength required to meet the Type 1 specification.</p> <p>- the manufacture even of the residual silts and clay fines into useable products such as in brick manufacture, and as material for landfill engineering and cover.</p> <p>11. The County Council should therefore be actively encouraging the installation of such systems through Policy M1. Not only would this enable recycled aggregate to substitute directly for virgin aggregates, with all the benefits that brings for the environment, but it would also promote healthy competition and remove the current monopoly of the minerals industry, which is acting as an obstacle to the use of more high quality recycled aggregate.</p>
857 (Shenington with Alkerton Parish Council)	The policy includes the provision of temporary facilities at inert waste landfill sites to enable the supply of secondary and recycled aggregates. We would point out that Alkerton Quarry is very remote from planned growth areas in the county, and thus its use in this way would contravene objective vi.
566 (Vale of White Horse District Council)	The figure is consistent with the Oxfordshire figure in the South East Plan. The principle that land should be supplied to meet the need for the recycling of aggregates is a good one, as recycled aggregate will substitute for the use of other materials at some point. It is recognised that recycled aggregates can generally be used only for lower grade uses but their substitution where possible helps conserve primary aggregates for uses where they are the only suitable alternative.
635 (WODC)	Policy M1 needs to be strengthened to maximise production and supply from secondary and recycled aggregates (includes construction waste and ash from Didcot power station and the new Ardley waste station). The policy as currently drafted only gives 'encouragement'. Changing construction methods make less use of aggregates, using more steel and wood.

639 (Surrey County Council)	Policy M1 makes provision to supply at least 0.9 million tonnes per annum (mtpa) of secondary and recycled aggregates which reflects the sub-regional apportionment for Oxfordshire in RSS Policy M2. This policy is supported and reflects the approach contained in the SMP Core Strategy. SMP Policy MC5 makes provision for at least 0.8 mtpa of recycled and secondary aggregates by 2016 based on RSS Policy M2, and at least 0.9 mtpa by the end of the plan period in 2026 when pressure to utilise alternative supplies of aggregate are expected to become increasingly apparent. Surrey has allocated sufficient sites in its Aggregates Recycling Joint DPD proposed submission document (August 2011).
667 (Hills' Quarry products)	<p>11. This policy has laudable aims but appears to be unrealistic in its expectations to supply 900,000 tonnes of secondary aggregates per year. Moreover, if it is the basis of assessment of the quantity of primary aggregates to be planned, it will produce an unsound strategy.</p> <p>12. The plan has been put forward on very little evidence of the volume of materials which are being recycled now. What materials are being recycled? Where are they recycled (demolition sites, quarries)? What use is made of the recycled materials? What volume of recycled materials can realistically replace primary aggregate in concrete and high end uses? It is known that Didcot Power Station will close shortly but the impact of the reduced supply of secondary aggregates from 2015 may not be known. If the reduced supply is significant, how will it be replaced? Is there sufficient capacity to produce more recycled aggregates? In order to provide a sound strategy of replacing primary aggregates with secondary aggregates which will accurately identify the need for primary aggregates, many questions need to be answered about recycled materials. Without robust evidence to support the aims of the policy, the strategy will be unsound.</p>
690 (Lafarge Aggregates)	<p>2.3.2 Lafarge Aggregates support the principle of maximising the provision of secondary and recycled aggregates. However, in this instance, it is unclear if there is a sufficient evidence base underpinning the provision of 0.9 mtpa of secondary and recycled aggregates.</p> <p>2.3.3 It is our understanding from the stakeholders forum hosted by Oxfordshire County Council on 29 September 2011 that the figure of 0.9 mtpa is an aspiration and that the current figure for secondary and recycled aggregates in the County is approximately 0.3 mtpa.</p> <p>2.3.4 Whilst there may be potential for a small increase in the provision of secondary and recycled aggregates, it is our contention that the provision of these resources is already operating close to capacity and improvements in efficiency are unlikely to yield a rate of 0.9 mtpa. AM2009 estimates future production of secondary and recycled materials in Oxfordshire as peaking at around 0.4 - 0.55 mtpa.</p>

	<p>2.3.5 We acknowledge that the Council will be presented with similar uncertainty regardless of the figure selected for the provision of secondary and recycled aggregates. However, we are concerned that the selection of a particularly high rate for secondary and recycled aggregates is inconsistent with the more conservative methodology and approach used to derive the rates of extraction for mineral working, which are set out in Policy M2.</p>
<p>697 (MPA) & 709 (OMPG)</p>	<p>The MPA objects to this policy. While we generally support the intention to increase the amount and proportion of aggregates supply (and consumption) from secondary and recycled materials, and acknowledge that this amount is set out in Policy M2 of the South East Plan, the level of increase (below 300,000 tonnes currently to 900,000 tonnes) does not appear to be deliverable or realistic. No assessment appears to have been made of the quantity of arisings suitable for use to meet the expected level of supply, and how the potential shortfall in supply from the loss of a major source (Didcot) closing early in the Plan period will be bridged.</p> <p>The 'Local Assessment of Aggregates Supply Requirements' study by Atkins, which is used as the basis for provision for primary aggregates, applies a variety of assumptions in considering options for primary aggregate supply (provision) and also assumes a proportionate supply from secondary and recycled materials of 27% (of total aggregate demand) with little potential to increase substantially beyond that level. The report also assumes parity between imports and exports, although AM2009 confirms Oxfordshire is now a net importer of all primary aggregates. It also estimates future production of secondary and recycled materials in Oxfordshire as peaking at around 400-550,000 tonnes by 2016, and that existing capacity far exceeds this, even when the closure of Didcot A is taken into account, and is not delivering this amount of supply.</p> <p>At 900,000 tonnes, secondary and recycled aggregates would represent 32% of indigenous supply (if the level of provision for primary aggregates in Policy M2 is adopted). It appears very unlikely that there is any realistic prospect that such levels will be deliverable or practical. There is therefore a real danger that actual demand will not be met from planned provision and Oxfordshire's reliance on imports will continue to increase, which is not compatible with a number of aspects of the Vision and Objectives. The approach the Council is proposing - adopting the South East Plan apportionment for recycled and secondary aggregates but under-shooting the apportionment for primary aggregates is therefore unbalanced, undeliverable and illogical.</p> <p>We recommend that the balance in supply between recycled and secondary, and primary aggregates, and the deliverability of this approach, is reviewed further.</p>

373 (D K Symes)	<p>The principle of increasing the supply of recycled materials is supported. However, the three fold increase in output from 0.300 to 0.900 Million tonnes p.a. is, as the plan notes an ambitious target and it is questioned whether this is a sound approach.</p> <p>When considering replacing primary aggregates with recycled aggregates there needs to be caution as much of the recycled aggregates are of low quality and therefore do not replace the high quality locally won materials. It is not clear whether this aspect of the supply pattern has been appropriately addressed in the background work to the plan. It is also noted that this figure of 0.9 Million tonnes is from the South East Plan target. It is this plan that also set the original Land Won target with which the County have taken issue and have reduced their apportionment. It is understood that the concern is that the South East Land Won target was too optimistic in relation to demand etc. and a similar argument should also be applied to the 0.9 Million tonnes of recycled, as this will depend upon the level of development for its feedstock.</p>
547 (SODC)	<p>The figure is consistent with the Oxfordshire figure in the South East Plan. The principle that land should be supplied to meet the need for the recycling of aggregates is a good one, as recycled aggregate will substitute for the use of other materials at some point. It is recognised that recycled aggregates can generally be used only for lower grade uses but their substitution where possible helps conserve primary aggregates for uses where they are the only suitable alternative.</p>
362 (Bampton Parish Council)	<p>Bampton Parish Council strongly supports: The whole of 4.8 Policy M1</p>
396 (BEWG)	<p>Bampton Environmental Watch Group (BEWG) strongly supports: The whole of 4.8 Policy M1</p>

414 (Hanson Aggregates)	<p>Policy M1: Provision for secondary and recycled aggregates.</p> <p>The desire to encourage the production of secondary and recycled aggregates is commendable. Indeed the minerals and construction industries have an excellent track record in this regard, as evidenced by the fact that the supply of aggregates from recycled and secondary materials is reported to be higher in Great Britain than anywhere else in Europe. It is doubtful, however, that further significant improvements can be achieved. The target to increase the supply of secondary and recycled aggregates to at least 900,000 tpa represents a threefold increase over current rates which is considered over-optimistic. Consequently, there is serious concern that over-reliance will lead to a shortfall in the provision of primary aggregates during the Plan period and a resultant increase in importation.</p> <p>It is important to note that increasing productive capacity for recycled aggregates will not necessarily result in increased demand for this material in substitution for primary aggregates. Recycled aggregates must be 'fit for purpose' and generally this is not the case for higher-specification uses due to the variable nature of the source material. Recycled aggregate is not a suitable substitute in concrete production, which is one of the principal sources of demand for land won sand & gravel.</p> <p>The availability of recyclable construction, demolition and excavation (CDE) waste is also a constraining factor in the use of recycled aggregates. The production of CDE waste is dependent upon investment in redevelopment and replacement of existing infrastructure. If the Council wishes to take a highly optimistic view of future economic activity to support the necessary increase in CDE waste production this should also be reflected in a corresponding increase in assumed demand for aggregate to achieve this level of economic activity. This is not the case.</p> <p>In summary, the Council's approach to the major contribution that secondary and recycled aggregate is expected to provide in meeting the demand for construction materials is considered over-ambitious, unrealistic and inconsistent with its demand forecasting for primary land won aggregates.</p>
971	<p>Para's 4.1. 4.8 and Policy M1. The policy to encourage use of recycled aggregates is to be applauded, but the important question is how? This aim has been in OCC policy documents for several years, but in 2009 not even adequate data has been collected. So 'by what means, administrative or otherwise, is this aim to be achieved?' is a relevant and important matter which can't be adequately covered by the single word 'encourage.'</p> <p>Para 4.10 is to be applauded.</p> <p>Para 4.16 Fig 7 which provides one hub of this paragraph is quite obscure and at least needs bringing up to the standard of clarity of the other figures in this document.</p>

	<p>Para's 4.21 and 4.22 are acceptable, as far as they go. However, the existing quarries are known and do not cover the extensive area sketched in Fig 7, although they may be contained within it. Please also note above remarks on the need to improve the clarity of this figure. It is also important that extensions to existing quarries should not be regarded as unconditional or automatic, for otherwise a bad decision could be compounded subsequently. Text to this effect should be added.</p>
726 (Smiths Bletchington)	<p>2.1 We support the hierarchy of mineral supply and the emphasis on the increased use of secondary and recycled aggregates. But the "use" of such materials is determined not by the producers of recycled materials but rather by their customers the construction sector. The decision on whether or not recycled or primary materials will be used in a development is taken by engineers and architects and is outside of the control of the producers. Irrespective of the productive capacity or the availability of recycled and secondary materials within the County they will only be used instead of primary aggregates if they are considered to be fit for purpose. There appears to be no evidence to suggest that increased availability of secondary and recycled aggregates will result in a proportionate increase in its use by the construction sector.</p> <p>2.2 The minerals sector has been and remains committed to maximising recovery from CDE wastes. Pre-treatment is demanded by legislation and commercially there is a well established market for recycled materials. Recovery rates are already high and there appears to be limited evidence indicating how much more improvement can be delivered.</p> <p>2.3 Where recycled materials are an appropriate substitute for primary aggregates then the key driver will be pricing. Recycled materials already have the price advantage that they do not attract the levy on primary aggregates of (currently) £2.00 per tonne and supply and demand may also result in pressure on prices through increased completion. A wider spread of recycling locations may also reduce haulage costs between supplier and customer.</p> <p>2.4 The production of recycled aggregates from construction, demolition and excavation (CDE) wastes is also wholly dependent upon the availability of such wastes arising from redevelopment and demolition of existing infrastructure. The scale of this activity tends to reflect general levels of economic activity and investment and can result in significant variations in local supply.</p> <p>2.5 The volumes and the nature of the CDE wastes available to producers can also be highly variable. Recycled aggregates are invariably a mix of concrete, brick and tiles arising from construction, demolition and utility operations and the quality of the recycled aggregate are dependent on the quality of these wastes and the degree of subsequent processing carried out. Only in a limited range of uses can recycled aggregates directly substitute for primary aggregates.</p> <p>2.6 In short the availability of the raw material for recycled aggregates is a function of factors outside of the control of mineral planning and is not controlled by the producers of recycled aggregates. So although the proposed increase in productive capacity (through W5 of the Waste Plan) is supported and the aim to supply 900,000 tonnes of recycled</p>

	<p>aggregates each year is commendable, we believe it to be unrealistic to view this as a an alternative to the working of primary aggregates.</p> <p>2.7 We support and welcome the principles of Policy M1 but believe the level of reliance on recycled aggregates to provide an adequate and steady supply of materials in place of primary aggregates is flawed.</p> <p>We believe that the balance of aggregates provision (set out in Policy M2) should be reviewed and greater flexibility introduced to ensure that an adequate and steady supply of materials can be maintained from a mix of recycled and primary sources.</p>
	Comments on Policy M2: Provision to be made for mineral working
ID No (& name of org)	Comment/issue raised
2	The revised annual figure is welcome news and gives the Council a robust argument for future planning applications in regard to land bank requirements, this should stop unnecessary development.
36 (Earthline Ltd)	<p>Government advice on aggregates apportionment is that the figures set out in the Proposed Changes to the South East Plan (March 2010) should be used unless authorities have new or different information and a robust evidence base (DCLG letter 6 July 2010). OCC has carried out its own Local Assessment (Atkins, January 2011) and figures lower than the recommended apportionment are proposed, particularly in respect of sand and gravel.</p> <p>I have reservations regarding the methodology for such a large reduction in the sand and gravel figure, particularly in respect of imports/exports and cooperation with adjoining authorities. However Earthline's interests are in soft sand and limestone and I will only deal with these.</p> <p>(i) Soft Sand</p> <p>The company presently produces approximately 70,000 tonnes of sand per annum from Shellingford Quarry. The remaining permitted sand at Hatford quarry is outside of the current operational area (within areas E&F) and an application for a further extension for sand/limestone is being prepared. A combined production from both quarries of up to 100,000 tonnes of sand is anticipated.</p> <p>The proposed apportionment for soft sand in the Draft Plan is 250,000 tonnes per year. An equivalent figure for sand is not included in SE Plan since it is wrapped into the overall sand and gravel figure, but a split based on current production indicates an apportionment for soft sand of 420,000 tonnes (ie 20 % of the total of 2.1mt). However the past</p>

production indicated in the Atkins Report shows sand production relatively level around the 200 - 250,000 tonne mark over the last 10 years. The proposed apportionment therefore does not appear to be unreasonable.

(ii) Crushed Rock

The company presently produces approximately 130,000 tonnes per annum of limestone from Shellingford and Hatford quarries. Shellingford quarry has a long life, but Hatford will require extensions to enable production to continue throughout the Plan Period.

The proposed apportionment for crushed rock is 630,000 tonnes per year. This is marginally below the recommended figure of 660,000 tonnes in the SE Plan, and significantly below the longstanding figure of 1 million tonnes in previous regional guidance.

Consideration of crushed rock supply in Oxfordshire is not straightforward since the resources comprise minerals of different origins, with different properties and uses. Much of this material, including the ironstones from north Oxfordshire, is primarily used as a fill material. These compete in the same market as recycled aggregates and have therefore probably held down production. However Earthline produce higher quality Type 1 materials from their two quarries. These harder minerals compete with imports of crushed rock and production has held up reasonably well.

Figures in the Atkins report indicate that crushed rock production has been circa 600,000 tonnes over recent years, except for a peak in 1999 - 2002, with the last three years given (2007 - 2009) averaging circa 565,000 tonnes. In these circumstances an apportionment in the general order of 0.6 - 0.7 mtpa appears reasonable. However it is not clear in the Draft Strategy how the proposed figure of 0.63mtpa was reached (it is not a figure found in the Atkins Report). It is therefore suggested that the recommended figure of 0.66mtpa in the SE Plan documents be substituted since it is so close.

The company's main concern is how the apportionment figure is interpreted in the calculation of the landbank. The proposed 10 year landbank for crushed rock is in accordance with national guidance and is accepted. The current permitted reserves are given as 12.6 million tonnes (Fig 6) and by a simple division by the annual apportionment these are sufficient for circa 20 years, and there is no additional requirement (Para 4.14). However there will be a need to permit additional reserves to maintain production of the hard Type 1 aggregates from Hatford quarry. I understand from discussions with Lois at the Consultation Forum (on 29 September) that that provision will be made for quarry extensions in such circumstances, and a 'hard line' on the landbank will not be taken, but this needs to be explained in

	<p>the Plan.</p> <p>One final point is that the landbank of permitted reserves needs to be reviewed to omit sites that are unlikely to be worked (eg dormant ROMP sites) and any reserves that are tied up in large permissions that cannot be worked during the Plan Period.</p>
77	As for the unmet need for aggregate, this also is very unclear, both because of the uncertain economic future that we face during the planning period, and also because no adequate account is taken of alternatives to gravel already available and/or likely to be developed during the life of the plan.
80	Also, rather than just accepting that the County Council needs to go on mining for gravel, I encourage the Council to challenge this assumption and look more seriously at other means (like re-cycling) for obtaining materials for building and maintenance.
105	<p>The proposal for separate landbanks for sand & gravel and soft sand is supported.</p> <p>Under para. 4.9 the adopted SE Plan (Policy M3) advocates an annual supply of 1.82 million tonnes of sand and gravel (soft sand at 20% = c. 360,000 tonnes pa)</p> <p>Under para 4.10 the CC is proposing an annual supply of 1.26 million tonnes of S&G (soft sand at 20% = c.250,000 tonnes pa).</p> <p>I suggest that to maintain a 7 year landbank for soft sand the policy should be flexible to allow for an increase in market demand, etc over the plan period. A minimum of 250,000 tonnes pa and a maximum of 360,000 tonnes pa for soft sand is therefore advocated.</p>
106	<p>Para 4.13 - Requirement for soft sand in plan period between 5.0 million tonnes and 7.2 million tonnes.</p> <p>Para 4.14 - Additional requirement for soft sand between 1.59 million tonnes and 3.79 million tonnes over the plan period.</p>
107	Para 4.15. Policy M2. Suggest annual output for soft sand of a minimum of 250,000 tonnes pa and a maximum of 360,000 tonnes pa during the plan period.
130 (Bucks CC)	Buckinghamshire County Council (BCC) understand that OCC are required to make provision (sites) for mineral extraction to maintain a supply of aggregates (sand and gravel and crushed rock) over the plan period to 2030. A letter to all MPAs from Central Government (July 2010) advised that in considering the Government's intention to revoke Regional Spatial Strategies (RSS), planning authorities in the South East should work from the apportionment set out in the 'Proposed Changes' to the revision of Policy M3 in the SEP (March 2010). Notably, the minerals planning strategy

proposes to adopt locally derived annual supply figures lower than those set out in the 'Proposed Changes to Policy M3 of the South East plan' (SEP), figures which are apportioned between the South East Minerals Planning Authorities (MPAs). Government also advised that "planning authorities can choose to use alternative figures for their planning purposes if they have new or different information and a robust evidence base". OCC have sought to do this by undertaking an assessment of local aggregates supply requirements, resulting in the following figures for annual extraction:

Sand and gravel - 1.26 million tonnes per annum (as opposed to 2.10 mtpa in the 'Proposed Changes'); and
Crushed rock - 0.63 million tonnes per annum (as opposed to 0.66 mtpa in the 'Proposed Changes').

We question the methodology behind the new annual supply figures and do not believe they have been prepared using sufficiently "new or different information" and a "robust evidence base".

BCC understands that two methods have been taken into account when defining a methodology for OCC apportionment, this includes:

The 'Smoothing' of past sales as a predictor of future demand - seeks to apply a moving average over a certain period, which is the previous method used to establish the apportionments prior to the review of Policy M3; and

A Comparison of national and local per capita consumption of primary aggregates (a population proxy) - This method uses population as a proxy for total primary aggregate consumption, identifying an average consumption based on primary aggregate sales per head. An average of 5 years from this process is used and applied to Oxfordshire's forecast population figures for each year to 2030 resulting in average annual consumption of primary aggregates.

We consider that the two methods are not based on sufficiently "new or different information" and they are not robust for the following reasons:

The two methods rely on the application of past sales (the historical method) in applying assumptions of future aggregate demand rather than the current approach of estimating economic growth and proximate demand.

The apportionments only allow for supply to meet Oxfordshire's population requirement only, without contributing to growth needs beyond Oxfordshire in line with the region's national aggregate guideline figures.

The methods do not recognise that Oxfordshire is already a net importer of aggregates, and therefore their assumption of a net balance is inaccurate.

BCC understand that the apportionments have been calculated using an average of the two calculations. The justification for this was that the 'population proxy' method was considered as being the most robust and the figures were very close to the figures from the 'smoothing' of past sales. BCC do not consider this to be a sound justification for selecting alternative apportionments.

Overall, BCC do not consider that the locally-based apportionments have been devised on sufficiently new or different information or a robust evidence base for the reasons set out above and for this reason strongly object to this

	<p>methodology and policy.</p> <p>Policy M2 (Provision to be made for mineral working) is inflexible in that it does not allow for review and a subsequent update to the apportionment. BCC also note that the opportunity to review the provision has not been accommodated in the plan's Monitoring framework. BCC feel that flexibility to monitor the apportionment should be built into Policy M2 and monitoring framework.</p> <p>National Aggregate Guidelines</p> <p>BCC believe that the strategy for minerals provision is not robust in so far as it does not demonstrate how provision could be made to contribute towards the national aggregate guideline figure for the South East.</p> <p>The implications of the significantly lower apportionment and a divergence from the South East's national aggregate guidelines apportionment places Buckinghamshire at risk of either being apportioned a greater percentage of the South East's guideline figure, or greater pressures and ad-hoc demand for Buckinghamshire's sand and gravel resources. For this reason Buckinghamshire County Council strongly objects to the draft proposals.</p>
167 (PAGE)	<p>OCC has identified that the total annual supply of sand and gravel should be 1.26 million tonnes per year for the period to 2026. PAGE cautiously supports this as a maximum figure, supported by the work undertaken by Atkins.</p> <p>5. PAGE is encouraged that the targets will be reviewed and, if necessary, amended every five years.</p>
444 (Northants CC)	<p>The county council objects to the minerals apportionment for sand and gravel and crushed rock not being in line with that set out in the 'Proposed Changes' to the South East Regional Strategy, as required by the Secretary of State in his letter of 25 June 2010. MPAs could only use alternative figures if they had new or different information and a robust evidence base. It is not considered that the Atkins report is sufficiently robust to have led to the level of divergence from the Proposed Changes figures the draft Core strategy is proposing.</p>
261 (BaCHpoRT)	<p>BaCHPoRT welcomes OCC's challenge to the sand and gravel apportionment set for the county in the South East Plan, and the downward revision of the county's target annual production from 1.82 to 1.26 mpta.</p> <p>There is evidence from the construction industry that the consumption of sand and gravel per unit of construction has been declining over the past decade, and it is reasonable to expect that this decline will continue. This trend should be monitored, as even the figure of 1.26 mpta may prove to be an overestimate of future demand for sand and gravel in the county, so that to license production at this level could very well result in net exports of a significant proportion of sand and gravel extracted in Oxfordshire.</p> <p>It will be important to monitor both local production and local consumption to ensure that the county does not become a net exporter or importer of sand and gravel, in keeping with the stated objectives of achieving a supply of aggregates to</p>

	meet the development needs of Oxfordshire, and minimising the distances minerals are transported by road.
272 (Cemex UK Ltd)	<p>It is disappointing Oxfordshire has decided to abandon the national approach to the supply / distribution and management of minerals within the County. Oxfordshire's approach is not supported as it negatively impacts the national approach of MASS.</p> <p>Oxfordshire has not substantiated their role with other councils, adjoining or within the South East Awp area. Oxfordshire is a net importer of local and non locally derived material.</p> <p>All councils have the option to use alternative figures for their planning purposes if they have different or robust evidence.</p> <p>Oxfordshire instructed Atkins to analysis current aggregate supply and demand in Oxfordshire, appropriate, transparent and robust methodology that can produce forecast demand in Oxfordshire, an assessment if maximum contributions from secondary aggregate, aggregate movements and break down quantities and aggregate supply in Oxfordshire during the plan period to 2030.</p> <p>The conclusions within the Atkins report do not support the policies identified within the Core Strategy.</p> <p>Should the MPA have chosen one of the 4 methodologies it could have been argued the evidence was robust but the Atkins report does not include a figure for 1.26mtpa which Oxfordshire has put forward within Policy M2. Oxfordshire have merged two methodologies to assist their needs and a lower figure. There is no clear methodology or evidence to substantiate 1.26mtpa. Therefore it is concluded that Oxfordshire do not have a robust evidence base to deviate from the national approach.</p> <p>The Atkins report is based upon the 2005 AMR. The 2009 AMR report has been published since Atkins report was finalised and therefore their findings are not up to date or the best available evidence.</p> <p>The Atkins report primarily concentrates on the local consumption and production in Oxfordshire not the South East Awp therefore the context of Oxfordshire within national strategic position and distribution is lost.</p> <p>Oxfordshire's desire to move away from a national approach could be a catalyst for the collapse of Mass and structured apportionment and cross boundary movement of material.</p> <p>Should other councils be mindful to take a similar approach, Oxfordshire's vision of importing material could be unsound and alternatives would need to be investigated.</p> <p>Cemex does not support Oxfordshire's approach to aggregate apportionment and would prefer the continuation of a national approach possibly using the last 10y production levels as a means of calculating a County apportionment.</p> <p>The current 2009 AMR demonstrates Oxfordshire is a net importer of sand and gravel which does not complement the vision of reducing primary aggregate.</p> <p>With regard to Policy M2 - Cemex object to the policy as the figures are not substantiated by a robust evidence base.</p>

	<p>The Company promotes a minimum of 7year landbank of sand and gravel and 10y for hard rock through out the plan period.</p>
285	<p>Policy M2 is also accepted. However the following matters are not clear:</p> <p>a. How have the targets been used in the selection of the Preferred Strategy Areas, and what contribution is expected from each area in meeting the forecast demand?; and</p> <p>b. How will the targets be used in the assessment of an individual planning application in terms of the contribution it makes to the aggregate level of supply at any point in time?</p> <p>It is therefore not clear how the Preferred Strategy Areas identified in Policy M3 will be controlled to conform with the level of demand that is identified in Policy Min2 whilst balancing the supply of workings across the County. Unless these matters are clarified in the policy wording, Policy M2 is in danger of being ineffective.</p> <p>a. The relationship of the Supply and Demand in the draft Strategy needs to be clarified and made transparent, including setting limits to the scale of development that is expected from any identified preferred areas of search for new mineral workings;</p>
397 (Grundon)	<p>The Plan largely ignores the role the County is play in the supply of aggregates to the Region. The reason why the apportionment has been set is set out in the RSS and this contribution is set to continue when the RSS itself is cancelled. Oxfordshire is to supply an increased share to overcome resource and environmental constraints elsewhere much in the same way that the South West, East Midlands and North Wales contribute to other areas by the export of crushed rock. It seems that the County wants to enjoy the benefits of such imports without making its envisaged contribution to overall supply.</p> <p>Changes to the apportionment can be made provided that there is a robust evidence base to support such a change. We do not consider that such evidence has been provided. The figure used is not based on any number from the Atkins report but is the average between the two lowest and the higher numbers have been effectively ignored. Method 4 based on a per capita consumption is stated as being the most robust, but this figure has not been used and ignores the Regional role that the County is envisaged to play.</p> <p>The report acknowledges that outputs have been lowered by the closure of 3 large quarries and the recession has reduced more recent outputs. The industry has been trying to replace closed units and to maintain production elsewhere but has struggled to do so due to increasing resistance. The entrenchment of such a reduction, on political grounds, will exacerbate the level of imports placing a strain on ever more distant sources. The County has not addressed or discussed with neighbouring authorities how such a reduction in its apportionment would be accommodated.</p>

	<p>The Plan states that AM2005 showed a balance of supply it does however rely upon some crude assumptions regarding the destination of 'unknown' sales over 3 sub regions. It states that AM2001 showed a net export, however how this can be determined given data is only at a regional level. AM2009 was not used as it was not available but was immanent so the report is premature and it is the only one with County level data that shows the County is a net importer. So the Plan is flawed in not using up to date and relevant information upon which to base its assumptions.</p>
308 (Carter Jonas Ltd)	<p>Policy M2: The strategy seeks to provide consistency between national, regional and local policy and guidance and should therefore be deemed acceptable.</p>
492 (Hinton Waldrist Parish Council)	<p>What restrictions are placed on minerals operators to prevent or restrict the export of our valuable minerals outside the county? Any significant exporting of minerals would seriously distort the supply figures in Policy M2, Policy M2 should make it clear that there is no requirement to approve any mineral extractions over and above existing approvals for soft sand (there is 13.64 years already) and crushed rock (20 years already). We suggest the you delete the words "of at least" in the policy as this makes the policy difficult to enforce, ie does 'at least 7 years' permit applications for a supply of 8 years, 10 years, 20 years or forever? Policy M3 states that there are already permissions for soft sand extractions to meet demands until 2023. There seems to be no reason why new permissions should be approved now that potentially blight properties for a minimum of 12 years.</p>
374 (DKSymes)	<p>The commitment to maintain a land bank of at least 7 years for soft sand and sharp sand and gravel and 10 years for crushed rock is supported.</p> <p>However, to specify the rate of extraction within the policy is too prescriptive and should be removed. Its removal will not weaken the policy as the figures are referred to in the text.</p> <p>This approach would provide greater flexibility in terms of maintaining a steady supply as the demand for minerals fluctuates over the plan period.</p>
450	<p>The landbank should include land with planning permission AND land designated in the MWDF. The soft sand rate appears to be 25% of sharp sand and gravel rather than the 20% stated elsewhere. Paragraph 4.22 - the preference for extensions to existing quarries is supported.</p>

452	<p>The locally derived supply figures are welcome and supported. Whilst the requirement to maintain landbanks of 7 years may be justified, relating this to 'reserves with planning permission' will hand control to the minerals operators. It should relate, at least, to sites with planning permission and/or allocated in the MWDF.</p>
548 (SODC) and 567 (VoWHDC)	<p>The current approach in respect of planned provision for sand and gravel conflicts with national planning policy and the current adopted Development Plan. Whilst the South East Plan is unlikely to be in force by the time the examination on the core strategy is held, the evidence base (and advice in Steve Quartermain's letter dated 6 July 2010) both suggest a higher level of sand and gravel provision might be required. At examination, an Inspector is unlikely to find the strategy sound, unless the proposed figure of 1.26Mtpa can be shown to be based upon a "robust and credible evidence base". In order to demonstrate that this is the case, additional work seems to be required, particularly an updating of the Atkins report to take account of AM2009, and some further justification of how the selection of an apportionment made up of the average of options 2 and 4 is supported by the evidence base as a whole.</p> <p>National minerals planning policy contained in MPS states in paragraph 3.4 that 'if a MPA notifies the RPB that it is unable to identify sufficient resources to meet the apportioned supply over the plan period at acceptable environmental cost, the RPB should consider the consequences for supply and demand within the region taking advice from the RAWP, and consulting the Department if there are likely to be national implications. A shortfall in one part of a region should, where practicable, be made up for elsewhere in the same region.' Paragraph 3.5 continues 'The Secretary of State will, where appropriate, intervene in a RSS that does not take full account of the regional aggregates guidelines and of agreed sub-regional apportionments.' Therefore, should the strategy be found sound it would be likely to lead to a need to reconsider the apportionments in the proposed changes to policy M3 of the South East Plan and potentially for the resulting shortfall to be made up within other counties in the south east region, which may make this approach politically unpopular with neighbouring mineral planning authorities.</p> <p>In view of the potential impacts on other mineral planning authorities within the south east region it would be advisable to undertake more work now with these other</p>

authorities with a view to gaining their support for the strategy and to ensure cross boundary impacts are properly managed. Work to date in this area appears to have been fairly limited and this is an issue which could sensibly be addressed in more detail, in sufficient time to allow the consideration and assessment of any issues raised through the SA/SEA process.

MPS1 also states that mineral planning authorities should use the length of the landbank in its area as an indicator of when new permissions for aggregates extraction are likely to be needed. The landbank indicators are at least 7 years for sand and gravel and at least 10 years for crushed rock. If the landbank drops below these levels it 'indicates that additional reserves will need to be permitted if acceptable planning applications are submitted.'

If the strategy were to be found unsound, or were adopted with insufficient provision to maintain a 7 year sand and gravel landbank in the future, this will have implications for the district. It will potentially open up the possibility of the development of sites not currently within the proposed strategic areas for future minerals development in order to meet shortfalls in the 7 year landbank. For other sites to be developed, it will be necessary to demonstrate that no unacceptable impacts will result, however, the applicant will be starting from a position where the need for the development is accepted.

The issue of the locally derived apportionment, as assessed in the SA/SEA of policy M2, is arguably slightly more complex than expressed, in that the level of provision of land in the plan for future mineral extraction in line with a level of apportionment does not drive future demand or actual levels of mineral extraction. Furthermore, policy M2 (along with national mineral planning policy) also states at any particular time Oxfordshire will maintain a 7 year landbank of planning permissions for sand and gravel, and a 10 year landbank for crushed rock.

This is a significant point, because should the overall provision of land in Oxfordshire be insufficient to meet actual future levels of extraction and maintain 7 or 10 year landbanks, then towards the end of the plan period new, unallocated sites will need to be found to make up the shortfall. These sites may in fact have higher or different environmental or other impacts than sites which might be considered in advance and be included within this plan. Therefore the statement as currently expressed in the

	<p>SA/SEA that 'the [expected] adverse environmental and social effects of the proposed apportionment level might be less adverse than those experienced under the delivery of the current policy [in the South East Plan]' may not necessarily hold true. Serious further consideration needs to be given in relation to ensuring policies M2 (and M3) provide an adequate mechanism for maintaining supply in accordance with plan objective 'iii'. It is likely that further information will need to be provided at the examination in public to support the level of the locally determined apportionment, and ensure that any issues are considered in time to allow their evaluation through the SA/SEA process. A slightly fuller evaluation of the implications of proposed policy M2 within the SA/SEA would potentially assist with improving the robustness of the plan's evidence base.</p>
572 (CPRE Oxfordshire)	<p>Oxfordshire's requirement of aggregates</p> <p>3. CPRE places great importance on the matter of the rate of extraction of minerals. Over a long period there is little doubt that a substantial area of Oxfordshire will be damaged by quarrying and associated operations. At any one time a lower rate of extraction implies a smaller area being currently worked with consequentially smaller numbers of residents affected and hectares of landscape blighted. A lower rate of working may be assumed to allow for more attention to monitoring restoration operations than might otherwise be possible.</p> <p>4. In the past, discussion of future targets for supply of material has been clouded by uncertainty over whether the strategy is designed to meet the needs of the extraction industry, or the requirements of residents, or some more nebulous, intermediate position. National guidance in both MPS 1 and NPPF requires authorities to plan for a 'steady and adequate supply of land-won aggregates'. Both documents duck the issue of what is implied by the word 'adequate' by passing the buck, even in NPPF, to regional plans. But at MPA level it can mean anything from no net trade to requiring net exports or accepting the opposite.</p> <p>5. CPRE welcomes the important policy now proposed which includes the objective that aggregates supply should satisfy development needs (Summary, p.4, paragraph 6), and, in different words, at paragraph 2.1 and 3.5 i. We consider that this policy should be explicitly stated in M2.</p> <p>6. CPRE welcomes Policy M1 and stands ready to take a positive attitude to proposals in the field of minerals recycling.</p> <p>7. In what follows attention is centred on sand and gravel (S&G) since permissions for sources of crushed rock are less critical. The actual level of supply of newly-won S&G depends on market forces with an upper bound limited by licences. For some decades Oxfordshire has been a net exporter of sand and gravel but in the most recent years a net importer. In 2005 net exports re estimated to have been over 700,000 tonnes per year. whereas in 2009 net imports were 133,000t.</p>

8. The independent assessment of Atkins offers no explanation for the decline in sales from Oxfordshire. The principal uses of S&G lie in construction. For GB, construction output in real terms rose slightly from 1995 to 2009 while consumption of S&G (land-won plus marine) fell steadily. S&G requirement per unit of construction activity fell by an average of 3½% compound per year over this period. Data are not available to carry out the same calculation for Oxfordshire but for land-won S&G in SE England consumption per unit of construction activity fell on average 7% p.a. compound over a similar period. On the supply side, this change is due to increasing use of marine S&G and of recycled material. On the demand side, building design and methods have reduced the demand for concrete with greater penetration of steel framing in industrial and commercial buildings, and of timber framing in houses.

9. Future construction activity is likely to grow on average no more rapidly than GDP, so that if total output in Oxfordshire rises at the same rate as in Britain as a whole, building in Oxfordshire will only increase a little over 2% per year. Even if the reduction in land-won S&G requirement rises only one-third as rapidly in the future as over the past 15 years the absolute quantity demanded is unlikely to rise.

10. Atkins does not provide an estimate of county needs, but assumes that provision should be made for net exports to exceed county consumption by 9%. As noted, CPRE recognises the aim that meeting the county's development needs implies zero net export. It is estimated that apparent consumption by Oxfordshire's population has been running, pre-recession, at about 800,000t. This is less than two-one thirds of the figure of 1.26 Mt referred to in paragraph 4.10. A check on the plausibility of this figure is provided by Atkins' Table E. 6. All aggregates for England in 2009 equalled 2.05 t per head. With Oxfordshire's population of 640,000 a similar consumption per head implies a total for S&G and crushed rock of 1.312 Mt. Assuming that S&G accounts for 66% this means a figure of 870,000t, or 30% less than the 1.26 Mt proposed.

11. In relation to monitoring, the statement at para. 6.18, including reference to monitoring changes in patterns of supply and forecasting future demand, is most welcome.

Sources of supply

Imports

12. The strategy makes clear the desirability of maintaining rail depots (p.5,14), encouragement of movement of aggregates by rail (p.20, vi) and of further rail depots for aggregates (policy M 4). CPRE welcomes these proposals and suggests that an outstanding matter requires attention This is the potential for transport of material, such as china clay sand from Cornwall, by rail.. Since the quantities required in Oxfordshire of such material are relatively small for a rail contractor, inter-county collaboration is called for as suggested in NPPF paragraph 109 and as noted in the draft strategy at para.2.20.

13. CPRE recognises that a lower target figure for newly-won S&G may imply a reduced ability to meet the target for recycled material.

	<p>14. The development in 3.5 of 'Vision and Objectives' could be made clearer. Sub-para v refers to two issues, one the addition to greenhouse gas emissions, the other the risk from increased rainfall. The first is adequately covered in vi. It would be preferable to re-word v on the lines of 'Minimise the disturbance of quarrying operations on communities and keep to a minimum the impact on areas vulnerable to flooding'.</p> <p>15. On the question of extensions to existing quarries and the location of new sites, we support the proposed limitation of activity in quarrying sharp sand and gravel in west Oxfordshire (paras. 4.18, 4.19, policy M3) Although the promise means well it is of little significance to any particular resident or village community. The anxieties of home owners will hardly be assuaged by the statement. This is because neither extensions nor new sites are identified. CPRE strongly favours the policy set out in M3 concerning soft sand and crushed rock which makes it clear that new quarries will only be permitted if sufficient provision cannot be made through extensions. The environmental and especially the landscape consequences of extensions should be managed and it is suggested that this point might be added at the end of the paragraph beginning 'Preference will be given ..' in 4.28, top of p.28.</p> <p>16. The location of new quarries is the most divisive, yet inescapable, aspect of the policy. CPRE considers that Figure 7 contributes unnecessarily to this worry. The statement of M3 is clear, necessary and adequate. In respect of soft sand we suggest rewording the 2nd bullet point to read 'to the west of Abingdon subject to minimising encroachment on the Corallian ridge'.</p> <p>17. The supporting papers 'Preliminary site assessment - sharp sand and gravel, and soft sand - set out in tables how sites perform against specified criteria. It is appreciated that these do not, except in a few cases, provide final judgements on the acceptability of specific sites. However, some of the data summarised are liable to mislead. We note with interest that for sites SG 9, SG 20a, SG 62 and SS 05 archaeological concerns appear not to be decisive in rejecting them as possible sites. On the other hand, SG13, where the site nominator notes the existence of archaeology to the south, the site is marked down on both archaeological and general planning grounds. It seems that there are degrees of redness in the traffic lights. It is considered that, despite the amount of information provided, summarisation or even omission of important factors may mislead.</p>
597 (Nuneham Courtenay PC)	<p>The Council welcomes the proposed adoption of the lower levels of extraction for sand and gravel as identified in the last stage of consultation. However there is no indication of any intention to review the levels during the plan period (other than maintaining 7 years worth of stock-piling). The adoption of the Minerals Plan may well open up a number of simultaneous applications for extraction from specific areas. Consideration should be given to an incremental approach to granting permission to avoid creating consents to extract which may not be required if the use of sand and gravel is less than the levels predicted. This may safeguard against a whole area being blighted by a number of simultaneous applications to extract.</p>

<p>638 (Surrey County Council)</p>	<p>Policy M2 seeks to maintain a landbank of at least 7 years for sand and gravel and 10 years for crushed rock based on the extraction of 1.26 mtpa of sand and gravel and 0.63 mtpa of crushed rock. This represents a 40% reduction for sand and gravel extraction and a 4.5% reduction for crushed rock compared to the sub-regional apportionment included in the Secretary of State's Proposed Changes to RSS Policy M3 published in March 2010.</p> <p>In contrast, the SMP makes provision for 1.4 mtpa of sand & gravel extraction through the plan period, 10% above Surrey's sub-regional apportionment contained in the SoS's Proposed Changes to RSS Policy M3 in order to provide a degree of flexibility. The emerging Minerals Planning Frameworks in Kent and Buckinghamshire also seek to meet their sub-regional apportionments contained in the Proposed Changes to Policy M3. While Hampshire are proposing to extract 17% less land-won aggregate compared to their sub-regional apportionment figure, their proposed degree of undershooting, whilst concerning, is less than half that proposed in Oxfordshire, and their ability to import directly significant quantities of marine sand and gravel leaves them better placed to make up for any local and regional shortfall in supply.</p> <p>It is acknowledged that the Government has given planning authorities in the South East the choice of using alternative figures for their planning purposes to those contained in the Proposed Changes to RSS Policy M3 if they have new or different information and a robust evidence base. In response, Oxfordshire propose to use a locally derived annual supply figure based on consultancy work from Atkins commissioned by the County Council. While this approach is therefore acceptable in principle, the proposed outcome gives cause for considerable concern on account of (i) the justification for the proposed provision for 1.26 mtpa of sand and gravel; and (ii) the extent of the shortfall from the apportionment figure in the proposed revision to RSS Policy M3.</p> <p>(i) The Atkins report has a fundamentally inconsistent basis in that, while accepting that "the less urbanised MPAs that have primary aggregate resources are net contributors to the overall primary aggregate supply" (para 6.3), the whole thrust of the report is focused on balancing demand and supply within Oxfordshire with parity of imports and exports ("assuming a parity balance of trade" - para 6.9). There does not appear to be a clear recommendation from the Atkins report as inferred in the report to Cabinet and the subsequent consultation material.</p> <p>Oxfordshire's 1.26 mtpa figure is 50% based on past sales. The situation in Surrey illustrates a major flaw in this approach. Table 5.1 of the Atkins report shows Surrey as the biggest sand and gravel producing county in the South East for 2002-08, providing 21% of the region's sales, equivalent to provision of 2.33 mtpa (based on 21% of the regional total of 11.12 mtpa). However, Surrey now has an adopted Minerals Plan providing 1.4 mtpa of sand and</p>
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gravel to 2026, equivalent to just 13% of that regional total. The Planning Inspector stated that "unlike some other counties with substantial unconstrained mineral resources, Surrey is not in the position where there are sites being held in reserve.

Therefore, the distribution of sand and gravel sales in the South East is likely to change if provision is made for an adequate and steady supply as required by policy. It will not stay fossilised as set out in para 5.4. As Surrey's proportion of the South East total is likely to continue to decrease as diminishing reserves are worked out, particularly of sharp sand and gravel, other counties' contribution will rise, particularly for those with significant unconstrained resources, such as Oxfordshire, unless limited without due justification. As the second paragraph of your executive summary for the Minerals Plan consultation 2011 starts: "Oxfordshire has extensive sand and gravel resources ..."

One clear recommendation in the Atkins report (6.13) is the need for a "contingency" in any local assessment, particularly important when relying on figures returned during the recent recession and slow recovery. While the median figure of 1.17 mtpa has a 10% buffer added, there does not seem to be any similar contingency added to the 1.23 mtpa figure based on per capita consumption. The Surrey Minerals Plan provided for 10% provision over the revised Policy M3 apportionment to meet the soundness requirement for flexibility.

(ii) The 1.26 mtpa figure proposed for sand and gravel is 40% below the revised Policy M3 figure of 2.1 mtpa for Oxfordshire that guidance from CLG advises planning authorities to work to unless they have new or different information and a robust evidence base. While modest variations from the Policy M3 figures might be accommodated fairly readily, such a large shortfall is likely to have significant impacts on other counties in the South East. It is acknowledged that, given Surrey's constrained situation and the non-adjointing geographical relationship of our counties, there may be only a relatively minor knock-on effect on Surrey keeping sales up and potentially bringing sites forward more quickly than had been anticipated. However, Oxfordshire's approach seems to run contrary to the spirit of the proposed duty to co-operate by diverging so markedly from the apportionment advised by the South East England Aggregate Working Party.

Therefore, unless a more balanced reflection of para 15 of the guidance issued on 6 July 2010 is forthcoming at the proposed submission stage, ie making greater provision for sand and gravel, it is likely that Surrey County Council will formally object to your Minerals Plan.

668 (Hills Quarry Products)	<p>13. National arrangements for sand and gravel production proposed that Oxfordshire should provide for the supply of 2.1 million tonnes per year. The strategy now proposes to drop this and use its own figure which was hastily produced by consultants. The way it has been produced has been so heavily criticised by the mineral industry that Oxfordshire may not be able to establish that the new figure has been chosen in line with a sound evidence base. The figure may not be capable of justification at the public examination.</p> <p>14. HQPL commented on the consultant's approach in March 2011 and stated; "there is concern that if the County's mineral needs are based on incorrect and out of date figures without a proper understanding of the true consumption of aggregates in the County the results will merely back up the County's perception that 2.1 million tonnes per annum is too high and will simply perpetuate importation from a distance and the increase in carbon footprint which inevitably results". A copy of the full comment is attached as it remains applicable.</p> <p>15. If the County's Minerals Plan is based upon a flawed premise that fewer mineral are needed than is actually the case then there will be a foregone conclusion that there is a reducing need for more local quarries. This will result in an escalation in the importation of stone from further afield (the Mendip Hills in Somerset or Leicestershire) which will fly in the face of National Objectives in Mineral Policy Statement 1 ("MPS1") to reduce carbon footprint. MPS1's national policies, the strategy's vision and objectives all seek to minimise transportation but, unless planning policy supports the provision of adequate supplies of minerals from local quarries (and it is not considered that 1.26 mt of sand and gravel is an adequate provision to make), the Minerals Plan, in the context of national policy, will be neither robust nor sound.</p> <p>16. HQPL is a member of the Minerals Products Association which has commented at length on the flawed concepts of the Atkins report. Those comments refer to the reduced provision for local aggregates which will result in greater reliance on imported minerals mostly by road. Reliance upon a hastily prepared, falsely interpreted, incomplete report will produce a flawed strategy which will not stand the test of an examination in public. HQPL firmly supports the deep concern of the Minerals Product Association in every aspect of their comments in this regard.</p>
691 (Lafarge Aggregates)	<p>2.4.2 Lafarge Aggregates consider that the figures for annual mineral extraction set out in Policy M2 of the Draft Minerals Strategy are too low and are based on an inconsistent evidence base. The figures are essentially derived from four separate methodologies, which were set out in the Atkins Report to Oxfordshire County Council in January 2011.¹ The methodologies used and the respective annual extraction figures derived for sand and gravel are compiled and summarised in Table 2.1 below.</p> <p>2.4.3 The combined total of 1.26 mtpa of sand and gravel set out in Policy M2 of the Draft Minerals Strategy appears to be based on a median between the two lowest figures set out in Table 2.1. It does not appear to be based on any</p>

rationale that would suggest this is more robust.

2.4.4 For the reasons we summarise below, there are flaws in both of the methodologies adopted. The moving average is too short and masks structural issues that have contributed to the decline in recent production in Oxfordshire.

Similarly population and per capita aggregate consumption

masks real trends in construction and materials locally and does not adequately reflect the local characteristics of the County. The fact that Oxfordshire is now a net importer is also relevant.

2.4.5 This figure is also significantly lower than the 1.82 mtpa of sand and gravel that was set for Oxfordshire in the South East Plan for the period to 2016, the rationale for which was clearly based upon a robust evidence base accepted by the authorities and the region.

2.4.6 Whilst we recognise that the Secretary of State announced the revocation of the Regional Strategies, the letter from the Chief Planning Officer in July 2010 clearly stated that the sub-regional apportionment set out in the Proposed Changes to Policy M3 of the Regional Spatial Strategy (March 2010) should form the basis of provisions for minerals extraction, unless planning authorities have new or different information and a robust evidence base.

2.4.7 It is our contention that the methodology and evidence base used to derive the provision for minerals extraction in Policy M2 is not sufficiently robust and does not warrant a diversion from the RSS evidence base.

2.4.8 There are a number of factors relevant to this that have influenced production within Oxfordshire in the past and that are also relevant to future requirements.

2.4.9 It is submitted that the proposed annual extraction rates need to take into account the relatively low level of reserves permitted within the County. In this regard, we are aware that following a meeting of the South East England Regional Aggregates Working Party on 4 October 2011, Oxfordshire County Council have corrected their figures for the quantum of sand and

gravel reserves that were set out in the South East Aggregates Monitoring Report (February 2011). Table 1 of the Monitoring Report recorded that there was 7,928,000 tonnes of sharp sand and gravel reserves in Oxfordshire at the end of 2009. However, the correct figure is understood to be 4,828,000

tonnes. Similarly, this means that the total figure recorded for all sand and gravel reserves (9,055,000 tonnes) was also incorrect, with the correct figure now understood to be 5,955,000 tonnes. This is well below the 7-year landbank level, even allowing for the Council's proposed apportionment figure of 1.26 mtpa.

2.4.10 This highlights the reduction in reserves over a period in Oxfordshire that we consider has contributed to the reduced level of production within the County and hence, this to some extent becoming a self-fulfilling prophecy. As production reduces the requirement to identify sites, if solely based on the average of recent production also reduces so fewer sites are identified.

2.4.11 AM2009 confirms that Oxfordshire is now a net importer of all primary aggregates, it cannot now cater for its own needs.

2.4.12 Having regard to our previously stated concerns regarding Policy M1, this is of particular concern. It goes against the principles of national planning policy (and those aims set out in the Plan itself) to import aggregates longer distances than are necessary. Each authority should, wherever possible, seek to meet demand from indigenous sources.

2.4.13 At 0.9 mtpa, secondary and recycled aggregates would represent 32% of the overall indigenous supply. Failure to meet this provision will lead to a further continued shortfall in aggregate supplies within the County over the plan period.

2.4.14 It was acknowledged in the Atkins study that secondary and recycled materials cannot substitute for quality sand and gravel in any event and a large proportion of this, due to its nature, is used in low grade fill type uses; hence it cannot be assumed to replace losses in sand and gravel capacity.

2.4.15 This would undermine the need of each County to provide a steady and adequate supply of aggregates.

2.4.16 Each authority must make a contribution to supply that reflects the minerals in its area. In doing so, authorities should not rely unduly on imports from neighbouring authorities, as this is not sustainable and increases the impact of transport in environmental and carbon terms (something the strategy actually seeks to reduce in line with national policy).

2.4.17 With reference to the bordering Counties, we are concerned that a lack of consultation has taken place between Oxfordshire County Council and neighbouring authorities in formulating the Minerals Planning Strategy Consultation Draft.

2.4.18 The Atkins Report from January 2011 acknowledges that the recent trends of reduced sale of aggregates are unlikely to continue (paragraphs 5.25 and 6.10). It is important to recognise that there is a strong relationship between housing growth and the need for sand and gravel.

2.4.19 As such, there is a need to ensure that supply is not constrained by being based on inadequate, local annual production figures that reflect a recessionary period rather than forecast building and construction. A period of 7 years is simply too short to be representative of full economic cycles.

2.4.20 We therefore support the position of the Mineral Products Association, if the apportionment figure for the South East is not to be adopted, which submitted in writing to Oxfordshire County Council on 31 March 2011 that a more reliable and robust methodology could be provided on the basis of 12 years past sales data (with the highest and lowest values removed to reduce distortion). This would provide a figure of 1.49 mtpa of sand and gravel and is based on a sufficiently long series of data and covers periods of different economic conditions. This is considered the minimum necessary in order to maintain a steady and adequate supply based on recent trends.

699 (MPA) and 710 (OMPG)	<p>Paras 4.9 - 4.15 and Policy M2: Provision to be made for mineral working</p> <p>The MPA objects to this policy. Overall the MPA is very concerned about the unilateral approach taken by the County Council planning for a significant reduction in the provision for primary aggregates compared to its apportionment set out in the South East Plan which still forms part of the development plan. This will result in a serious risk of under-provision on a wider regional basis and threatens delivery of the Managed Aggregates Supply System.</p> <p>The sub-regional apportionment in the Proposed Changes to SE Plan Policy M3 is based on the methodology that gave most weight to construction demand and location of resources. Oxfordshire County Council agreed with this approach at the Examination in Public (para 3.7 of the Panel's Report, November 2009), albeit conditional upon a lower regional total apportionment being adopted resulting in an apportionment of sand and gravel for Oxfordshire of 1.58mtpa.</p> <p>The recently issued National and Local Guidelines for Aggregates Provision in England 2005-2020 contain the higher apportionment figure for Oxfordshire as contained the Proposed Changes to Policy M3 of the South East Plan.</p> <p>The Guidelines confirm the instruction from the DCLG Chief Planner (July 2010) that mineral planning authorities can choose to use alternative figures for their planning purposes if they have new or different information and a robust evidence base. We acknowledge that sales of primary aggregates have declined in recent years and the apportionment appears to be excessively high, and understand why the various alternative methodologies were investigated. However, we do not believe that the selection of the alternative provision figure of 1.26 mtpa of sand and gravel is based on a robust approach.</p> <p>The County Council's Cabinet resolved (16 February 2011) to adopt an average of the two lowest figures emerging from the Atkins report with officer advice that these were considered by Atkins to be the most robust. The Atkins report (paras 5.27 and 5.36) actually only refers to Methodology 4 (based on per capita consumption of primary aggregates) as being viewed by the consultants as a more robust methodology for forecasting future aggregate supply requirements than Methodology 3 (planned new build housing as a proxy for future aggregates consumption) and does not state that methodologies 2 and 4, and selecting a figure between these, is a robust approach to provision. The selective quotation of the report may have resulted in the report's conclusions being falsely interpreted.</p> <p>Our overall comments on the level of provision proposed are set out below:</p> <ul style="list-style-type: none"> - The proposal to dramatically reduce the planned provision is politically motivated rather than based on objective and technical analysis. It appears that the conclusions of the Atkins study have been selectively quoted and mis-interpreted. - The selection of an average of the 2 lowest figures does not represent a robust approach or evidence base to justify deviation from the provision expected of Oxfordshire in the Proposed Changes to Policy M3 of the South East Plan and the National and Local Guidelines. - Reduced provision for primary aggregate production undermines the forward-looking approach taken in South East Plan policy M3 and the Managed Aggregates Supply System, and is likely to increase Oxfordshire's reliance on imports
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	<p>particularly given that the proposed planned provision also relies on massively increased supply of secondary and recycled aggregates which the County Council's own evidence suggests is unlikely to be deliverable</p> <ul style="list-style-type: none"> - The Atkins report contains assumptions which lead to outputs that may not be robust and need to be revisited, particularly now that AM2009 has been published. AM2009 confirms that Oxfordshire is a net importer of primary aggregates, which is contrary to the assumption of 'parity' in the Atkins assessment, and may affect the results, particularly of methodology 3 and 4 - Given that Oxfordshire is a net importer and the potential implications of reducing indigenous provision to the extent proposed, the County Council must demonstrate that it has consulted adjoining and 'supplier' Mineral Planning Authority areas over the implications of its proposals and the ability to maintain an adequate and steady supply of materials required - We accept that the RSS apportionment may be seen as unreasonable and undeliverable given current and more recent sales, and there may be merit in considering an alternative figure. However, we believe that this should be based on a long time-series of past sales data to account for recent economic conditions and reflecting the long-term horizon of the Plan - We recommend that a longer (at least 10-year) series of data is used as a more robust basis for assessing future provision, and that account is taken of inter-authority supply patterns. Use of the median or mean (with buffer) would be relatively simple and transparent, reflect the presence and availability of resource, market conditions, and mix of supply. We are aware that other Mineral Planning Authorities, including in the South East, are considering using this approach in setting figures for planned provision. Applied to Oxfordshire's sales this would result in an alternative provision of around 1.50 mtpa. This figure itself is similar to the output from Atkins' Methodologies 1 and 3 (and possibly Methodology 4 if account were taken of imports), and the apportionment previously proposed by the Regional Assembly in its review of Policy M3 of the South East Plan that was accepted by the Council. <p>Notwithstanding concerns over the quantum of the provision, we recommend that Policy M2 makes it clear that sufficient permissions will be granted to maintain landbanks of at least 7 and 10 years throughout the plan period.</p>
727 (Smiths Bletchington)	<p>The Draft Minerals Plan describes significant growth in population, housing and infrastructure in the county over the next 20 years and recognises the need to make adequate and steady provision for the construction materials necessary to support this growth. This approach is welcomed and supported. However the parochial approach to this provision based upon the "Local Assessment of Aggregates Supply Requirements" (January 2011) carried out on behalf of the County Council by Atkins is not supported.</p> <p>3.2 The Atkins study was premature as it reported (January 2011) before the publication of the AM2009 figures (July 2011). In view of the overall length of time involved in the preparation of the MWLDF a delay of a few months in the work commissioned from Atkins might have provided "new or different information" and the "robust evidence base" for</p>

the local assessment as perhaps envisaged by the Chief Planner in July 2010. The advice is repeated in the National and local guidelines for aggregates provision in England 2005 to 2020 but in the absence of up to date figures we do not believe the report has the credibility demanded.

3.3 Of the 4 methods considered by Atkins in predicting future aggregates demand in Oxfordshire the most robust approach was considered by them to be population proxy method (Method 4). Although Atkins indicated that Oxfordshire has over time changed from being a net exporter of aggregates to a net importer Method 4 assumed that imports and exports would be in balance. There has over recent years been a significant reduction in productive capacity of sand and gravel in the County with the closure of major processing plants. The reduction in local supply does not however reduce the local demand for construction aggregates and the materials are simply sourced from further afield. The AM2009 figures confirm that the County is now a net importer which arguably questions the assumptions and robustness of the Atkins approach.

3.4 The actual provision figure of 1.26 Mtonnes is one adopted by Cabinet in February 2011 and is a mean of the two lowest figures arrived at by Atkins (Methods 2 and 4). It is not a figure reported by Atkins but one determined by the Minerals and Waste Plan Working Group in January 2011. We do not believe that this is a robust approach.

3.5 The figure of 1.26 Mtonnes for sand and gravel falls way below previous levels of provision of 1.82 Mtonnes in the Regional Spatial Strategy (RSS) for the South East and the Secretary of State's proposed changes of 2.1 Mtonnes. This disregards the reasoning behind the increased level of provision which viewed the "common" and "extensive sand and gravel resources" in Oxfordshire as a source of supply to the wider region. Arguably, this is an inconsistent approach if the County continues to import Type 1 limestone from those counties with suitable geology.

3.6 The Draft Plan (2.20) acknowledges that the strategy should take in to account the existing and emerging plans of neighbouring counties. Yet the adoption by Oxfordshire of the reduced level of provision for sand and gravel appears to have been taken without regard to the knock on affect this reduction may have in the south east and further afield. It does not address the shortfall between the RSS figure and the adopted provision and how this will be met by other counties.

3.7 The draft Minerals Plan has cherry picked the RSS by maintaining the level of provision for secondary and recycled aggregates (at the original figure of 0.9 Mtonnes per year) whilst substantially reducing the level of land won sand and gravel. Atkins concludes that there is already adequate capacity for the anticipated level of future arisings and predicts that production will rise slightly before levelling off post 2015. They also identify that the level of use of recycled and secondary materials is at about 27%, consistent with the rest of the south east. The report does not identify a need to double recycled aggregates production capacity in the County.

3.8 Although the RSS figure of 0.9 Mtonnes remains a commendable target it is not a substitute for an adequate level of provision of sand and gravel.

	<p>3.9 We believe that the level of provision of sand and gravel should be reviewed. It should be reviewed using the methodology recommended by the Mineral Products Association to DCLG based upon a longer data set of at least 10 years.</p> <p>3.10 We welcome and support the identification of the separate landbanks for sharp sand and gravel and for soft sand. We also support the single landbank for crushed rock covering both limestone and ironstone. However we would also welcome a clear statement in Policy M2 that the landbanks of reserves with planning permission will be maintained throughout the Plan period.</p>
418 (Hanson Aggregates)	<p>Hanson shares the concerns expressed by the Mineral Products Association (MPA) in relation to the Council's 'inward looking' approach to the provision for primary aggregates compared to its apportionment set out in the South East Plan. Whilst it is acknowledged that sales of primary aggregates have declined generally in recent years, it is important to note that within Oxfordshire this is partly a function of the fact that the mineral industry has struggled to secure timely permissions for new and replacement reserves leading to an increased reliance upon importation by road from surrounding counties and by rail from further afield. To a substantial extent this therefore masks the underlying demand for primary aggregates within Oxfordshire and has brought about a reversal in Oxfordshire - changing from a net exporter to a net importer.</p> <p>The Council's intention to adopt substantially reduced rates of extraction as set out in draft Policy M2, will further increase Oxfordshire's reliance on imports, particularly given that the proposed planned provision also relies on massively increased supply of secondary and recycled aggregates which evidence suggests is unlikely to be deliverable. This approach will lead to greater reliance on road haulage from further afield which is not consistent with the principles of sustainable development and is contrary many of visions and objectives that supposedly underpin the Minerals Planning Strategy.</p> <p>As a net importer, the Council has a duty to liaise with adjoining authorities to ensure that the principle of maintaining a steady and adequate supply of mineral on a wider basis can be maintained. The Council has not demonstrated that the needs and capabilities of these surrounding areas have been properly assessed, leading to the conclusion that Oxfordshire is inward looking in its approach to apportionment.</p> <p>The Council's alternative provision figure of 1.26 mtpa of sand and gravel is not based on a robust approach; being simply the average of the two lowest figures emerging from the Atkins report. Moreover, the Atkins report contains assumptions which lead to conclusions that may not be robust and need to be revisited, particularly now that AM2009 has been published (which was not available when the report was being compiled). AM2009 confirms that Oxfordshire is a net importer of primary aggregates, which is contrary to the assumption of 'parity' in the Atkins assessment.</p>

840 (Gloucestershire County Council)	<p>Gloucestershire has concerns regarding the use of alternative aggregate apportionment figures which are lower than those contained within the South East plan and the national and regional guidelines, particularly in relation to Sand and Gravel. Sand and gravel reserves and resources in Gloucestershire are located very close to the border with Oxfordshire and are potentially very sensitive to exportation if insufficient provision is made in those areas. In the event of shortfalls in supplies of indigenous resources in Oxfordshire the sand and gravel pits in the Gloucestershire will undoubtedly be called upon to supply aggregates to the Oxfordshire because of their close proximity. Gloucestershire is currently an area experiencing a shortfall in meeting the sub-regional apportionment figures and pressure to supply neighbouring areas could exacerbate the situation. It is felt that transporting potentially large quantities of aggregates particularly by road into Oxfordshire is not a sustainable strategy for meeting need.</p>
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