

<b>M3: General comments on minerals strategy</b>	
ID No	Comment
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>
168 (PAGE)	<p>Policy M3: Strategy for the location of mineral working</p> <p>6. The identification of the new area of working at Cholsey is broadly supported as the southern site to replace Sutton Courtenay when supplies expire around 2020. Cholsey is closest to the demand nodes and has limited risk of flooding. Continued extraction is supported at the existing areas of working (the Lower Windrush Valley, Eynsham/Cassington/Yarnton, Sutton Courtenay, and Caversham). These sites can provide sufficient resources to meet the above supply requirements and are well located to the principal centres of demand - i.e. where significant housing development is proposed - at Oxford, Witney, Didcot and Wantage &amp; Grove. In addition they are well located to the strategic transport network to access centres of demand in the north of the County at Banbury and Bicester.</p> <p>7. Notwithstanding this broad support, the policy as drafted is objected to: the wording should be amended so as not to necessarily restrict working at the reserves at the Lower Windrush Valley, and at Eynsham/Cassington/Yarnton. Similarly, an objection is made to the supporting text at paragraphs 4.18 and 4.19 where it is stated that one of the 'principles' which has informed the selection of the preferred strategy is that the rate and intensity of mineral workings at west Oxfordshire should not be increased.</p> <p>These are arbitrary restrictions on production in these locations, which have no basis in evidence. The policy rightly states that new production in these areas could be achieved through extensions to existing quarries, as this reflects point 6 of paragraph 15 of Minerals Planning Statement 1 (MPS1). Moreover, there are obviously economic reserves in these areas and the effect of the policy would be to sterilise these (which is clearly contrary to national policy on minerals). This is strongly objected to.</p>

8. Paragraph 4.18 of the draft Core Strategy explains that the cap is proposed due to concerns regarding generation of traffic, impacts on local rivers and groundwater flows, and the impact on local communities; however these concerns apply equally to all the potential mineral extraction sites being considered and are therefore not sufficient justification, in themselves, to warrant the cap. Further, the policy requires rates of extraction to not exceed past levels, which have been low in recent years and represent only a fraction of the reserves available (see above). Applying this artificial cap to sites at west Oxfordshire means that the draft Core Strategy does not offer flexibility: if for any reason sites are not delivering as planned then the document needs to contain the flexibility of approach to increase the rate of supply at existing workings rather than to open new sites. As proposed, the strategy is therefore considered to fail the tests of soundness.

9. Support is expressed for the exclusion of sites at Benson, Drayton St Leonard, Shillingford and Stadhampton (sites SG-03, SG-09, SG-13 and SG-59 respectively) from the preferred strategy. These, along with all the other sites considered, have been assessed through the Council's 'Preliminary Assessment of Minerals Site Nominations' and comments on this are made as follows:

- o SG-03: support is given for the classification of this site as "red" (whereby the site is precluded from further assessment) on the grounds that it is almost entirely within flood zone 3b, is high quality agricultural land and is adjacent to the Area of Outstanding Natural Beauty (AONB).
- o SG-09: under the issue of archaeology, the assessment concludes that the site "should not, on archaeological grounds, be considered for mineral extraction". However, the overall planning assessment is "amber" (i.e. that it can be considered) - no reasoning is given for this overall assessment which is contradictory and is objected to.
- o SG-13: support is given for the overall classification of this site as "red" (to be precluded from further assessment).
- o SG-59: object - this site should also be "red" as a) its delivery appears to depend on site SG-09 (which should be "red" in any event) and b) over 50% of it lies within Flood Zone B - we contend that the latter point renders it unsuitable for further consideration.

10. All four of the above sites should therefore be precluded from further assessment and discounted as future sites for mineral extraction (including safeguarding, see below). The reasons that these sites should be excluded all relate to their impact on finite resources (e.g. soil quality (agricultural value), features of archaeological interest, flood zones) - the protection of these resources must be considered paramount when balanced against other objectives such as traffic impacts and local communities which, although important, are only temporary in nature (as the impact only takes

	<p>effect for the duration of time that the minerals are worked). In addition, the above sites are not as well located in relation to the future centres of demand previously referred to (Oxford, Witney, Didcot, and Wantage &amp; Grove) or as easily accessible to those centres in the north of the County (Banbury and Bicester).</p> <p>11. Finally, an objection is made to the exclusion of Sutton/Stanton Harcourt as a potential new site as it has a capacity of 14mt. No reason is provided for its exclusion.</p>
<p>216 (Radley Parish Council)</p>	<p>Oxfordshire County Council is currently seeking comments from parishes and other groups its draft plan for minerals to 2030.</p> <p>Radley Parish Council responded to the Minerals and Waste Framework (Spatial Strategy) consultation in August 2010 expressing its deep concern about the ongoing consultation on the Minerals and Waste Development Framework (Spatial Strategy) and its grouping of Radley and Nuneham Courtenay into an area of existing sand and gravel extraction. The Cabinet subsequently accepted the recommendation that the Radley/Nuneham Courtenay area should be discounted because neither of the sites within it is likely to be deliverable.</p> <p>No significant amounts of sand/gravel have been extracted in Radley for at least 20 years, and none at all since 2004. Indeed, the operators of the main quarry in Radley, Tuckwells, have claimed, in their recent CLEUD application, that they have extracted no gravel from their Thrupp Lane quarry since 1995. Whether or not this is entirely true, the fact is that the Radley area hardly meets the criteria of being one of current active minerals extraction.</p> <p>Radley has an active ROMP application site in the SW of the parish. If this proceeds, the local infrastructure would not cope well with extraction occurring simultaneously elsewhere in the parish. This ROMP site does not feature in any of the proposals under the strategy.</p> <p>Radley and Nuneham Courtenay are areas of existing extraction only in terms of the existence of previous workings and general proximity thereto. They are not areas that have existing active workings and have a significant infrastructure to exploit. Old infrastructure from previous workings may no longer be suitable or adequate, and much of it may have been subsumed into other uses.</p> <p>We should point out that Radley is still suffering under the legacy, dating back nearly 70 years, of previous gravel extraction and the consequences of inadequate planning control applied to it, which has led to:</p> <ul style="list-style-type: none"> <li>- The destruction of around 2 sq.km of agricultural land (about 15% of the parish.)</li> <li>- Uncontrolled and largely unmonitored industrial development and activity squatting on Oxford Green Belt land under the terms of old minerals permissions granted in the 1940s.</li> <li>- The "inadvertent" granting of a permanent planning permission for what should have been temporary plant.</li> <li>- Three CLEUD applications (of which, so far, one has been successful and one rejected. The outstanding CLEUD is a reapplication and is still under consideration.)</li> <li>- An active ROMP application in the SW corner of the parish, which seems likely to prolong this general state of affairs.</li> </ul>

	<ul style="list-style-type: none"> <li>- Outstanding restoration issues following the extensive infilling of gravel pits with fuel ash.</li> <li>- The disappearance of topsoil set aside for restoration from a large area of the S Radley site.</li> <li>- The creation of an environment where there is a general prevalence of or tendency towards lawlessness.</li> </ul> <p>Radley Parish Council proposes that, at least until all of these matters are satisfactorily resolved or concluded, there should be no prospect of any new mineral working in Radley.</p> <p>A minerals strategy needs to be sustainable, and that means not just for the next 15 years. Minerals are a finite resource and are becoming more difficult to access without damaging people's lives, the environment or both. The days when mining companies could descend upon a community and ravage the countryside around it with impunity ought to be long gone. If there were proper redress, people might welcome it, but all they get is noise, dust, traffic, damaged roads and buildings, destroyed countryside, and the possibility of worse to come in the form of landfill with waste. Only if they are very very lucky might they end up with a nice lake or two for people and wildlife to enjoy!</p>
262 (BaCHPoRT)	<p>BaCHPoRT welcomes the consultation draft's emphasis on keeping the distances that minerals need to be transported as short as possible. BaCHPoRT is particularly concerned that the dearth of Thames crossings suitable for heavy lorry traffic should be acknowledged a significant constraint on development (see comment on Policy C7: Transport, below). Any new minerals workings should be located on the same side of the River Thames as the location(s) of the end use of their production, or within easy reach of a viable river crossing.</p>
273 (Cemex UK)	<p>It is considered the current areas identified for future sand and gravel is restrictive. The current areas should be promoted in addition to all river deposits around Faringdon and Wantage. The policy doesn't exclude alternative areas but does not address the matter either?</p> <p>Although it is appreciated extension of existing is a preferred approach by the County Council policy criteria should be available for alternative sites to be considered on their own merit against development control policy criteria.</p> <p>The lack of flexibility could be considered anti competitive especially with sharp sand and gravel being identified within one area only. Areas of mineral resources should only be excluded subject to robust evidence. It is in appropriate to exclude areas for mineral extraction on limited information that only indicate the possibility of archaeological interest.</p> <p>Policy M3 - Past level of vehicle movements? A clear definition of past levels of vehicle movements should be clarified and should not be based upon the last 3 years as the industry / economy has been through a recession and economic down turn.</p>
601 (River Users Society)	<p>We have considered the principles of gravel extraction at the side of the River Thames (SG-03, 17, 19, 41, 42, 44, 45, 47 and 60) and wish to raise OBJECTIONS for the following reasons:</p> <p>The Green Corridor character of the Upper Thames is an important asset vital to maintain. It should not be compromised by adverse visual or noise intrusion close to the river.</p>

	<p>The Thames Path is a popular National Trail, well used by walkers, anglers, cyclists and others and its environment must not be damaged by unpleasant or unattractive development.</p> <p>There are national planning guidelines to prevent development on the flood plain. It is essential to respect these rules with regard to gravel extraction. There must be no interference with the free flowing of flood waters.</p> <p>Security fencing to protect any workings would become blocked with water-borne debris in times of flooding, preventing the free-flowing of flood water with increased risk of flooding elsewhere.</p> <p>Due to the high water table most waste material is unsuitable for landfill so other solutions are needed for replacement of extracted material, or the sites must become new water space areas.</p> <p>If flood water from the river was allowed to flow into gravel workings the biological diversity of the two waters would become mixed and likely to cause damaging effects.</p>
286	<p>Policy M3 itself is a composite policy which is excessively complicated and loose in its wording. This will make it open to challenge or misinterpretation. For example, I am concerned that:</p> <p>a. The term 'extensions' is used very loosely in the documents and in places refers to sites which appear to be larger than the current workings they adjoin. This presumption therefore could be used to justify what are in effect new workings. This would be like Tesco saying that a supermarket proposal is merely an extension if it is adjoining one of its small express stores; and</p> <p>b. The policy states that 'areas will not be permitted if it would lead to an increase in the overall level of mineral extraction or mineral lorry traffic above past levels within these areas combined.' In practice it will difficult to implement this and as a result the guiding principles of the strategy will not be realised.</p>
290	<p>Given the deposits in West Oxfordshire we accept, albeit with a heavy heart, that the District has a continuing role to play in Oxfordshire County Council's Mineral Core Strategy to the year 2030.</p> <p>But to expect the District to supply the bulk of the County's aggregate needs, when only around a quarter of the demand is north of the Thames, around three-quarters to the south, seems to us totally unreasonable and flies in the face of the present Government's declared policy to dig gravel closest to where it is needed.</p> <p>The sheer scale of the operation would generate thousands of extra lorry movements and place an intolerable burden on a traffic infrastructure that is already at saturation point.</p> <p>Newbridge and Swinford Toll Bridges, like the intervening roads, are not suitable for heavy goods vehicles, while the A40 and A34 are close to capacity. Indeed, it is Government policy not to increase traffic on the A40 and the Highways Agency</p>

	<p>forbids new traffic schemes on the A34.</p> <p>To transport vast quantities of gravel south of the Thames would involve heavy fuel and road maintenance costs as well as raising considerable environmental concerns, while the impact of the excavations on the landscape of West Oxfordshire poses questions the proposed plan fails to address.</p> <p>What impact will the excavations have on the archaeology, palaeontology and flood-risk of the area? What will be the cumulative impact of more digging on a landscape which in parts already resembles a map of Finland? What dangers will the inevitable increase in bird population pose to RAF Brize Norton?</p> <p>Neither the County Council nor the operators has a good track record on after-use and whatever the final decision on how the burden of extraction is allocated it seems to us of paramount importance that more imaginative schemes are proposed to compensate local communities for the aggravation they will suffer in the coming decades.</p> <p>To mention just one possibility, a rail link alongside the A40 would provide in the shorter term a more environmentally friendly method of transporting aggregates to a convenient railhead, in the longer term an attractive alternative method of travel to the heavily congested road for West Oxfordshire residents.</p>
351 (Newington Parish Council)	<p>As a member of the PAGE alliance, Newington Parish Council are writing to endorse the submission made by PAGE on the 23rd October 2011 to the Minerals Draft Plan consultation.</p> <p>We endorse the comments made by PAGE and the report submitted by the planning consultants, Hives, which accompanied their letter.</p>
399 (Grundon)	<p>Location (M3)</p> <p>The plan seems to be based on 4 gravel pits to supply the envisaged requirement. Whilst there may be plenty of resources there are productive capacity issues and lack of flexibility.</p> <ul style="list-style-type: none"> <li>- Eynsham/Cassington/Yarnton 7 areas containing 3.82mt to be worked at 180,000 tonnes over 21 years</li> <li>- Lower Windrush 12 areas containing 14mt to be worked at 500,000 tonnes over 28 years</li> <li>- Sutton Courtenay 4 areas containing 2.05mt to be worked at 330,000 tonnes over 6 years</li> <li>- Cholsey (to replace Sutton Courtenay) 3 areas containing 4.86mt to be worked at 180,000 tonnes over 24 years</li> <li>- Caversham 1 area containing 4mt to be worked at 130,000 tonnes over 30 years</li> </ul> <p>The Plan seems to rely upon a mosaic of areas coming forward at each main location at the right time. Only at one site is there a simple single area to deal with.</p>

326	<p>Policy M3 is complicated and appears misleading.</p> <p>4.28 Policy M3: Strategy for the location of mineral working</p> <p>Whilst there may be a preference for those 5 areas other applications elsewhere should be treated on their merits and granted permission if they meet the Plans other policy criteria.</p> <p>The policy seeks to refuse working outside of the identified areas unless the required provision cannot be met from within those areas. However no one will know this until the end of the Plan period by which time it is too late to rectify. This results in a lack of realism and flexibility in the Plan and Policy.</p> <p>Another flexibility issue is the cap on output from the two areas that comprise the Lower Windrush and Eynsham/Cassington/Yarnton area that provide the majority of the envisaged output. If there are delays or sites do not come forward as envisaged there would be no productive flexibility, hence additional areas or policy flexibility is required. The historic output rates are not given so there is uncertainty on this. The above details on the 5 areas was gleaned from the background paper on flooding so how relevant they are is questionable due to the status of these papers but they are the only numbers around that detail what is expected in terms of where, how much, output and timeframe. Clarification is needed on the status of background papers and how they influence policy and interpretation of policy. This is of great relevance to Policy M6 as well.</p> <p>Another locational factor is archaeology with areas excluded on this basis, however there is no background paper on the subject so these exclusions cannot be examined.</p> <p>The Plan already refers to the potential that some identified working areas may need to be discounted due to their effect on various SAC's and that further work is needed. This is another issue that may prevent or delay the envisaged release of sites and is again a flexibility concern especially when added to the policy constraint on output levels.</p> <p>The policy also gives rise to competition issues in that it prevents anyone else from entering the market and as such is a restraint on trade.</p>
511 (Drayton St Leonard Parish Council)	<p>This is to confirm that Drayton St Leonard Parish Council is a member of PAGE, and is in full support of PAGE's submission dated 24 October 2011 in regard to Oxfordshire County Council's draft Minerals Core Strategy.</p>
512 (Sutton Courtenay Parish Council)	<p>The Parish Council recognises the necessity for mineral workings and appreciates that the resources in the Sutton Courtenay have been mostly worked. The continued workings in this area should continue to afford proper protection for the parish and its road network. However, all current operations with time limited planning consents such as clay extraction need specific mention in the documentation to avoid any misunderstanding as to date when these operations too will cease. Again, it should be made clear that the policies only relate to the life of the document, and that comments such as safeguarding rail sidings are only relevant for the immediate future.</p>

463 (Environment Agency)	Policy M3 sets out the broad locations for minerals working without nominating specific sites. There should be a link between policy M3 and the latter development control policies C1-C8 - such as 'New sites should be in accordance with the core minerals and waste development control policies' This will ensure that if there is any conflict with development control policy it is not prejudiced by the principle of allocation contained in this policy. Or, in other words, the principle of allocation is only acceptable if it is compliant with the development control policies.
375 ( D K Symes)	The recognition that the Sutton Courtenay working will need to be replaced during the plan period is supported. The suggestion that this should be restricted to Cholsey is considered too restrictive and a wider area of search should be shown that is similar to that for the other minerals (e.g. crushed rock at Bicester or soft sand along the A420). This area of search should extend both north and south of Wallingford to include those sites that were put forward for consideration to include the land at Drayton St. Leonard / Berinsfield.
596 (Nuneham Courtenay Parish Council)	<p>1. The proposed policies largely reflect the position established in the preceding consultation process and indeed appear to try to provide broad protection against permitting extraction in line with the issues we raised in relation to the Nuneham Courtenay site..</p> <p>2. The proposals do not include specific sites at this stage, but broad areas of development. Again these were highlighted in the last consultation phase. Cholsey area has been brought into play formally to replace Sutton Courtenay as reserves run out. Whilst regrettable it is difficult to argue that South Oxfordshire should be unaffected by any extraction proposals given the areas of potential development. Nuneham Courtenay Parish Council is obviously unaware of the specific issues around the development of the Cholsey site but it is assumed that, in terms of the various sites being considered in the</p>
322 (Savills)	<p>Savills acts on behalf of Corpus Christi College and Exeter College , Oxford. We make the following objections to certain parts of the Plan.</p> <p>1) The Plan makes insufficient provision for production of sharp sand and gravel to the south of Oxford. It is too limited, both in terms of location and operator.</p> <p>2) OCC should identify at least one, and probably two, further areas for extraction to the south of Oxford and the River Thames.</p> <p>3) We believe that OCC has given insufficient consideration to the mineral reserve at Berinsfield/Drayton St Leonard. This is a proven reserve, which would come forward for development if identified by OCC. The site is owned by the Colleges identified above, and is not under option to any operator at present.</p>
629	MJCA are commissioned by Premier Aggregates Limited to review the Oxfordshire Minerals Planning Strategy



	<p>Consultation Draft and provide comments. Premier Aggregates Limited are an independently owned mineral and waste management contractor based at Finmere Quarry in the north of Oxfordshire. We note that on Figure 3 Finmere Quarry is identified as a location of active mineral workings and site with planning permission. Finmere Quarry has the benefit of planning permissions for the extraction of sand, gravel and clay albeit that the clay only is used as an onsite engineering material at the non hazardous landfill at Finmere Quarry.</p> <p>We note that in Paragraph 4.13 the requirement for sharp sand and gravel over the plan period (2011 to 2030) is identified as 20.2 million tonnes and that the net requirement taking into account permitted reserves over the plan period is 14.26 million tonnes. We note that Policy M2 states that permission will be granted for mineral working to enable landbanks of reserves with planning permission to be maintained of at least 7 years for sharp sand and gravel.</p> <p>In Figure 7 the locations for sharp sand and gravel working are identified. Although Finmere Quarry is identified in Figure 3 of the document as having active mineral workings and a site with planning permission the area of Finmere Quarry it is not identified in Figure 7 as a location for sharp sand and gravel working. We should be grateful if the area of Finmere Quarry could be identified in the submission draft of the Minerals Planning Strategy.</p> <p>Policy M3 refers to Figure 7 and outlines the principal locations for sharp sand and gravel working as Lower Windrush Valley, Eynsham/Cassington/Yarnton, Sutton Courtenay and Caversham through extensions to existing quarries or new quarries to replace exhausted quarries with a new working area at Cholsey to replace Sutton Courtenay when reserves there become exhausted. We should be grateful if Finmere Quarry could be added to the list of principal locations for sharp sand and gravel extraction in Policy M3. In June 2010 a scoping report was submitted to Oxfordshire County Council with respect to a northern extension at Finmere Quarry. The northern extension covers an area of approximately 9.9 hectares and includes approximately 165,000m<sup>3</sup> of sand and gravel resources together with approximately 90,000m<sup>3</sup> of clay which could be used in landfill engineering. The extension of the permitted sand and gravel reserves at Finmere Quarry would provide valuable and much needed sand and gravel reserves in the north of the County from an established mineral extraction facility where infrastructure already exists to facilitate mineral extraction. The clay available in the extension would provide for the shortfall in clay needed to complete the engineering of the existing non hazardous landfill at Finmere Quarry. We should be grateful if the northern extension to Finmere Quarry could be considered in the specific sites allocation documents that will be published shortly.</p>
	<p>636 (Surrey County Council) Like Surrey, where approximately 73% of the county is green belt and 25% is designated as AONB, Oxfordshire has a</p>

	rich variety of landscapes, biodiversity and historic assets with a similar proportion of AONB designation. The identification of broad areas for future areas of mineral working outside the AONB is therefore supported to conserve and enhance this nationally important asset, a similar approach to that in the recently adopted (July 2011) Surrey Minerals Plan (SMP).
669 (Hills Quarry Products Ltd)	<p>The strategy places reliance upon four existing areas and one additional area. This does not meet the stated objectives of the strategy to be deliverable and flexible. HQPL accepts that there could be a preference for the existing working areas but to identify only one additional site is inadequate.</p> <p>18. HQPL has proposed the development of a significant deposit of sand and gravel at Culham. Importantly, if the vision and the objective to minimise the distance that aggregates are transported by road are to be upheld, this site provides a suitable resource closer to south and west Oxford than the site which has been selected to replace Sutton Courtenay. Culham should be included in the resource area because reliance upon a single site is simply inadequate and, contrary to your objective 3.5 iii, inflexible. If other sites are proposed to work in tandem with, or in place of, Cholsey, a comparison can be made between them. It is noted in the Preliminary Assessment that an application is likely to come forward within 10 years at Cholsey whereas an application for the land at Culham could be ready within 2 years. By excluding suitable sites the opportunity for detailed assessment and debate is precluded. Without that debate Oxfordshire could potentially end up with a Plan which cannot, and does not, achieve its objectives. It would be unsound.</p> <p>The requirement that planning permission will not be granted for mineral workings outside of the identified locations removes flexibility. That is contrary to objective 3.5 iii. Instead, any site which becomes available (a windfall site) and by environmental assessment can be shown to be as good as, or more suitable than, a site within the identified areas, and if working accords with policy, should be considered on its merits.</p> <p>The difficulty of identifying a few large areas with no flexibility whatsoever is of concern to the industry as it potentially reduces the ability of operators, other than existing operators, to enter the market. Mineral Policy Statement 1 requires that large landbanks bound up in very few sites should not be allowed to stifle competition. This has also been a concern of the Office of Fair Trading who are at present considering reviewing this position with the Competition Commission. The mineral strategy should reflect this position.</p>
728 (Smiths Bletchington)	<p>4.1 Smiths welcome the emphasis that minerals can only be worked where they are found. This simple statement must underpin the basis for where future mineral working should take place.</p> <p>4.2 We support the proposed spatial strategy for sand and gravel, soft sand and crushed rock in the County. For sharp sand and gravel we specifically support the identification of resources in the Lower Windrush Valley, at Eynsham/Cassington/Yarnton and at Cholsey and confirm that these sites remain deliverable within the Plan period.</p> <p>4.3 We support the preference to be given to extensions to existing soft sand and crushed rock quarries.</p>

	<p>4.4 We do not support the current wording in Policy M3 regarding the overall level of mineral extraction or lorry traffic. Past and current output rates from existing plant sites are not provided to define the base line for this proposal and it is unclear from the broad sweep of the statement whether lorry traffic associated with ancillary and added value operations on the mineral sites are included. Smiths Gill Mill site does not have a production limit set by the planning permission. Similarly it does not have a limit on lorry movements as in addition to added value operations it provides a very well used public weighbridge service for lorries. The wording of this part of the policy is far too vague. If necessary and appropriate we may support a form of words that stated that the Windrush Valley should not significantly increase its overall permitted contribution of sand and gravel to the County. However the overall contribution figure would still need to be defined and should be based upon permitted operations and a sufficient number of years to properly reflect pre and post recession economic activity.</p>
<p>711 (MPA) and 700 (OMPG)</p>	<p>The MPA recommends that the locational strategy be more flexible. The strategy should continue to identify the principle locations for production of sand and gravel, but we are aware from operators that while there appear to be adequate resources, there are issues of productive capacity at some sites. If there are delays or sites do not come forward as envisaged there would be no productive flexibility, hence additional areas or policy flexibility is required. The policy seeks to refuse working outside of the identified areas unless the required provision cannot be met from within those areas. However this will not be known until the end of the Plan period. We therefore recommend that the policy is amended to provide for greater flexibility for applications elsewhere to be treated on their merits and granted permission if they are environmentally acceptable and meet other Core Policies. We are aware that operators are concerned that the only additional new area identified for sharp sand and gravel is Cholsey. In order to provide a greater degree of flexibility as outlined above, we recommend that other sites that have been precluded (based on outcome of the Preliminary Assessment of Minerals Site Nominations) should not be ruled out at this stage, particularly on grounds of potential archaeological interest. Paragraph 4.19 refers to the assumption that the rates of working within the existing areas of working (Lower Windrush Valley, Eynsham / Cassington / Yarnton, Sutton Courtenay and Caversham) would be at the levels allowed by existing planning permissions or proposed in planning applications. We assume that the reference in the policy to further working not being permitted 'if it would to an increase in the overall level of mineral extraction or mineral lorry traffic above past levels within these areas combined' means the permitted levels. However, it is not clear that setting such a limit is practicable given that we understand some sites do not have production limits set by a permission, and the County Council may not have robust data on actual production or 'past levels' of lorry movements. In addition, 'past levels' of lorry traffic is vague. We recommend that the policy is amended to state that production from the Lower Windrush Valley and Eynsham / Cassington / Yarnton area 'should be maintained but not significantly increase its overall contribution to the County's supply' which again introduces a greater degree of necessary flexibility as opposed to a cap as currently</p>

	proposed.
398 (Bampton Env Watch Group)	Bampton Environmental Watch Group strongly supports: The whole of 4.28 Policy M3
415 & 419 Hanson Aggregates	<p>Where should future mineral working take place?  Sharp sand &amp; Gravel - Preliminary Assessment of Mineral Site Nominations.  CLANFIELD  Evidence base  There is the suggestion within the report prepared by the County Archaeologist that the archaeology with the mineral sites ranges from the Neolithic to Romano British period. This is presumptuous given that there is very limited evidence for some periods i.e. the Neolithic period is merely represented by the stray find of a Neolithic axe, as reported in a desk-based assessment prepared by Oxford Archaeology. Similarly the report suggests that the potential for early prehistoric archaeology to occur is very low given the absence of cropmark evidence attributable to this period. The report also states that '...no major monuments of this date are likely to be present' (Oxford Archaeological Unit February 2007).  The report prepared by the county archaeologist refers to various types of archaeological features being present in the nomination areas but there is no direct evidence to substantiate this, thus making it impossible to make any solid conclusion without further evidence. To rule out nomination areas on such a limited evidence base is premature.  Planning guidance states that planning authorities are required to carefully consider mineral proposals which should include an assessment of sites relative significance, setting and their relationship with other sites and landscapes. In this case the potential archaeological resource has not been assessed in sufficient detail to make an assessment on the future of a site at this stage.  Presumptions  Along with the lack of direct evidence for the archaeological resource, the Clanfield assessments are mainly based on conjecture and assumption with no definitive evidence to substantiate the statements made. This is partly due to the lack of investigation into the archaeology of the area. Ruling out nomination areas on the basis of circumstantial/ unproven evidence is therefore premature and inappropriate. Similarly, it has been assumed that a number of the sites may link to those that have previously been scheduled, and are thus assumed to be of national significance by association. Again there is limited evidence to substantiate this. Whilst it is acknowledged that some of the sites may be linked to the scheduled sites it may also be the case for example that field systems of low value link to these sites which does not</p>

elevate their value to nationally significant.

#### Extent of Archaeology

The nomination reports clearly state that the level of preservation of archaeological remains is not known, thus assigning a value to this resource is difficult. It could be the case that preservation is poor due to ploughing, therefore, preservation in situ could have an adverse affect whereby the archaeology is irreversibly damaged without record. On the other hand preservation by record would record the diminishing resource. These factors would need careful consideration prior to making a decision on the future of such sites.

Whilst it is appreciated that significant archaeological deposits lie within some of the nomination areas there is no evidence or statement to suggest that such a resource covers the whole nomination area. Given the combined size of the Clanfield nominations (in excess of 1,300 acres) there will undoubtedly be sizeable areas where there are no archaeological deposits or areas where there is low density archaeology i.e prehistoric/ Romano British field systems. Such areas may well equate to substantial parts of the sites capable of sustaining commercially viable mineral operations.

#### Scheduled Monuments

A number of the nomination areas appear to have been ruled out in part due to the presence of scheduled monuments within or near to the site. Obviously, it is accepted that the areas covered by scheduled monuments and their immediate area may need to be avoided (and indeed these areas are excluded from the preliminary reserve tonnage assessments) but we do not accept that the wider areas should be discounted simply because of association, particularly as some of these areas will contain either limited archaeological deposits/ features, or the archaeology will be less dense and the remains may be of limited significance.

The archaeological reports have indicated that the level of preservation within the nomination areas is unknown, thus undertaking further investigation within the site could be seen as a positive in terms of recording important archaeological remains that are continually being eroded by ploughing. Important archaeological sites could be lost without such intervention. Similarly undertaking investigations within areas adjacent to Scheduled Monuments and the associated landscape would significantly enhance the archaeological knowledge of the landscape, which would not be possible through preservation in situ.

#### SHILLINGFORD

It is acknowledged that this nomination site has specific datable archaeological evidence as proven through investigation. Nevertheless, these archaeological remains do not cover the whole nomination area which extends to more than 700 acres and thus should not be a factor in sterilising the whole site as there will be less dense archaeological areas, where possible remains of lesser significance will occur.

#### SUMMARY

The nomination reports prepared by the County Archaeologist are preliminary and at this stage are only designed to give

	<p>a strategic overview of archaeological assets. These have ruled out a number of mineral sites on flawed arguments which are in part based on a series of presumptions and predictions for which there is currently no concrete evidence. This is insufficient to rule the sites out in their entirety. Any decision that is made on such sites must be consistent in meeting the tests of reasonableness, proportionality and justification by the supporting evidence, which these reports do not. Essentially there is not enough evidence to rule out any of the nominations at present.</p> <p>Hanson supports the spatial strategy for the location of mineral working. In particular, Hanson supports the proposal for continued working in the Eynsham/Cassington/Yarnton, Lower Windrush Valley and Sutton Courtenay areas; all of which are supported by existing well-established processing facilities which benefit from excellent infrastructure, good links to the primary road network and close proximity to the major local markets.</p> <p>The preference for extensions to existing soft sand quarries is also supported.</p> <p>The eventual need for a replacement for Sutton Courtenay is acknowledged (once suitable local extensions have been exhausted) but the provision of a single new allocation at Cholsey is very restrictive and inflexible in its approach. Other locations for replacement facilities in the South of the county should not be ruled out until further assessments have been undertaken.</p>
596 (Nuneham PC)	<ol style="list-style-type: none"> <li>1. The proposed policies largely reflect the position established in the preceding consultation process and indeed appear to try to provide broad protection against permitting extraction in line with the issues we raised in relation to the Nuneham Courtenay site.</li> <li>2. The proposals do not include specific sites at this stage, but broad areas of development. Again these were highlighted in the last consultation phase. Cholsey area has been brought into play formally to replace Sutton Courtenay as reserves run out. Whilst regrettable it is difficult to argue that South Oxfordshire should be unaffected by any extraction proposals given the areas of potential development. Nuneham Courtenay Parish Council is obviously unaware of the specific issues around the development of the Cholsey site but it is assumed that, in terms of the various sites being considered in the south, the proposed area is one where extraction considered as having the least adverse impact on the environment and people in the area'.</li> <li>3. The possibility of a site at Nuneham Courtenay or in any of the immediately adjoining areas, which might have created concerns for us, is not mentioned. Clearly, given previous representations, the Parish Council welcomes what it sees as recognition of the issues around developing this and other adjacent S. Oxfordshire sites and their exclusion from this Plan.</li> </ol>
970	This section contains much that is central to the minerals strategy, yet there are areas of contradiction and lack of realism

	<p>within it. Most obviously these contradictions appear between some of the discussion of the restoration of sites and of the recycling of aggregates. The conclusion must be that this section needs reworking with a clear eye to consistency and practicality.</p>
326	<p>The principal locations for sharp sand and gravel working, as shown in figure 7, will be at:</p> <p>i. existing areas of working at: Lower Windrush Valley; Eynsham / Cassington / Yarnton; Sutton Courtenay; and Caversham; through extensions to existing quarries or new quarries to replace exhausted quarries; and</p> <p>ii. a new area of working at Cholsey, to replace Sutton Courtenay when reserves there become exhausted; Permission for further working within the Lower Windrush Valley and Eynsham / Cassington / Yarnton areas will not be permitted if it would lead to an increase in the overall level of mineral extraction or mineral lorry traffic above past levels within these areas combined.</p> <p>This firstly states existing areas when at present Eynsham has no extraction and Cassington permission for one final area, then it says permission will not be granted if it would lead to an increase in overall mineral lorry movement. Policy M3 should say potential preferred sites rather than sites will be. Policy C3 - environment and amenity protection. Has this been fully tested and can it be proved that there will be no adverse effect on Siemens Eynsham(a sensitive receptor) Like wise the sequential testes for flooding. Again wouldn't it be more prudent to do this first? I agree with the mineral planning vision in particular 3.4b the distances aggregates travel by road - why then are most of the preferred sites in west Oxfordshire when only 10% of the demand for minerals is in the district, Sites near to Eynsham and Cassington will only exacerbate the traffic problems long the A40 and put undue pressure on the Swinford Toll. Newbridge only has a weight limit of 18.5t Policy C5 is too woolly - the word 'should' , should be replaced by 'will'</p>
OCC natural env team response	<p>Broadly agree with the strategy for the location of mineral working (policy M3). However, it should be noted that parts of the Eynsham / Cassington / Yarnton area are very close to Oxford Meadows Special Area of Conservation. If the Habitats Regulations Assessment concludes that there could be potential impacts on the hydrology of Oxford Meadows as a result of minerals extraction, the boundary of the area may need to be refined to exclude land close to Oxford Meadows. This should not affect the deliverability of the area due to the large amount of mineral resource within it.</p>





<b>M3: Comments on crushed rock strategy</b>	
ID No (& name of org)	Comment/issue raised
23	<p>You said that because the 1957 planning permission for the proposed quarries in Shenington and other villages is already extant, it was not necessary for the county minerals core strategy to identify it, other than in passing. This seems rather counter-intuitive and I suggest your draft strategy is fundamentally flawed as a result. The sheer scale of the mineral deposits in question means that this is major omission from your strategy. The document doesn't actually refer to these permissions, even in passing, and it certainly doesn't name them. How can the public make an informed comment on the strategy if all of the pertinent information is not laid before them?</p> <p>Further, if, as you told me, the reason for non-inclusion is that the sites already have permission, why are they not identified on the map on p11 (figure 3) which shows the "Location of active mineral workings and sites with planning permission"?</p> <p>Notwithstanding my comments above, there is much in the strategy that provides us the basis for objection to the current application. Not least the section below which states: "Better quality aggregate is generally available from within the limestone deposits than from the ironstone. Any additional provision should be made within the limestone areas."</p> <p>However, given OCC's clearly stated position, I'm confused as to why your colleagues have entertained the current application and indeed provided detailed guidance over the past 18 months on exactly what environmental impact studies needed to be undertaken by the agents for the rights holder. This doesn't seem very joined up.</p> <p>I think that whichever way you look at it, the core strategy is ill conceived. It's almost farcical that it stands ignorant of the largest, most damaging and most controversial crushed rock extraction application in living memory. It is not in a fit position to have been put out for public consultation as it omits information that is relevant to swathes of the North of the county. I suspect that the minerals strategy formulation will, in due course, be subject to the same legal scrutiny as the application process itself.</p> <p>Please would you log this as a comment received during the strategy's consultation period? Further, would you please advise whether the strategy will have to be withdrawn and redrafted?</p>

	<p>Finally, the RAWP information is highly pertinent. I don't know how you can make statements in the strategy about the county allocations for minerals, and current status against targets, without access to their reports. Is there a contact at DCLG that we might speak to directly?</p>
335	<p>4.0 DRAFT MINERALS PLANNING STRATEGY</p> <p>4.1 Policy M3 of the Minerals Planning Strategy sets out where future mineral working should take place. It is acknowledged that this policy predominantly addresses future allocations and permissions, but regard needs to be shown to existing permissions, as stated earlier in the Minerals Planning Strategy in paragraph 7 of the Executive Summary.</p> <p>4.2 This would also assist the Council in determining ROMP applications which may exist but may lie outside the areas identified in Policy M3. Considering that ROMPs need to be reviewed every 15 years then it is conceivable that the Council may need to determine further ROMP applications during the Plan period, over and above the existing Shutford and Shenington ROMP application.</p> <p>4.3 As previously mentioned in Section 2 of these representations, 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.</p> <p>4.4 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> <p>4.5 As already observed earlier in this Report, 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 resource for crushed rock which would further reduce the need to grant additional permissions towards the end of the plan period if demand increased.</p> <p>4.6 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>
507	<p>It is my opinion that it can be demonstrated that the location of mineral extraction in Shenington and Alkerton will have a significant adverse impact on the local environment and community through any of the following:</p> <ul style="list-style-type: none"> <li>- Noise</li> <li>- Lighting /illumination</li> <li>- Visual intrusion</li> <li>- Vibration</li> <li>- Odour</li> </ul>

- Dust
- Emissions
- Contamination
- Water quality impacts
- Transport impacts
- Loss of best and most versatile land

Planning permission should not be granted for this proposal where by reason of the collective impact of different proposals or be reason of a number of impacts for the same development, the proposal has an unacceptable cumulative impact. Where new mineral development is proposed on, or in proximity to an existing mineral site, the cumulative impacts of all developments in the locality must be taken into account and with the agreement of the local community.

#### Noise

Mineral extraction facilities are likely to produce noise from vehicles and heavy machinery, including reversing alarms, as well as from recycling plants and machinery, particularly those managing construction and demolition waste. Noise impacts should be appropriately mitigated to an acceptable level to the community and where necessary informed by a noise assessment by an independent acoustician. Proposals should be designed to minimise noise at source, taking account of layout, landscape/landform, materials and wind direction, and implement appropriate measures to control noise generated.

#### Lighting illumination

Mineral extraction facilities can produce light pollution, particularly where operations take place at night. Unacceptable levels of light pollution can have an adverse effect on the environment and the quality of life of local communities. Lighting or illumination impacts will need to be controlled to an acceptable level to the community, and an independent lighting assessment undertaken that takes account of problems such as positioning, height, alignment, light intensity and period of use. The Council should use its planning controls at the application stage to minimise any adverse impacts to the local community.

#### Vibration

Vibration is often linked with noise generation. Vibrations can occur from vehicles and heavy machinery as well as from recycling plants, particularly those concerned with construction and demolition waste. Consequently, proposals should aim to mitigate the impact of vibration at the point of source by influencing the site location and the layout of the site. Where necessary suitable controls should be agreed with the local community in advance of obtaining permissions.

#### Visual intrusion

New mineral extraction developments will need to ensure that any visual impacts of the development are not of an unacceptable level to the local community. Visual impact is normally assessed from publicly accessible viewpoints of the development site. In assessing visual impact, all component parts of the development should be considered e.g the layout

and the location of the site, access routes, design of built structures and landforms and ancillary infrastructure such as fences and hedges. Where necessary proposals will need to demonstrate in advance of permission through a suitable assessment that any adverse impacts of the development upon the amenity of local land uses and the general landscapes are acceptable to the local community.

Shenington and Alkerton have Conservation Area designation.

Odour, dust and emissions

Mineral extraction can impact on local air quality through emissions (both from on-site operations and vehicle movements on and off-site), dust and odour. Where necessary proposals will need to demonstrate in advance through a suitable assessment that any such impacts are of an acceptable impact to the local community, The Council should work closely with regulatory partners in the assessment of planning applications (and submitted assessments where necessary) and the imposition of conditions on planning permissions where required.

Mineral extraction can have an impact upon climate change through the production of greenhouse gas emissions, although the impact of certain types of facility can be greater than others. Landfill sites produce large quantities of methane gas that can contribute significantly to climate change. New mineral extraction development should make provisions to reduce greenhouse gas emissions and impacts upon climate change by being situated close to the designated areas for development.

Contamination

It is possible for mineral extraction activities to contaminate land and this is an important issue that must be addressed. Proposals for mineral extraction activities that would lead to unacceptable levels of contamination on and off site as part of the operation, restoration or aftercare of that development should not be permitted.

Development should be located in the least susceptible areas and with suitably sized buffer zones around the site where necessary and in advance agreement with the local community. Facilities that store and treat mineral extraction can present risks to groundwater where leachate and other polluting substances may leak from storage areas. Situated at the top of a ridge Shenington and Alkerton are not suitable for this development.

Applications may need to be accompanied by an independent land contamination assessment which should include an extended assessment of contamination in line with PPS22. Sufficient advance information should be required to determine the existence or otherwise of contamination, its nature and the risks it may pose and whether these can be satisfactorily reduced to an acceptable level to the local community.

Water quality impacts

Mineral extraction can have an adverse impact on ground and water quality unless they are appropriately planned, designed and monitored throughout the life of the development. New proposals must take into account existing ground conditions, pollution arising from previous uses and any proposals for land remediation and the potential impact of the

	<p>development. Proposals for mineral extraction and management will only be permitted where it can be demonstrated that provision has been made to protect and where appropriate enhance ground and surface water.</p> <p>Facilities that store and treat mineral extraction can present risks to groundwater where leachate and other polluting substances may leak from storage areas.</p> <p>Situated at the top of a ridge Shenington and Alkerton are not suitable for this development.</p> <p>Transport impacts</p> <p>Mineral extraction and management proposals must seek to use alternatives to road transport where feasible. Developers must demonstrate in advance that the proposal facilitates sustainable transportation by:</p> <ul style="list-style-type: none"> <li>? Minimising transportation distances</li> <li>? Minimising the production of carbon emissions</li> <li>? Where the road is the only viable method of transportation, demonstrating in advance and with the agreement of the local community that there is no unacceptable adverse impact on the safety, capacity and use of the highway network</li> </ul> <p>Shenington and Alkerton are situated at the extreme north of the county and are not in close proximity to the areas of development.</p> <p>Our roads are:</p> <ul style="list-style-type: none"> <li>Narrow with hidden bends</li> <li>less than 4.4m in many places</li> <li>unlit</li> <li>lack pavements</li> <li>lack road markings</li> <li>used by horses</li> <li>used by families walking their children to primary school</li> <li>used by teenagers walking to buses to access secondary school</li> <li>used by the disabled</li> <li>used by regular and frequent buses to Banbury, Stratford, Kington, Warwick and Leamington</li> </ul> <p>PPS10 states that existing and potential transport infrastructure should be considered to support the sustainable movement of mineral extraction with alternatives to road transportation (e.g. rail and water) used where practical and beneficial.</p> <p>Loss of best and most versatile agricultural land</p> <p>PPS7 states that where the development of agricultural land is unavoidable proposals should be located on land of lower agricultural land quality (i.e. grades 3b-5).</p>

325 (Burford Town Council)	Burford has two quarries to the south both with egress onto the A40 and both with allowable 100 lorry movements per day. However, one quarry, Burford at Stonelands, has a lorry routing agreement associated with its operations and the other, Whitehill, does not. The Town Council would like to see this situation regularised by having routing agreements for all quarry workings and using those agreements to protect small villages and heritage sites. 6 wheel quarry lorries are disruptive when empty more than when full and have impact upon the tourist economy if traversing heritage towns and villages with a summer pavement culture for eating and drinking. Please take this into account.
661 (Croughton Parish Council)	<p>Croughton Parish Council wishes to comment as follows on the Oxfordshire Minerals and Waste Strategy, in relation to the plans for Bicester and surrounding area:</p> <p>1. We are most concerned about the proposed new crushed rock quarry in the area described as 'North of Bicester to the east of the River Cherwell'. This appears to cover an area directly south and south east of Croughton - from just below the A421, and then across and down the A43 to J10 and a little beyond.</p> <p>We have major concerns regarding the exact location of the quarry works, and the works access. There is potentially a significant impact on landscape and on tranquillity in this rural area.</p> <p>This could also have a major impact on traffic on the A43, and on Junction 10 of the M40, which already has serious traffic problems (see point 2) which are likely to worsen with the new Ardley development.</p> <p>2. We are also concerned about the potentially detrimental impact on Junction 10 of the M40 of the additional lorry traffic predicted for the A34/A41 and Junction 9 of the M40. This traffic is due to build up during the Bicester house-building programme and continue long-term due to the planned permanent C&amp;I waste site.</p> <p>Whilst considerable emphasis is placed on Junction 9, which is currently undergoing major construction, little if any attention is being paid to the major traffic problems which already exist at Junction 10 of the M40, causing it to regularly tail back as far as Junction 9 in the evening rush hour, and producing daily delays getting on and off at Junction 10. This is due to the already heavy load of traffic using the exceptionally poorly planned series of roundabouts leading to and from the A43 at J10, as part of the major north/south lorry cut-through from the M4 via the A34 to J9 and then via J10 and the A43 to the M1.</p> <p>Whilst it is perhaps unlikely that the lorries heading into Bicester would divert via J10, we do have serious concerns that local/through traffic will divert to J10 if J9 becomes too congested. There is a simple 'drive-around' route into Bicester via J10, the A43 and then turning off on to the B4100 into Bicester, or the B421 to Buckingham.</p> <p>We ask therefore that you:</p> <p>a) Provide more details on the proposed rock quarry, the environmental impact assessment, and your plans to consult local communities.</p>

	b) Include in the scope of your review recommendations for the improvement of J10 of the M40.
858 (Shenington with Alkerton Parish Council)	<p>This states that additional working of ironstone for aggregate use will only be permitted in exchange for revocation of an existing permission containing workable resources. It is not clear whether "additional" means an extension to an existing quarry or totally new quarries or both.</p> <p>The Trustees of the Needler D4 settlement have planning permission to extract ironstone from a number of areas around Shenington and Alkerton, and have recently submitted an environmental statement to work only certain parts of those areas (Shenington Quarry ROMP reference MW.0121/11). We are concerned that they might subsequently request planning permission to work extensions or totally new areas in exchange for the parts not included in the current statement. We suggest that this policy be modified to clarify that such exchanges would have to be justified providing an overall benefit as described in the common core policies.</p>

<b>M3: Comments on soft sand strategy</b>	
ID No (& name of org)	Comment/issue raised
108	<p>The grading of the soft sand deposits at Tubney is slightly coarser than those in the Faringdon area. The deposits to the south and se of Faringdon are finer and will support their use in asphalt in addition to the mortar sand market (probably with some blending of coarser material).</p> <p>NB. The deposit at Site SS-07 Home Farm, Shellingford is derived from the Highworth Grit as per the soft sands from the Tubney area, albeit slightly finer in consistency.</p>
57 (Kingston Bagpuize with Southmoor Parish Council)	<p>Kingston Bagpuize with Southmoor Parish Council is disappointed that the paragraph on soft sand - 4.22 - restricts development to extensions of existing quarries to the period 2020 to 2030.</p> <p>This restriction should apply from the start of adopted plan. The failure to impose this restriction before 2020 will lead to planning blight in this period on a number of areas between Tubney and Faringdon, with a number of planning applications likely to be submitted in an attempt to beat the 2020 date.</p>

135 (Appleton with Eaton Parish Council)	<p>Council is concerned that with the density of operations proposed in this relatively small area.</p> <p>The operations for Sand extraction are around areas of natural landscape and the extraction will affect and damage the landscape.</p> <p>Although the plan is to extract one site at a time, there will be an increase in traffic on A420 with one site being filled in and returned, while extracting from another site.</p> <p>Currently, the site in Appleton/Besselsleigh has not ceased operations and Council is concerned that another site has been granted permission for sand extraction before this site is properly reclaimed.</p> <p>Council is pleased that OCC has reduced the volumes of extraction to reflection the demand in the current economic climate.</p>
37 (Earthline Ltd)	<p>The proposed 'principal locations' for both soft sand and crushed rock working include the area 'East and south east of Faringdon' and which includes Shellingford and Hatford quarries. However the area shown on Fig 7 does not appear to include the area of Shellingford Quarry - ie west of the A417 and south of the B4508 - and this needs to be corrected.</p> <p>The preference to be given to quarry extensions for both soft sand and limestone working is supported. However, as note previously it needs to be made clear in the Plan that quarry extensions will need to be granted within the Plan Period to maintain production, notwithstanding the overall landbank position. For crushed rock this is dealt with in Para 4.23. I suggest that the following section of Policy M3 be amended as shown:</p> <p>'Permission will be granted' to extensions to existing soft sand and crushed rock quarries to maintain production throughout the Plan Period.</p>
110	<p>The proposal for the location of soft sand working to the south and south east of Faringdon is supported. The area is well sited in respect of its proximity to the growth area of "Science Vale" (Didcot, Wantage &amp; Grove)</p> <p>While the preferred strategy of extensions to existing soft sand operations is noted only 2 soft sand sites (SS-07 and SS-08) in the Preliminary Site Assessment meet the criteria of the Archaeology Key and the Overall planning status key.</p>
226	<p>The document indicates that for continuation of production, a new extraction site may begin production as restoration begins at an old one. In general this might be acceptable but in large areas of a resource the two sites might be close together, such as at north and south of the A420 near Tubney, with a consequent large increase in heavy traffic.</p>
493 (Hinton Waldrist Parish Council)	<p>We welcome the proposal to give preference to extending existing quarries for the supply of soft sand and rock. This seems very sensible as it utilises the infrastructure already in place. However the green oval on fig 7 extends too far south west as there are no existing quarries in the Kingston Bagpuize/Longworth area - the existing quarry is concentrated in Tubney Woods. The green oval should be reduced in size for the minerals preferred strategy area here</p>
451	<p>Whilst these areas contain soft sand, they are very widely drawn. The area 'north and south of the A420' is vast and is</p>



	nearly all covered by Policy N7 in the Vale Local Plan which designates the Corallian ridge as an area of Great Landscape Value.
747 (Green & Co)	<p>This policy identifies the need to provide soft sand at a rate of about 0.25m tonnes per annum, based upon projections regarding future development. Given the need to encourage economic growth through house building and the expansion of commercial developments as part of the Science Vale UK Enterprise Zone it is possible that this represents an underestimate.</p> <p>It is acknowledged in the preamble that existing permissions are likely to run out at around 2023. The land at Pusey Lodge Farm as identified in the attached report from Hydrock offers potential to supply about four years worth of soft sand (estimated reserves being between 900,000 and 1 million tonnes).</p> <p>This land at Pusey Lodge Farm should therefore be identified as a reserve which can be brought forward in the absence of alternative provision, or where the expansion of existing sites is impractical, or environmentally unacceptable.</p>
748 (Green & Co)	<p>This policy identifies the general areas available for the extraction of soft sand. The areas shown on the map are clearly simply indicative and very crude as indicators of potential locations.</p> <p>The land at Lodge farm Pusey is situated between the two green areas shown as suitable for soft sand extraction to the west of Abingdon. This plan should be altered to include this land and its availability for soft sand should be recognized. The Policy requires that preference should be given to the expansion of existing quarries, this preference should be qualified. Not all existing quarries can be expanded, or of expansion impact may be harmful in planning terms. It should therefore be recognised that where further expansions may cause unacceptable environmental impact, or are impractical or are less favourable in planning and transport terms than alternative sites within the same area, then alternative site should be considered.</p> <p>In this context Lodge farm Pusey offers advantages and clear benefits in terms of ease of access to the A420 and minimal impact upon neighbouring residential properties. As such this land should identified within the overall strategy as having short, medium and long terms potential.</p>
972	<p>Para 4.28 and Policy M3. The need to improve Fig 7 has already been referred to. In connection with soft sand the phrase 'north and south of the A420 to the west of Abingdon' would not be recognised as describing 'existing quarries' as referred to in paragraph 4.22 It seems designed to offer maximum freedom to approve new applications for mineral extraction in the Corallian Ridge which should be protected from development by the saved Vale Local Plan Policy NE7. Since this consultation document shows little reason why this is necessary and desirable I offer the following reasons this policy is important:</p> <p>1 The Ridge consists of good quality (grade 2), well managed agricultural land in cultivation throughout (both animal and arable husbandry), mixed with small woods and coppices - often seen as typical English landscape; at the northern end, closer to Oxford, there are the more extensive Tubney Woods.</p>

	<p>2. This landscape contains attractive and historic villages dating from the Conquest or before (eg Fyfield, Longworth, Hinton, Buckland etc)</p> <p>3. From many points along this broad ridge one has uninterrupted views across the valleys of the upper Thames and Windrush Valleys to the north across the Cotswold Hills and by turning to equally uninterrupted views across the lower Thames Valley towards the Chiltern Hills and veering to the south west, to the Berkshire Downs.</p> <p>4. There are few rural sites in Oxfordshire which can offer such a range of breathtaking views from its public footpaths and bridlepaths and similar areas for spiritual refreshment. In these respects the Corallian Ridge in Oxfordshire is comparable only with the larger Cotswold Ridge running westwards along the A40, although in this case the A420 does not follow the highest contour.</p> <p>I believe that it is for these reasons among others that the authors of the Vale Local Plan 2011 originally drew up Policy NE7 which currently constitutes part and should continue to constitute part of the Development Plan.</p>
<p>1005 (Shellingford PC)</p>	<p>With particular ref to the two quarries to the SE of Faringdon on the A417.</p> <p>Within the last year both the Bowling Green Quarry and the Shellingford Quarry have had planning permission granted to extend the sand and gravel extraction on both sites. As part of the planning consent, both quarries are to restore part of their original workings so as not to appreciably increase the areas being quarried in relation to what is being restored. Due to previous lack of Council control and where the previous owners 'cherry picked' the site and carried out no restoration works, Shellingford Quarry in particular has an immense task to backfill and restore large areas of the site. It has been agreed with the present owners that the new works and restoration will be completed within the new lifetime of the quarry operating permission so as not to appreciably extend the quarrying area in relation to restoration. The Council are fully aware that this needs to be monitored.</p> <p>Although no figures seem to have been submitted as to how many extra vehicle trips will be required to carry out the restoration within the allotted time scale, it is calculated that at least double the amount of vehicle movements compared with the present will be required along the A417 from now and into the future to comply with the programme, something again the Council needs to look into.</p> <p>Simply, the A417 and surrounding roads are not suitable or equipped to carry this amount of extra traffic.</p> <p>It is further noted that should additional extraction or recycling facilities be considered on either site, not only will there be additional and excess traffic to both sites but again and especially Shellingford Quarry will not comply with the restoration programme now in place. There will be further noise pollution to consider.</p> <p>It is therefore requested that neither Bowling Green nor Shellingford Quarries are considered for any additional extraction or recycling and that the Council closely monitor the current workings.</p>

<b>M3: Comments on sand and gravel area; Sutton Courtenay</b>	
ID No (& name of org)	Comment/issue raised
120	<p>Policy C4 on bio/geodiversity is encouraging, and could release significant enhancement opportunities, especially for freshwater mosaic habitats, which would in pre-Roman times have dominated the river terrace landscape.</p> <p>Gravel pits like Sutton Courtenay have produced large quantities of Pleistocene mammal remains, and have revealed important snapshots of conditions in back-water silt and peat lenses. Developers should be made to provide access at appropriate times (eg weekends) to scientists (Oxford and Oxford Brookes Universities) and local people with volunteer guides so that the geology revealed can be recorded and all possible educational opportunities realised.</p>
512 (Sutton Courtenay Parish council)	<p>The Parish Council recognises the necessity for mineral workings and appreciates that the resources in the Sutton Courtenay have been mostly worked. The continued workings in this area should continue to afford proper protection for the parish and its road network. However, all current operations with time limited planning consents such as clay extraction need specific mention in the documentation to avoid any misunderstanding as to date when these operations too will cease. Again, it should be made clear that the policies only relate to the life of the document, and that comments such as safeguarding rail sidings are only relevant for the immediate future.</p>
419 (Hanson)	<p>Hanson supports the spatial strategy for the location of mineral working. In particular, Hanson supports the proposal for continued working in the Eynsham/Cassington/Yarnton, Lower Windrush Valley and Sutton Courtenay areas; all of which are supported by existing well-established processing facilities which benefit from excellent infrastructure, good links to the primary road network and close proximity to the major local markets.</p> <p>The preference for extensions to existing soft sand quarries is also supported.</p> <p>The eventual need for a replacement for Sutton Courtenay is acknowledged (once suitable local extensions have been exhausted) but the provision of a single new allocation at Cholsey is very restrictive and inflexible in its approach. Other locations for replacement facilities in the South of the county should not be ruled out until further assessments have been undertaken.</p>

<b>M3: Comments on sand and gravel area: Caversham</b>	
ID No (& name of org)	Comment/issue raised
101	<p>I am another resident of Sonning Eye and I live in a listed 18th century barn. I have lived in this barn for the last 10 years, and as a family we have suffered flooding in our property back in 2003, and have come close to being flooded on three other occasions.</p> <p>My wife and I are bemused, frustrated and disappointed at the most recent attitude being shown by the OCC regarding the latest chapter in Lafarge's attempts to excavate this beautiful part of the country.</p> <p>A few years ago, I enquired on whether I would have permission to redevelop part of the interior of my barn. The OCC and the SODC rejected my proposals 100% because they care about how properties are maintained. I understand this. And yet, the same organisations have allowed Lafarge to exist in a flood plane for goodness knows how many years, and are now considering letting them do further excavation along the Thames Valley from Caversham to Shiplake. This is a disgrace to put it mildly. It is also hugely inconsistent. In this respect there seems to be a complete disregard for the needs of the residents of Sonning Eye and surrounding areas, and a total lack of understanding of the geological make-up of the land we live on.</p> <p>Let us look at the flooding situation. There are residents in Sonning Eye who have been here for 30 to 40 years. In those early years, flooding was never an issue. The geology of the land has taken several thousands of years to evolve. Since Lafarge have been here, the flooding threat has changed significantly. There are many factors that determine what happens when rain falls in these parts. There is the capacity and porosity of the land itself which determine how much water the land can hold, and how fast the water flows within it. There is of course the river itself; the speed at which it flows and the capacity of the river and its tributaries. This is a very complex model to understand, and yet someone in their wisdom at the OCC has taken a very laissez-faire attitude towards all this. How can we even consider excavating this land and replacing it with land-fill without full understanding the consequences of doing so. I know geologists at energy companies who have told me that it is easier to model a North Sea Oil field (which takes up to a year to achieve in some cases) than it is to model the complex water flow in this area. Yet.....the OCC seem to totally disregard this. Hence our dismay and outrage that the OCC are willing to consider Lafarge's latest proposals.</p>

	<p>Let's add to this the minor point of the traffic situation in these parts. There are only three bridges in the Reading area that cross the Thames. The traffic is finely balanced and sensitive to any changes. Believe me, we know as we live here. A little snow will bring Reading to it's knees. A major flood is more catastrophic. Allowing large numbers of trucks to move around this area will also have an impact. Quite frankly, it is crazy. Someone needs to open their eyes and take a closer look.</p> <p>I could go on. The feelings in our community are strong. We are not stupid, and we will not sit back and watch while ridiculous decisions are being considered. The Sonning Eye residents should not be underestimated with respect to how we feel and what we will do to make our feelings known. We will use whatever channels are available to us to make our case known more widely.</p> <p>I therefore ask that the OCC take a very close look at the actions they are about to make. I ask you to defer any and all decisions until you are 100% convinced you know you are making the right decision. There is only one decision to make.</p> <p>I hope that the OCC takes the opportunity to listen to what we are saying, and I hope it does the right thing.</p>
160	<p>I write to protest at the proposal to allow and enlarge continuing gravel extraction in Sonning Eye over the next 30 plus years. Sonning Eye has already had about 70 years of extraction and the further proposals can only exasperate flooding of homes in the area which is a major concern. There are other reasons as well and under the circumstances it seems perverse not to move the operation from Sonning Eye, a Conservation area, to sources of gravel nearer to Shiplake where the impact would be considerably less.</p> <p>I have lived in adjacent Sonning since 1968 and have been aware of the flooding problems and alarmed at proposals of expanding an activity which will make the condition for homes in Sonning Eye worse, not forgetting road disruption and other problems associated with flooding which impact on Sonning as well.</p> <p>I ask that you seriously consider blocking the proposal to expand the gravel extraction at Sonning Eye.</p>
83	<p>Please accept this email as notice of my concern and disappointment regarding OCC minerals and waste policy for the Sonning Eye area.</p> <p>Given a consistent and long term history of flooding in this area it seems ill conceived at best. Whilst acknowledging the need for extraction exists, OCC policy should be primarily aimed at protecting the needs of its residents and tax payers, not the short term conveniences of a multinational corporation.</p> <p>The residents of Sonning and the Eye and Dunstan parish have negotiated honestly and openly throughout 75 years of extraction, with more than a fair degree of accommodation to the needs of industry development. However in doing so we seem to be eternally subject to Lafarge's "laissez-faire", or in plain English, slipshod attitude to statutory planning law</p>

	<p>obligations and requirements.  Engineering decisions being taken with respect to continued extraction at Sonning Eye are bordering on the professionally if not criminally negligent.  How the instantiation of massive soil banking and the proposal of water impervious clay lined pits manages to make it past the sensibilities of even the most ignorant layperson when cited in reference to a consistently active flood plain is staggering, and trending towards high on the scale of blind stupidity.  Now, I feel the time has come to state clearly, enough really is enough. I shall invest more than just my time and thoughts in defending this conservation area and my rights to a reasonably environmental threat free existence.  If the value and preservation of our properties is to be further undermined, then it is far better that our potential losses are invested in seeking the consultative and legal help required to bring an end to this continuous intrusion into our lives and our surroundings, than merely sit by and have them slowly eroded away.  Presumably the role of OCC should be that of governance and duty of care. In this regard you should expect that OCC and its officers will be cited as litigants should the easily foreseeable consequences of exacerbated flooding duly arise.  Be prepared, for I give you honest warning that you will become as used to, and resentful of, the sound of SEAG and our civic and legal actions. Just as we have had to try to become used to the constant mechanical cacophony of noise pollution and the pock marked disfigurement of our local area so poignantly reminiscent of the Somme that LaFarge, one would expect, should have more sensitivity to.  Whilst some of the content of this email may register my emotional dissatisfaction with the current situation, please don't make the mistake of concluding that we do not have the grim determination, resources and stamina required to execute efficiently on our strategy and have this issue resolved in the favour of Sonning Eye and its residents.</p>
163	<p>We are writing regarding the Oxfordshire MWDF which is currently out for consultation. We have spent some time reviewing the document and have tried to extract relevant information that we feel needs to be addressed.</p> <p>The plan discusses how it has considered the local flooding issues and the impact to the Caversham/RAS 16/Sonning Eye identified area. How is this possible when no consideration has been given to the residents of Sonning Eye? We should be part of the discussions and decisions made rather than live with the consequences of decisions made by committees and individuals who are the least to be impacted by the impact this plan will have to the flooding.</p> <p>The consultation document has ignored a number of crucial areas in their planning policy including and not limited to; impact of climate change, framing policy to avoid flood risk to people and property, a proper risk based approach, scientific method and the precautionary principle, the sequential test and the exception test and failing to carry out a proper flood risk assessment.</p>

	<p>We are extremely vulnerable to flooding in Sonning Eye and our properties have been flooded or very close to being flooded many times over the past years. In 2003, the water level was within 10cm of flooding a major proportion of the homes within the hamlet. My own property becomes inaccessible very quickly due to the low road in front of my home. This tells us that any minimal impact to the floodplain will severely impact Sonning Eye.</p> <p>It is clear from the current gravel dig by Lafarge in the triangle that any regulations put in place to minimise our concerns are then ignored by the applicant, in areas of bunting (causing flood water direction change), work times, noise levels etc. Therefore it becomes critical that we drive towards getting this area removed as a potential area for gravel.</p> <p>We also find it interesting that this area ranks high in the way of location for access to the final consumer, which I assume is Reading. Obviously no-one travels around this area, as access through Sonning and Sonning Eye is both restricted and a complete nightmare during peak times and heavy during none peak times.</p> <p>We also feel that a proper analysis has not been done on areas closer to Reading, if not within Reading itself that would be able to provide the required gravel. We believe that visibility should be given into what the plan for areas that are better located for the end consumer.</p> <p>Finally, we don't understand how a potential area can be back filled with soil after the gravel has been extracted, when there is no plan from where this soil would come from in the framework, and therefore indicating that the area would become a landfill site destroying both the area and potentially the Thames.</p> <p>We believe with these issues alone, this are cannot be considered as a potential gravel extraction zone and should be removed from the list.</p>
164	<p>I am writing to object to the plans for more gravel extraction and landfill in the beautiful village where I live in Sonning Eye. My family has lived here for forth years in one of the grade 2 listed properties. Over the years we have seen the flooding become increasingly worse.</p> <p>We are at risk not only from the River Thames but also from the lake of the old gravel diggings which is at the bottom of our garden. Digging continues in another field just across the road. At its worst we have had water reaching up to our back door. Our garden can be full of water at a moment's notice and it also creeps up our road cutting us off.</p> <p>It is up to Oxfordshire County Council to carefully scrutinise any plans to further dig on land so close to these properties</p>

	<p>on an area already a flood plain and consider how climate change will worsen its effects of increased flooding. So please remove Sonning Eye from the list of sites for gravel extraction and keep us out of the minerals plan.</p> <p>Yours sincerely</p>
138	<p>I write as a resident of Sonning who regularly uses the road from Sonning bridge through Sonning Eye to gain access to Dunsden.</p> <p>It is understood that continued gravel extraction in Sonning Eye is very likely especially if the area is included in the Oxfordshire County Council list of sites for mineral extraction.</p> <p>It would appear that the Conservation Area in which Sonning Eye sits has no bearing on the likely impact of the effects both short and long term of further gravel extraction especially when considering the close proximity to the River Thames.</p> <p>Bearing in mind the considerable concern over potential flooding and the serious risk that this poses to both local residents and the disruption to those travelling through Sonning Eye, I strongly urge you to remove Sonning Eye from Oxfordshire's mineral extraction plan.</p> <p>I would be grateful if you would confirm save receipt of this letter indicating our disapproval of Oxfordshire's plan to designate the area as one where gravel extraction will be supported.</p>
161	<p>I would like to comment on the minerals plan that is currently out for consultation. I am a builder by trade and know Sonning Eye very well. I did my apprenticeship with Mr John Hiles who was born in Sonning Eye who remembered the flood of 1947 and have worked in the area ever since.</p> <p>Over the past 25 years, I have worked for many residents of the village and have come to know their properties very well. I must say I was really very surprised when I was told of plans to extend the gravel digging in this area. It seems so obvious to anyone who knows the area that this will make their problems with flooding much worse.</p> <p>There have been many times when I have been called by householders to come and help with protection to stop flood water entering the house. We have had to use sand bags and pumps to try and keep damage to a minimum. Afterwards there is the repair work to be done.</p> <p>Getting to the houses at this time can be difficult as the road floods and becomes impassable. In fact the road from Sonning up to the main Henley road is closed at such times.</p>



	<p>I am surprised that you don't seem to know about this, as it must have a bearing on where you decide to dig gravel. All I can say is that any interference with ground around Sonning Eye is bound to make life for the local householders much worse in times of flood, and I speak from a long experience of working in the area.</p>
<p>185</p>	<p>As residents of Spring Lane, Sonning Eye, we wish to object in the strongest possible terms to the planned extraction of gravel to the east of Spring lane. We note that this site is continually referred to as 'Caversham' in order to suggest that it is part of the current workings. This is grossly misleading as they would quite plainly be new workings. We would stress that we have read and understood the response to this proposal that is being put forward by the Sonning Eye Action Group along with other technical documents opposing this application, and fully endorse their opposition to this extraction along with all the points put forward by the Sonning &amp; Sonning Eye Society.</p> <p>The whole area adjacent to Sonning Eye has been blighted by gravel extraction for almost 70 years and the time has come to call a halt.</p> <p>Sonning Eye lies within a conservation area and it appears as if you do not attach any importance whatsoever to this designation whereas we understand that other areas prosed for extraction have been rejected on this basis.</p> <p>The area to the east of Spring Lane consists of farmland and a landscape that can be enjoyed by many people who walk in the area. Any desecration of that countryside would impact on the Thames Path and is totally unacceptable. It is also home to many varieties of wildlife and acts as a vital 'lung' to the East of Caversham and Reading. Any restoration work of whatever nature can never replace the existing countryside which is of course lost during extraction and thereafter.</p> <p>Landfill would have a devastating effect on local roads due to the lorries required to transport the waste and cannot even be considered.</p> <p>Apart from the noise disruption, and devastation of this beautiful countryside and tranquil area, we have very grave concerns with regard to the increased risk of flooding. No doubt Lafarge have numerous computer models and statistics which suggest that there will be no increased risk of flooding. We see on almost a daily basis that when man meddles with nature these projections are worthless. We do not believe that you can interfere with a natural flood plain in any way without risking serious consequences for which the householders in Sonning Eye would have to pay for, not only in restoring their properties, but in seeing their houses rendered valueless.</p> <p>We understand that your papers make much of the Planning Policy Statements. However, it appears as if many of these statements are not followed and indeed specifically ignored in relation to Sonning Eye.</p> <p>There are a number of references under Key Planning Objectives, amongst which are the following, which state that: Policies should be 'framed for the location of development which avoid flood risk to people and property...manage residual risk, taking into account the impacts of climate change'</p> <p>'Only permit development in areas of flood risk where there are no reasonably available sites in areas of lower flood risk; 'Within each flood zone, new development should be directed to the sites with the lowest probability of flooding.'</p>

	<p>In the context of risk to Sonning Eye the current proposal for extraction produces the highest risk to householders. We do not believe that you have taken into account any of the aspects contained in the assessment of flood risk. For insurance purposes, Sonning Eye now lies within an area designated as 'at the highest risk of flooding' and this is reflected in our premiums.</p> <p>You must be aware that a large number of properties are already at risk of flooding even without any disturbance to the natural flood plain.</p> <p>And yet, prior to your approval in 2008 to extract gravel from the west of Spring Lane, Lafarge commissioned an environmental statement which contained the extraordinary sentence 'it is not know whether residential properties in the proximity to the site lie in the flood plain.'</p> <p>It beggars belief that this was accepted as satisfactory by SODC and the EA and we feel strogly that at the time we were let down by yourselves and the EA.</p> <p>It seems to us if you are about to commit the same error again and totally ignore the risk to people and properties. It is your duty to ensure that any site included in a development plan is able to comply fully and in every way with planning policy and we have doubts as to whether this is the case with respect to the site east of Spring Lane. It would seem that the policy has been drafted for the developer and that the area has been selected at the request of and for the convenience of the developer.</p> <p>We hope that you will not compromise the safety and wellbeing of a community to satisfy the short term profit motives of the various parties who have an interest in this application being granted.</p> <p>You, SODC, should represent us and have our best interests at the heart of any decision making, you have a duty of care with respect to householders and their property but you appear to have overlooked us completely and indeed ignored the presence of the whole community of Sonning Eye.</p> <p>As previously stated we concur totally with the response and technical papers being sent to you by the Sonning Eye Action Group and the opinions of the Sonning and Sonning Eye Society.</p>
139	<p>A number of my residents, (plus Sonning Parish Council) have expressed concerns about the details, the boundaries of the extraction might be in some cases be 10's of meters away from some of my residents properties and certainly within 100's. I feel it appropriate to forward these concerns to you. Sonning and Sonning Eye have a close relationship.</p> <p>The concerns expressed to me fall in a number of categories, the first is flooding, the area is known to flood, I would suspect that the gravel is actually present because the area is (or was geologically a flood plain or glacial outflow). In past times the water levels have come very close to properties in Sonning Eye and anything that disturbs the water table has to be of concern. The roads in this area flood pretty much every winter, I have photo's of the last major occurrence, when this happens the area becomes hugely congested, it's pretty busy in peak times anyway. The extra lorries would only add to the already difficult situation.</p>

	<p>The second concern is transport, The roads in this area are fairly narrow, if my calculations are right there would be hundreds of thousands of lorry journeys over the very extended time that the extraction would take place, the congestion, the pollution, the carbon footprint of this effort has been identified as a concern. Do we know where the gravel would be taken?</p> <p>The third concern is that Sonning and Sonning Eye form a Conservation area, anything that is to the detriment of this has to be a big concern to the residents and to me personally, the heavy lorries cannot come over the bridge into Sonning, there is a weight restriction and indeed successful prosecution has been brought. The local concern is one of damage to the environment in any number of ways.</p> <p>A Conservation area is far more than just a collection of picturesque buildings - It is the whole fabric and I fear this would be impacted.</p> <p>The general feeling I am getting is not one of total objection, more of working together and the possibilities taking the mineral extraction out towards Shiplake which would lessen the impact on Sonning and Sonning Eye.</p>
154 (SEAG)	<p>I am responding to the above consultation on behalf of the Sonning Eye Action Group</p> <p>I notice you do not include us in the "Target Group" by geographical area, as on your web site:  Geographical Area Banbury, Bicester, Kidlington and Yarnton, Oxford City, Benson, Berinsfield and Wallingford, Goring and Henley, Didcot, Abingdon, Faringdon, Grove and Wantage, Burford and Carterton, Charlbury, Chipping Norton and Woodstock, Witney</p> <p>which is in keeping with the way in which we have been ignored in every other respect in this whole process.</p> <p>Our evidence is contained in a submission which is attached to this e-mail.</p> <p>Please confirm safe receipt of this.</p> <p>We would be happy to supply any further detail or documentation that the committee may require. Please let me know if this is the case</p>
71	<p>The first thing I object to is the added risk to flooding.</p> <p>We have put up with years of gravel extraction.</p> <p>Our roads are so busy morning and early evenings, if more gravel should be taken from our area the flooding will get worse.</p> <p>We have very old properties in Sonning Eye that must be protected: it is our heritagea part of England that has been here for hundreds of years.</p> <p>It is time to use other areas for gravel extraction that is not at risk of flooding. This site should be rejected.</p>
28	<p>Dear Sir/Madam,</p> <p>Re: Oxfordshire Minerals &amp; Waste Plan Development Framework</p> <p>I am writing on behalf of Sonning Eye Action Group regarding the recent proposals set out in the Oxfordshire</p>

Minerals & Waste Plan Development Framework. Members of the Action Group live in the village of Sonning Eye which is located within the area designated 'RAS16' in the Development Framework. This area is also known as 'Caversham'.

My client's particular concern relates to increased flood risk as a result of proposed sand and gravel extraction in the area. Many of the residential properties in Sonning Eye are located in Flood Zone 3 and consequently they are extremely vulnerable to flooding. The proposed favoured quarry works in RAS16 largely relate to the area known as 'Caversham Quarry Phase C' immediately to the north of Sonning Eye which is also in Flood Zone 3. Any works which adversely affect flood levels in the area will therefore increase risk of flooding to member of Sonning Eye Action Group's properties.

Having reviewed your document entitled 'Background Paper 2: Flooding and Mineral Development, September 2011' I am concerned that the main thrust of Sequential Test as set out in PPS25 seems to have been ignored. Paragraph D1 in Annex D of PPS25 states 'The risk based Sequential Test should be applied at all stages of planning. Its aim is to steer new development to areas at the lowest probability of flooding (Zone 1)'. Table 4 in your document shows areas allocated green, yellow and red (lowest to greatest flood risk). Only 10% of the 'green' lowest flood risk sites are accepted in the Development Framework proposals. Furthermore, 43% of the 'yellow' areas and 100% of the 'red' highest risk areas have been accepted in the Development Framework. I have also calculated that, of the areas that have been accepted, 49% are in Flood Zone 3b and 14% are in Flood Zones 2 and 3a. Whilst I understand that much of the sand and gravel resources are located in the fluvial flood plains, it would appear from these statistics that the ethos of the Sequential Test has been ignored in the allocation of sites in favour of other planning issues.

I appreciate a balance needs to be struck when considering the various planning issues for selecting sites to be included in the Plan Development Framework. However, in my opinion, the mitigation of risk to life and property posed by increased flood risk should be made a very high priority. As such a full assessment of flood risk should be carried out prior to allocation of land to ensure planning policy can be adhered to.

The comment in Table 4 relating to RAS16 reads 'Area included on grounds of flood risk outweighed by: the need to work minerals efficiently using existing sites and infrastructure, good location for proximity to markets in Reading, road infrastructure is good, few other environmental constraints such as archaeology or designated areas.' I consider that commercial viability of a site should not be a consideration of the Waste Planning Authority and it certainly should not be considered ahead of the risk to life and property caused by increased flood risk.

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	<p>info@abingtonconsulting.co.uk www.abingtonconsulting.co.uk  Abington Consulting Engineers Limited - Company Registration Number 6170809 - Vat Number 754550916  If the summary in Table 4 is a true reflection of the WPA's reasoning, then this would appear to demonstrate that flood risk has not been adequately considered. In the case of Caversham the site is located almost entirely in Flood Zone 3b. PPS25, Annex D, table D1 states that development 'should be designed and constructed to:</p> <ul style="list-style-type: none"> <li>- Remain operational and safe for users in times of flood;</li> <li>- Result in no net loss of flood storage;</li> <li>- Not impede water flows; and</li> <li>- Not increase flood risk elsewhere.'</li> </ul> <p>Suitable means of mitigation against the risk of flooding would have to be provided for the Caversham site and at present it is unclear how this could be achieved. The raising of ground levels within the functional flood plain would be inevitable to accommodate over burden and topsoil mounds (which is not permitted in areas liable to flood as stated in MPG7 Appendix A paragraph 44). Normally this would need to be mitigated by means of flood compensation, ie. by reducing levels outside of the existing flood plain to form a new area of flood plain. As the site falls entirely within the functional flood plain, it would appear that this is unachievable. Similarly, offices, welfare facilities and processing areas should also be located outside of the flood plain to ensure that the site can operate safely during flooding. The inability for these features to be located outside of the flood plain means that they would have to be located in the flood plain, where arguably the all the conditions set out in Annex D and listed above would be breached. This would be contrary to planning policy and perhaps more importantly, increase the risk of flooding to the village of Sonning Eye. Based on my assessment above, I would ask that the Waste Planning Authority examines Caversham in more detail to ensure that, prior to the inclusion in the Plan Development Framework, the site can be developed in accordance with planning policy. If it cannot, we would expect that the site should be rejected accordingly.</p>
33	<p>We are writing to you to express our deep concern at the developments that we understand are to be proposed by Lafarge for its Sonning Works and the impact on the surrounding area.</p> <p>We understand that Lafarge will be submitting an application to your office for extension to its gravel extraction works. We are obviously concerned at the flooding risk to our home and ourselves. In recent years the increasing variation in rainfall and its intensity has brought about flash flooding. On several occasions the area has been under water for days. We understand also that landfill is being considered after extraction which to us appears utter madness! Sonning Eye is a</p>

	<p>conservation area and as such the area is to be protected, therefore it is imperative that Oxfordshire County Council undertake a thorough review of the potential flood risk to the area.</p> <p>Please would you confirm to us that any development that is approved will not put our home or ourselves at risk to flooding and that the protection of Sonning Eye will be maintained?</p>
42	<p>We are writing in reference to the mineral plan for the Sonning Eye area. We are residents of Sonning Eye and chose to live here partly because it is a Conservation area, we feel very strongly that this must be protected, as we hope that the Council does by having specific planning rules for conservation areas.</p> <p>The amount of local gravel extraction over the past 70 years is not helping to protect this beautiful conservation area, our village suffers enormously from the amount of heavy extrcation vehicles driving on our small village roads and we ask if Oxfordshire County Council would consider that Sonning Eye has suffered enough and look elsewhere for future extrcation. It is not necessary to look far, as there is plenth of gravel not far away towards Shiplake.</p> <p>By leaving large soil banks on the floodplain locally, we believe that the Lafarge operation conflicts with current Government rules, and additionally it increases the flood risk, which is something that concerns us greatly. Our driveway has flooded often in the last four years, and we have had to protect our property with sandbags on two occasions. The last time we had severe flooding, we were unable to get to work, and the disruption is locally is considerable. We are concerned that this rate of flooding will increase due to current practices.</p> <p>From our view it would appear that OCC has neglected its duty to protect Sonning Eye which is at high risk from flooding from the impact of gravel extraction. Additionally, without landfill, the extraction would have far less impact on our community.</p> <p>We ask that the location of gravel extraction in Oxfordshire is re-considered, and that our objection is noted.</p>
147	<p>I am writing to express my grave concerns about the proposed plans to allow Lafarge further gravel extraction rights from the site between Sonning Eye and Shiplake. I am astounded that the council can allow this for a number of reasons:</p> <p>Flood risk - the area is already prone to flooding given the low lying nature of the village to the river and the removal of the natural drainage provided by the gravel puts the village in increased risk of flooding. There is also the not inconsiderable matter of insurance for building and property which will be impaired by your actions in allowing this proposal.</p>

	<p>Access - Sonning is already blighted by significant levels of traffic along narrow local roads given the lack of river crossings in the Reading area. The quality of road surfaces and congestion has already been further impaired by the large increase in heavy goods vehicles accessing the extended Lafarge works. Further expansion will endanger these amenities further.</p> <p>Sonning Eye, Sonning and the surrounding area are a wonderful place of natural beauty, and home to a wide diversity of wildlife. The landscape has already been horribly impacted by the conveyor system and the appalling overhead structure straddling the B478. Further development of this site will destroy the environment further and diminish the quality of life for local residents.</p> <p>I would be very interested in your response to these points and a sense to the timescale of your decision making process regarding this application.</p>
154	<p>I am responding to the above consultation on behalf of the Sonning Eye Action Group I notice you do not include us in the "Target Group" by geographical area, as on your web site: Geographical Area Banbury, Bicester, Kidlington and Yarnton, Oxford City, Benson, Berinsfield and Wallingford, Goring and Henley, Didcot, Abingdon, Faringdon, Grove and Wantage, Burford and Carterton, Charlbury, Chipping Norton and Woodstock, Witney which is in keeping with the way in which we have been ignored in every other respect in this whole process. Our evidence is contained in a submission which is attached to this e-mail. Please confirm safe receipt of this. We would be happy to supply any further detail or documentation that the committee may require. Please let me know if this is the case</p>
156	<p>Proposed extension of gravel extraction in Sonning Eye (Caversham Site)</p> <p>I am writing to you to register a strong protest at the Oxfordshire gravel plan &amp; the impending application by Lafarge to further extend their gravel extraction operations in the Sonning Eye (Caversham Lakes) area towards Shiplake.</p> <p>The main concern is the increased potential for flooding in Sonning Eye &amp; Lower Caversham areas. If you have driven along the B478 to Sonning bridge at certain times of year you will have seen the flooding that occurs in the area, &amp; the road has had to be closed on occasions in the past few years. SEAG (Sonning Eye Action Group) have obtained technical opinions from hydrology experts that the gravel workings including the large heaped-up 'bunds' of earth that are produced, have the effect of making flooding worse &amp; slowing the rate at which flood water from the Thames can subside.</p>

	<p>An extra rise of only a few inches would cause many houses in the Sonning Eye &amp; lower Caversham to be flooded. They believe on that OCC's planning department have not taken this into account in designating the area suitable for further gravel extraction.</p> <p>There are a number of other significant concerns: the disturbing noise of the gravel conveyors; the extra traffic generated by site lorries; the fact that both Sonning &amp; Sonning Eye are conservation areas with historic buildings; spoiling the tranquillity &amp; view from the Thames Path national trail, alongside part of which large mounds of earth would be built up; traffic chaos caused when Sonning Bridge has to be closed due to flooding; and not to mention desecrating a beautiful area of countryside close to the Chiltern AONB. Further, there are plans to use some of the pits created for landfill with unknown consequences</p> <p>SEAG have calculated that the number of lorry movements generated over a 30 year period could be over a million. Since there is a weight limit preventing lorries from crossing Sonning bridge, all lorries have to pass either through Caversham or through Henley to cross the river to areas in Berkshire where it is thought much of the gravel would be used. Traffic through both these places is already very congested, &amp; in the event that Sonning bridge (B478) is closed due to flooding (which will be more common if the gravel extensions are allowed), gridlock then ensues, as there is no other Thames crossing between Henley &amp; Reading.</p> <p>I ask that you use your influence to oppose any further extension of gravel extraction in the Sonning Eye (Caversham lakes) area. Other areas for extraction exist which do not have the same high combination of serious problems.</p> <p>As a Caversham resident my interest is particularly in the worsening traffic problem, but also I frequently walk in the Sonning Eye/Shiplake/Thames Path area which is beautiful and peaceful &amp; should not be further damaged by gravel workings.</p>
157	<p>Mr Brazier in his letter (25 Sep 2011) has challenged the OCC's document for by-passing specified prescribed requirements.</p> <p>As a lay person the technical challenge appears to be clear.</p> <p>The question that I have is this 'What authority did the OCC rely on to by-pass these noted prescribed requirements?' It may be that in response to Mr Brazier's challenge (on behalf of this community) it will be made clear that the OCC has the authority to put aside these requirements. If this is the case will such evidence be made available?</p> <p>It will be helpful if your response can be made available to all interested parties.</p> <p>Could you le me have a copy of your response please?</p>



181	<p>I write to raise my concerns regarding the application by Lafarge to expand their gravel extraction works in the area between the Playhatch roundabout and Sonning Eye.</p> <p>My objections are regarding the following key issues:</p> <p>The increased risk of flooding to the houses in the Sonning Eye area. As a resident I have witnessed the flood waters rising in previous years and the precarious position our homes are in already. Any further rise in flood water levels would have an immediate and catastrophic effect on this very flat piece of land in the Thames flood plain. This would be in addition to the very real threat that climate change could impose on the area in years to come.</p> <p>I do not feel adequate flood risk assessment has been carried out for the project; although it may not be possible to extrapolate exact figures for the potential impact of climate change and the effect of the proposed increased gravel extraction, it cannot be denied that ANY rise in water levels would significantly increase the chance of our homes flooding.</p> <p>The increase in activity on the Sonning site would also increase the traffic flow on a small road that already struggles to cope with the current volume, vehicles being at standstill frequently during the day.</p> <p>Lastly Sonning Eye is a Conservation Area, if this designation is to mean anything then surely regard must be taken to the impact industrialisation would have on a beautiful part of the Thames.</p> <p>I hope you will reflect on these factors which will have a devastating effect on our community and do not seem to have been taken into consideration to date.</p>
927 (Rt Hon Theresa May)	<p>I have received correspondence from the Sonning &amp; Sonning Eye Society regarding the above publication, which I understand lists Sonning Eye as a site for gravel extraction.</p> <p>Sonning Eye is located just outside my constituency but the issue of gravel extraction will certainly be of interest to many of my constituents. I am aware of the concern that exists about this issue, particularly in regard to flooding. As you will know, this area is one that is at a high risk of flooding so it is essential that nothing is done to increase this risk. Further removal of gravel could increase the risk without sufficient justification to outweigh this considerable threat to local residents. I am aware of the specific points that have been raised by the Sonning Eye Action Group about this, and I trust that these will be taken into account.</p>

	<p>In addition, local residents will be concerned about the potential side-effects of gravel extraction at this site, namely the need for high numbers of lorry movements on local roads, and the visual impact of the work.</p> <p>I would be grateful if these points could be considered.</p>
835	<p>I am not normally prone to writing to complain about planning applications and indeed this is the first time I have ever done so, however, as a resident of Sonning Eye, I very strongly disagree with the current plans of Lafarge with regard to their gravel extraction and subsequent landfill plans at Sonning Eye.</p> <p>I believe that the landfill plans contravene current legislation in that they will cause a displacement of water on a flood plain and as such put all houses in the local area at higher risk of flooding. Sonning Eye is already considered to be at high risk of flooding so it would seem ludicrous, and in breach of your duty to protect such areas, to grant permission for Lafarge to continue with their current plans for the landfill.</p> <p>I am less concerned about the gravel extraction component of Lafarge's plans but I am not prepared to support these unless the landfill issue is resolved satisfactorily. I would support a plan to leave the resulting gravel pits unfilled as this would not only not change the risk to local flooding but would also, over time, add to the beauty of the Conservation Area that is Sonning Eye.</p>
651	<p>I am a resident of Sonning Eye and have lived here for the past 13 years with my family. Over the years we have been threatened a number of times with flooding - in fact, in 2003 the shed at the bottom of the garden was flooded with at least 6 inches of water and my house was about a day away from being flooded too, but by the grace of God, the waters started to subside.</p> <p>I am bemused and disappointed at the current attitude being shown by the OCC regarding the latest chapter in Lafarge's attempts to continue their excavation around Sonning Eye.</p> <p>I continue to be intrigued and dismayed by the inconsistencies of the OCC planners when they repeatedly refuse reasonable requests for families to improve their homes, yet they then allow large multi-nationals to completely wreck the surrounding areas for many years, and ruin the lives of families who have their futures invested in properties which are then severely damaged by the resulting actions of Councils, wealthy land owners and corporates. We are consistently reminded that Sonning Eye is a Conservation Area - an area of natural beauty that must be protected. So how does this reconcile with regard to Lafarge and the way that their activities are trashing the environment, both visibly and ergonomically? I understood that part of the role of OCC was that of a duty of care. Quite honestly, decisions thus far are a far cry from this duty. The residents of Sonning Eye have been hampered for far too many years by the growing threats</p>

	<p>of flooding and Lafarge's footprint is getting bigger and bigger - it has to stop. Due to the high risks of flooding, many of us are now struggling to get house insurance, and when we do, the premiums are excessive. Will the OCC compensate for this? Will the OCC also compensate for all the flood damage that is undoubtedly going to happen if you allow this madness to continue? We all know that there are alternative sites for Lafarge, but of course, it is much more convenient for them to simply move across the road and continue the destruction and intimidation of the Sonning Eye residents.</p> <p>There are residents in Sonning Eye who have been here for 30 to 40 years who can vouch for the fact that flooding has become significantly worse since Lafarge have been active. There are many factors that determine what happens when rain falls in these parts. There is the capacity and porosity of the land itself which determine how much water the land can hold, and how fast the water flows within it. There is the river itself; the speed at which it flows and the capacity of the river and its tributaries. This is a very complex model to understand, and yet there appears to be no-one at the OCC who has taken the time to properly review this. How can anyone consider excavating land and replacing it with land-fill without fully understanding the consequences of doing so? Engineering decisions being taken with respect to continued extraction at Sonning Eye appear to be totally negligent. The process that has taken place in order for Lafarge to reach the point they have reached has raised many questions in terms of legitimacy and integrity.</p> <p>Additionally, there are only three bridges in the Reading area that cross the Thames. The traffic is finely balanced and sensitive to any changes. A major flood is catastrophic. Allowing large number of trucks to move around this area will also have an impact. Quite frankly, it is madness.</p> <p>I therefore ask that the OCC review this matter, ensuring they engage specialists who can advise them accurately instead of the apparent laissez-faire attitude. Without doubt, the results of a proper investigation would recommend a different outcome.</p>
281	<p>After studying Lafarge's public exhibition of their proposed gravel extraction plans between Sonning Eye and Shiplake I am dismayed at the relative disregard for the sensitivity of Sonning Eye to flooding. Nowhere have they addressed the fact that several properties have already flooded more than once since 2000, let alone the expected increase in risk owing to climate change alone. The computer modelling for flooding on which Lafarge's proposals are based has a margin of error quite unacceptable given the recent history of the area. Indeed proposal of any development on this scale in such an area which has the slightest chance of increasing flood risk to people's homes is callously irresponsible.</p> <p>Coupled to the above a vast area around Sonning Eye is already given over to the ravages of gravel extraction. Surely further extension on the scale proposed can only be seen as gross over development.</p>

282	<p>I am a professional geologist with 25 years experience in the Oil and Gas sector and a Fellow of the Geological Society of London. I live in Sonning Eye and I am writing to express my opposition at the proposal of the Oxfordshire County Council for sand and gravel extraction in relation to the inclusion of Caversham/RAS 16/Sonning Eye.</p> <p>The main focus of this letter, contained in Section A, will be based on my assessment of the statements and findings contained in the Hydrogeological and Hydrological report issued by MJCA on behalf of Lafarge Aggregates Ltd in 2004 to support the extension of gravel extraction activities. The report is titled "AN ASSESSMENT OF THE POTENTIAL HYDROGEOLOGICAL AND HYDROLOGICAL IMPACTS OF THE PROPOSED SAND AND GRAVEL EXTRACTION IN THE NORTHERN EXTENSION OF CAVERSHAM QUARRY, OXFORDSHIRE" (Report Reference: LAF/CAV/JRA/2286/01f) December 2004.</p> <p>In addition to concerns about the MJCA report above, I would also like to draw your attention to legislation, policy and good practise guidelines, clearly set out in the governments Planning Policy Statement 25 (PPS 25), that are being ignored. These will be detailed in Section B.</p> <p>SECTION A: REVIEW OF THE REPORT: "AN ASSESSMENT OF THE POTENTIAL HYDROGEOLOGICAL AND HYDROLOGICAL IMPACTS OF THE PROPOSED SAND AND GRAVEL EXTRACTION IN THE NORTHERN EXTENSION OF CAVERSHAM QUARRY, OXFORDSHIRE" (Report Reference: LAF/CAV/JRA/2286/01f) December 2004.</p> <p>The first point to note is that in Section 2.3 describes only a few residential properties in the immediate vicinity, a radius of approximately 100m from the centre of the proposed site, and neglects to point out the location of the remaining 30 properties in Sonning Eye which lie any distance from 150 to 300m from the site. Given that the proposed extraction site, all the properties in Sonning Eye and the River Thames lie in a designated floodplain within the same dynamic, hydrological system, sharing the same groundwater levels and the same sub-terranean aquifer, it is a significant omission for a report that purports to be a hydrogeological and hydrological impact assessment. The more densely populated Lower Caversham area, which also lies within the floodplain, is located only 1.5km to the SW.</p> <p>It is also interesting to note that the maps in the MJCA report do not have a scale bar annotated instead relying on a scale indicator, such as 1:2500 or 1:50000, making it more difficult for the reader to gauge distances from the maps. Also the various maps are presented at different scales, obfuscating matters further.</p> <p>Section 4.2 refers to the four groundwater monitoring boreholes, BH1, BH2, BH3 and BH4 which were drilled within the proposed site in order to monitor groundwater levels between 2002 and 2004. Given that the location of the proposed site, and that all the properties of Sonning Eye lie within the same hydrological system, within a designated floodplain zone, and knowing that the gravel will be extracted dry, which means that it will be dewatered before it's excavation, it is necessary to have this network of groundwater monitoring boreholes extended to cover the area SE of the site, down to the River Thames to be able to understand properly the impact of these activities on groundwater movement.</p>
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Figures 3, 5 and 6 are charts showing measured groundwater level, surface water level and monthly rainfall data. These three charts, if properly compiled and synchronised, should show if there is a relationship between rainfall and the groundwater and surface water levels. However, what we actually have is a rainfall chart (Figure 6) that ends in January 2002, precisely the time when the groundwater (Figure 3) and Surface Water (Figure 5) level charts commence, making it impossible to see if a causal relationship exists. Also no explanation is given about the cause of the high water level in BH2 on 12/1/02 which is not observed in the other boreholes. Also no explanation is given about the missing data in Figure 5 between 4/1/02 and 7/1/03. In summary these charts serve no purpose at all, other than to flesh out the report and give it the appearance of a scientific document.

Section 4.2 states that the direction of groundwater flow is NNE and NE, however, the location of BH2, BH3 and BH4 in a straight line make this statement invalid, with BH1 being sited too far away from the other boreholes to be used as a triangulation point. A closer network of groundwater monitoring boreholes, arranged in a grid pattern, covering a more extensive area, including Sonning Eye, is required before any valid conclusions can be made about the direction of flow of the groundwater.

Section 5.2 states that Berry Brook and Eye Marsh Ditch do not have a GQA classification from the Environment Agency and that Lafarge is planning to pump water from the works in to both channels. Given that they eventually drain into the Thames, is this permissible?

Section 5.3 and 5.4 states that water levels in Berry Brook and Eye Marsh Ditch are presented in Figure 4, but as stated in the paragraph above, most of this data is absent and all that exists are a couple of 'snapshots' taken in 2002 and 2004, which cannot be substantiated by observed data.

Sections 6.1 and 6.2 explain how the gravel will be dewatered before it is extracted and that the groundwater level will be artificially maintained at a depth corresponding to the base of the gravel with the excess water being pumped into Folly Lake. No reference is made as to how the levels of Folly Lake will be affected with reference to the neighbouring properties of Sonning Eye and flood resilience. This section states that degree of dewatering will diminish rapidly away from the extraction site, which is very important with regard to the risk of settlement of the homes in Sonning Eye. Are charts or tables showing compaction of sediment with dewatering available? A map covering the proposed site and Sonning Eye to illustrate the extent of dewatering. A map of the hydraulic gradient would also be helpful.

Section 6.5 relates to the risk of differential settlement of buildings as a result of the dewatering of the aquifer, and mentions that an assessment has been made of the risk. Furthermore it states that this assessment is based on an assumption that the buildings are underlain by sand, gravel or silt. Given that this concerns peoples homes, it would be prudent, if not compulsory, for a more detailed analysis of the substrate beneath every home in Sonning Eye be conducted based on borehole data and outcrop mapping, rather than on an assumption.

Section 6.3 states that Lafarge will arrange alternate supplies of water in the event that water supplies are adversely

affected by their activities. Is there a risk that water from other sources may risk ecological harm, for example introduction of parasites or exotic species for example the N. American signal crayfish which undermine river banks.

The observation in figures 3 and 5 which show that the groundwater levels are higher than the surface water levels in the Eye Marsh Ditch and Berry Brook are counter-intuitive and highlight the limited understanding of the delicate interplay of the various factors that constitute this dynamic hydrologic system.

Section 6.6 states that restoration of the site is unlikely to significantly affect the flow of groundwater across the site and that the voids are to be partially infilled by the overburden. The gravel in the area has been winnowed and sorted over a period of tens of thousands of years by the River Thames, removing the finer grained sediment from the system and improving the porosity and permeability to the point where it has a terrific capacity to absorb excess water flow. Extraction of this natural sponge and it's replacement with a poorly sorted topsoil, described earlier in the MJCA report as relatively impermeable, or backfilling with so called inert building waste, will result in a decrease of the capacity of the land to absorb water. In order to understand how the flood storage capacity will be affected it is necessary to have data on many variables, which are not mentioned in this MJCA report, for example porosity Vs. permeability (log scale) plots for the chalk substrate, the sand and gravel, the top soil as well as the proposed infil material are notable by their absence. Infilling with impermeable overburden to create a lake will effectively cut off that area from the hydrologic system, as is already demonstrated by the levels of Berry Brook and Eye Marsh Ditch whose levels are observed to be lower than the surrounding ground water levels.

The dynamic hydrology of the area is a delicate balance of a multitude of factors including, but not restricted to, rainfall, groundwater levels, river and tributary levels, surface water flow, vegetation cover and interception, degree of urbanisation, and there cannot be a single, deterministic answer to susceptibility of an area to flooding. The MJCA report, which attempts to address this question is not a particularly robust piece of work, and it fails to stand up to even the most superficial scrutiny. I cannot help but suspect that it exists simply to be checked off a task list.

In attempt to try to understand the real objectives of this report, remembering that it is "AN ASSESSMENT OF THE POTENTIAL HYDROGEOLOGICAL AND HYDROLOGICAL IMPACTS....." it is notable that prior to the final planning approval in 2008 to dig gravel to the west of Spring Lane (the current workings) P08/E0740/CM, the operators commissioned an environmental statement including the Flood Risk Assessment. The latter completely ignored local housing and indeed contained the remarkable statement "it is not known whether residential properties in the proximity to the site lie in the flood plain".

In conclusion, it seems remarkable that this was accepted as a satisfactory Flood Risk Assessment by both South Oxfordshire District Council and The Environment Agency. We the local residents and council tax payers feel very strongly that we have been let down by these agencies that are there to protect us. There is a real concern that we will be

	<p>ignored by the County Council in its Flood Risk Assessment and in its consideration of the Sequential Test. The risks to People and Housing are being ignored. I read on the BBC website today that two people drowned yesterday (24th October 2011) in floods near Dublin (<a href="http://www.bbc.co.uk/news/uk-northern-ireland-15442031">http://www.bbc.co.uk/news/uk-northern-ireland-15442031</a>). These risks are real and the consequences of getting your decision wrong can be catastrophic. In my own industry, oil and gas, we have recently observed the consequences of bad science with the Deepwater Horizon disaster in the Gulf of Mexico and the crippling effects that had on BP both financially and to their reputation. There will be a temptation to ignore the issues I raise about the MJCA report, but I would point out, that bad science has a habit of being found out, usually in disastrous consequences, and the people responsible are eventually held to account.</p>
628	<p>As long-term residents of Sonning, we write regarding the proposal to include Sonning Eye in the list of sites for further gravel extraction.</p> <p>We are strongly opposed to the proposal, believing that it will result in further erosion of the Sonning Eye conservation area, damage the local environment for residents and greatly increase the risk of flooding.</p> <p>The area around Sonning and Sonning Eye is, without doubt, one of the most attractive in the region. People come from far and wide to enjoy the amenities provided by the river and the surrounding countryside. The views and enjoyment of the path that runs alongside the river would be seriously impaired by an intensification of industrial activity and the creation of huge solid banks.</p> <p>The proposal to replace the extracted porous gravel with impermeable landfill runs the risk of making the likelihood of flooding in Sonning Eye much worse. Flooding is already a common occurrence in Sonning Eye and the surrounding area. Every time floods block the road between Sonning Bridge and the Henley Road, the disruption to local traffic and to the lives of residents is massive. Sonning Bridge carries an enormous amount of traffic each day and is the only bridge on the river between Henley and Caversham. It is a vital crossing point. Whenever this route has been flooded in the past, the traffic chaos that results causes untold misery for local people and businesses alike.</p> <p>After some 70 years of gravel extraction locally, enough is enough for the residents of Sonning Eye. There must be many other sites for gravel extraction, where the impact of the plant and proposed landfill would be felt far less.</p> <p>It is for these genuine concerns that we are opposed to the inclusion of Sonning Eye in Oxfordshire's minerals plan. We sincerely hope that Oxfordshire County Council will think again before condemning local residents to years of disruption, inconvenience and the real threat of damage to their properties.</p>
617	<p>After studying Lafarge's public exhibition of their proposed gravel extraction plans between Sonning Eye and Shiplake I am dismayed at the relative disregard for the sensitivity of Sonning Eye to flooding. Nowhere have they addressed the fact that several properties have already flooded more than once since 2000, let alone the expected increase in risk owing to climate change alone. The computer modelling for flooding on which Lafarge's proposals are based has a margin of error quite unacceptable given the recent history of the area. Indeed proposal of any development on this scale</p>

	<p>in such an area which has the lightest chance of increasing flood risk to people's homes is callously irresponsible. Coupled to the above I have attached an aerial photograph showing the vast area around Sonning Eye Already given over to the ravages of gravel extraction. Surely further extension on the scale proposed can only be seen as gross over development.</p>
474 (River Thames Society)	<p>I write on behalf of the River Thames Society, Middle Thames Branch, (RTS),to express our concern at the continued attempts to encroach on the land along the Thames for the purpose of gravel and other extraction.</p> <p>As guardians of the River Thames the RTS and its members keep an eye on the river, its banks, footpath and the various activities along the river in an attempt to ensure that the wellbeing of one of this country's natural assets is not abused. I refer to my letter addressed to the Mineral and Waste Policy Team, Speedwell House, dated 14th June 2007 when I expressed our concern for this area of great landscape value designated as being of special character by the SODC. Also our concern for the further loss of the non wet-land habitat which would seriously disadvantage the biodiversity of this natural habitat. I referred to an extract from the Planning Inspectorate APP/23115.a.01/1077772 (5.4.02). All this is unchanged and the landscape should be retained for those reasons set out.</p> <p>The continued inclusion of the area 'RAS16', also known as Caversham, as a proposed site for extraction is to further abuse this area and indeed the surrounding area. As a Caversham resident and Chairman of the Deans Farm Management Company, I am distressed to note that although the consultation admits that should this area be exploited there is a 'flood risk' this consideration is overridden by the fact that there are 'existing sites and infrastructure there', 'good roads' etc: Thus showing a complete lack of care or consideration where the flood risk is deemed very likely to endangering the lives and homes. Not to mention that most of the roads in the vicinity, and the bridges over the Thames, are already under pressure and are not suited to large industrial vehicles. Having just flown into Heathrow over the land in question I can confirm that there is little to see but water and further extraction can only add to this and the continued risk of flooding to the few pieces of land still standing above water level.</p> <p>I have sight of the Abington Consulting Engineer, Ian Brazier's lucid comments of the 29th September and would also urge that the Waste Planning Authority examine Caversham in more detail.</p>
479	<p>I am writing as the former Chairman of Sonning Parish Council and Wokingham Borough Councillor for the Ward of Sonning with regard to the proposed gravel extraction in the area designated as RAS16.</p> <p>My primary concern is the vulnerability of the area to flooding, many of the properties in the village of Sonning Eye are located within Flood Zone 3, and your Authority's failure to comply with the Sequential Test as laid out in PPS25.</p> <p>The aim of this risk based sequential test is to direct new development to areas at the lowest probability of flooding. However, within your Development Framework 100% of the highest at risk areas have been accepted. PPS25 states that development should be designed and constructed to:</p>



	<ul style="list-style-type: none"> <li>- remain operational and safe for users in times of flood</li> <li>- result in no net loss of flood storage</li> <li>- not impede water flows</li> <li>- not increase flood risk elsewhere</li> </ul> <p>Therefore, to meet the thrust of PPS25, mitigation measures against the risk of flooding would have to be provided for this area, an area that is already vulnerable to flooding</p> <p>The raising of ground levels within the extraction area would be required in order to accommodate overburden and topsoil mounds thus increasing the risk of flooding. This would need to be mitigated, no mitigation measures have so far been provided.</p> <p>At the Lafarge exhibition, I questioned the impact of replacing gravel with landfill on the permeability of the area and it was admitted that this was not an exact science. Therefore, there is uncertainty on the long term impact on the flood plain in this area in addition to the impact during the life of the proposed workings.</p> <p>Additionally, the proposed workings will generate in excess of 100 lorry movements a day. Since the target market for the gravel is the Reading area, has the Authority carried out traffic modelling to assess and mitigate the impact on Caversham and its residents and in particular the increase in congestion in the area of Caversham Bridge?</p> <p>Therefore, for RAS16 to be included in the Development Framework, your Authority must demonstrate that the Sequential Test as laid out in PPS25 has been met and effective mitigation measures conditioned. In my consideration, until this has been achieved, RAS16 cannot be included within the Development Framework.</p>
482	<p>As a long term resident of Sonning, I was extremely concerned to see the proposed inclusion of the Sonning Eye site in the plan for gravel extraction and do not support the proposal as it could have a very serious impact on flooding of residential properties in that area.</p> <p>By raising soil banks on the floodplain, Lafarge operates in a way that completely conflicts with Government rules and greatly increases the risk of flooding over an area that is already vulnerable to flooding. It appears to me that no mitigation measures regarding this have been provided which is clearly in breach of planning policy. Further, replacing porous gravel with impermeable landfill would also have a very serious impact on flooding in Sonning Eye and the properties situated there, a cause of great concern to the residents there and also to the people of Sonning.</p> <p>As a user of the road from Sonning Eye to the Playhatch roundabout, I have been alarmed to see that the tarmac on the road is breaking down, due, I strongly suspect, to the number of heavy lorries that are now using the road. This adversely affects the safety of all road users and is another reason why I strongly urge you to reject inclusion of the Sonning Eye</p>

	site in your plan.
484	<p>I feel not enough interest is taken in the plight on Sonning Eye, a small hamlet on the very boundary of Oxfordshire, and yet a vital link to the motorway network and beyond, for those living in South Oxfordshire. The bridge at Sonning is used not only by commuters but parents taking their children to local schools, by local trade personnel who operate on both sides of the R.Thames for their livelihood and by visitors and local alike.</p> <p>Recently we had heavy rainfall over a short period of time, which not only flooded Playhatch (which it has done on previous occasions) but caused flooding along the Reading/Henley Road between Playhatch and Shiplake, as well as roads nearer the river, causing traffic chaos. Nearly every winter it seems, the access road to Sonning Bridge is closed at some point because of flooding and the removal of the gravel alongside the river in this area only exacerbates this problem.</p> <p>Over recent years we have experienced periods of exceptionally heavy rainfalls and are told that we can expect this weather pattern to continue into the future. Interfering with the natural flood plain has caused problems in many areas of Britain in recent years so the evidence is there. Allowing more extraction to take place over the next 30 years in this area is shortsighted and bound to lead to problems for the people of South Oxfordshire who want to cross the river at Sonning or travel along the A4155 Reading/Henley Road to do business, or cross the river, at Henley.</p> <p>Sonning Eye is a Conservation Area and the whole area between Sonning Eye, Shiplake and Henley is popular with locals and tourists who enjoy river walks and the history of the area. To ruin this lovely landscape for gravel, which could be extracted with less destruction to the countryside and obstruction to the local population, in other less sensitive areas, seems criminal.</p>
611	<p>I write to express my concern that the floodplain area between Sonning Eye and Shiplake may be selected as a site for gravel extraction. I am not convinced that the sequential test has been or will be applied fairly. Can you send me information on this and is this an open documented process with due diligence? In particular, I do not believe that the danger of increased likelihood of flooding for local houses has been considered adequately. Again, can you demonstrate that appropriate professional investigations have been or will be undertaken before proceeding? The actions of the council seem to indicate that it is allied with business rather than rate-paying local residents. Can you provide any real assurance on this aspect? I look forward to hearing your assurances or otherwise.</p>

644	<p>I wish to object to your plans for further extraction of gravel at sites close to Sonning Eye and Caversham. I live in Hurst in Berkshire, so for me it is not a case of these gravel pits having a direct impact on my daily life - they will not.</p> <p>However, I do often visit the area around Sonning Eye and I believe the planned extractions will have a detrimental effect on the area in many ways. I also believe that, with respect to flooding in particular, no amount of 'flood modeling ' is going to be sufficiently accurate to predict future water levels if the extraction does go ahead.</p> <p>On one hand I am myself an environmental consultant with many years experience and I know very well that certain types of modelling, such as predicting future flooding, are notoriously unreliable.</p> <p>On the other hand I am a regular canoeist and cyclist. Over recent years I have noticed flooding being a more and more regular event over the last five years. In fact each year over the previous five years the Thames has flooded so that I have been able to paddle up to peoples doors - particularly on the loddon backwaters. As a cyclist I have noticed more regular flooding on the B478.</p> <p>The huge increase in HGV movements and the visual impact of the workings also concern me.</p> <p>The roads surrounding Sonning Eye, and the Caversham-Henley road, were not designed for the huge gravel lorries, nor for the increase in movements. The whole area, being on the edge of the hugely busy Reading area, is already drowning in traffic.</p> <p>The area is one of great beauty, between the Thames and Chilterns, but your policies have already greatly spoilt it. I just hope you will think sensibly before you go ahead and ruin the area</p>
789	<p>I and my family are deeply concerned about the devastating consequences of the continued extraction of gravel in the area of Sonning Eye and flooding that occurs in the area. It is truly shocking that this is allowed to continue on the flood planes.</p> <p>I would like to know what protection and safeguards you are offering the residents and wildlife in this area of outstanding natural beauty?</p> <p>When after all these years are you going to call a halt to this massacre of our countryside?</p> <p>If you continue to allow the digging by Lafarge knowing the consequences of this action where do the local people stand for recourse?</p>
649	<p>I am opposed to the inclusion of land designated RAS16 at Sonning Eye in the Development Framework for the following reasons:</p> <ol style="list-style-type: none"> <li>1) As suggested by Sonning Eye Action Group, OCC's failure to apply the Government recommended sequential test to prove the site means that its inclusion is untenable (PPS25).</li> <li>2) Any working on this site would have important implications for the amenity value of two key walking routes: a public footpath along Spring Lane, Sonning Eye, and the Thames Path. Any attempt to screen these routes with bunds would</li> </ol>

	<p>have serious flooding implications to an area of high flooding risk by temporarily holding-up floodwaters.</p> <p>3) Reference to the British Geological Survey shows that past gravel extractions at Sonning Eye have occurred in areas of specific geological quality. The areas of previous gravel extraction stretching from Sonning Eye to Reading were located in an area where the superficial deposits were ' KEMPTON PARK GRAVEL FORMATION - SAND AND GRAVEL'. The small triangle of land which has recently attained extraction permission comprises 'ALLUVIUM - CLAY, SILT, SAND AND GRAVEL'. However the area RAS16 is 'LANGLEY SILT MEMBER - CLAY AND SILT'. In other words, the proposed site is an un-connected area of poor quality sand and gravel yield.</p> <p>4) The site is close to a Thames Water extraction site at Playhatch. The risk of pollution to groundwater by gravel extraction has frequently been documented (<a href="http://iahs.info/redbooks/a222/iahs_222_0427.pdf">http://iahs.info/redbooks/a222/iahs_222_0427.pdf</a>) - these risks been factored into the site selection process, it might not have been included.</p> <p>5) The site owners have provided evidence of their requirement that landfill be carried out after extraction on RAS16 (see the scoping report for an imminent planning application). There is a considerable shortage of suitable inert landfill material within a 10-mile radius, and transporting this material from greater distances would be unsustainable. Furthermore the site is not recommended for landfill in the Waste Plan. Inert landfill with a clay lining (as specified in Government guidance) *would* have extremely difficult to accurately quantify effects on the dispersion of flood-levels.</p> <p>6) Elevated or difficult to quantify risk of flooding to highly vulnerable areas means the site is unsuitable: Given the high risk of flooding to the Sonning Eye Conservation area, to parts of Playhatch and to many houses in Lower Caversham in the the Borough of Reading, the risk of a reduction in the capacity of the floodplain both during extended working and after restoration is too great to make the Sonning Eye site suitable for inclusion in the Minerals Plan.</p> <p>7) Local roads are under considerable pressure, and site access would be via a sub-standard narrow 'A' road which has a dangerous pinch point at the house Botany Bay. This spot has frequently been the site of accidents.</p> <p>8) It is believed the Borough of Reading has not been consulted on the suitability of this site.</p>
650	<p>In 1945 or thereabouts, it was anticipated I believe, that there was at the most 50 years of gravel extraction to happen in this area and that that would be the end of it. But it has been 65 years now and we are told it could go on for another 40 years.</p> <p>The Olympic rowing course has increased the flooding in this area, blocking the road in two places instead of just one and this is a vital road for traffic to cross the river. Some 13,000 cars a day, I believe.</p> <p>I have lived here 46 years and have put up with dust and noise and the constant threat of flooding in all that time. Any further interference with our floodplain can affect all our lives. Our house insurance premiums will go up (if we can get one) and if we can't we won't be able to sell our houses. In any event, homes will obviously be devalued.</p> <p>I was marooned here when the road was blocked in two places, and unable to get to the doctors.</p>

	<p>There is banging and grinding coming across to our houses all the time and dust and noise and we are utterly sick of it. I have a few questions to ask if I may:</p> <ol style="list-style-type: none"> <li>1. we all know that a man as important as Lord Phillimore, who is the landowner, is not without influence. Naturally he is looking after his own - but he is on our parish council. I am told he has no vote on these issues when discussed at council meetings. Unless he is prepared to support the people like us, who he is supposed to represent, do you not think he should come off the council and let someone else be elected who will?</li> <li>2. How many people do Lafarge employ at the gravel works, and how many actually live in the area of Sonning Eye? My impression is that it is a handful, and therefore their contribution to the local economy is minimal.</li> <li>3. What does OCC gain from the Lafarge site?</li> <li>4. What is Mr Howells, our MP, doing for us that is having any effect? We supported him in his election, is he supporting us now or is he afraid they may re-direct the attention of envisaged gravel extractions back to the area where he lives?</li> <li>5. Infill of the site will not be domestic waste, but will be inert building materials. Who knows what else might be dumped in there? You can't trust people. I know SODC spent some £30,000 once, clearing up after gypsies had dumped rubbish. Will every skip or lorry load be thoroughly inspected. Some of our drinking water comes from this area, and who can guarantee it will not be polluted, especially with all the chemicals and toxic materials used in today's building industry?</li> </ol> <p>For pity's sake, enough is enough.</p>
692 (Lafarge Aggregates)	<p>Lafarge Aggregates support Policy M3 and the principle of extending or replacing exhausted quarries within existing areas of working. This recognises the importance of existing operational quarries, the capital investments on-site, and the improvements to the local transport infrastructure that may already have taken place and the environmental benefits of extensions.</p> <p>2.5.3 Specifically, we support the inclusion of Caversham in Policy M3 as one of the principal locations for sharp sand and gravel working in Oxfordshire. There are three key considerations, which underpin the importance of the existing mineral workings at Caversham as a principal location for sand and gravel extraction within the County:</p> <ol style="list-style-type: none"> <li>1) Existing operation and availability of resources;</li> <li>2) Location and proximity to markets;</li> <li>3) Quality and end use of aggregates.</li> </ol> <p>2.5.4 The inclusion of Caversham in Policy M3 to provide for the continued supply of aggregates is a sensible option,</p>

given that it is an existing operational quarry and provides an availability of supply. The mineral workings in Caversham have been in operation for close to 40 years, which has provided a continued supply of sand and gravel to the County over that period.

Lafarge have made significant capital investments in their site and have plans for the prospective extension of the existing quarry to provide an extended lifetime of 15 years. The site is important in being able to meet a steady and adequate supply of materials for which there is clear evidence of demand.

2.5.5 The designation of Caversham as a principal location for sand and gravel extraction is important, having regard to its strategic location and the need to provide a geographically balanced approach to mineral working across the County. In this regard, Caversham is located in the southeast of the County, whereas the other locations included in Policy M3 of the Draft Minerals Strategy are predominantly located in the central and northern parts of the County.

2.5.6 The site offers the continued supply of aggregates to local markets in the south and east of the County, thereby providing a sustainable approach through the minimisation of transport and carbon miles in accordance with the Plan's strategic objectives and those of national policy in MPS1. In contrast, the reliance on other sites in the centre and north of Oxfordshire alone to serve the southeast of the County would lead to an increase in haulage that would run counter to these objectives.

2.5.7 The Caversham site is also important in terms of the quality and end use of the aggregate resources. Its location within the Thames Valley means that the aggregates contain flint and quartzite gravels, which can be used for high strength concrete end uses. This quality of aggregate differs from the sand and gravel deposits that exist within the northern and central areas of the County. As such, it is important to recognise the distinct and separate uses and markets that exist under the umbrella of "sand and gravel" resources. The inclusion of Caversham in Policy M3 for sand and gravel working therefore provides for diversity in the quality and end use of aggregates supplied within the County.

2.5.8 In addition to supporting the inclusion of Caversham in Policy M3, we wish to comment briefly on a specific aspect of the 'Preliminary Site Assessment' (Annex 2) that was undertaken as part of the Preferred Minerals Strategy. With reference to 'SG-12' (Land South of Chazey Wood), the 'Preliminary Site Assessment' states that these lands are precluded on the grounds of deliverability, proximity to the AONB and access. By way of clarification, we would respectfully point out that these lands will be available from 2020 which is within the Plan period, thereby meaning that they are deliverable. Further, it is submitted that the points relating to the proximity of the AONB and access are not sufficient to preclude this site, as there is an opportunity to transport aggregates by barge to the processing plant at Sonning for wider distribution to the market. The site is outside the AONB and is capable of being worked in a manner that is policy compliant and consistent with the maintenance of an acceptable landscape and visual impact.

837 (Reading Borough Council)	<p>The issue that most affects this Council is the identification of Caversham as a principal location for sharp sand and gravel working in Policy M3. The Council notes that the policy specifies that this will be focused on the existing area of working, through extensions to existing quarries or new quarries to replace exhausted quarries. The Council supports this reference, and takes this to mean that significant increases in workings and traffic generation will not be likely to result from the policy. Were any such increases to arise, we would have significant concerns about the effects of increased traffic on Reading Borough, and Caversham in particular, particularly since the Minerals Key Diagram (Figure 8) shows that the main flows of aggregates from this area are likely to be towards the M4. Should additional cross-Thames travel measures be delivered in this area, this could of course potentially contribute towards mitigation of any impacts that arise. There is a need for a new Thames crossing, managed in a way that distributes traffic away from the existing congested bridges (Reading Bridge and Caversham Bridge), and away from central Reading and Caversham. The problems caused by crossing capacity, and the need for an additional crossing, are identified in Reading's Local Transport Plan 3 (2011), as well as in Reading's adopted Core Strategy.</p> <p>The Council also supports the likely exclusion of the Land South of Chazey Wood as set out in the preliminary site assessment, for reasons of access, proximity to the AONB and deliverability. This was a site on which this Council raised significant concerns in the Minerals Sites Development Plan Document Issues and Options Consultation in 2007. Since this site west of Caversham is likely to be excluded, and taking into account where the principal location is shown on the Minerals Key Diagram (Figure 8), it may be clearer for the reference in Policy M3 to be to 'East of Caversham'.</p>
843 (Open Spaces Society)	<p>The Open Spaces Society objects to the site nomination for gravel extraction at Sonning Eye. This will impinge on a public footpath along Spring Lane which adjoins the site. People's enjoyment of this route will be destroyed by the noise and visual intrusion from the nearby works. This area is a peaceful, pleasant place where people may enjoy the riverside ambience. It is completely inappropriate for gravel extraction and we trust that the works will not go ahead.</p>
846 (Eye & Dunsden Parish Council)	<p>On behalf of Eye and Dunsden Parish Council, I have been asked to write to you regarding the Sonning Eye Action Group response to the OCC Minerals extraction review that I assume you have received although I will try to attach a copy. The response raises a number of significant concerns that if proved valid would be of concern to the Parish Council and to some of the parishioners. The Parish Council is asking for OCC to give urgent consideration to the report particularly in relation to the alleged irregularities in OCC procedure and the possibility of an increased flood risk.</p>
483	<p>I should like to add my voice to the objections to gravel extraction along the river from Sonning towards Shiplake. I am concerned about the damage to the countryside here, the movement of large lorries on a busy but not very wide road and the possibilities of flooding.</p>
481	<p>As residents in Sonning Eye, we would like to express our deep concern with the proposed mineral extraction by LaFarge in the immediate vicinity of Sonning Eye (RAS16).</p>

	<p>We have lived in Sonning Eye for the past 6 years. During this time we have seen the proposed area of gravel extraction completely underwater 3 times. During the winter, the water often meets the roadside from both sides and floods it in parts. As such, our primary concern with the proposed plan is the increased risk to flooding.</p> <p>I am aware that almost 50 % of the proposed gravel extraction side is flood plain 3b. If this land that is currently naturally filled with porous gravel is replaced with backfill/waste the risk to flooding in the local area will be even worse. Part of the planning consideration surely must be risk to increase in local flooding?</p> <p>I have not seen evidence of Lafarge plans taking this into consideration with appropriate Sequential Testing (PPS25) Why has this been overlooked?</p> <p>Even if you as the local authority are to overlook your resident's safety and welfare in their own homes, I would urge you to consider the huge disruption to traffic flow that flooding causes when the road is blocked. This is a very busy commuter route to cross the river, and the loss of access affects all who use this road.</p> <p>This road is already subsiding, large areas have sunk leaving it a dangerous road to travel at speed which so many of the commuters do. The safety of this road is another area of concern to us. I have seen 2 very serious car accidents at the corner where the road crosses the river that has no doubt been contributed to by the condition of the surface.</p> <p>Furthermore, in the LaFarge proposal they grossly underestimate the traffic flow of lorry loads involved in the extraction. Firstly because they only consider lorries taking gravel out and not the empty lorries going in. These lorries need to travel through the already congested Caversham to get to Reading/ M4, or through Henley where the roads and Township are surely too narrow to take this traffic burden without serious risk to pedestrians and commuter chaos.</p> <p>These local communities which will also be severely affected along with us in Sonning Eye have not been informed with these traffic realisms. It leads me to believe that there has been a lack of local consultation in this proposition.</p> <p>The planning laws are there to protect the "little people" such as myself and my family from big co-operations like LaFarge increasing the risks of flooding, devaluing our homes as a result, not to mention the increased noise and dust associated with such a high volume of articulated vehicles.</p> <p>In summary, I would ask - as our representative in this matter - to ensure that all the planning laws are upheld to the intention to which they were written. Please do not let financial motive destroy this community.</p>
956	<p>I am writing to object to the proposed plans for gravel extraction in the Sonning Eye area because I have very real fears of the increased risk of flooding that it will bring to my house.</p> <p>As you are aware much of Sonning Eye, including my house, is already in an area that the Environment Agency describes as at risk from flooding from the river. Indeed, on several occasions I have been in a situation where the road outside my house has been flooded and I feel that it would not have taken a much greater rise for the waters to have entered my house.</p>



	<p>It is my understanding that the proposed works bring with them a greater risk of flooding due to the way that the soil banks created by the extraction will impede the drainage of floodwater from the plain. I cannot over stress the worry that this causes me. I quite understand the need to extract these resources, but I do not think that a commercial operation should be allowed to go ahead when it poses a threat to my home.</p>
997	<p>I am writing in response to the Mineral Plan Consultation and specifically to object to the proposed extension of gravel extraction on (SG-11) the land to the East of Spring Lane, Sonning Eye- somewhat misleadingly referred to as "Caversham C" in the consultation documents.</p> <p>I have lived at Mill Farm House for over 30 years, and for the first 20 years living here I never had to worry about my home flooding.</p> <p>When Redlands/Lafarge extended gravel extraction in Sonning Eye 10 years ago the possibility of flooding increased. In Jan 2003 there was a serious flood as water from the river rose and my house came within inches of flooding. Since 2003 my house has been close to flooding on a number of occasions, this is a constant worry as I am widowed and living on my own. When there are a few days on continuous rain, I find it hard to get to sleep because I worry about my home flooding.</p> <p>The proposed extension of gravel extraction to the East of Spring Lane would raise the probability of flooding even further. Apart from the damage and distress that flooding would cause, home insurance premiums would shoot up even more than they have already, assuming that I would be able to find an insurance company willing to insure my home. As it is, I am finding it increasingly difficult to find insurance companies that are willing to insure my house because they say that I live on a flood plain. It will become impossible to get a Home Insurance Policy, which would make it virtually impossible to sell my home, should I need to do so in the future.</p> <p>Other houses in the area would also endure the same problems, and I wonder why our local community should suffer for the material benefit of one person, Lord Phillimore, who resides well above the River at Binfield Heath.</p> <p>Furthermore, I would question what benefit our community would gain from extending gravel extraction, apart from more dust, noise pollution and trucks. I am not aware of any local people employed at the quarry and any profits made by multinational Lafarge Aggregates would be repatriated to France.</p> <p>As stated in the "Minerals Planning Strategy" consultation Draft, Executive Summary, Local and Policy Context section: "A key challenge for the plan is to make provision for the construction materials (aggregates) required to support planned development in the county".</p> <p>In the Vision and Objectives section, the following is stated as one of three strands: "minimising the distance minerals are transported by road, to reduce impacts on the environment".</p> <p>In the preferred Minerals Strategy and Proposed Policies section, included in the "Principles which underpin the strategy for sand and gravel extraction" is the following:</p>

	<p>"minimising the distance sand and gravel needs to travel by road; and continuing sand and gravel working to the south of Oxford to enable a local supply to planned development in Southern Oxfordshire".</p> <p>The gravel extracted from Sonning Eye is unlikely to be used in Oxfordshire anyway, there are gravel quarries nearer to Didcot and Wantage &amp; Grove - the gravel is going to Berkshire or elsewhere outside Oxfordshire - see "minerals Key Diagram" (mineral_KD20110822.jpg). therefore, the rationale for permitting further gravel extraction to the East of Spring Lane in Sonning Eye would run counter to the policies, principles and objectives quoted above.</p> <p>The "Development of Draft Minerals Planning Strategy" document of September 2011, refers to Stage 10: Preliminary Site Assessment, January 2011" where site nominations were assessed against various planning criteria. The sixth criterion referred to is:</p> <p>"The proportion of the site in flood zone 3b, the functional flood plain."</p> <p>The "Annex 2: Preliminary Site Assessment, Sand and Gravel" chart states that the 91.6% of the SG-11 site (in Sonning Eye) is in flood zone 3b, yet the first reason listed for precluding SG-03 (Land adjacent to Benson Marina) from consideration for gravel extraction is that 91.7% of the land is in flood zone 3b.</p> <p>To allow further gravel extraction on a floodplain, where the probability of flooding is greater than 5% per annum, would exacerbate the risk of homes being inundated where the likelihood of flooding has already increased by other factors namely: the effects of climate change, unusual rainfall patterns and the reduction of ground absorption of rainfall.</p> <p>The Infill/Builders waste that could be used to replace the extracted gravel is less permeable than the existing gravel (which is porous) and would further raise the probability of houses in Sonning Eye being flooded. Furthermore, it would be far more environmentally responsible to recycle builders waste for building aggregate requirements rather than trucking freshly dug aggregates around the county and then truck builders waste to holes where aggregates have been recently extracted.</p> <p>Lafarge have the habit of leaving large soil banks adjacent to the sites where they extract gravel which effects the way that water flows when flooding does occur. We have put up with over 50 years of gravel extraction in our area and any policy that would permit LaFarge to extract more gravel from Sonning Eye would be inimical to our community by increasing the probability of our homes being flooded.</p> <p>In light of the recent announcement by South Oxfordshire District Council that they will not be providing sand-bags in the event of future flooding, and if the land East of Spring Lane were to be added to the list of sites where gravel can be extracted, What guarantees could Oxfordshire County Council give me about the safety of my home due to increased flooding risk?</p>
1003	<p>As residents in Sonning Eye, we would like to express our deep concern with the proposed mineral extraction by LaFarge in the immediate vicinity of Sonning Eye (RAS16).</p> <p>We have lived in Sonning Eye for the past 6 years. During this time we have seen the proposed area of gravel extraction</p>

	<p>completely underwater 3 times. During the winter, the water often meets the roadside from both sides and floods it in parts. As such, our primary concern with the proposed plan is the increased risk to flooding.</p> <p>I am aware that almost 50% of the proposed gravel extraction side is flood plain 3b. If this land that is currently naturally filled with porous gravel is replaced with backfill/waste the risk to flooding in the local areas will be even worse. Part of the planning consideration surely must be risk to increase in local flooding?</p> <p>I have not seen evidence of Lafarge plans taking this into consideration with appropriate Sequential Testing (PPS25). Why has this been overlooked?</p> <p>Even if you as the local authority are to overlook your resident's safety and welfare in their own homes, I would urge you to consider the huge disruption to traffic flow that flooding causes when the road is blocked. This is a very busy commuter route to cross the river, and the loss of access affects all who use this road.</p> <p>This road is already subsiding, large areas have sunk leaving it a dangerous road to travel at speed which so many of the commuters do. The safety of this road is another area of concern to us. I have seen 2 very serious car accidents at the corner where the road crosses the river that has no doubt been contributed to by the condition of the surface.</p> <p>Furthermore, in the LaFarge proposal they grossly underestimate the traffic flow of lorry loads involved in the extraction. Firstly because they only consider lorries taking gravel out and not the empty lorries going in. These lorries need to travel through the already congested Caversham to get to Reading/M4, or through Henley where the roads and Township are surely too narrow to take this traffic burden without serious risk to pedestrians and commuter chaos.</p> <p>These local communities which will also be severely affected along with us in Sonning Eye have not been informed with these traffic realisms. It leads me to believe that there has been a lack of local consultation in this proposition.</p> <p>The planning laws are there to protect the "little people" such as myself and my family from big co-operations like LaFarge increasing the risks of flooding, devaluing our homes as a result, not to mention the increased noise and dust associated with such a high volume of articulated vehicles.</p> <p>In summary, I would ask - as our representative in this matter - to ensure that all the planning laws are upheld to the intention to which they were written. Please do not let financial motive destroy this community.</p>
1012 (SEAG)	<p>A. This document reviews the proposals of the Oxfordshire County Council for Sand and Gravel extraction in relation to the inclusion of Caversham / RAS 16/ Sonning Eye. It notes that planning policy is extensively quoted but ignored in relation to the selection of this site.</p> <p>B. Section 1 reviews the relevant planning issues particularly with a view to flooding locally. It asks why this has not been considered, and why local residents who are clearly stakeholders have been ignored.</p> <p>C. It looks at all the areas where the Oxfordshire County Council consultation document has ignored planning policy in</p>

this respect including :  
 Climate change,  
 Framing policy to avoid flood risk to people and property,  
 Ignoring a proper risk based approach,  
 Ignoring Scientific method and the precautionary principle  
 Ignoring the Sequential Test and the Exception Test.  
 Failing to carry out a proper Flood Risk Assessment.

D. Section 2 looks at Sonning Eye, the area of housing immediately adjacent to the "Caversham" site and presents data to show its extraordinary vulnerability to flooding. Historical data is included to support this. It demonstrates that there is no scope for any loss of flood resilience.

E. Section 3 comments on specifics in the documents out for consultation. It demonstrates how many of the statements made are at odds with planning policy. In particular it draws attention to the fact that RAS 16 is almost wholly within zone 3b making it impossible to comply with these policies.

F. It notes the failure of Oxfordshire County Council to progress to a level 2 FRA for RAS 16 despite later going on to include it as a preferred site contrary to the Sequential Test.

G. Contrasts are drawn between sites rejected where risk to housing seems to have been considered, and Sonning Eye / Caversham /RAS 16 where it is ignored.

H. Given that the target market for gravel from this site is Reading, no comment is made on the Berkshire Minerals Plan, and the sites they have identified within Reading itself.

I. In section 4 three options are considered as to how The Oxfordshire Strategy can progress without it being at the expense of the people and houses in Sonning Eye. The residents fully accept the need for gravel, and that there is a valuable resource locally. Suggestions are made how this could be accessed whilst complying with planning policy.

J. The relative risks between areas RAS16 and RAS18 are compared. The decision to exclude RAS 18 in preference to RAS16 is irrational.

K. Any disruption to the floodplain local to Sonning Eye has a definite potential to raise the level of flood water. Even very small changes in flood height would have a catastrophic effect on local housing. The change in water level is so small that it is impossible to calculate if it would occur as it lies within the margin of error of any current methodology.

L. Flooding when it affects homes and businesses is a "Once Only" event. Unlike most other planning issues, it changes the property forever. Insurance will no longer be available, and selling may be impossible. A family's main capital asset will be destroyed. No commercial interest or landowner should have the right to do this. Our elected representatives have a legal duty to implement planning policy and to protect the ordinary citizen from such hazard.

M. The events disclosed in this submission are such as to indicate a serious dereliction of duty by the Local Authorities.

They are of such gravity and have such far reaching consequences that consideration is being given to referring the matter to the Local Government Ombudsman.

#### INTRODUCTION

The papers lay out the choices that Oxfordshire County Council proposes for gravel production over the period to 2030. Much is made of the Planning Policy Statements which are quoted extensively. We believe that despite this, these statements are not followed and specifically ignored in relation to Sonning Eye.

This paper sets out the evidence for this contention and makes proposals which allow The County Council to achieve its aims in Minerals Production whilst giving maximum protection to the residents of Sonning Eye; a requirement demanded by planning policy

#### SECTION 1 : RELEVANT PLANNING ISSUES

PPS 25 in its opening statement requires that "its policies should be taken into account by regional planning bodies in the preparation of regional strategies"

In the section on Background, it draws attention to the potential consequences of future climate change whose "impacts can be avoided and reduced through good planning and management" (page 1.1). It goes on to say "These factors will lead to increased and new risks of flooding within the lifetime of planned developments" (page 1.2) and that "flood risk is taken into account at all stages in the planning process to avoid inappropriate development in areas at risk of flooding and to direct development away from areas at highest risk." (Page 2.5)

PPS 25 Key Planning Objectives demands a proper Appraisal of Risk: To identify which land is at risk and the degree of risk. Policies should be "framed for the location of development which avoid flood risk to people and property ... manage any residual risk, taking account of the impacts of climate change", it goes on to say,

"Only permit development in areas of flood risk when there are no reasonably available sites in areas of lower flood risk and the benefits outweigh the risks of flooding".

It goes on to recommend a partnership approach including "other stakeholders" and making best use of their expertise. Local residents are stakeholders in this context and therefore their opinion should have been sought earlier in the process. They have considerable knowledge of both historic and recent flooding.

Section 9 (page 6) says a risk based approach should be adopted at all levels of planning applying "the source-pathway-receptor model to planning".

This has not been done in the OCC document. There is no mention of flood pathways which are very relevant to the movement of flood waters around Sonning Eye. Nor is there any mention of the "Receptors". These are clearly defined to include People and Property that would be affected by the flooding.

Section 16 The Sequential Test (page7) This states very clearly that all development should be directed to areas of the lowest probability of flooding. This has been set aside in the case of Sonning Eye without good reason

Section 17, It goes on to say "within each flood zone, new development should be directed to the sites at the lowest probability of flooding" In the context of risk to the Sonning Eye, the current proposal produces the highest risk to residents.

Sections 18-20, The Exception Test. Although this is the rationale under which Caversham infrastructure must be included in the proposed plan, no mention of this test is made in its selection. Its criteria are laid down in Annex D of PPS 25 and D13 in particular states "Compliance with each part of the exception Test should be demonstrated in an open and transparent way". This most certainly has not been done.

For the Exception Test to be passed

i). "It must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk informed by a SFRA". Since no SFRA has been included that looks at the risk to local housing this criterion has not been passed.

ii). "The FRA must demonstrate that the development will be safe without increasing flood risk overall". Since no FRA has tested the risk to Sonning Eye this condition has not been passed.

Section D 11 notes that "Where the application of the Sequential Test indicates the Exception Test needs to be applied, this should be done as early in the plan making process as possible. This will minimise the need to apply it to individual planning applications". The failure of the County Council to apply the Test at this stage means that alternative sites which may be preferable from a flooding point of view will not have been considered and will not be in the Minerals Plan.

PPS 25 Annex A. Using Sound Science Responsibly. "Policy should be developed and implemented on the basis on of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle)".

No evidence has been sought relating to the housing in Sonning Eye and none is presented. We will present evidence which should be applied and looked at in conjunction with prevailing uncertainty and the risks posed with climate change. The selection of RAS 16 against the demands of the Sequential Test has no scientific basis, no clarity or method. The decision to select RAS 16 appears irrational.

PPS 25 Annex B Climate change. Section B9 suggests the impact of flooding should include an appropriate precautionary response to river flooding. Between 1990 and 2055 peak river flows of +10% - +20% can be expected. Section B 10 goes on to say that "changes ... can be very dramatic in very flat areas, and will reduce the return period of a given flood." Sonning Eye lies in just such an area and one can reasonably assume that climate change will both increase the flood water heights and their frequency of occurrence.

PPS 25 Annex C. Forms of Flooding. C4 outlines the types of river flooding. It goes on to say "Land use, topography, and

the form of local development can have a strong influence on the velocity and volume of water and its direction of flow" details of which will be presented in this context.

1.12 PPS 25 Annex D. The Sequential Test. In Background Paper 2 of the "Oxfordshire Minerals and Waste Development Framework, Minerals and Waste Core Strategy (OCC Paper 2), The Sequential Test is defined but in an abbreviated form excluding important planning issues. Zone 3b, the one relevant to Sonning Eye, includes under "appropriate uses" the following strictures relating to its use.

"Result in no loss of flood plain storage"

"Not impede water flows"

"Not increase flood risk elsewhere"

These considerations are an essential part of The Sequential Test and have not been included as an element assessing the suitability of the sites proposed for gravel extraction. It goes on to include "Policy Aims"

1. Reduce the overall level of flood risk in the area through the layout and form of the development.

2. Relocate existing development to land with a lower probability of flooding.

The current development for gravel extraction at Sonning Eye is highly prejudicial to flood risk to local housing. If ongoing extraction is to continue locally this issue needs to be addressed at the stage of strategic planning.

1.13 PPS 25 Annex E. The Assessment of Flood Risk. Section E3 sets out the minimum requirements for flood risk assessments, at all stages of the planning process. These criteria should apply to this OCC strategic document and its decisions.

These statements include

1. consider the risk of flooding arising from the development in addition to the risk of flooding to the development;

2. Take the impact of climate change into account

3. To be undertaken by competent people, as early as possible in the particular planning process, to avoid misplaced effort and raising landowner expectations where land is unsuitable for development.

4. Consider the effects of a range of flooding events, including extreme events on people and property.

5. Be supported by appropriate data and information, including historical information on previous events.

We do not believe any of these aspects have been considered in the context of the flood risk assessment carried out prior to the inclusion of Caversham (Sonning Eye) being included in the minerals plan as a preferred site.

We will present data to show that the current proposal is inappropriate.

## SECTION 2 : SONNING EYE

2.1 Sonning Eye is a Thames side hamlet just to the north of the Thames by Sonning bridge. It lies entirely within the functional flood plain (zone 3b) bounded on the south by the Thames, and on the west by open water (old gravel

workings going back 70 years). To the north are current gravel workings and the processing plant. Open farmland lies to the east and northeast.

2.2 The proposed site "Caversham" in the consultation document (RAS 16), will in effect be directly continuous with the current gravel workings. Only Spring Lane separates the two. These areas are shown the map (Appendix A)

2.3 Sonning Eye is a designated Conservation area. One of the buildings is listed grade 2 starred, which will have direct views north towards the proposed workings.

2.4 The houses within Sonning Eye lie either in zone 3a or 3b. The Environment Agency Flood Map (see Appendix B) shows the extent of the flood plain and how it stretches back into Lower Caversham.

2.5 A close up of the area around Sonning Eye is shown in Appendix C. This reveals that water flow once it leaves the Thames must flow round Sonning Eye , i.e. to the north, through the current gravel workings and directly into the area of RAS 16.

2.6 Any activity in these areas will clearly have an effect on water flows in times of flooding. Local residents are well aware of the direction of flood water flows and levels reached during times of flood. The impounding of water by various structures like the new stretch of the B478 (1986) are very obvious.

2.7 The Environment Agency acknowledges the flood risk to local houses and in 2010 commissioned an accurate "Threshold Survey" of the most vulnerable houses in the community. The data from this study is presented in Appendix D.

This graph shows threshold heights of each house across the page from lowest to highest.

By way of reference the high water level for the flood of 2003 at Sonning Lock (headwater) is recorded by the Environment Agency as 36.11m. As can be seen this equates with the Threshold of some 13 or 14 houses in Sonning Eye

2.8 The Environment Agency has a flood model for the Thames capable of predicting the heights of flood waters for given conditions. However the model related to three "nodes" which are shown on their map (Appendix E) these lay on the river bank at Sonning Bridge and well to the west of the village. There are therefore no points near the housing that predict water heights for the properties. The Environment Agency has confirmed that their model "is not property specific but only area specific". (E-mail 22/4/10). They are unable to model in detail for the village. It therefore follows that "The Precautionary Principle" should apply, and that local knowledge is at a premium here.

2.9 The Environment Agency's Flood Risk Assessment Guidance note 1, accepts that its knowledge is limited in a number of respects and local input is crucial

"Account should be taken of local knowledge of flooding held in the community. Our records of flooding are not exhaustive and the absence of information does not mean that a site will not flood."

2.10 The accuracy of modelling also has to be considered. They quote no tolerances for their predictive data, but informal



communications with their engineers suggests its 50cms at best.

2.11 Any Flood risk Assessment given this background must conclude

- a. A large number of properties in Sonning Eye are already at risk of flooding
- b. Climate change will increase this risk and increase the number of properties at risk.
- c. The way in which water enters the flood plain locally is via an expanse of open water then through old and current gravel workings. ANY hold up, impounding, or displacement of flood water must adversely affect the water levels in Sonning Eye.
- d. The Environment Agency flood model for the Thames will not be helpful in this context.
- e. That the Precautionary Principle should apply (PPS 25, section A1), and no activity that might in any way interfere with flood water flows should be sanctioned.

2.12 "The current 20% figure is a memorable precautionary sensitivity allowance and is used in all flood management design and appraisal activity" (Defra and Environment Agency research news issue 16 Jun2009) It is generally accepted that an error of 20 % is the best one can hope for trying to predict the effects of any intervention with respect to flooding. In the context of Sonning Eye this would be at least a further 20 to 30 cms increase on previous maxima. As appendix D demonstrates that level would flood at least a further 10 - 15 house. No modelling process would be able to detect or exclude changes of this level.

2.13 Previous Flood Risk Assessments. Prior to the final planning approval in 2008 to dig gravel to the west of Spring Lane (the current workings) P08/E0740/CM, the operators commissioned an environmental statement including the FRA. The latter completely ignored local housing and indeed contained the remarkable statement "it is not known whether residential properties in the proximity to the site lie in the flood plain". It seems remarkable that this was accepted as a satisfactory FRA by both South Oxfordshire District Council and The Environment Agency. Local residents feel very strongly that they have been let down by those agencies that are there to protect their interests. There is a real worry that exactly the same mistake is being made by the County Council in its FRA and in its consideration of the Sequential Test. The risks to People and Housing are being ignored.

2.14 Flooding is a "Once Only" event. It is different from almost any other planning consideration. Once a house has flooded this is part of the knowledge that must be passed on to any prospective purchaser. It makes the house uninsurable and may make it impossible to sell. Its value will be catastrophically reduced. No Council, Landowner, or business has the right to take this risk with other peoples' main capital asset.

2.15 Aerial Photographs of the flood of 1947 are included in Appendix H. The high water mark at Sonning Lock (Environment Agency data) was

2003 36.11m  
1947 36.21m

This is only a 10 cm difference. The photos show just how extensive the flooding was, and how Sonning Eye was completely cut off.

#### SECTION 4 : OPTIONS APPRAISAL

4.1 It is quite clear from the above analysis that in producing the document for consultation, a particular area of land has been selected adjacent to Sonning Eye at the request of the developer. The Council has however failed to take into account many relevant considerations. It has selected RAS16 contrary to the Sequential Test. It has failed to apply the Exception Test to the associated infrastructure. It has failed to carry out second level flood risk assessment despite the very high risk to adjacent housing. It has in fact completely ignored the presence of the whole community of Sonning Eye. It has failed to assign any importance to the designation of "Conservation Area" of Sonning Eye. Many of the other areas evaluated were rejected on the basis of such national designations. In short the area as it stands in the current proposals should be rejected.

4.2 The residents understand that gravel can only be dug where its found, and that the reserves along the north of the Thames will need to be exploited. They would have no objection to this provided all of the relevant planning policy as laid out in Section 1 was adhered to. This would include:

- a. Siting of the extraction area further downstream, so as to leave an area of untouched floodplain beyond Sonning Eye. This would ensure that there was no impounding or displacement of flood water.
- b. Inclusion of land outside the floodplain so soil etc. can be properly stored
- c. Removal of infrastructure currently in the floodplain, to an area outside it.
- d. A mechanism which can be shown to increase floodplain capacity as required by PPS 25 and climate change.

A regional strategy must look to allow full implementation of planning policy and not be restricted by limited proposals from a single developer.

4.3 Comparing RAS 16 (included) against RAS 18 (excluded) it is difficult to see why this decision has been made. Both have plenty of alluvial sand and gravel, and only 19.9% of the RAS 18 area is in flood zone 3b. The flood risk is described as medium although risk to housing is not mentioned. There are no national designations here. The need to transport the product through towns and villages appears to have been judged more important than a national designation of conservation area and a very high risk of flooding to people and property. This is not a defensible position. The amount of traffic generated would be the same as that going through Caversham and over the Reading bridges currently from the Caversham plant. This is trivial in comparison to 30 homes flooding. In view of this Oxfordshire County Council is obliged to reconsider the inclusion of RAS 18 as an option.