

Minerals Plan Consultation; M3 West Oxfordshire comments

ID No (& name of org)	Comment/issue raised
94	<p>We find it difficult to believe that gravel extraction from the Eynsham/Cassington/Yarnton area could be transported by road to the Didcot area, some distance away via the A40 and A34. These roads are already very congested, and surely, the Swinford Toll Bridge would not be used as it is a Grade 1 listed structure. It is already overused anyway.</p> <p>Large scale extraction will have an unknown effect on the flood plain, and will destroy the area presently used for recreation</p>
84	<p>As residents of Standlake we would like to express our concerns about further gravel extraction in the West Oxfordshire area.</p> <p>One of our main objections relate to the increase in traffic, mainly in the form of huge lorries. As a resident on the A415, we are acutely aware of changes in the type and volume of traffic on our local roads and feel that this area has 'done our bit' for the gravel production quotas. We have more than enough gravel for our local consumption, if the demand for gravel is from further afield, let that area share some of the load (and the 'benefits' i.e. recreational lakes - we already have plenty of those for a small community)</p> <p>The risk of flooding is also a major consideration for this area as some of our neighbours know all too well. Since the bad floods of 2007, much has been done to alleviate the risk of flooding but increased extraction will surely add to the risk.</p> <p>I know too that concerns have been raised about sites of historical interest in the Windrush Valley which may be threatened if plans go ahead.</p>
79	<p>1. My greatest concern is that the criterion of gravel being extracted as near as possible to where it is to be used is being ignored in this proposal. I understand that more than 85% of gravel extraction is being planned for north of the Thames, whilst 80% or more of the presumed need of 20.2 million tonnes of sharp sand and gravel up until 2030 is required in the south of the Thames, in such places as Didcot, Grove and Harwell. This will hugely impact on the carbon footprint of the county due to CO2 emissions produced by increasing the transportation of gravel from north to south of the county.</p> <p>2. The A40 is already heavily congested and this proposal will add to that problem.</p> <p>3. Both Newbridge and Swinford bridges are unsuitable for HGVs. Newbridge has a weight restriction of 18 tonnes and Swinford bridge is very narrow. Public buses coming from opposite directions and meeting on the Swinford bridge sometimes become stuck together due to the narrowness.</p> <p>4. The criterion of cumulative effect has also not been taken into account. Continuing to extract gravel at current sites and adding</p>

new sites, north of the Thames, poses an even greater health risk for residents due to increased dust pollution and CO2 emissions.

5. Siemens at Eynsham is a state of the art production facility where the design and manufacture of the superconducting magnets for all Siemens magnetic resonance imaging (MRI) scanners worldwide are produced. This facility is threatened by an increase in the amount of dust in the atmosphere due to proposed gravel extraction very nearby and its transportation to south of the county. Losing this production facility would cause huge job losses in the county.

6. National security is also potentially put at risk due to increased dust in the flight path of an increasing number of military planes using Brize Norton. This flight path already crosses existing sites and appears to cross some of the proposed new sites as well.

Questions

1. Given that road haulage of gravel from north to south of the Thames will increase if the proposals go ahead, has the cost of maintaining road surfaces been estimated and taken into account with this plan?

2. Has consideration been given to ensuring that the profit-making gravel extraction companies are not let off with just providing more bird hides and small amenities for local communities? Has the Council considered ensuring that these companies pay significant pollution charges and maintenance charges for the roads they damage as they transport the gravel?

3. Has the Council considered how the gravel will be transported across the Thames and the extra mileage that may be necessary if Swinford and Newbridge bridges cannot be used?

4. Has increased dust in the flight path of military planes using Brize Norton been investigated in terms of risking national security?

5. Has the risk of air pollution been assessed in relation to the highly sensitive equipment used and produced by Siemens? And the impact of local job losses if Siemens decides to move its production elsewhere?

6. Has the cumulative effect criterion been adequately investigated in terms of health and social risks for residents north of the Thames?

Although I live in Eynsham, north of the Thames, my concerns and questions about this proposal are not in the "Not in back yard" category. We already have a huge number of gravel extraction sites around us and we are living with the destruction it has caused and is still causing. However, it is unacceptable that swathes of the county in the north will become like small islands in an archipelago of 'lakes'. I urge the Council therefore to consider the above concerns and questions. Also, rather than just accepting that the County Council needs to go on mining for gravel, I encourage the Council to challenge this assumption and look more seriously at other means (like re-cycling) for obtaining materials for building and maintenance.

76

I have read the Draft OCC Minerals Strategy Document with a great deal of concern, and would urge you to amend the document to take account of the following points.

While fine words are spoken about the need to exploit mineral deposits close to the point of use, it is clear that the intention is to do exactly the reverse. I am unclear whether the report is just badly drafted or is intentionally devious. My fear is that it is both. There is no doubt that it contains some very woolly sentences at critical points.

In my opinion, digging more of West Oxfordshire to supply gravel to South Oxfordshire and other locations even further afield, does not make sense from any point of view, particularly when the deposits are there in South Oxfordshire and could be exploited if the will were there.

In addition, the pressure on already over-burdened roads and bridges would be unreasonably increased by further digging in the Windrush Valley when the need for gravel is clearly elsewhere.

The cumulative impact (i.e. adding the new digging to the total digging done so far in the Windrush Valley) is already little short of an environmental disaster, as aerial photographs attest. It is a requirement to take this impact into account in defining the plan, but little effort seems to have been expended in so doing.

Furthermore, there is no clearly-validated scientific evidence that post-digging management is in any way enhanced by the scale of the scar left behind, an argument that has been advanced in some pseudo-scientific circles who seem to think that having all the digging in one place makes it easier to manage the aftermath. This is not demonstrated and, in any event, West Oxfordshire has no need for more lakes and reed beds, which are already over-represented in the Windrush Valley farming landscape and which significantly and adversely impact on the natural flora and fauna of the area.

As for the unmet need for aggregate, this also is very unclear, both because of the uncertain economic future that we face during the planning period, and also because no adequate account is taken of alternatives to gravel already available and/or likely to be developed during the life of the plan.

Finally, I am sure that the Committee Chairman, who is, I understand, a Councillor from South Oxfordshire, will declare her interest and take no part in the discussion or voting. I trust that we can be reassured that this is the case, as the Committee's deliberations could be subject to a Judicial Review were proceedings conducted in an inappropriate way.

Thank you for giving us the opportunity to comment. We shall look forward to seeing a significantly amended final version of the Minerals Strategy in due course.

<p>58 (OUTRAGE)</p>	<p>OUTRAGE was established in 1976 when ARC applied for permission to dig gravel from a site at Watkins Farm to the north and east of Northmoor in the Lower Windrush Valley.</p> <p>We have a long history of engagement with the problems of mineral extraction in the Stanton Harcourt area, most recently and most bitterly in relation to Stonehenge Farm, Northmoor.</p> <p>OUTRAGE does not consider that the proposed strategy is acceptable. It will fail to achieve major objectives, and it unfairly continues to concentrate the extraction of sand and gravel in West Oxfordshire.</p> <p>1 Distance to market</p> <p>The proposed strategy continues the existing policy of concentrating sand and gravel extraction in West Oxfordshire, while the bulk of development in the plan period is to be in South Oxfordshire.</p> <p>The proposed strategy includes the following:</p> <p>Vision b:</p> <p>Mineral working will be located and managed to minimise:</p> <ul style="list-style-type: none"> - the distance that aggregates are transported by road; - the use of unsuitable roads through settlements; and - other harmful impacts of mineral extraction and transportation on Oxfordshire's environment and communities. <p>Objective v:</p> <p>Minimise the impact of mineral development on climate change by identifying areas for mineral extraction which reduce the need to transport minerals and which minimise the impact of mineral working on areas vulnerable to flooding. General comments</p> <p>Objective vi:</p> <p>Minimise the distance minerals need to be transported by road and encourage where possible the movement of aggregates by conveyor, rail and on Oxfordshire's waterways in order to reduce adverse impacts of mineral transportation on local communities and the environment; and minimise the impact of mineral traffic on local communities through implementation and monitoring of routeing agreements.</p> <p>The proposed strategy is based on the expectation that</p> <p>2.8 About 40,000 homes could be built in Oxfordshire between 2011 and 2026.</p> <p>There is a need for considerable investment in new infrastructure to support the objective for Oxfordshire of supporting a thriving economy and to meet the pressures on essential services such as schools, transport and other community facilities. A key challenge for minerals planning is to make provision for the necessary construction materials in an effective and sustainable way. There is also a need to ensure that new developments reduce carbon emissions and are resilient to climate change.</p> <p>2.9</p>
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Key locations for development, as shown on figure 5, are:
- Didcot and Wantage & Grove, which are within the Science Vale UK area which also includes Milton Park, Harwell Science and Innovation Campus and Culham Science Centre;
- Bicester, where the 5,000 home eco-development proposal is acting as a focus for delivering an international exemplar of sustainable development;
and
- Oxford, which remains a world class centre of education, research and innovation.

Large housing developments (1000+ homes) are also proposed at Banbury, Upper Heyford, Witney and Carterton.

Over and above this, a recently announced Enterprise Zone at Harwell is to provide 8000 new jobs, and it can be expected that these will increase the demand for housing and infrastructure in South Oxfordshire. From all this it is clear that the bulk of development in the plan period is to be in South Oxfordshire.

There are weight restrictions on the bridges across the Thames which mean that HGV mineral traffic with destinations in South Oxfordshire will be obliged to follow longer routes on roads that are already congested (the A40 and A34), with a consequent increase in carbon emissions. These routes are expected to become even more congested during the plan period, and the Harwell development is likely to place them under still greater pressure.

On this basis it is impossible to see how the proposed strategy can achieve its stated vision and objectives of minimising the distance that aggregates are transported by road and minimising the impact of mineral development on climate change.

Conclusion

OUTRAGE does not object to mineral extraction per se, and we recognise that there is a need for minerals extraction to meet local demand. But the proposed strategy rides roughshod over concerns that OUTRAGE has expressed on many occasions during the last thirty years. Mineral extraction is a burden on communities. The proposed strategy does not distribute this burden fairly. It is not sufficient to say that the rate of extraction in West Oxfordshire will remain the same. It should now be decreased. Social justice aside, the proposed strategy will fail to meet its own aims. The stated intention is to minimise the distance that aggregates are transported by road and to minimise the impact of mineral development on climate change. This will not be achieved by concentrating sand and gravel extraction in West Oxfordshire when the bulk of the market is in South Oxfordshire and can only be reached by long journeys on roads that are already congested.

<p>60 (OUTRAGE)</p>	<p>Cumulative impact is mentioned just once in the proposed strategy, in a confused and misleading paragraph at 4.18: Although there are extensive sand and gravel resources in west Oxfordshire, the rate and intensity of mineral working in the area should not increase due to concerns about generation of traffic, impacts on local rivers and groundwater flows, and cumulative impact on local communities. It is implied in that if extraction continues at the same level in West Oxfordshire, there will be no cumulative impact on local communities. This cannot be true. The following paragraph on page 5 of the Sustainability Appraisal is equally confusing: Appropriately, the policy will not lead to an overall increase of working activity in West Oxfordshire, or in any one particular area, and so no significant additional adverse cumulative effects are expected on top of those already experienced, which is particularly important in areas where there has already been extensive working. Cumulative impact is the result of successive action over time. If you go on piling one thing on another at the same rate, the heap gets bigger. Each new gravel pit adds to the impact of previous digging. Furthermore the area left untouched becomes smaller, so that the effective impact of each new pit becomes greater. The impacts of gravel extraction in West Oxfordshire have accumulated over sixty years, and most of all in the Lower Windrush Valley. OCC should stop trying to change the meaning of words, and pay attention to the inhabitants of West Oxfordshire.</p>
<p>54</p>	<p>In response to the County Council consultation on the Waste and Mineral Plan to 2030 I wish for the following points to be taken into account. It is evident that the opportunities to transport extracted sand and gravel by use of alternative methods other than by road in the county are minimal. The announcement in August 2011 that a new Enterprise Zone and its associated infrastructure is to be developed within the Science Vale around the Milton and Harwell area south of the River Thames will therefore require significant quantities of sand and gravel to be transported to site by road to enable the construction of the estimated 8,000 new houses and associated infrastructure, plus the construction of the 200,000 sq metres of new high tech industrial enterprise units themselves. The current plan indicates that a significant volume of sand and gravel extracted in the north and west of the county would be required for use in this development. The transportation of millions of tons of minerals from West Oxfordshire to South Oxfordshire would mean using roads entirely unsuitable for such purpose. Long transport distances will be incurred, impeded by the weight restrictions at Newbridge, Radcot, and the historic bridge at Swinford. It would therefore be totally inappropriate for sand and gravel to be extracted north of the River Thames and be transported for use on such enterprises to the south of the River Thames. In order to comply with their policies OCC should designate the mineral extraction from sites nearest to the new development area as oppose to allocation sites currently being proposed a considerable distance away north of the Thames in West Oxfordshire.</p>
<p>49</p>	<p>On the 17 August 2011 the Government announced a new Enterprise Zone would be developed in the area of Milton Park and Harwell. By 2015 the Enterprise Zone will provide 8,400 jobs, requiring the construction of 200,000 sq metres of new high tech industrial enterprise units. In order to be sustainable it will also require 8,000 new homes and associated infrastructure to be built. Over the next 15 years or so the majority of new housing and employment development in Oxfordshire will take place in the southern part of the County at Didcot, Grove, Wantage and the Harwell Science and Innovation Centre. In order to minimise transport distances,</p>

	<p>and in adherence to the principles of sustainability, sand and gravel extraction should be located as close as possible to those main market areas.</p> <p>The crossing of the Thames is severely limited upstream of Oxford with little prospect of improvement in the foreseeable future. The transportation of millions of tons of minerals from West Oxfordshire to South Oxfordshire would mean using roads entirely unsuitable for such purpose.</p> <p>Around 80% of the sharp sand and gravel quarried in Oxfordshire for Oxfordshire is currently being produced in the Lower Windrush and Evenlode Valleys. Moreover, over 40% of the land bordered by the Thames, the A40 and the A415 (Witney to Newbridge) is being or has been excavated</p> <p>The need for sand and gravel in Oxfordshire has been dictated by a planning policy that takes little account of local issues. To comply with their policies OCC should designate the mineral extraction from sites nearest to new development areas and not the allocation sites currently being proposed North of the Thames in West Oxfordshire.</p>
50	<p>On the 17 August 2011 the Government announced a new Enterprise Zone would be developed in the area of Milton Park and Harwell. By 2015 the Enterprise Zone will provide 8,400 jobs, requiring the construction of 200,000 sq metres of new high tech industrial enterprise units. In order to be sustainable it will also require 8,000 new homes and associated infrastructure to be built.</p> <p>Around 80% of the sharp sand and gravel quarried in Oxfordshire for Oxfordshire is currently being produced in the Lower Windrush and Evenlode Valleys. Moreover, over 40% of the land bordered by the Thames, the A40 and the A415 (Witney to Newbridge) is being or has been excavated</p> <p>To comply with their policies OCC should designate the mineral extraction from sites nearest to new development areas and not the allocation sites currently being proposed North of the Thames in West Oxfordshire.</p>
62	<p>I wish to object to the proposal to concentrate gravel extraction in the Lower Windrush valley on the following grounds :</p> <ol style="list-style-type: none"> 1. The bulk of the predicted demand for gravel is south of the Thames - a prediction made even more convincing by the recent announcement of the Harwell / Milton enterprise zone. It would make no sense to extract north of the river even if communications were easy. 2. Access by road across the Thames from the Lower Windrush is severely restricted by the bridges and roads (especially the A415) that are already inadequate for the existing traffic and would result in funnelling all the estimated 770,000 extra lorry movements onto the A40. 3. Congestion on the A40 is already notorious and would become impossible under this new load. 4. The major enlargement of the role of RAF Brize Norton that is currently taking place, together with the proposed housing developments at Carterton and Witney, will put even more pressure on the A40 and its feeder roads. 5. Access to RAF Brize Norton by road is already difficult : a serious increase in congestion could pose an insurmountable problem in case of a pressing national defence requirement (eg. urgent supply to forces on operations overseas). 6. It is not acceptable to increase the amount of destruction of the landscape by such a large amount in a valley that has already lost so much of its land surface. In particular : <ol style="list-style-type: none"> a. the archaeology of the valley has proved over the years to be really exceptional, and simply recording in advance of extraction is not satisfactory when we have a once-off chance to preserve the remaining areas of land for future generations. b. the villages have suffered detriment to their surrounding environment and their everyday living for nearly half a century, despite assurances at the beginning that this would be for 25 years at most. Hardly any easily-accessible public amenities have emerged in

	<p>partial mitigation, despite what was anticipated. The villages deserve to have their remaining (still very attractive) countryside retained in some compensation for past and present industrial activity that has brought them very little of benefit.</p> <p>c. the substantially-increased amount of air traffic raises worries about the likelihood of bird-strike in the event of major increase in the amount of wet landscape.</p>
43	<p>Looking through the options for minerals in the county Option 2 seems most sensible, ie, to minimise the impact on any one area. Choosing to maximise impact on West Oxfordshire seems thoroughly perverse as according to your transport maps the A40 link to the A34 will be at capacity in 2011 from the B4040 towards Oxford and the A34. The junctions all have red stars on them! Apart from capacity issues, which involves time taken in transportation, no mention is made of the implied costs of choosing to use one of most congested routes in the county. That's without considering the impact on the local area which will be considerable.</p> <p>As a regular user of the Eynsham Toll bridge I know that gravel lorries regularly use this route even though they are not supposed to. This is perhaps not surprising since it cuts the mileage and time taken to reach the A34 dramatically. In an age of high fuel costs, this is no doubt an important consideration for hauliers.</p> <p>When one of the problems for the country is the high cost of land and construction to perversely add cost seems unnecessary.</p>
41	<p>Having downloaded and read your paper on the Minerals and Waste Core strategy I am appalled by the idea of extracting more gravel from the Windrush Valley area and then transporting it many miles on unsuitable roads. Why cannot gravel be extracted from areas south of the Thames to be used in the new housing areas? Newbridge quite rightly has a weight restriction and Swinford bridge would certainly be damaged by a large number of heavy lorries. The A40 is already gridlocked at some times during the day as is Wolvercote roundabout.</p> <p>Quite apart from transportation there is the spoilation of the countryside to consider. I have lived here for 50 years and have had my quality of life affected by gravel digging. 20 or so years ago we were promised a by pass at Sutton. We were let down. The lorries doubled in size and the operators were allowed to forget the condition of building Sutton bypass.</p> <p>It is most frustrating when plans are issued for the public to comment on, but little notice is taken of our views.</p>
15	<p>I am concerned that a new Enterprise Zone and its associated infrastructure is now to be developed around the Milton and Harwell area and the high levels of housing and infrastructure will result in even greater demand for gravel extraction from the area around Standlake and the neighbouring villages.</p> <p>I believe that it makes far more sense for gravel to be extracted close to any new development where that is practical, as in this case rather than from as far away as the Standlake, Northmoor, Stanton Harcourt area which is already substantially affected by gravel extraction. The problem would be compounded when you consider the A415 River crossing at Newbridge, the B4044 Swinford Toll Bridge at Eynsham and the A40 route around Oxford, all of which are entirely unfit for the purpose of the daily transportation of many millions of tons of minerals via HGV's to Milton and Harwell areas south of the River Thames.</p> <p>It would seem that the present allocation sites being proposed for mineral extraction north of the River Thames around the Standlake, Northmoor, Stanton Harcourt area are entirely at odds with OCC's own policies.</p> <p>OCC Policy LTP.3 states . . .</p> <p>5. Minimise the distance minerals need to be transported by road and encourage where possible the movement of aggregates by conveyor, rail and on the River Thames in order to reduce the adverse impacts of mineral transportation on local communities and on the environment.</p> <p>The wording of OCC Policy C7 reads . . .</p>

	<p>Minerals and waste development will only be permitted where provision is made for convenient access to and along the primary road network in a way that maintains or improves:</p> <ul style="list-style-type: none"> · the safety of all road users including pedestrians; · the efficiency and quality of the road network; · residential and environmental amenity. <p>Proposals for mineral working should</p> <ol style="list-style-type: none"> a) wherever possible, transport minerals by rail, water, pipeline or conveyor, rather than by road b) minimise the number of miles that have to be travelled to reach markets if this can be achieved using roads suitable for lorries <p>I look forward to my views being seriously considered by Members.</p>
144	<p>I understand that the proposed policy for gravel and sand extraction in the Lower Evenlode and Lower Windrush Valley would mean that more than 85% of the gravel would come from north of the Thames. I also understand that 80% of the presumed need for the gravel and sand will be south of the Thames such as Harwell, Didcot and Grove. This does not make sense to me!</p> <p>The policy would mean cluttering up already overfull roads, eg the A40, with lorries full of gravel which could be extracted at existing locations eg Sutton Courtenay, south of the Thames and closer to the sites of need.</p> <p>With a projected 700,000 additional HGV movements between these two areas, my objections are on the grounds of road safety, unnecessary use of fossil fuels and increase in nitrous oxide pollution.</p> <p>I suggest that if OCC wishes to be seen as a 'Green Council', they make more effective plans which link sand and gravel extraction to its use.</p> <p>Would you be kind enough to convey my wishes to the council?</p>
3	<p>The announcement of the Enterprise Zone in the Science Vale area is a new development since the Cabinet meeting in July and means that the proposed allocation sites have to be re-visited. Prior to the announcement there was an imbalance in site allocation as the South/Vale area was projected to have an addition 22,000 homes that would require 21,000,000 tonnes for development (as per the Atkins report) whilst only 7,450,000 have been identified in the area, Sutton Courtenay 2,550,000 & Cholsey 4,900,000 as the 4,000,000 at Caversham will be primarily exported out of the county. The Enterprise Zone is expected to bring 8,000 jobs to the area, which has a low unemployment rate. To be in line with current polices, any development should be sustainable, requiring an addition 8,000 homes otherwise new jobs will only bring more commuting and gridlock to the area. This will require approx 7,700,000 tonnes of additional minerals creating a shortfall of approx 21,000,000 tonnes that would have to be transported across the county.</p>

6	<p>My main concern is which roads to and from these new or expanded sites the HGV's are allowed to use by the Council. Bladon being a prime example of a situation that should not be repeated by lack of Council control. As you know Bladon is overrun by heavy Mineral and Waste HGV's although there is an alternative route using roads designed for such traffic. This was shown during the Country Fair when hardly any HGV's passed through Bladon.</p> <p>The Council will need to put limits on the movement of these large lorries especially where villages are concerned. Come to Bladon early in the morning to hear the Mineral and Waste lorry chorus!!</p> <p>Much more thought is required on HGV movements especially as they get heavier and longer, mineral lorries being the heaviest. They bring vibration, noise, danger and poor air quality to village life.</p> <p>I hope you will consider my comments as I have first hand experience on the degradation of the quality of village life caused by the increase in HGV volume and weight having lived in Bladon for about 40 years.</p>
12	<p>As announced by the Government on 17th August 2011 a new Enterprise Zone and its associated infrastructure is now to be developed within the Science Vale around the Milton and Harwell area south of the River Thames. As a result I would contend that the OCC minerals and waste consultation as undertaken to date will ultimately be vigorously challenged and subsequently judged to be unsafe and unsound unless it is now radically altered.</p> <p>By 2015 this new development is to provide 8,400 new jobs, and in order to be sustainable will require 8,000 new houses and associated infrastructure to be built, plus the construction of the 200,000 sq metres of new high tech industrial enterprise units themselves.</p> <p>As a result of this significant recent announcement OCC must now entirely reconsider and recalculate the volumes of minerals (gravel) required for future use around the Harwell and Milton areas south of the River Thames. Additionally, in order to comply with their own policies this will require OCC to designate minerals extraction sites nearest to the new development areas and not those allocation sites currently being proposed many miles away in my West Oxfordshire District Ward north of the River Thames.</p> <p>It is very clear that the present allocation sites being proposed for mineral extraction in my Ward areas north of the River Thames, are entirely at odds with OCC's own policies. Especially when considering the A415 River crossing at Newbridge, the B4044 Swinford Toll Bridge at Eynsham and the A40 route around Oxford, all of which are entirely unfit for the purpose of the daily transportation of many millions of tons of minerals via HGV's to Milton and Harwell areas south of the River Thames.</p> <p>OCC Policy LTP.3 states . . .</p> <p>5. Minimise the distance minerals need to be transported by road and encourage where possible the movement of aggregates by conveyor, rail and on the River Thames in order to reduce the adverse impacts of mineral transportation on local communities and on the environment.</p> <p>The wording of OCC Policy C7 reads</p> <p>Minerals and waste development will only be permitted where provision is made for convenient access to and along the primary road network in a way that maintains or improves:</p> <ul style="list-style-type: none"> the safety of all road users including pedestrians; · the efficiency and quality of the road network;

	<p>· residential and environmental amenity. Proposals for mineral working should</p> <p>a) wherever possible, transport minerals by rail, water, pipeline or conveyor, rather than by road</p> <p>b) minimise the number of miles that have to be travelled to reach markets if this can be achieved using roads suitable for lorries</p> <p>I look forward to my views being seriously considered by Members to ensure that the final result of your lengthy consultation process cannot be challenged and judged as being unsafe and unsound.</p>
<p>151 (Hanborough Parish Council)</p>	<p>Hanborough Parish Council has the following comments to make on OCC's proposed minerals extraction plan which, despite the reduction in scale previously conceded, still gives rise to the following concerns.</p> <p>Our main concern relates to the volume of heavy vehicle traffic that implementation of the plan would generate. Hanborough parishioners already suffer from stress and lost working time due to daily congestion on the A4095, the A40, the A44 and the A34. There is neither any prospect of significant improvements to our local road infrastructure, nor much scope for improvements that would not entail unacceptable levels of collateral damage to our environment.</p> <p>The stretch of Lower Road up to the A4095 is unsuitable for lots of big lorries and this route would also lead to mineral-laden vehicles bringing their dust, noise and fumes past a children's nursery and then going through Church Hanborough (a conservation zone where the road is narrow) and/or up to the busy village of Long Hanborough (with its primary school, doctor's and dentist's surgeries, and shops along the A4095).</p> <p>Neither direction out of Long Hanborough would be feasible, let alone desirable, for an increased volume of heavy vehicle traffic. The Mill Street area of Witney lies in one direction and the village of Bladon (a centre for tourism with a narrow road) lies in the other direction along the A4095. This concern links to another; namely, the impact that implementation of the plan would have on the quality (and hence the character) of residential areas through which mineral-laden lorries would pass: vibrations rattling windows along with all of the pollutants released into the atmosphere.</p> <p>We also have two wider environmental concerns. First, in addition to the negative by-products of transportation, there is the prospective waste of lorry fuel by dint of allowing extraction from sites at distances remote from where the minerals are required. Secondly, there would be a severe loss of amenity around the proposed extraction sites and along the lorry routes away from them. West Oxfordshire has been subjected to more than its fair share of mineral workings over the years, leaving parts of our landscape disfigured and some sites only fit for landfill rubbish.</p> <p>Mineral workings have been of relatively little benefit to the West Oxfordshire economy, so please spare us from further unnecessary blight.</p>
<p>152</p>	<p>I wish to register my objection to the further expansion of mineral extraction in an area that has been heavily exploited already and as a result of the substantial area of lakes areas left we have reduced the range of types of habitats as well as the actual reduction in area of wild habitats, reduced the linkages between areas for small mammal movement and as a result will have reduced the diversity of plant and animal species in the locality. It is time to adopt some more creative and innovative solutions and the first of these is to challenge the extraction firms to find a new way of restoring the land; the second is that we must see an economic return to the council for any loss of environment and or amenity not the trivial amounts paid currently; thirdly the expectation should be always</p>

	<p>that secondary sources should be prioritised and a penalty attached to any LA scheme which uses primary source material; emium and finally that they are challenged to make better use of existing sites not expand to new areas.</p>
183 Oxford Green Belt Network	<p>As an organization whose interest lies in the protection of the Oxford Green Belt we have confined our comments to the Plans as they might affect the Green Belt. We have noted the 5 areas for sand and gravel working in Policy M3. We are pleased that it is not the County's intention to seek to develop new sites in the southern part of the Oxford Green Belt, e.g. in the vicinity of Dorchester/Berinsfield.</p> <p>So far as Eynsham/Cassington/Yarnton is concerned, we have reservations about any attempt to open up a new area of gravel working south of the A.40 and east of Eynsham. We expressed these reservations when there was a planning application relating to this area. That appears to have been withdrawn in response to the reduced demand for gravel and we hope that it will not be revived since we understand that the County has been successful in reducing the Government's requirement for gravel from Oxfordshire and also because of the increasing amount of alternative material becoming available from reworked CDE waste. We therefore suggest that reference to Eynsham be dropped from "Eynsham/Cassington/Yarnton"</p>
220 (Woodstock Town Council)	<p>At the October Town Council meeting Woodstock Town Council resolved to advise you that:</p> <ol style="list-style-type: none"> 1. It resists the intensification of the Slape Hill Quarry at Glympton, and 2. The proposal to take minerals between the A40 and A4095 is of concern. If Oxfordshire County Council should proceed Woodstock Town Council asks that a railway terminus be built. <p>Please can you email confirmation that these comments will be included in the current minerals and waste consultation.</p>
221	<p>I'm writing to express my strong concern about the inclusion of sites SG 31 and SG 29 in your list of possible sites for delivering the county's gravel and sand target in the years through to 2030.</p> <p>Both sites are on the flood plain and their exploitation is likely to upset the balance of land where flood water can run, leading to the strong risk of greater flooding nearby. As a household already struggling to secure insurance in the wake of the 2007/08 floods, the adoption of these sites would likely make my home uninsurable.</p> <p>The sites are similarly close enough to residential areas to suggest a compromise of residential amenity through increased noise, dust, heavy goods traffic and inaccessible landscape.</p> <p>The sites north of the Thames already contribute disproportionately to the County's targeted output, so I sincerely hope that these sites, already grossly inappropriate in my view, do not add to the current imbalance.</p>

222	<p>I am a resident of Standlake in West Oxfordshire. In this area there has been a great deal of gravel extraction and it will clearly continue in the future. I believe the consultation document lays out some good rules for this extraction and am concerned that they will be ignored.</p> <p>I understand that the greatest need for gravel is in the South and East of Oxfordshire, but that it is proposed that the greatest extra extraction is to be in the West. This goes against the principle in the Background paper no 5 that "there is a need to ensure that mineral working in west Oxfordshire is not increased" the reasons for this are clearly stated; the roads cannot cope with transporting vast amounts from one end of the county to the other; "there are approximately 350 Scheduled Ancient Monuments and many scheduled and non-scheduled archaeological sites along the Thames valley"; "the cumulative impact on these localities is potentially significant and damaging both to the highway network and to residential amenity".</p> <p>The two routes other than the A40 / A34 one are through villages and narrow roads, using these roads for heavy traffic will have a huge impact on the many locals who use them and live on them. There is no good route south for the extra heavy traffic.</p> <p>I would add to this that reassurances for the future are not convincing, we have lakes, both amenity and wildlife, we are surrounded by them, I cannot see why anyone would think the promise of more would be attractive. We have had promises that lorries would operate only at certain levels on certain routes, these are well meant but not kept to and there is no reason think the future will be different. I am also concerned about the increased risk of flooding in the future caused by large bodies of water replacing free draining gravel.</p> <p>In summary I believe that the community in this area have suffered enough mineral extraction, but stopping it is not practical. To reduce some of the impact it needs to be done close to where it is to be used, the location of the Thames means that extraction in West Oxfordshire should be for projects in the West and North and projects in the South and East should use gravel extracted in that area. This seems so obvious and is so clearly stated in the consultation document, I am astonished that it might not be the case.</p>
434 (Ducklington PC)	<p>Ducklington PC considered the above consultation document at its meeting on 5 October and has the following comments to make. Ducklington is situated in the Lower Windrush Valley and had direct experience of the devastating environmental consequences of extensive quarrying for sand and gravel. There are many lakes situated around Ducklington down towards Stanton Harcourt which have been formed as a result of quarrying. Gill Mill, operated by Smiths of Bletchington is situated within Ducklington and you will be aware of their current plans for extending the area from which they extract sand and gravel up to the A40 at Witney.</p> <p>Councillors are aware of the necessity for the extraction of sand and gravel for building works, and appreciate that where building is to take place local to Ducklington, there is a justifiable reason for that sand and gravel to be extracted from our locality. However, Councillors do not accept that sand and gravel should be extracted from west Oxfordshire when it is needed for development works in the south and east of the county, when there are deposits of sand and gravel which could be used to meet building needs more local to those areas. The Parish Council firmly believes, as indeed is stated in the consultation document, that the distances over which minerals should be transported should be minimised, however the proposed strategy will not deliver this. The largest developments which are proposed for the plan period are located south of the River Thames and in the east of the county.</p> <p>Extracting minerals from the Lower Windrush Valley for use in these locations will cause significant road congestion. Most of the bridges over the River Thames in our immediate locality are subject to weight restrictions - the only way to transport minerals to the development sites outside of West Oxfordshire will be via the A40. This road is already severely congested and it would be detrimental to the other traffic dependent on this road, both commercial and private, and indeed to all residents of West Oxfordshire, for the lorry journeys which would be needed to transport the minerals out of our area to be dependent on this road. The Parish Council is of the</p>

	<p>opinion that the potential new minerals identified in Cholsey should be opened up early in the plan period, and extensions of the sites at Sutton Courtenay and Caversham built before there is any consideration of taking minerals from west Oxfordshire out of the area.</p> <p>Ducklington Parish Council also has significant concerns about the detriment to the environment of West Oxfordshire by the inevitable restoration of any further digging in the area to large bodies of water. Whilst the consultation document pays heed to the need for good quality restoration, it also acknowledges the reality that 'most sand and gravel workings in the river valleys of Oxfordshire will have to be restored to water bodies.'</p> <p>When the Lower Windrush Valley is viewed from the air, the devastating impact of historic quarrying is clear - the fertile farm land and varied countryside which once formed the landscape is gradually being replaced by large areas of open water. Extending the areas within the valley where quarrying is carried out will extend this devastating impact to the point where there will be very little land at all, with settlements surrounded by bodies of water on many sides. The Parish Council shares the concerns that the MoD will no doubt raise about the risk of bird strike on the planes flying out of RAF Brize Norton, the largest operational RAF base in the country.</p> <p>The Parish council also has a very particular and significant local concern about the extension of quarrying around Ducklington. Ducklington Mead SSSI is at significant risk of being destroyed by dewatering which is necessary to carry out quarrying in the area. Whilst Smiths of Bletchington is attempting to work out how best to protect the Mead despite planning to extend their quarrying site, no scientific modelling can predict with certainty what would actually happen if the fields near the Mead are dewatered and dug. The only way to protect the Mead is not to dig any closer to it than at present.</p> <p>In conclusion, whilst councillors accept that there is a necessity to make provision for future minerals extraction to deliver the development requirements of the county, they are firmly of the opinion that minerals should be extracted as close to the development sites as possible, and oppose the County council's plans to extract the vast majority of the future sand and gravel required from the Lower Windrush Valley and Eynsham areas despite the main development sites being located at a significant distance in the south and east of the county.</p>
232	<p>I write to comment on the apparent policy regarding the extraction of gravel etc in the Lower Windrush valley, Lower Evenlode valley, Yanton, Caversham and Cholsey.</p> <p>On looking at the proposals it seems to me that the great majority of the requirement for sand and gravel (new houses etc) is south of the River Thames but the plans for minerals extraction seem to be concentrated on areas north of the Thames. How is all this gravel etc to be transported from where it is dug to where it is required? As much of the gravel is to be extracted from the Stanton Harcourt and Eynsham/ Yarnton area I presume the plan is to use the A34 and the all ready full to overflowing A40. As you will know the bridges over the Thames and associated roads at Newbridge and Eynsham are certainly not suitable for the huge number of lorries that will be required.</p> <p>I thought it was council policy to extract gravel as close to where it is required and to transport it by the most environmentally friendly method possible. It is also your policy I believe not to exacerbate the traffic problems on the A40 or the A34.</p> <p>I am not at all happy about the current plans and ask you to consider extracting more gravel from areas where it is most needed and</p>

	not from the all ready overdug areas where it is currently not
239	<p>I would like to add my voice to those objecting to the plan to extract gravel from around Eynsham, despite the fact that most of this is for use south of the river. The following points I feel are relevant:</p> <ul style="list-style-type: none"> - the sites are close to the village and local industries, but far from the places where they will be required. - the A40 and A34 are incredibly congested, and this will increase the burden with up to 1.5 million lorry runs possible. There is a big problem with the access across the river on the birdges, it would seem more sensible to set up workings south of the river for this reason. - Flooding is a problem in this area, and it is extremely likely that this will cause further extreme flooding. - the Siemens plant is important to the area, and this will cause vibration, dust and noise to them. It is highly likely that they will not stay if this is the case. - the quality of life in the local area will be affected to a high degree, to the extent that a once pleasant area to live will be blighted. <p>I do hope that the concerns of local people will be addressed and that alternative plans will be put in place to find gravel for use south of the river.</p>
242	<p>We are dismayed to learn that, despite much opposition, plans to extract gravel from Eynsham are to go ahead. We would like to stress that the negative impact this will have on the local environment and on the quality of life of local residents, cannot be understated. We therefore urge you to reconsider this plan, and to keep us informed on the matter with regular updates.</p>
256	<p>I am emailing to express my opinion & disapproval of the plan by Oxfordshire County Council to have extensive gravel extraction from Eynsham.</p> <p>Eynsham is a large village with small roads, and 1 small toll bridge across the Thames.</p> <p>The reasons for my objection are not just of the 'not in my back yard' variety !</p> <p>To imagine that this could be an area where any increase in lorry traffic makes sense, obviously hasn't visited the village. Every road around and through this old village is already overloaded with traffic trying to navigate through there, made even worse whenever there is one of the frequent pile ups on the A40, A34 & M40. The A 40 around Eynsham in both directions is a nightmare - in fact it must surely be up for one of the prizes of worst road in Britain - along with the A34! And because Eynsham is close to them both, and within (what was) easy commuting distance of Oxford, it suffers! As do we who live there. Please do not take an action which will just serve to make a bad situation much worse.</p> <p>I understand that the gravel being extracted is not actually going to be used in our area, but will be driven many miles. This is not a 'localism policy'. It does not make sense. Gravel should be extracted near to the areas where it is needed</p> <p>Eynsham has a thriving, expanding population of young and old. Gravel is not a healthy substance. It gets in the air, it gets in the lungs. It is ludicrous to put gravel extraction so close to a large population of people. Speaking as someone who works in health care, I can feel law suits coming on!</p> <p>Eynsham has a flood plain adjacent to it, and is on the flight path to Brize Norton for military planes. Both of these things are not</p>

	<p>moveable & both can be jeopardised by gravel extraction with potential catastrophic consequences. The consequences of birds being scared by lorries into the path of low flying aircraft over Eynsham does not bear thinking about. Shame on you Oxfordshire Council for considering the introduction of such an 'ungreen' policy. Here we all are madly recycling every bit of food and plastic and you plan to throw it all up in the air and introduce something that flies in the face of any form of green policy.</p>
257	<p>We would like to register our objection to any further gravel expansion in the Lower Windrush Valley as this area has already been heavily blighted, apart from the obvious increased risk of flooding, noise levels etc, the complete and irreversible destruction of vast areas of ancient fields and hedgerows has been most demoralising to watch. As you are aware, once the gravel has been dug, despite considerable efforts by the operators, the excavation sites are usually being transformed into faceless, sterile looking lakes. We are aware of the fact that there is planning for more houses to be built in the Witney area but equally, there are other issues which will need to be addressed first, for example the lack of infrastructure to support these new housing developments, the A40 and the A34 are known to be exceeding capacity. There are also question marks over the proposed Cogges Link Road which has been met by considerable local opposition. Our family has been living next door to a gravel site for the best part of 15 years and have first hand experience of the irreversible destruction of landscapes and wildlife. We feel it is very important to pay much more attention to preserving the local environment we live in for future generations.</p>
297	<p>I live in Standlake. We are surrounded by lakes which are the result of gravel extraction. We have recently be condemned to a further operation at Stonehenge Farm, Northmoor.</p> <p>I am strongly opposed to the plans you now have for further extraction in this area. The basis of my opposition is set out in the document prepared by OUTRAGE on 6 October 2011 of which you have received a copy.</p> <p>I do not see how you can maintain your plans against the arguments in that paper.</p>
359	<p>I wish to object to further extraction of sand and gravel north of the Thames for the following reasons:</p> <ol style="list-style-type: none"> 1. Extraction should take place as near as possible to the areas where the material will be used, i.e. south of the Thames. 2. The movement of lorries would add to the congestion already experienced on major and minor roads. 3. Neither Newbridge or Swinford Toll Bridge are suitable for heavy lorries. 4. Further extraction in this area would worsen problems of flooding.
393	<p>I live in Stanton Harcourt, an area directly affected by the above proposals.</p> <p>I should like to make the following points relating to these proposals:-</p> <p>The local road system is already suffering from excessive traffic (A40/A34/B4449/B4044/B4017), which cannot be easily upgraded to a</p>

	<p>suitable level, although it should be as traffic jams are a regular feature in this locality.</p> <p>The road infrastructure is inadequate to cope with HGV's. The two narrow G1 bridges at Newbridge and Swinford are certainly unsuitable for gravel lorries. This places a huge burden on the A40, which is already at capacity. The A34 is also suffering from traffic overload.</p> <p>The primary usage of the local gravel extraction is a long distance away, which is not carbon efficient and probably uneconomic in any case.</p> <p>This area has been thoroughly exploited for many years for its gravel, and has substantially done its bit for national needs.</p> <p>The area is already overburdened with gravel pits. There are no advantages in this locality for any more such recreational/bird sanctuary type facilities, which, in past approvals, have been considered a local 'benefit'.</p> <p>This region is well known for flooding : additional gravel pits will not improve matters.</p> <p>The local residents have not benefitted from previous extraction, and are unlikely to benefit from significant royalties now.</p> <p>The gravel extraction in the area appears to be controlled by one company, which might contravene monopolist laws.</p> <p>It is a well known fact to local residents that haulage operators hereabouts frequently ignore the restrictions (pollution / road usage etc) originally placed upon them by the planners to ease the burden on them. Such restrictions are well understood to be used as one excuse to approve planning proposals. Why would it be any different now?</p>
<p>458 (Oxfordshire Nature Conservation Forum)</p>	<p>We strongly support extending the Lower Windrush Valley Project area approach to cover each of the strategic areas for minerals extraction in Oxfordshire which will result in the long-term management and maintenance of restored sites for the benefit of local communities and the enhancement of the natural environment of Oxfordshire. This approach is one that deserves further exploration. We also strongly support the requirement for securing long term maintenance of BAP priority habitats and appropriate contributions of Oxfordshire BAP targets through the CTA approach. Without such a strong requirement, it is unlikely that proposals will include the creation of high quality habitat.</p>
<p>317</p>	<p>I wish to object to any NEW areas of gravel extraction along the 'Old Cassington Road', which runs approximately eastward, from the Eynsham bypass towards Cassington. My reasons are:</p> <p>1) Minimising the distance minerals are transported by road, to reduce impacts on the environment: your summary says that the greatest need for gravel is in South Oxfordshire. The roads around Eynsham are already over-full: traffic crawls along the A40 at many times of day currently. We don't want more lorries on our narrow, overcrowded roads and tollbridge.</p>

	<p>Therefore, please do not allow any new extraction in Eynsham, which is many miles from South Oxfordshire.</p> <p>2) Your plan recognises that development may need to take place in flood risk areas but only where alternative sites have been considered and discounted: the 'Cassington Road' area I've outlined above is often flooded, and so I feel it should be removed altogether from the plan.</p> <p>3) restoration of mineral workings to enhance the natural environment and the quality of life for Oxfordshire's residents: the 'Cassington Road' area is one of the very few areas near Eynsham available to nature-lovers, joggers and dog-walkers. If gravel extraction is allowed, many of the currently available paths will be lost for years, if not permanently.</p> <p>Furthermore, we do not want any lakes which no doubt would be left after gravel extraction: these cause mist and fog: a hazard for health and driving.</p>
<p>881 (Eynsham Soc, Eynsham & Cassington Gravel Committee)</p>	<p>This strategy has been slowly progressing over several years, during which time I was a member of the working party (Oxon. CC Minerals and Waste Forum) organised by the County Council and Proteus, an independent environmental organisation. What particularly worries is the scant regard to the points repeatedly made during its meetings, which almost have to be repeated ad nauseam, leading one to fear that points made usually fall on deaf ears.</p> <p>We repeatedly pointed out problems with the minerals apportionment, areas already subjected to excessive minerals extraction, problems with transport and the desirability of extraction close to quarries, restoration being essentially a misnomer for lakes (usually of little use to local residents and often poorly cared for), destruction of the local countryside and local amenities, threats to local high technology industry and little consideration for local settlements and no compensation for them for the harm done to their local environments.</p> <p>I have lived in Eynsham since 1963, and have taken part in various Local Minerals Plan and Structure Plan inquiries since that time, mainly representing Eynsham Parish Council and also working in close collaboration with the Eynsham Society and Cassington Parish Council via the Eynsham and Cassington Gravel Committee of which I have been Chairman.</p> <p>We produced three volumes - in 1992, 1994-5 and 2006-7 in relation to minerals applications and the Structure Plan Inquiry. In 1992 the applications were withdrawn after 'call-in' by the Sec. of State for the Environment. Most recently in July 2011 the 2007 application was also withdrawn over legal and other problems after the application had laid before the County Council for about five years.</p> <p>I would also like to remind the County Council that the Minerals Industry held a conference in Oxford in April 2011 at which the industry itself proposed that its minerals applications should be more transparent to local villages and settlements, more cooperative and sympathetic to their feelings and should ideally help them with projects, which mineral operators have no legal compulsion to do at the present time, as even the small levy that could be used has now been lost for this purpose. This conference also recommended that no further 'wet digging' took place, as when employed there was no visual inspection of the underlying soil and minerals, nor of their archaeology or palaeontology (the study of fossil remains). It also implied that more dust would be made in sensitive areas such as near to industrial units employing high technology which should be protected from such interference by the Jodrell Bank principle - see also p.4 re the Siemens Magnet Factory in Eynsham.</p> <p>In the three volumes (noted above) we were able to stop previous applications in the Cassington/ Eynsham area and to exclude Eynsham from the Structure Plan and Minerals and Waste Local Plan, including the present one dated 2006. .</p> <p>Some historical points.</p> <p>In 1991-2 applications were made to extract minerals and clay from the very large area between Eynsham and Cassington extending</p>

from the River Evenlode in the East to almost the Eynsham Eastern by-pass (B4449) and from just north of the River Thames to Eynsham Mill (north of the A40), and to refill the area - essentially the 1km wide flood plain of the River Evenlode - with rubbish up to 12 to 20 feet above the present ground level. This was preposterous and with help from our MP at the time Douglas Hurd (now Lord Hurd and then also Foreign Secretary) and Michael Heseltine (now Lord Heseltine - then Sec. of State for the Environment) who called in the applications and also 'directed' that a full Environmental Assessment be carried out. Following this the applications were withdrawn..

At the 1995 inquiry re the Minerals and Waste Local Plan it was pointed out that the County Council had not complied with a 'direction' from Michael Heseltine when first-time Sec. of State for the Environment, when he approved gravel extraction in Cassington/ Yarnton but required the County Council to define the gravel bearing areas on an ordnance survey basis This they omitted to have done and so Eynsham was not included in this or the later and presently still extant Minerals and Waste Local Plan 2006.

An inquiry was held in 1994 re dualling of the A40 in Eynsham and Cassington, but was later shelved on the grounds of costs. However when approving the later Structure Plan the County Council resolved that no minerals extraction should take place in Eynsham until the A40 had been dualled.

In 2006 ARC/Hansons submitted an application to extract gravel on land south of Cassington Road and north of the Siemens Magnet Factory in Eynsham parish. In doing this they failed to note that (A) Thames Water had sold the access field in 1997 and that it had later been the basis of a land-sale scam reported by BBC TV - that it had been sold in small plots to about 90 purchasers mostly from the Indian subcontinent. This was essentially perjury as Hansons had submitted a false statutory certificate. And (B) two very large water mains passing through part of the site. These errors resulted in Oxon. CC rejecting the original application. It was then resubmitted in 2007, but was finally withdrawn in July 2011 as several problems could not be resolved - see above.

Comments on the present consultation including housing areas and the incongruity of taking most of the minerals needed for housing from north of the Thames to south of it. .

The revised annual figure of need for minerals reduces the land bank requirements for minerals extraction, thus not all the areas shown in the Consultation Map (appended) should be needed.

The major point re the areas shown on the map is that much of the proposed mineral extraction is north of the River Thames in the Windrush and Evenlode valleys whilst most of the new housing development in Didcot, Wantage, Grove, etc, including that which will be associated with the new Enterprise Zone in the Science Vale area is south of the River Thames.

This means that such material if extracted will somehow have to cross the River Thames. Routing has been proposed e.g. for the new quarry at Northmoor - A415 to Ducklington, A40 to Wolvercote roundabout, A44 to Peartree and then A34 to the south. This would avoid Tadpole Bridge (impracticable and banned to gravel lorries), and New Bridge (which has an 18 tonne weight limit and where the proposed new bridge has been abandoned). Swinford Toll Bridge, built in the late 1770's has no weight limit, but is rather narrow and

at times very congested with queues of traffic waiting to cross it. Also routing away from it appears to be largely ignored by mineral lorry drivers who are mostly franchisees and who are paid by the number of deliveries made each day. The two routes (1) from Northmoor (where a new quarry was authorised this year) via Sutton (strictly not allowed) or (2) via Ducklington and the A40 to Eynsham and the Toll Bridge are much shorter than the County's route. This bridge is privately owned and it is up to the owner to decide if lorries can pass over it, paying the toll and thus avoiding the already severely overcrowded and longer route along the A40 to the A34.. It also means that the County's routing is not enforceable and that large numbers of lorries will pass through unsuitable narrow country roads.

This also runs contrary to Oxon. CC Policy C7 reproduced below:
Policy C7: Transport and rights of way policy

Minerals and waste development will only be permitted where provision is made for convenient access to and along the primary road network in a way that maintains or improves:

- the safety of all road users including pedestrians;
- the efficiency and quality of the road network;
- residential and environmental amenity.

Proposals for mineral working should

- a) wherever possible, transport minerals by rail, water, pipeline or conveyor, rather than by road
- b) minimise the number of miles that have to be travelled to reach markets if this can be achieved using roads suitable for lorries

Cllr Ian Hudspeth has also noted that in the Local Transport Plan 3 one of the requirements to be taken into consideration is: 'to minimise the distance minerals need to be transported by road and encourage where possible the movement of aggregates by conveyor, rail and on the River Thames in order to reduce the adverse impacts of mineral transportation on local communities and on the environment'

This means that the transport strategy in the new Framework runs contrary to both the County's own transport policies, which we trust will be fully noted both by the County itself and also the Government Department which we trust will requisition a public inquiry to sort out both this and other matters which are inconsistent..

Other matters

Siemens Magnet factory

As noted on p. 1 the proposed ban on 'wet digging' could well have a deleterious effect (from dust) on the Siemens Magnet Factory in Eynsham, which needs clean air and a suitable local environment. It produces around 50% of the world-wide demand for high powered magnets for medical use in Magnetic Resonance Imaging, which unlike any X based system uses no ionising radiation - only low power radio frequency waves in association with the techniques. The factory was first developed by Oxford Instruments plc, and over the past 30 years in Eynsham has grown from strength to strength being awarded six Queens Awards and three national awards in 2010, two Best Factory Awards and The Institution of Mechanical Engineers Award for Product Innovation. Over this time Oxfordshire has become known in Industry circles as 'Magnet Valley' given the presence of Siemens, Oxford Instruments and their respective suppliers such as Air Liquide which is also in Eynsham.

Dry extraction represents a destiny changing threat to the Siemens factory given the potential impact on product quality. What is a lush valley today of successful high technical businesses could become a large dust bowl in the future.

The factory has been considerably updated and automated in recent years and is one of the largest employers in West Oxfordshire, and is considerably supported by West Oxfordshire District Council

Its Managing Director forwarded a five page objection to the 2006-7 applications pointing out its importance to the manufacture of its products most of which are exported, local employment, etc. He also noted the large investments that had been made in the factory, and that it could be affected by dust, vibration and flooding if the local water flows were changed.

Hansons had proposed 'wet digging' near to the factory, but this may not now be possible - see p. 1.

The value of its products - about £400M per year in relation to the value of minerals - estimated at about £ 1M or less per annum also needs consideration.

Flooding

As the proposed areas lie within the flood plain of the River Evenlode, it is not surprising that flooding may occur in its flood plain. The most recent severe flooding occurred in July 2007 but it has also occurred in other years since we lived here and also previously in e.g. 1945, 1890, and there are also records saying that the Toll Bridge was nearly swept away soon after it was built.

In this area when floods occur water rushes across the fields from the north, crossing and passing under the several culverts under the A40, then over the fields south of the A40, via the huge culverts under Cassington Road (made by the then Duke of Marlborough in 1802 when he built this road to be elevated above the flood plain) and over it to the fields to the south which are drained by several ditches which empty into the Thames, from which backflow may also occur.

The fear is that mineral and possibly also clay removal in this area will result in much worse flooding problems.

Local amenity area

This area between Eynsham and Cassington (and close to the Eastern end of Eynsham Village, where a new housing estate is now being constructed) is also used by local residents as an amenity area for sport - a new cricket and croquet sports field here was opened by David Cameron as our local MP in May 2006 and is in constant use. The area is also used for cycling (both by adults and children) and walking including dog walking, and contains several public footpaths. It is particularly popular as its eastern end was gated and closed to through traffic when the Eastern By Pass was opened in 1981.

It lies within the Oxford Green Belt, and we note that the new regulations re minerals extraction came into force in Jan, 2006 which place certain limitations on mineral working in Green Belts.

Agriculture.

The area is at present well farmed, with both arable and grazing usage. It is graded 1, 2 and 3a - which should normally be preserved for agriculture.

Danger to military (and other) aircraft from Bird Strike.

We must also point out that this area of Eynsham lies directly under the approach path for landing at Brize Norton, and that the number of aircraft movements into Brize Norton has increased in 2011, with the relocation of aircraft from Lyneham to Brize Norton.

Extra lakes in the area can produce an increased hazard.

We also have helicopters from and to RAF Benson passing over the area several times most days.

Restoration is a misnomer

Unless returned to agriculture the land is changed for ever by minerals extraction.

	<p>Usually the areas are left as lakes, perhaps tended for a few years, but then often abandoned. This has been the situation in particularly the Windrush Valley. No compensation for local communities.</p> <p>This was noted on p.1. Only the landowner gets a price or royalty for the minerals. The local community usually has no benefits, only misery and inconvenience whilst the minerals are being removed and later a totally altered landscape, which may become a wilderness - perhaps a haven for wild-life but of little benefit to the human population.</p> <p>The above points all need careful consideration particularly in relation to the stated aims given in the policy below: - especially location, proximity to main market areas, main transport routes, risk of birdstrike, loss of good agricultural land, nuisance to the adjacent local community, loss of local amenity area, etc.</p> <p>Policy M2 from the Oxfordshire Structure Plan 2016</p> <p>"Locations for sand and gravel working will be identified in the Minerals and Waste Development Framework. In identifying appropriate locations, the County Council will take account of the distribution of sand and gravel resources; the existing pattern of supply and distribution of workings; proximity to main market areas; accessibility to the main transport routes; risk of birdstrike; restoration and after use potential; and development plan policies, in particular which seek to safeguard:</p> <ul style="list-style-type: none"> important archaeological remains, historic buildings and areas; areas and sites of nature conservation importance, especially Special Areas of Conservation and Sites of Special Scientific Interest; features of landscape importance, especially areas of Outstanding Natural Beauty; best and most versatile agricultural land; the water environment; land uses which are sensitive to nuisance; and the safety and convenience of all road users, including pedestrians and cyclists." <p>FINALLY I append a copy of the map from the OCC strategy booklet showing clearly in blue the River Thames and in blue with crosshatching the areas proposed for minerals extraction in the Windrush and Evenlode Valleys.</p> <p>Clearly the largest areas are in the Windrush and Evenlode Valleys, with only minor areas to the south, including a small area near Reading where the minerals go to Berkshire.</p> <p>In relation to the areas needing minerals for building these are very badly sited, as transport by numerous lorries is required to take them where they are required!</p> <p>It would seem preferable and more sensible to take minerals from the reserves still in the south of the county!</p> <p>Why should the Windrush and Evenlode Valleys (which are already largely filled with lakes in old quarries), be subjected to this further large provision for supplying minerals, when the main need is in south Oxfordshire?</p> <p>The Evenlode Valley not only includes a large threatened area (or areas) in Eynsham parish, but also adjacent ones in Cassington parish, all lying within the floodplain of the River Evenlode with all the resulting attendant disadvantages.</p>
309	<p>Policy M3: Whilst it is of course important to generally recognise that minerals may only be worked in the locations which they naturally occur, specific opportunities for mineral extraction should be positively endorsed where existing, associated infrastructure arrangements already exist. The benefit of such existing infrastructure (e.g. processing plant, adapted/improved highway arrangements, environmental monitoring regimes etc) allows for future working to progress without inappropriate and/or undue effect on the surrounding environment.</p>

	<p>It should also be a preferred choice to work deposits of mineral as extensions to existing quarry sites rather than establishing operations in greenfield locations where mineral extraction may not be viewed as a typical land use.</p> <p>With the above in mind, proposals to continue the focus of sharp sand and gravel extraction within the Eynsham/Cassington area (i.e. those prospects which may potentially serve existing quarry sites in this locality) should be approved.</p>
319	<p>I strongly oppose the mineral sand waste plan proposed for the Eynsham area as it would cause too much traffic congestion on the A40 and Tollbridge roads. It would be of no benefit to the local community and detract considerably from the outstanding beauty of the area.</p>
487	<p>I am writing to urge the Minerals and Waste Policy Team to reconsider the decision to include the extension of existing gravel workings in the Lower Windrush Valley in their new Minerals Plan. The theme throughout the document is that future gravel workings should be close to the market needs, minimising transport requirements and avoiding damage to the environment and local community.</p> <p>The Lower Windrush Valley is wholly unsuitable and its inclusion in the plan contravenes each of the three points set out in paragraph 3.4 b of the consultation document: Mineral working will be located and managed to minimise:</p> <ul style="list-style-type: none"> - The distance that aggregates are transported by road <p>The document clearly states that the main areas of development are Oxford, Bicester and the Science Vale (including Didcot, Wantage and Grove). Of the five areas proposed for gravel working the Lower Windrush Valley is furthest away from these main areas and crucially on the opposite side of the river Thames.</p> <p>The A415 is closed to HGVs over 18 tonnes at Newbridge, so traffic to the Didcot, Wantage and Grove area would be forced to take a significant detour down the A40 and onto the A34, clocking up many, many more road miles than the proposed sites in the south of the region.</p> <ul style="list-style-type: none"> - The use of unsuitable roads through the settlement <p>The roads from the Lower Windrush Valley to the main areas of development (A40 / A34) are already the most heavily congested routes in the region. The road system between Witney and Oxford is wholly inadequate for the existing volume of traffic. To add a large number of additional HGVs to this would have an enormous impact on the flow of traffic, resulting in further delays along this stretch of road and inevitably to more accidents. The prospect is unthinkable and directly contravenes paragraph 5.35 of the Consultation document.</p> <ul style="list-style-type: none"> - Harmful impacts of mineral extraction and transportation on Oxfordshire's environment and communities <p>The extra road miles and concomitant increased CO2 emissions in moving the gravel from the Lower Windrush Valley to the areas of development would have a very harmful effect on</p>

the environment and directly contravenes paragraph 5.31 and 5.32 of the Consultation document.

The impact of the additional congestion on the A40 between Winey and Oxford on local businesses and community should not be underestimated.

So much of the Lower Windrush Valley has been worked already and there are only so many fishing lakes, reed beds and nature areas that a local community needs. It needs to be remembered that this is a farming community and it would be good to protect and maintain at least some of the original character of the countryside and landscape (as stated in paragraph 5.26 and 5.27 of the Consultation Plan).

However my greatest concern is the effect of the mineral extraction on flooding and the flood risk in the Lower Windrush Valley. Paragraph 5.5 states that the aim is to steer development to areas of lowest flood risk and paragraph 5.11 could not be clearer in stating that the mineral development should not take place in areas at risk of flooding. And yet the Lower Windrush Valley is still being considered.

The attached photographs show one of the areas that has been nominated by a landowner in the Lower Windrush Valley (SG-28). During the floods of 2007 the whole of this area flooded. The surrounding area has been extensively worked already and my concern is that with additional extraction the flood risk would become significantly worse and cause even more devastation should we have a repeat of the July 2007 conditions.

Section 7.9 of the Background Paper no. 2 (Flooding) states that "The Environment Agency has expressed concerns about the cumulative impact of further working on ground water flows" in the Lower Windrush Valley. However it is argued that the good infrastructure and proximity to markets outweigh these concerns. But I would argue very strongly that there is not a good infrastructure and that there is definitely not proximity to the markets and therefore the decision to include the Lower Windrush Valley should be reversed.

Paragraph 4.18 of the Consultation Document supports my personal concerns perfectly:

- Although there are extensive sand and gravel resources in west Oxfordshire, the rate and intensity of mineral working in the area should not increase due to concerns about generation of traffic, impacts on local rivers and groundwater flows, and cumulative impact on local communities.
- The distances minerals need to be transported from quarry to market should be as short as is practicable.
- There should be continued sand and gravel working in the area to the south of Oxford to enable local supply of aggregates for planned housing and economic growth in southern Oxfordshire, including the Science Vale area.

Any further expansion of gravel workings in the Lower Windrush Valley would be totally unacceptable at all sorts of levels and I urge you to reconsider this decision.

490 (Savills Ltd)	Savills acts on behalf of Corpus Christi College, Oxford. The College has an interest in land at Eynsham/Cassington, and supports the identification of the sharp sand and gravel reserves in that area as being suitable for extraction within the emerging Mineral Plan.
501 (Ducklington with Hardwick Charity)	<p>We recognise the huge effort which has gone into the development of this plan, but are concerned at the impact which such a long term plan will have on developments which have not yet been thought of or considered. Equally there seems to be significant contradictions in some of the statements, making the conclusions questionable. While the areas identified as possible sites for digging are well known, it is not at all certain that these will all become available, and other sites will then have to be considered. It is therefore vital that this plan provides a template against which any development can be considered.</p> <p>If we accept the proposition that about 1 million tonnes of gravel will be needed to be dug in Oxfordshire every year up to 2030, then there are three criteria which must be considered before any decisions are made on sites. These are:</p> <ol style="list-style-type: none"> 1. The digging must be economic, and meet carbon reduction plans 2. The impact on the local environment must be minimised 3. The restoration of the land after digging to economic use must be ensured, and the burden must not fall on the County <p>Economics of digging: The statement rightly highlights the problem of movement of the gravel from the digging site to the area of use. Some years ago the contractors estimated that it was not economic to move gravel by road more than 25miles, and this must be significantly less today. Costs will inevitably rise in the period up to 2030. This means that sites remote from the areas of need must not be considered. The aspect of carbon emissions has not been emphasised enough in the Plan, and this must be rectified before any final plan is agreed.</p> <p>Impact on the Local Environment: There are a number of items to be considered under this heading:</p> <ol style="list-style-type: none"> 1. Noise and Dust. This is particularly important in any area, both from the point of view of local inhabitants and also damage to adjacent agricultural land. 2. Drainage. All areas under review are low lying and in river flood plains. This means that alteration to watercourses and drainage ditches can, and already has, resulted in alteration to the water table (wells and ponds drying up, floods etc). Over very many years much investment in drainage has been made to bring these areas into cultivation, and the wholesale interruption and destruction of these works will inevitably impact on the possibility of restoration to economic use. 3. Wild Life. Much has been made in past applications of the possibility of improving wild life habitats. Of course, the habitat formed after digging is completely foreign to the area, and impacts on local species, whether encouraging species non native to the area is a good idea is very debatable, and should be studied further before being ignored, as at present. In any case to over prioritise habitat over economic use is surely a matter we should not follow. 4. Archaeological and Geological Significance. All areas under consideration have considerable archaeological significance. No systematic survey has been done, so we have no idea of what could be destroyed by digging. Already it is clear that much has been lost, and while it is impossible to preserve everything, total vandalism by digging without prior investigation is not acceptable. Note the requirements at Gill Mill where Smiths have to pay for Archaeologists to be present and to be instructed by them when the top soil is removed. Any sign of ancient remains and Smiths have to stop until the Archaeologists have finished, which can take months or in

the case of one area near to Gill Mill house, the area was so rich in finds that Smiths abandoned it as the costs of paying for all the archaeological work would be greater than the value of the gravel. Equally the geological structures of the areas are of significance, and should be investigated for possible preservation, if of the necessary significance.

5. Transport. Not only is this of economic significance, as noted above, but it has a major impact on the local infrastructure. For example the Lower Windrush valley is suggested to produce the bulk of the gravel needed. As the demand is expected to be in the Harwell/ Didcot area, which is about 15 miles away as the crow flies, and at least 30 miles by road, this already makes the project marginal in economic terms. However, the question of transport links has not been addressed in the Plan at all. The suggestion that gravel could be moved by rail or water from the Valley is clearly uneconomic, because of the double handling, and the associated road transport to any port or rail head. The infrastructure does not exist, while port works might be possible, rail could not be created in the time available. Road transport out of the Valley is equally problematic. New Bridge cannot be used, because of the weight limit, and the proposed new replacement bridge will still funnel all traffic through Standlake village. The other bridges over the Thames are totally unsuitable. This leaves the A40 and the A34 as the only viable means of moving gravel to the Harwell / Didcot area. Both roads are grossly overloaded today with no plans published yet to alleviate the problem. It is therefore unwise to even contemplate an additional 270 lorry movements a day (one every two minutes) on these routes, without major upgrading, which would have to be paid by the digging companies, making the Valley even more uneconomic.

Restoration After Digging.

All mineral digging in this country, and elsewhere, eventually requires restoration. In the past this has been left to future generations, and we only have to look at the old coal mining areas to see the huge cost being incurred to restore these areas. We already have large areas of Oxfordshire which are devastated by gravel digging, and cannot generate any income compared with the previous agricultural use. We simply cannot continue to allow our county to lose the potential for jobs and income generation. It is therefore vital that any digging is accompanied by a comprehensive plan to restore the land to profitable use. The Plan mentions this, but is very vague, and understandably so, until some imagination is applied to the problem. Ideally the best option would be more "good" land fill to restore the land to agricultural use or park land, as is being done in the Birmingham area, and has been done in a limited way already. A glance at the map shows that we are already well on the way to replicating the disaster area in South Gloucestershire, and more lakes is simply not an option to leave to future generations. It should be the responsibility of the digging companies to propose bankable schemes which can be fully evaluated in the detailed planning process. These can easily be monitored as works proceed, and should not leave any financial burden on the County.

Conclusions.

Much work needs to be done on the Plan to remove contradictions and provide a sound template with which to evaluate detailed planning applications.

Items which have been highlighted include:

- The economics of digging in each area as related to the place of demand for the gravel. This must include studies on the impact of carbon release.
- The impact of further digging on drainage, local amenities, archaeology and wild life must be subject of a major survey, using criteria agreed by all parties beforehand. This will have to be paid for by the digging companies, so it will be essential that all parties

	<p>agree at each stage, so that bias cannot be claimed as biased by anyone.</p> <ul style="list-style-type: none"> - The solution to transport of the gravel out of the Lower Windrush Valley must be found before any further digging is authorised. This Plan is useful as it highlights a major problem (inadequate bridges, and the saturation of the A40 and A34 to handle up to an extra lorry movement every two minutes) affecting the whole of West Oxfordshire, which needs to be tackled urgently. - The Plan must include much stronger requirements for restoration to economic use after digging. If this is not done, the cost of restoration will fall on future generations after the income generated by the digging has been lost. - As about half of the available gravel in the Lower Windrush Valley has already been dug, it seems perverse to contemplate further environmental damage when the gravel digging would appear to be marginal economically, and the impact on the local infrastructure would be disastrous.
513	<p>I should like to endorse the comments made by Cllr Ian Hudspeth.</p> <p>It seems to me quite simple. There is an additional demand for minerals south of the River Thames, largely due to the Enterprise Zone in the Science Vale area. There are suitable sites to source this material south of the river which should be used and councillors in these areas need to face up to this. Economically, with the cost of fuel, and environmentally it must make sense to minimise the length of road journeys needed to shift this material.</p> <p>The current plan to extract in the Windrush area will have a negative impact on the efficiency and quality of the road network, not brilliant currently as it is, and also on local residents and the environment. Restoration of mineral extraction sites is simply a misnomer.</p> <p>The Highways Agency objects to the proposed increase in HGV movements on the A40 and knock-on effect on the A4095 and A44 as do existing users of these roads and local residents. So the council needs to put in place a minerals strategy to minimise visual, environmental and economic impact. The current proposal smacks of undue influence of councillors south of the Thames.</p> <p>By all means investigate using the river itself for transport, more environmentally friendly, quieter, and would ease pressure on the roads.</p>
520 (Standlake Parish Council)	<p>Standlake Parish Council has not changed its view of mineral extraction in West Oxfordshire since our response to the previous consultation in June 2007. I have attached a copy of that response for your reference.</p> <p>The council wishes to register its objection to any further gravel extraction in the Lower Windrush Valley area. The comments in our previous response remain valid and should be considered as part of our response to the current consultation.</p> <p>Since 2007, our locality has been further blighted by the granting of permission for gravel extraction at Stonehenge Farm. Whilst the council accepts that some extraction for projects in West Oxfordshire is necessary, it is opposed to further extraction to fulfil requirements in other parts of the county, or even further afield where there are adequate sources of local supply and we do not believe that our local residents should suffer the detriment to their lives that would result.</p>

	<p>The cumulative effect of decades of gravel workings is now significantly impacting upon the rural environment of our parish and we remain deeply concerned about the further impact of continued or increased extraction on our community. In particular, we are concerned about the risk to inhabitants from gravel lorries ignoring routing agreements and using inappropriate village roads. You will also be well aware of the problems the area has had with flooding in recent years and we are not convinced that continued or increased gravel extraction will not adversely affect the water table and increase the risk of flooding.</p> <p>Standlake is already close to being an island, viewed from the air, it is surrounded by water on three sides, the negative impact of further gravel working would be hugely detrimental to the community.</p> <p>Please feel free to contact me if you require further articulation of the Standlake Parish Council views.</p>
525 (CPRE West Oxon)	<p>4.18 Rate of extraction in West Oxfordshire. The commitment not to increase the rate of extraction in West Oxfordshire is welcome but there seems little recognition of the impact that continuing at the present rate is likely to have on the area. While the impact from traffic and associated nuisance will be no worse than at present, the cumulative impact on the landscape is not considered. Despite Policy C5, in the Lower Windrush Valley, for the reasons stated in the document, restoration is more likely than not to be as reed beds which may be excellent for wildlife but are in no way characteristic of the existing landscape which is largely small fields for grazing bounded by hedgerows.</p> <p>The commitment to speedy restoration and proposals for after management are welcome but past experience has shown that the benefits envisaged are not easily achievable, are slow to appear, and may in some cases be mutually exclusive. For example, the creation of new habitats and increase of biodiversity does not always sit comfortably with recreational uses and increased public access. On the other hand local residents who are the ones who have had to endure the inconveniences of extraction with no identifiable local benefits are often unhappy that after management means the setting up by the landowner of commercial fisheries where access to the public is denied.</p>
533	<p>I write with regard to the proposed gravel extraction plans for West Oxfordshire and ask that when making your decision you carefully consider the impact such extraction will have on our community. I am particularly concerned that the road structure isn't suitable for the increase in traffic that will be created by the scheme. The A40 & the A34 are both nearing capacity and the extra lorries will add to the queues and delays that are so frequent on these roads.</p> <p>As the majority of gravel will be required in the South of the county it would make more sense to extract the gravel closer to the need thereby reducing the carbon emissions, cut down on fuel and reduce the damage to the roads and bridges.</p> <p>I understand that we need to produce gravel and we have excelled at this in the Lower Windrush Valley, but I do think that our landscape has suffered enough and further extraction in this area should only take place to cover our own local needs.</p>
538 (Northmoor PC)	<p>Northmoor Parish Council having made a careful appraisal of Oxfordshire County Council's Proposed Core Strategy for Minerals, wishes to make the following representation with particular regard for sand and gravel provision.</p> <p>This Parish Council recognizes that if some 40,000 homes are to be built, together with the infrastructure to support them, within the period that this policy will cover, sand and gravel supplies must be provided for within a core strategy.</p> <p>It also understands that sand and gravel can only be quarried in locations that have commercially viable deposits and that these are located within Oxfordshire along the River Thames and its tributaries.</p> <p>The Council were heartened on reading the supporting papers on environmental and community protection, flooding, sustainability,</p>

and transport of minerals, that careful consideration would be taken into account of these issues. Particularly in relation to the cumulative impact on the landscape and communities, the effect of dewatering and flood risk, the use of secondary and recycled aggregates, and the mitigation of the effects of transportation of these products to construction sites.

So why, having taken these important factors into consideration, has Oxfordshire County Council disregarded them in relation to West Oxfordshire?

The natural environment of West Oxfordshire has already suffered severely due to the extraction of sand and gravel for some sixty years. Flooded worked out quarries line the roads and surround the villages of the Lower Windrush Valley now, what will it look like in twenty-five years time?

If West Oxfordshire is to continue providing aggregates at the same rate as it has in recent years then no regard has been taken to the cumulative effect

There are fine promises of restoration of old workings for the enjoyment of the local residents. Reed beds for professional ornithologists; private fishing lakes fouled with human excrement by camping visiting fishermen; noisy powerboats for water skiing enthusiasts.

Restored for local residents to enjoy? It hasn't been so far.

The paper on flooding and mineral development, item 5.10, includes the requirement to "only permit the development in areas of flood risk when there are no suitable alternative sites elsewhere".

Thirty-nine percent of this area lies within the functional flood plain of the Thames and Windrush.

This area has to accept that some of their resources should be used for the construction of homes. But it should be for those that will be built in places such as Witney, Carterton and Bicester, i.e. north of the Thames, but not in Didcot, Harwell, Wantage and Grove, to the south.

There is also the problem when rainfall is low of extraction of minerals causing dewatering of rivers and watercourses. The Windrush already suffers in this respect yet permission for more works alongside this river have already been given and will add more pressure to this problem with little evidence of mitigation measures in place.

So having extracted and processed the aggregates they need to be delivered to their market. Having taken the Atkins reported figure of 1.26 million tons per annum the Core Strategy calculates that some 20 million tons will be required over the period. Unfortunately it has not taken into account that this is not an even distribution of requirement. Of the 40,000 homes projected to be built some 17,000 will be built by 2015. That means that more than forty percent of the construction will take place in twenty percent of the time. If an average of 1.26 million tons are required a year over twenty years how much will be required for the first four years? The rate of use of sand and gravel is clearly not a straight line distribution, the pressure for more material from West Oxfordshire than is currently produced will be great.

Result, the level of production from West Oxfordshire will not remain at its current levels, it will increase.

That increase will harm the environment, as the only available routing of HGVs travelling south carrying sand and gravel from West Oxfordshire will be along the A40 and A34, and will greatly exacerbate the congestion on those roads, already close to, and sometimes already exceeding, their capacity. Production will also be centered on too few contractors, with the result of imports of aggregates from outside Oxfordshire, greatly increasing the road mileage with even more added damage to the environment.

If, as a result of this Consultation, the core strategy is revised, more minerals are excavated in South Oxfordshire and less in West Oxfordshire; the load to supply is widened to increase the number of contractors providing the materials, and the requirement versus

	<p>time is acknowledged and provided for, what benefit will the local population gain at each of the areas of mineral extraction? No reduction in their rates as compensation? No royalty to be spent on local needs? No improvement in their infrastructure? It is time people came before nature or ancient remains; that the environment in which they live and the services provided were made the first consideration of the consequences of the Core Strategy, not the last.</p>
539	<p>The Village of Eynsham is a substantial human settlement of great age at a crossing of the Thames historically carrying traffic from Oxford to the West of England and Wales. Its antiquity as a centre of scholarship is attested by the work of Aelfric, famous throughout Europe for many hundreds of years. Today it houses a combination of families who have lived there for many generations while also serving as a residential extension of Oxford providing homes for an increasing proportion of active and retired academic, professional, and technical staff. It is most notable as the site of the Siemens superconducting magnet manufacturing plant which provides the single largest direct and indirect employer in West Oxfordshire supplying their astonishingly high-technology magnets throughout the world and providing a site for the training of highly skilled staff from the whole world. Eynsham's location, therefore, is strategically important within Oxfordshire as a location of the highest technology and as a site for foreign and national investment. The excellent transport links by rail to London and by road to Oxford and to the international airports, the excellence of the local schools - Bartholomew Secondary School being rated 'outstanding' by Ofsted - and its location close to the immense resources of Oxford and the inspiring natural beauty of the surrounding countryside mark it out as increasingly desirable for professional housing and for promising investment in new technology in the same way as its sister institution Cambridge has generated a Silicon Fen in its catchment area.</p> <p>However, in being the first crossing of the river to the West of Oxford at a point where the Windrush and Evenlode tributaries join the main stream, there are also large deposits of gravel alongside the riparian system.</p> <p>So, for many decades, at least since the 1960s, commercial interests have sought to exploit this natural resource but for this same long period of time political authorities have had to balance the economic arguments for the extraction of the gravel with the larger demands of this human settlement of such ancient dignity and such current and future importance to the whole economy of Oxfordshire, in fact to the country and, indeed, in the case of Siemens, to the whole world. To some extent the manifest local culture of the village harking back to the Middle Ages with its village cricket and Morris dancing provides a beguiling but essentially oversentimental presentation of the real economic significance of this community in our own day and for our collective future.</p> <p>This setting of the context brings us to the County's current proposal for gravel extraction from now until 2030. The Core Framework initiated under the 2004 Act seems to have proceeded through three stages: the first a countywide inventory of gravel resources, the second a process of Consultation giving rise to a Summary Document published in 2007, and thirdly a resulting decision stage as to preferred locations. In the first iteration of this decision phase, Eynsham becomes a preferred location for extremely extensive gravel excavation in the years between now and 2030.</p> <p>In our view, however, there is a profound lack of consistency between the second Consultative phase and the first iteration of the decision stage. While it is necessarily the case that gravel can only be taken from its geological locations, it is not at all clear that the regulatory history of industrial gravel applications nor the results of the Consultative stage have sufficiently been taken into account. Rather it is as if stage one, the inventory, has morphed into the decision stage altogether bypassing the import of the second</p>

Consultative stage. This concentrates all of the political, social and economic costs of the County's plan on Eynsham while offering diffused benefits throughout the remainder of the County entirely disregards the County's own Summary of the Consultative process, and, indeed, the whole legislative and planning regulatory history heretofore.

The scale of the proposed excavation at and near Eynsham, supported by the doctrine of extensions to existing workings, suggests a strong reliance during this stage of decision upon the representations of existing commercial interests, a tentative decision no doubt reinforced by the relief of those parts of the County spared extraction by this argument as to the extension of existing workings. Thus it may be that majority political relief and particular commercial interests combine to make an industrial black hole of Eynsham.

But if, instead of dissolving straight from the inventory stage to the first iteration of the decision stage, we consider the content of the Summary made by County's own officials at the Consultative stage, we find the following considerations that should be taken into account as a substantive component of the Core Framework. These include:

a)-the proximity of excavation sites to centres of population and the distance of these sites from areas of need. As Eynsham is North of the river and the major areas of need are to its South and Eynsham is a substantial centre of population of a particularly valuable character, this consideration should strongly argue against Eynsham as a major site for countywide sourcing.

b)-a second criterion is the avoidance of an excessive burden on congested roads. The traffic of heavy goods vehicles laden with gravel should according to all transportation policies be kept to a minimum and the A40 is, we believe, the single most congested road in the county. Surely, no gravel extraction should take place in Eynsham until the A40 has been widened as policies adding to its congestion should be avoided if at all possible. The proposed route from Eynsham to the centres of need South of the river by way of Ducklington, Wolvercote and Peartree adds enormously to the traffic on already overlaid highways. On the subject of routes from Eynsham to sites South of the river, the proposed route through Ducklington and Wolvercote will in practice be unenforceable and it is likely that the river crossing will take place at the Swinford Bridge crossing which gave rise to the importance of the settlement at Eynsham so many centuries ago. The idea of passing of unenforceable regulations on gravel transport seems a major defect in the first iteration of the decision process.

c)-the Swinford Bridge crossing which seems the probable actual route in use by subcontracting hauliers takes the gravel lorries immediately alongside the Siemens superconductivity magnet plant with all of the risks of vibration, noise, and contamination that are implied. While these consequences are of greatest risk at the Siemens site with its direct and indirect employment of, perhaps, 2,000 posts and dependent on these, all of these consequences can also be expected on all property and institutions such as the primary School as a result of activities and traffic at the excavation sites and transportation routes. The near inevitable incompatibility of gravel extraction and work such as that carried out at the Siemens plant argues against the siting of gravel pits where any aspect of their operation compromises the work at Siemens. Furthermore, the deterrence of possible future investment in high-technology and scientific activities that might arise is an additional consideration over the period up to 2030. The unique location of Eynsham, its existing large population base, its travel links and excellent amenities need to enter into any planning horizon extending over the next twenty years.

d)-gravel extraction not only destroys the existing use and amenity value of open countryside, but results in such sites being left in practice unrestored giving rise to an essentially post-industrial water-filled landscape. This has already occurred widely throughout West Oxfordshire and is essentially unsightly and not only reduces the value of the countryside for use as a visual amenity but also acts as a deterrent to future development and investment. The waterlogged landscape that results, moreover, seriously adds to the problem of flooding which is so serious an environmental problem around and within the village of Eynsham. There is, additionally, the particular circumstance that Eynsham lies directly under the flight path to RAF Brize Norton which is now the main transportation hub for the whole RAF. The risk of bird strike, the possible loss of life and the putting of the interests of an extractive industry above that of a crucial national defence establishment could come to seem to exhibit a serious lack of foresight.

e)-mineral planning strategy must, moreover, be seen as a part of a much larger interactive network of strategic long-term planning and the need to protect Eynsham for high-technology investment which would provide much more productive employment and, hence, increased revenue streams for government at all levels. Planning must take into account alternative plans and above all the opportunity costs of one plan upon other more significant aspects of planning particularly where these concern the interaction of foreign investment, export revenues and the technological development of our human capital. Policy towards planning should take into account emerging trends as between centralization and decentralization in the distribution of powers among the various levels of government. The 2004 Act and, indeed, the NPPF Bill tend towards more centralized national policy-making. However, as against this, there is an emergent current towards Localism in Governance. It is hard to avoid the conclusion that the Minerals Planning Strategy undercuts emerging Localism and weakens and diminishes the local input into the planning process. It does this by presumptively rendering the acceptability of a particular planning application to a question of whether or not they fall within and comply with the pre-existing Core Strategy. The overspecification implied by the Core Strategy has, therefore, a tendency within it to the pre-approval of the use of subsequent applications for planning permission. This, surely, implies a presumption towards a commercial extraction in any subsequent planning application and undermines all possible alternative and possibly more desirable uses in the light of its impact upon the overall character of the settlement at Eynsham. This presumption in favour of a particular commercial interest is a most disturbing feature of the present iteration within the decision stage, and the balance of power should be restored towards the planning application process itself seen within the context of emerging Localism of Governance. The unforeseeability of alternative developments within this period, for example of the expansion of Siemens or of other similar investors, renders the specificity of the present preferred sites essentially presumptuous as to alternative possible future developments.

In conclusion then, in both the likely social and economic consequences of the present proposed decision and in the wider context of the future of planning for investment, the present proposals are deficient, and lack internal coherence within the processes of the Planning Strategy itself. They are insensitive to emergent aspects within the larger related planning context and the likely emergent powers of different levels of government. To some extent, the idea of such extensive excavation immediately adjacent to such a large, well-established and promising human settlement seems to us something of a return to the days before planning when industrial development overrode larger considerations of human welfare

We commend your wisdom in reopening this long-term plan to review at this stage and trust that the decision process in its further

	<p>iterations will take more fully into account the human factors and the extremely high opportunity costs implied by the present proposal.</p>
542	<p>I would like the following points to be taken into consideration for the new minerals strategy plan for west Oxfordshire. These points are raised by Cllr Fred Wright of the Eynsham Parish Council and I cannot improve upon Fred's analysis, so I will merely endorse it and say that I agree with his points raised.</p> <p>'We repeatedly pointed out problems with the minerals apportionment, areas already subjected to excessive minerals extraction, problems with transport and the desirability of extraction close to quarries, restoration being essentially a misnomer for lakes (usually of little use to local residents and often poorly cared for), destruction of the local countryside and local amenities, threats to local high technology industry and little consideration for local settlements and no compensation for them for the harm done to their local environments.</p> <p>I would also like to remind the County Council that the Minerals Industry held a conference in Oxford in April 2011 at which the industry itself proposed that its minerals applications should be more transparent to local villages and settlements, more cooperative and sympathetic to their feelings and should ideally help them with projects, which mineral operators have no legal compulsion to do at the present time, as even the small levy that could be used has now been lost for this purpose. This conference also recommended that no further 'wet digging' took place, as when employed there was no visual inspection of the underlying soil and minerals, nor of their archaeology or palaeontology (the study of fossil remains).</p> <p>Some historical points.</p> <p>In 1991-2 applications were made to extract minerals and clay from the very large area between Eynsham and Cassington extending from the River Evenlode in the East to almost the Eynsham Eastern by-pass (B4449) and from just north of the River Thames to Eynsham Mill (north of the A40), and to refill the area - essentially the 1km wide flood plain of the River Evenlode - with rubbish up to 12 to 20 feet above the present ground level. This was preposterous and with help from our MP at the time Douglas Hurd (now Lord Hurd and then also Foreign Secretary) and Michael Heseltine (now Lord Heseltine - then Sec. of State for the Environment) who called in the applications and also 'directed' that a full Environmental Assessment be carried out. Following this the applications were withdrawn..</p> <p>At the 1995 inquiry re the Minerals and Waste Local Plan it was pointed out that the County Council had not complied with a 'direction' from Michael Heseltine when first-time Sec. of State for the Environment, when he approved gravel extraction in Cassington/ Yarnton but required the County Council to define the gravel bearing areas on an ordnance survey basis This they omitted to have done and so Eynsham was not included in this or the later and presently still extant Minerals and Waste Local Plan 2006.</p> <p>An inquiry was held in 1994 re dualling of the A40 in Eynsham and Cassington, but was later shelved on the grounds of costs. However when approving the later Structure Plan the County Council resolved that no minerals extraction should take place in Eynsham until the A40 had been dualled.</p> <p>In 2006 ARC/Hansons submitted an application to extract gravel on land south of Cassington Road and north of the Siemens Magnet Factory in Eynsham parish. In doing this they failed to note that (A) Thames Water had sold the access field in 1997 and that it had later been the basis of a land-sale scam reported by BBC TV - that it had been sold in small plots to about 90 purchasers mostly from</p>

the Indian subcontinent. This was essentially perjury as Hansons had submitted a false statutory certificate. And (B) two very large water mains passing through part of the site. These errors resulted in Oxon. CC rejecting the original application. It was then resubmitted in 2007, but was finally withdrawn in July 2011 as several problems could not be resolved - see above.

Comments on the present consultation including housing areas and the incongruity of taking most of the minerals needed for housing from north of the Thames to south of it. .

The major point re the areas shown on the map is that much of the proposed mineral extraction is north of the River Thames in the Windrush and Evenlode valleys whilst most of the new housing development in Didcot, Wantage, Grove, etc, including that which will be associated with the new Enterprise Zone in the Science Vale area is south of the River Thames.

This means that such material if extracted will somehow have to cross the River Thames. Routing has been proposed e.g. for the new quarry at Northmoor - A415 to Ducklington, A40 to Wolvercote roundabout, A44 to Peartree and then A34 to the south. This would avoid Tadpole Bridge (impracticable and banned to gravel lorries), and New Bridge (which has an 18 tonne weight limit and where the proposed new bridge has been abandoned). Swinford Toll Bridge, built in the late 1770's has no weight limit, but is rather narrow and at times very congested with queues of traffic waiting to cross it. Also routing away from it appears to be largely ignored by mineral lorry drivers who are mostly franchisees and who are paid by the number of deliveries made each day. Taking the shortest route from Northmoor (where a new quarry was authorised this year (2011) via Sutton, the Eynsham southern bypass and the Toll Bridge is much shorter than the County's route. The bridge is privately owned and it is up to the owner to decide if lorries can pass over it, paying the toll and thus avoiding the already severely overcrowded and longer route along the A40. It also means that the County's routing is not enforceable and that large numbers of lorries will pass through unsuitable narrow country roads.

This also runs contrary to Oxon. CC Policy C7 reproduced below:

Policy C7: Transport and rights of way policy

Minerals and waste development will only be permitted where provision is made for convenient access to and along the primary road network in a way that maintains or improves:

- the safety of all road users including pedestrians;
- the efficiency and quality of the road network;
- residential and environmental amenity.

Proposals for mineral working should

- a) wherever possible, transport minerals by rail, water, pipeline or conveyor, rather than by road
- b) minimise the number of miles that have to be travelled to reach markets if this can be achieved using roads suitable for lorries

Cllr Ian Hudspeth has also noted that in the Local Transport Plan 3 one of the requirements to be taken into consideration is: 'to minimise the distance minerals need to be transported by road and encourage where possible the movement of aggregates by conveyor, rail and on the River Thames in order to reduce the adverse impacts of mineral transportation on local communities and on the environment'

This means that the transport strategy in the new Framework runs contrary to both the County's own transport policies, which we trust will be fully noted both by the County itself and also the Government Department which we trust will requisition a public inquiry to sort out both this and other matters which are inconsistent..

Other matters

Flooding

As the proposed areas lie within the flood plain of the River Evenlode, it is not surprising that flooding may occur in its flood plain. The most recent severe flooding occurred in July 2007 but it has also occurred in other years since we lived here and also previously in e.g. 1945, 1890, and there are also records saying that the Toll Bridge was nearly swept away soon after it was built.

In this area when floods occur water rushes across the fields from the north, crossing and passing under the several culverts under the A40, then over the fields south of the A40, via the huge culverts under Cassington Road (made by the then Duke of Marlborough in 1802 when he built this road to be elevated above the flood plain) and over it to the fields to the south which are drained by several ditches which empty into the Thames, from which backflow may also occur.

The fear is that mineral and possibly also clay removal in this area will result in much worse flooding problems.

Local amenity area

This area is also used by local residents as an amenity area for sport - a new cricket and croquet sports field here was opened by David Cameron as our local MP in May 2006 and is in constant use. The area is also used for cycling (both by adults and children) and walking including dog walking, and contains several public footpaths. It is particularly popular as its eastern end was gated and closed to through traffic when the Eastern By Pass was opened in 1981.

It lies within the Oxford Green Belt, and we note that the new regulations re minerals extraction came into force in Jan, 2006 which place certain limitations on mineral working in Green Belts.

Agriculture.

The area is at present well farmed, with both arable and grazing usage. It is graded 1, 2 and 3a - which should normally be preserved for agriculture.

Danger to military (and other) aircraft from Bird Strike.

We must also point out that this area of Eynsham lies directly under the approach path for landing at Brize Norton, and that the number of aircraft movements into Brize Norton has increased in 2011, with the relocation of aircraft from Lyneham to Brize Norton. Extra lakes in the area can produce an increased hazard.

We also have helicopters from and to RAF Benson passing over the area several times most days.

Restoration is a misnomer

Unless returned to agriculture the land is changed for ever by minerals extraction.

Usually the areas are left as lakes, perhaps tended for a few years, but then often abandoned. This has been the situation in particularly the Windrush Valley.

No compensation for local communities.

	<p>This was noted on p.1. Only the landowner gets a price or royalty for the minerals. The local community usually has no benefits, only misery and inconvenience whilst the minerals are being removed and later a totally altered landscape, which may become a wilderness - perhaps a haven for wild-life but of little benefit to the human population.</p> <p>The above points all need careful consideration particularly in relation to the stated aims given in the policy below: Especially location, proximity to main market areas, main transport routes, risk of birdstrike, agricultural land, nuisance, etc.</p> <p>Policy M2 from the Oxfordshire Structure Plan 2016</p> <p>"Locations for sand and gravel working will be identified in the Minerals and Waste Development Framework. In identifying appropriate locations, the County Council will take account of the distribution of sand and gravel resources; the existing pattern of supply and distribution of workings; proximity to main market areas; accessibility to the main transport routes; risk of birdstrike; restoration and after use potential; and development plan policies, in particular which seek to safeguard:</p> <ul style="list-style-type: none"> important archaeological remains, historic buildings and areas; areas and sites of nature conservation importance, especially Special Areas of Conservation and Sites of Special Scientific Interest; features of landscape importance, especially areas of Outstanding Natural Beauty; best and most versatile agricultural land; the water environment; land uses which are sensitive to nuisance; and the safety and convenience of all road users, including pedestrians and cyclists." <p>In relation to the areas needing minerals for building these are very badly sited, as transport by numerous lorries is required to take them where they are required!</p> <p>It would seem preferable and more sensible to take minerals from the reserves still in the south of the county!</p> <p>Why should the Windrush and Evenlode Valleys be subjected to the major provision when they have done this for so long, and where the countryside is already filled with so many lakes?</p> <p>Well said Fred!</p> <p>Now will our council representatives please show some common sense when evaluating the new proposals?</p> <p>Put simply</p> <p>Follow your own rules and recommendations - especially on transport and transport routes</p> <p>Extract minerals as close to the area of need as is possible</p> <p>Reduce transport of these minerals to a minimum</p> <p>Accept that this area has already had more than its fair share of disturbance through mineral</p>
544 (English Heritage)	<p>You will recall that you consulted us on proposals last year and we responded in a letter dated 13 August 2010 with respect to the historic environment generally, and on 31 August specifically with respect to archaeological remains. I do not intend to repeat any of the contents of that letter, except where they are relevant to this particular consultation. Our comments here are confined firstly to the proposed extraction in the Lower Windrush, and secondly to the wording of sections 5.28 to 5.30 and of the proposed policy C6.</p> <p>In our letter of 31 August 2010 we advised as follows with respect to the Lower Windrush area:</p> <p>This area includes what was described in 1974 as 'one of the finest series of successive landscapes in southern England' and it was recognised even then how much had been lost, largely unrecorded, through mineral extraction. In particular, the area includes the prehistoric ceremonial complex centered on the Devil's Quoits circle-henge monument.</p> <p>Given the importance of this area, the surviving archaeology in the heavily extracted area below Hardwick assumes a particular</p>

	<p>evidential value in its potential to provide information, in effect, about what has previously been lost without record. This potential can only increase with time and so in our view this area should be protected from further extraction.</p> <p>Above Hardwick and towards Witney, the cropmark evidence suggests a rather lower level of activity. Extensive area of alluvium exist within this upper section, however, and the County Council should seek further assessment of the relationship between the alluvium and known archaeology before taking any decision here.</p> <p>This remains our view with respect to this area. The southern section of the Lower Windrush area indicated on Fig 7 for sand and gravel extraction, essentially that section to the south east of Hardwick, is a remnant of what was a highly prehistoric landscape and what remains should be preserved. The area to the north is less well known, and any proposals here need to be accompanied by a better understanding of what might be hidden beneath alluvium.</p> <p>PPS5 advises that plans should take into account the contribution made by the historic environment by virtue of its influence on the character of the environment and an area's sense of place. In particular, the section of the Upper Thames valley within the county has been subject to decades of extraction of sand and gravel, and the archaeological work associated with that has revealed it to be the location of human settlement and ritual activity through millennia, of a type and intensity which is not often matched elsewhere. A detailed synthesis of this archaeological work has now been published in the Thames Through Time volumes, and this concludes that the Thames offers 'an almost unparalleled resource of archaeological information for both historic and prehistoric periods.' That part of the resource which remains is of corresponding importance in its contribution to the area's sense of place and our understanding of England's past, and this importance might be emphasised in the introductory paragraphs.</p>
413	<p>I am pleased that the Council has embraced the sound concept that gravel pits should only be dug where they are needed (para 6), and not 25 miles away reached by B-roads on the wrong side of a river where e.g. Hanson just happens to have an existing operation. I am strongly opposed to any further mineral extraction in the Lower Windrush Valley (para 11) especially in the fields adjacent to the settlements of Sutton and Stanton Harcourt. From the local residents' point of view, the noise pollution of conveyors, graders, reversing trucks, visual pollution of all the hoppers and heaps, the dust, and the heavy traffic impact on minor roads and bridges is just not environmentally acceptable adjoining residential amenities. The ensuing environmental misery is particularly intolerable when most, if not all of the gravel/sand will end up being hauled by heavy trucks across the Thames (Swinford toll bridge?) into South Oxfordshire to feed construction projects, there.</p> <p>I strongly advise that firm rules and regulations be put in place, with the mineral operators and their drivers incurring meaningful penalties for non-compliance. Promises of restored parkland in after-use for exhausted pits have not been honoured by operators in the past - they exploit the natural resources, take their profit, flood the pits, and move on, leaving their ecological disasters behind them.</p>
558	<p>In common with many people in this village I am very dismayed that the question of gravel extraction in Eynsham has been raised again. The proximity of the sites to residential areas is a major concern. This is an area which is very prone to flooding and gravel extraction will exacerbate this danger.</p> <p>There is the vibration, dust and noise which will be disastrous for the Siemens factory and for local schools plus the added congestion of a massive number of heavy vehicles.</p> <p>This is a beautiful area and a rare village. Please do not allow this disastrous plan to go forward.</p>

559	<p>1. Although the gravel requirement for areas north of the Thames amounts to not more than 30%, the plan is to expand existing sites in the Windrush and Evenlode valleys disproportionately to produce some 80% of the total Oxfordshire requirement.</p> <p>2. This will result in excess traffic movements north-south, using longer routes than those involved if gravel were to be dug closer to its likely point of use. The available routes are via the Swinford toll bridge (very narrow), Newbridge (already subject to an 18.5 tonnes maximum load limit), the intervening roads being the B4449 and B4044/4017 (unsuitable for HGVs), the A40 and the A34.</p> <p>3. The A40 must already be at or beyond capacity and the Highways Agency forbids new traffic schemes on the A34.</p> <p>4. To produce 80% of gravel requirement from areas north of the Thames will, quite apart from inequitably penalising communities in those areas, lead to increased traffic congestion in longer movements north to south than would otherwise be required and increased transport costs. The additional fuel used will unnecessarily add to the greenhouse gas burden. There will be amenity disbenefits to the local communities through which this traffic must pass (congestion, fumes, road wear, landscape degradation etc). The Lower Windrush valley has already been about 45% dug since 1945</p> <p>5. There should therefore be a more equitable division of extraction sites. Areas south of the Thames should bear the burden of the 70% of the requirement that they demand and areas north of the Thames should take the remaining 30%.</p>
560	<p>We wish to express in the strongest terms our concerns over the draft plans for future mineral extraction in the Thames valley area, specifically for the proposals which will involve additional digging in the north of the region and particularly with areas immediately south of the A40.</p> <p>Not only is there more than a degree of illogicality in the proposals but they would seem even to be in contravention of your stated policy. Excavating north of the Thames when the vast majority of the requirements are to be found south of the Thames is not only illogical and ill conceived, but will add a further unacceptable burden to the already clogged A40. The additional fuel costs, carbon emissions etc are simply not justified in the document as presented. Either there must be material facts which have not been stated, or more cynically there are political considerations which have been allowed to over-ride common sense, economic and other social factors which ignore the best interests of everyone concerned.</p> <p>Further loss of open space right up to the very edge of the village of Eynsham, for example, would reduce vital, well used amenities and produce no compensatory benefits.</p> <p>We trust that a degree of sanity will be allowed to influence your final decisions.</p>
564	<p>Whilst I appreciate the need to extract more minerals - my concern is that we in our area have borne enough for our local requirements and others (90%) are now being asked to do so further for usage in South Oxfordshire ie not our area at all. My understanding in the proposal is that extraction should be made near to required usage - this is not so in our case. I think I am correct in stating that we h</p> <p>Doing this has many disadvantages for us: Swinford Toll Bridge the Maybush Bridge, both of these are unfit for the level of large lorries that will be required to travel over it. Our local roads were not built for this level of heavy traffic. The disruption to our villages and danger with children and other pedestrians, the noise level. The countryside will be further destroyed with this new extraction proposal in our area - hasn't enough of our beautiful surroundings</p>

	<p>been mutilated - it is time for others to take their share of the burden.</p>
618	<p>I support the responses made by Eynsham Society and Eynsham and Cassington Gravel Committee and in particular those made by Dr F W Wright of Charfield, Cassington Road, Eynsham OX29 4LH.</p> <p>Cassington is adjacent to worked-out minerals' sites that are now under water with little or no benefit to the community. The residents of Cassington have not benefited financially from the loss of amenity that has arisen from the commercial activities of minerals extraction adjacent to the village.</p> <p>Cassington is fearful about the threats of new minerals extractions to the south west and to the west and north west of the village in the Windrush and Evenlode valleys. New minerals extractions in these areas will result in the permanent flooding of the extraction sites and Cassington will be surrounded by lakes on all sides.</p> <p>There are presently major transport problems adjacent to Cassington village especially at the single carriageway A40 road south of the village that connects Cheltenham and South Wales to London. There are few local river Thames crossing points. Minerals extracted from north of the Thames should not be consumed by property developments situated anywhere south of the Thames. This policy should be adopted to reduce heavy lorry traffic on the A40 and at the few bridges across the Thames. Heavy lorry traffic from minerals extraction seriously disrupts narrow roads, causes vibration and damage to properties and pollutes the countryside with noise, dust and fumes.</p> <p>The residents of all villages located adjacent to and suffering loss of amenity from mineral extractions must be financially compensated from the sales proceeds of those extractions. Compensation should be given via reductions in residents' council tax or precept levies.</p>
555	<p>We are grateful for the opportunity to respond to the consultation on the Core Strategy for minerals.</p> <p>We are in agreement with much of the Sustainability Appraisal Framework and support many of the 12 objectives referred to in the SA Framework. We believe that any increase or extension to the current mineral extraction in the Windrush Valley is incompatible with a number of these objectives:</p> <ul style="list-style-type: none"> To protect, maintain, and enhance Oxfordshire's biodiversity and geodiversity including natural habitats, flora and fauna and protected species Protect and enhance landscape character, local distinctiveness and historic and built heritage To mitigate Oxfordshire's vulnerability to flooding, taking account of climate change To minimise the impact of transportation of aggregates and waste products on the local and strategic road network To minimise negative impacts of waste management facilities and mineral extraction on people and local communities To protect, improve and where necessary restore land and soil quality <p>In discussions on further mineral works, I hope that the above points will be given the necessary weight in any decision-making process.</p>

580	<p>We consider there are serious flaws in the proposed plans to extract even more gravel from this area, the Lower Windrush Valley. Our main concern is the fact that the gravel to be extracted in the time scale of the plan will mainly be used south of the Thames. That will result in moving the gravel over large distances on roads that already suffer severe delays at all times of the day, that are breaking up under the wear and tear but not being repaired and the inevitable use of roads over the Thames and through villages that cannot take the weight of the lorries.</p> <p>There are also issues about the cost of moving the gravel over these distances. This is not just the obvious transport costs, but also the extra environmental costs.</p> <p>And while it is great to be able enjoy wild fowl and water sports at any number of venues in close proximity, unless a more imaginative solution to the treatment of big holes in the ground is found, we say enough is enough. Please reconsider the plan and adjust it to a fairer distribution of the pain of gravel extraction, because that is what it is.</p>
584	<p>I live in Eynsham and am totally opposed to the proposed gravel extractions.</p> <p>The nearby A40 and also the Tollbridge road into Botley are already overburdened with road traffic. The proposals to put yet more lorries on the roads serving Eynsham would only compound this problem.</p>
585	<p>With regard to your proposals for gravel extraction in and around the village of Stanton Harcourt. I STRONGLY OBJECT.</p> <p>To subject the village to more lorry movements, noise and more loss of land to gravel is unacceptable. The village has had to suffer this situation for approx. 50 years.</p> <p>It must be time that other gravel bearing land in Oxfordshire MUST be considered!</p>
589 (Stanton Harcourt Parish Council)	<p>I write to express to you the comments of the Stanton Harcourt Parish Council on the draft Core Strategy Minerals 2030. Stanton Harcourt lies in the middle of the Lower Windrush Valley, north of the river Thames and has since World War II been subject to constant gravel excavations; indeed over the last five years some ninety per cent of the gravel dug in Oxfordshire has been produced here. As a result the area is punctuated by lakes and infill and some three hundred acres of waste disposal site (Dix Pit).</p> <p>Firstly, it is important to confirm that we acknowledge the need for primary gravel to make up for the shortfall in secondary gravel and where secondary gravel does not fulfil the specifications for the product. It is, however, equally important to emphasise that the production of secondary gravel must be encouraged in every way to ensure that as little virgin gravel is used as necessary. As clearly it is not possible to measure the volume per annum of that secondary gravel, because there are no official records and mobile crushing units are difficult to keep tabs on, it follows that it is impossible to know how much virgin gravel needs digging.</p> <p>To overcome this dichotomy, it would be sensible to add to the Draft Report interim reviews of need every five years or some mechanism which will ensure that overall limit set for new minerals workings is minimised and in this way, it is only then that sites become designated or earmarked for use.</p> <p>The current landbank (page 23: 4.13) is said to stand at some 6m tonnes and that signifies some 5.95 years' worth of gravel (the annual average need is given in the Atkins report of January 2011 to be some 1.01 m tonnes although it can be argued this is somewhat too high given recent annual figures of 637,000 tonnes and 470,000 tonnes the last two published years (2009/2010)).</p>

The required need over the period is stated to be some 20.2m tonnes on this basis (presumably based on the government advice of seven years' landbank) so the shortfall is 14.2 million tonnes in the period. May I ask why the OCC Cabinet Paper quotes the 'Production Capacity' in the period to be some 33.25m tonnes (see attached Minerals and Waste Core Strategy - Preferred Minerals Strategy, Annex 4: Production Capacity and Likely Duration of Working in Strategy Option Areas). This fundamental lack of clarity does not even cover the cloudiness of whether the secondary market is included in the calculation and at what level, given that it cannot be accurately calculated.

Secondly the production north of the river Thames for use of approximately thirty per cent in West Oxfordshire, Cherwell and Oxford suggests that the other seventy per cent will be needed in places such as Grove, Culham, Didcot and Harwell (p13: 2.9), including the new Enterprise Zone (announced since the draft report was produced).

Housing in West Oxfordshire is designated to be, up to 2026, some 4,200 new units out of announced figures for Oxfordshire of some 42,000- ie 10 per cent- add Bicester, Banbury and Carterton to Oxford and a generous figure of some thirty per cent is attained. It therefore requires transportation to the south of the river Thames and here there are three alternatives- break the law by crossing the river at Newbridge over the oldest bridge in the South of England- Grade I and built by nine monks in the late 11th Century (HGVs with a capacity of more than 18.5 tonnes are not permitted to cross); cross via Grade I Swinford Bridge at Eynsham which is tolled and narrow and where two HGVs can scarcely pass and queues at prime time are lengthy; or finally join the A40 and the A34 to access South Oxfordshire and the need. This is contra to the requirement by the Highways Agency that nothing is done to increase the traffic on the A34 and in any case the traffic on the A34 and A40 is already close to saturation.

All this ignores the paradoxes (page 24:4.18) that the Draft Report has produced since it repeatedly emphasises the need to minimise gravel miles and then promotes a policy that ignores its own adage that gravel should be dug as close as possible to where its need is, all other things being equal. We would add that in our opinion, this is in direct contravention of Policy C7 (page 38) and also of OCC's adopted LTP3 that seeks to reduce the mineral miles travelled. Gravel is available south of the river in abundance.

Thirdly the use of the word extension (see page 27:4.28) without any definition is sloppy; if the majority of the proposed excavations is in the Lower Windrush and Lower Evenlode Valleys north of the river Thames, this area will continue to be the prime source of Oxfordshire gravel since World War II. The cumulative effect, the lack of variety in aftercare (lakes and fishing), the complete absence of infrastructure, the lack of enforcement of Planning conditions, the loss of serious Archaeology and Palaeontology (Stanton Harcourt is recognised in academic circles as an warm interglacial of 200,000 years ago of some importance as it is the only site in Europe to have mammoth (small and warm blooded) and elephant in the same stratigraphical layer), the threat of increased flood risk (ignoring the Pitt recommendations) and the lack of consideration of any kind offered to local residents all add to the conclusion that this draft policy is unsafe and that Oxfordshire County Council must earn an eco-reputation by concentrating the production of gravel as near as possible to its need and allow the fifty per cent of landmass in the Lower Windrush and Lower Evenlode Valley, some eleven square miles in total, which has not yet been excavated but which this Draft policy recommends is excavated, to continue as an unspoilt historic part of the Thames flood plain.

Lastly, we strongly object to the recent abolition by the Government of the Aggregate Levy Sustainability Fund, which, since it was introduced in 2002/3, to support community and environmental improvement schemes in areas affected by quarrying, has raised some £2.5 billion of which just one per cent has been allocated. Most communities are willing to burden their share of corporate

	<p>responsibility for the good of all; that is why they pay their full Council Taxes despite experiencing the inconvenience of communal facilities but some payback to acknowledge their sacrifice would be welcome- in the way of local royalty or other effective means of recompense. This could also be a source from which to fund urgently needed research to identify gravel substitute as gravel is a finite product.</p> <p>We believe that the effect of these draft plans are such that it would perpetuate a fundamental change in the ambience and character of this area; undoubtedly Eynsham, Northmoor and Stanton Harcourt are the communities most affected. It would therefore in our view be right, correct and your bounden duty to meet the local communities, hear the concerns in full detail and discuss whether they are well founded in an unprejudiced manner. To us, this is too important a decision to be left to the whim of third parties; I am sure that you will agree.</p>
591	<p>As Eynsham residents my wife and I wish to add our concerns in respect of gravel extraction adjacent to our home.</p> <p>The added risk of flooding has already increased the cost of house insurance in this area.</p> <p>The increase in traffic on the A40 and A34 would be intolerable with the consequent impact on quality of life, 'greenness' and localism. Our lives have already been changed by the increase in air traffic we need no further disruptions.</p> <p>Please add these comments in consultations.</p>
600	<p>I am opposed to further gravel extraction in the area of Stanton Harcourt (my village) on the following grounds:</p> <p>The road network is not appropriately sized to accomodate more traffic, nor the size of vehicles required.</p> <p>There is already extensive extraction in the area which at present is tolerable, further extraction will leave the area resembling a 'swiss cheese' and be detrimental to the rural setting.</p> <p>We already suffer significant noise and industrial impact from the Stanton Harcourt business park which literally backs on to many resident's gardens - I think that perhaps we already share our burden of development for a rural area.</p> <p>It is not environmentally responsible to transport vast amounts of gravel via a underscale rural road network, to an area which has local reserves of gravel in the south of the county.</p> <p>I thank you for your attention.</p>
641	<p>I am writing to lodge my strong objection to the proposals made in the 'Oxfordshire County Council Core Strategy 2030 Minerals' document.</p> <p>My wife and I moved to the village of Stanton Harcourt 2 years ago to raise out family. It is my understanding that gravel has been taken from this area for nearly fifty years, this is evident in the lakes and large waste pit that is on our doorstep.</p> <p>These things we were aware of when we moved here, but the new proposals will fill the roads with large slow moving trucks leading to increased noise, pollution and disruption. It is particularly objectionable as the majority of the material will be taken south of the Thames to be used. Would it not make more sense to take the gravel from the ground as close to its proposed desitination as possible? Or are there bigger political forces at work?</p> <p>I would invite you to contact me to discuss this further.</p>

627	<p>I wish to ask that no more sand and gravel is extracted from the Lower Windrush Valley. I am the head teacher of the biggest nursery school in the area with most of the 123 children who attend living in the Lower Windrush Valley. At the moment I feel there is already far too much gravel dug here leaving the area with one large swimming pool. These children do not need us to spoil the area in which they live and cause them to have to live elsewhere as they will soon not have suitable land on which to build. I cannot understand why so many of the already dug gravel pits are not left as they were initially found.</p> <p>I also wish to state that the danger of the roads is most important and that you have a duty of care not only to the children of the area but any other road user. Routing agreements are not necessarily kept to and I have seen gravel lorries going over both New bridge (as can most probably be seen from the camera evidence) and Tadpole Bridge in the last year. Many of the roads do not have pavements and pedestrians and cyclists are in danger of being hurt. I understand that there is a limit to the amount of miles gravel may be taken to a site and assume that paper work for the dug gravel and its destination from any site will be freely available to the public so that we many monitor it.</p> <p>The A40 is already over used and any gravel from the Lower Windrush Valley will have to go at least part of the way to its destination on this road I understand that there are no plans to improve the A40 so digging the Windrush Valley will surely not be viable as they will spend many hours on the ever increasingly busy road which after my journey this morning seems to be turning into one long car park. Depending on where the gravel dug is going and I suspect it is south of the river there should be no more gravel dug in the Lower Windrush Valley as it will have to travel too far and those that are already dug should be returned to their initial status.</p>
788	<p>Enough mineral extraction has taken place in the Lower Windrush valley over the years to render the original geographical vista almost unrecognisable. The well intentioned refurbishment of excavated areas does little, if anything, to retain the aura that was once there and seems only to benefit the sport fishing industry! There are other factors and people to consider!</p> <p>2. The transportation of minerals by road in this area has reached its limit, particularly when combined with existing HGV traffic! Roads such as the B4449 (for example) have been well over their limits for several years and any additional traffic is certainly going to lead to fatalities!</p> <p>3. Enough is enough - this area has more than contributed to the production of minerals in West Oxfordshire and when the current (not insignificant!) excavations are finished it should be left to recover to something approaching its past glory!</p>
793	<p>I understand that 40-45% of the Lower Windrush Valley has already been dug and that this will increase to ca 70% under the draft policy. The Local Planning Authority must surely take into account the cumulative effect and the loss of amenity for local people if such a huge proportion of the local area is dug. Aerial photos demonstrate most clearly how much of our countryside has been lost to water. The post extraction management replaces our natural agricultural landscape, flora & fauna with lakes and reed beds. There must be a limit to how much more of this changed landscape we can accommodate. In our opinion, the cumulative impact proposed is excessive and should be the basis for limiting additional extraction.</p> <p>It is current policy that digging should take place close to where the minerals are required. With the growth areas identified as Didcot, Wantage, Grove, Bicester, Oxford & Banbury as well as Carterton & Witney and with the creation of the new Enterprise Zone at Milton,</p>

	<p>in particular, and with it the associated new jobs and increase in housing requirements, it must surely follow that gravel should be extracted in the areas closeby to supply local need. Distance to market is a critical factor for consideration. In our opinion, the digging should be concentrated close to these new areas of demand.</p> <p>With the high cost of fuel it does not make economic sense to transport gravel any further than necessary. This, combined with the fact that to gain access to South Oxfordshire, for instance, the two local bridges, both Grade I Listed, are not suitable for the predicted extra HGV traffic: Newbridge is closed to lorries in excess of 18 tonnes and the alternative is Swinford bridge - a narrow toll bridge. Routing agreements have consistently been breached in our local area for economic reasons, the recommended A415/A40/A34 adding many miles and increased costs for the haulage companies. In addition to the mileage, these major roads are already highly congested, with the A40 from Eynsham to Oxford and the A34 being reported daily as suffering from traffic queues. The direct and indirect costs of longer transport routes (environmental impact, commercial impact of congestion) should lead to extraction taking place as local to demand as possible.</p> <p>Local people do not appear to have benefitted from the extraction in the area. Should more of the Windrush Valley be dug, serious consideration must be given to how local people can be compensated for the disruption to their lives, the noise, pollution and general loss of amenity.</p> <p>In addition to the more general points made above, we are concerned that the nominated site SG27 would appear to extend so close to the boundaries of our property. Vicarage Pit to the south of our boundary has already been dug and is now partly a large area of water and partly a former BBONT Nature Reserve. It is to be hoped that this area, so rich in wildlife, will be preserved and that there would be a suitably large buffer zone between our property and any gravel extraction activity.</p>
<p>622 (Cassington Parish Council)</p>	<p>"The council supports the responses made by Eynsham Society and Eynsham and Cassington Gravel Committee and in particular those made by Dr F W Wright of Charfield, Cassington Road, Eynsham OX29 4LH. Cassington is adjacent to worked-out minerals' sites that are now under water with little or no benefit to the community. The residents of Cassington have not benefitted financially from the loss of amenity that has arisen from the commercial activities of minerals extraction adjacent to the village.</p> <p>Cassington is fearful about the threats of new minerals extractions to the south west and to the west and north west of the village in the Windrush and Evenlode valleys. New minerals extractions in these areas will result in the permanent flooding of the extraction sites and Cassington will be surrounded by lakes on all sides.</p> <p>There are presently major transport problems adjacent to Cassington village especially at the single carriageway A40 road south of the village that connects Cheltenham and South Wales to London. There are few local river Thames crossing points. Minerals extracted from north of the Thames should not be consumed by property developments situated anywhere south of the Thames. This policy should be adopted to reduce heavy lorry traffic on the A40 and at the few bridges across theThames. Heavy lorry traffic from minerals extraction seriously disrupts narrow roads, causes vibration and damage to properties and pollutes the countryside with noise, dust and fumes."</p> <p>The residents of all villages located adjacent to and suffering loss of amenity from mineral extractions must be financially</p>

	<p>compensated from the sales proceeds of those extractions. Compensation should be given via reductions in residents' council tax or precept levies.</p>
<p>633 (WODC)</p>	<p>4.1. The District Council's stance on further mineral working in West Oxfordshire is largely unchanged since the 2007 and 2009 consultation responses set out above. A key issue remains the suitability of West Oxfordshire to continue to be the main supplier of sand and gravel in the County given:</p> <ul style="list-style-type: none"> - the location of key markets, in particular Bicester and Science Vale, the latter now designated as an Enterprise Zone to promote employment opportunities; - the constrained transport routes out of West Oxfordshire to markets elsewhere, in particular the congested A40 and A34 and substandard roads and bridges across the Thames. <p>4.2. There is an inherent conflict between the proposed minerals strategy and its concentration of mineral working in West Oxfordshire and the overall County transport policy. Core Policy C7 links to the Local Transport Plan and states: "Minerals and waste development will only be permitted where provision is made for convenient access to and along the primary road network in a way that maintains or improves:</p> <ul style="list-style-type: none"> - the safety of all road users including pedestrians; - the efficiency and quality of the road network; - residential and environmental amenity. <p>Proposals for mineral working and waste facilities should:</p> <ul style="list-style-type: none"> - wherever possible, transport minerals or waste by rail, water, pipeline or conveyor, rather than by road; - as far as possible, minimise the distance of mineral workings from locations of demand for aggregates, via roads suitable for lorries; - as far as possible, minimise the distance of waste facilities from locations of waste production, via roads suitable for lorries, taking into account that some facilities are not economic or practical below a certain size and may need to serve a wider than local area". <p>Whilst the proposals did not generate an increase in traffic movements, they did not represent the reduction that would be welcomed. The proposals had been put forward at a time when the Access to Oxford scheme of infrastructure improvement had been planned. As this scheme had now been withdrawn, improved links between the A40 and A34 were no longer proposed and greater difficulties were to be expected. Development in the growth areas of Didcot, Grove and the Southern Enterprise Zone would still generate the need for significant volumes of gravel and, by increasing employment, would create the need for further residential properties in those areas.</p> <p>4.3. Although OCC's proposed reduction in aggregates targets when compared to the existing regional apportionment should be supported, there appears to be an in-built assumption that it should be 'business as usual' as far as West Oxfordshire is concerned. The spatial options tested (up to 2020 and 2020-2030) in the 2011 Sustainability Appraisal contain an identical supply of sharp sand and gravel from the West Oxfordshire preferred areas ie 0.5 mtpa and 0.18 mtpa from Lower Windrush Valley and Eynsham/Cassington/Yarnton respectively. The total West Oxfordshire supply will increase from 60% to 67% of overall County supply after 2020. The addition or removal of areas located elsewhere in Oxfordshire produce the different spatial options tested. These options do not sit comfortably with OCC objectives to minimise the distance minerals need to be transported. The option of reducing the amount of extraction in West Oxfordshire in the longer term does not appear to have been tested and as such is likely to be challenged with the risk that the preferred strategy is found unsound.</p>

	<p>4.4. The Sustainability Appraisal indicates that sites in the south of the County such as at Cholsey, Stadhampton and Clifton Hampden can produce more resource earlier in the plan period, closer to the main area of market demand and potentially allowing reduction of extraction in West Oxfordshire in the longer term, minimising the transport of aggregates and providing some relief to West Oxfordshire's communities as intended but not delivered by the strategy. OCC should be asked to reconsider the weight given to the sustainability impacts of the various options outside West Oxfordshire, in particular the economic benefits of infrastructure improvements to accommodate sand and gravel working in the longer term in locations where the transport of minerals can be minimised.</p>
658 (BBOWT)	<p>4.28 The Eynsham / Cassington / Yarnton area is very close to Oxford Meadows Special Area of Conservation (SAC). If a Habitats Regulations Assessment concludes that there could be potential impacts on the hydrology of the SAC as a result of minerals extraction, the boundary of the area may need to be refined to exclude land in close proximity to this site.</p>
663	<p>I'd like to add my voice to the other Eynsham residents expressing surprise that OCC considers the site to the east of Eynsham to be a suitable location for gravel extraction. It seems to have none of the required characteristics of a suitable site - e.g. It is close to a populated area. It is close to existing high-tech industry which may be sensitive to noise and vibration and which employs 100x as many as gravel ever will. It is right under the Brize Norton flight path. It is part of the flood plain which currently attenuates flood-water from R. Evenlode, protecting the R. Thames from overload. The gravel is needed on the south side of the river whereas this site is to the north. The site is not part of Cassington, which is miles away, and is therefore a 'new' site. Please reconsider the appropriateness of this site in the light of your own criteria for viability.</p>
882 (Cllr Charles Mathew)	<p>The Plan as presently proposed will result in one operator being responsible for the vast majority of Oxfordshire's gravel output - impossible to measure accurately but probably more than 75 per cent after 2020. I question whether this is sensible. All sites suffer from similar inconveniences- flood risk, archaeology, palaeontology, infrastructure, aftercare monotony, destruction of landscape, loss of amenity and lack of enforcement of Planning conditions. This means that it is necessary to balance decisions on the specific matters which are relevant to that particular site area, like cumulative effect, a feature highlighted as important by OCC in its 2016 Minerals Plan as a persuading factor in making site choice. (Oxfordshire Structure Plan} saved policy M2 p78).(2.18) National policy MPS1, under para 14.'Protection of Heritage and Countryside' says '...take account of the value of the wider countryside and landscape, including opportunities for recreation, including quiet recreation, and as far as practicable maintain access to land. Minimise the impact of minerals operations on its quality and character and consider the cumulative effects of local developments'. This draft plan is a travesty of that policy. The adoption of the Lower Windrush and Lower Evenlode Valley to provide more than 26.7 m tonnes out of a total of 33.25m tonnes plus Cholsey with estimates of 4.9 million tonnes means the first recourse after the current landbank is exhausted (6m. tonnes undefined but mainly from the same area in West Oxfordshire) will be provided as to 70 per cent by this area and on second recourse some sixty per cent (Agenda papers to July Cabinet, page 16/annex4/CA8) (see attached) The Plan reinforces the requirement to dig close to the need geographically and this is reflected in OCC LTP3- an admirable proposal. The Plan then however proceeds to endorse a policy that totally contradicts that philosophy. (Executive summary 6, 2.10, 3.4(b),</p>

3.5(vi), 4.18, and 5.35 inter alia).

This contradiction is that there can be no reconciliation between 2.9 which emphasises that key locations for development are to a great extent South of the river Thames while the majority as stated of the gravel excavation is planned North of the river Thames; I would conservatively estimate that the figures are 70 per cent use in the south and eighty per cent digging in the north.

These figures emanate from WODC draft development plan which state that 4,200 new houses will be built in West Oxfordshire; add to that the developments in Bicester, Oxford and Banbury and put those in the context of Oxfordshire new housing of 42,000 (see 2.8 which states 40,000), it can be seen that the 70 per cent figure is most probably an underestimate.

Further strain on this policy has recently been announced in the Government's welcome inclusion of the Harwell Enterprise Zone together with some eight thousand additional planned jobs and some £6.5 m infrastructure grant; this is not included in the Report, having been decided recently and will no doubt increase housing and therefore gravel requirement.

In addition this material will need to cross the river Thames- at Newbridge on the A415, the most direct route; it will only be possible if the law is contravened (18.5 tonnes maximum gross weight limit on bridge) (Grade I packhorse bridge built by monks in late 12th. century)- or Swinford Bridge at Eynsham (Grade I toll bridge) where two lorries can scarcely pass due to its narrowness- or via the A40 and A34 which are already bursting and to which OCC has instructions not to cause any increase in traffic by the Highways Agency. The statement in the Report 4.18 that the rate and intensity of mineral working in West Oxfordshire should not increase is paradoxical and belies the draft Report. Clearly if the statement made in 4.18 is to be substantiated, it is difficult to reconcile the proposed extra working at Gill Mill (permission to be applied for by end of 2011) and Stonehenge Farm (Permission granted on appeal in December 2010) together with existing working will not increase tonnage extraction as claimed. It will be seen that 680,000 tonnes a year (see attachment) is foreseen and that is a level not previously attained. It behoves me to point out the Oxfordshire Minerals and Waste Core Strategy Sustainability/ Strategic Environmental Assessment, written by Scott Wilson under their section 1.5, which states

'Policy M3 sets out the spatial strategy for mineral working. It is recognised that whilst concentrating extraction predominantly in areas where working is currently taking place or has taken place recently has economic advantages and presents opportunities for co-ordinated large-scale restoration projects which would in the longer term lead to beneficial effects for local communities, landscapes and wildlife; the long-term nature of mineral works means that communities and environments within/close to the identified areas will continue to experience the cumulative adverse effects of mineral working for the foreseeable future.

Therefore measures to mitigate against negative effects should be required at site selection and planning application stages.

Appropriately, Policy M3 will not lead to an overall increase of working activity in West Oxfordshire, or in any one particular area, and so no significant additional adverse cumulative effects are expected on top of those already experienced, which is particularly important in areas where there has already been extensive working.'

The one new site south of the river at Cholsey, due to be worked around 2020, is in the North Wessex Downs Area of Outstanding Natural Beauty; no discussions have taken place concerning its inclusion in the Plan with this DEFRA supported organisation. (4.25)

The infrastructure in the Lower Windrush Valley is not designed for this volume of gravel digging and the B4449 is plagued by 44 tonne HGVs thundering twenty four hours a day through Sutton; the most recent approved Planning Application before OCC in the Windrush Valley has been subject to a routing agreement only at peak times, which is clearly unsatisfactory.

There is a vital need to define 'extension' as promoted in the draft Report; when is an extension not an extension?

There is some difficulty in reconciling the requirement for gravel as outlined in this draft Report. Landbank plus new sites should echo

	<p>the 20.2 million mentioned as the total requirement up to 2030. I believe this to be some 14m. tonnes estimated but Lower Windrush and Lower Evenlode Valleys alone seems destined to yield nearly twice that; that calculation ignores Sutton Courtney or Cholsey or Caversham.</p> <p>It is also not clear whether the figures include the secondary gravel production or not; clearly this at a maximum level of .9m. tonnes a year is significant. The difficulty in calculating this figure annually does give rise to a suggestion that a five year review of OCC Core Strategy must be carried out or some such mechanism to ensure that permission is not encouraged or granted to virgin land excavation, which in hindsight was unnecessary.</p> <p>Every site has individual characteristics and this surely infers that the level of deposit will vary; I can see no acknowledgement of this in the calculations</p> <p>LOCAL RESIDENTS</p> <ul style="list-style-type: none"> · Although there has been expert consideration given to many aspects and effects of gravel extraction in the draft Report, no consideration in depth has been given to local residents; suffice it to say, the face of the areas north of the Thames (over approximately 45 per cent of this 11 square miles area (defined as the A415 from Witney to Newbridge up the river Thames to the A40 and back to Witney) has already been scared by the intensity of excavation since the end of WWII- the present proposal represents a further disregard for the residents, their rural way of life and will affect their whole existence. · It must not be forgotten that the area is contained in a bend of the river Thames with a single exit at the South, another at the East and the A40 at the North with access to the Cotswolds to the West. This naturally at times means access and exit is fraught with delay. · Aftercare is a factor which needs further consideration; the area, should these proposals be agreed, does not need more reedbeds or lakes but imaginative use of the geography. To infer that the countryside will benefit from gravel excavation as in the draft Report is imaginative; I would hazard that on that basis all land is considered improved by excavation. · The local population receive no benefit from the gravel working in its area; no royalty, now no Aggregate Levy Sustainability Fund , which was set up in 2002 to support communities where minerals workings take place and has distributed 1 per cent of the £2.5billion raised . · The Lower Windrush Valley Project, funded by gravel operators and public money, has no local representation or consideration <p>I would ask you to thank those who have expended such time and energy on this draft report and to reiterate that your correspondent supports the excavation of gravel on economic and humane grounds and the prior production of secondary gravel where this fits the bill and is available. I therefore am keen to support a Core Strategy which mirrors the image of a forward looking thriving Oxfordshire; I regret this is not that strategy.</p> <p>I am available to help in any way to ensure that an equitable and considerate Minerals Core Strategy is adopted to the satisfaction of all parties involved.</p>
893 (Aston, Cote & Shifford PC)	<p>Minerals extraction should take place as near as possible to the development sites where the minerals are required. This is the existing paper policy of the County Council which states that minerals should be transported at most 30 miles by road to the destination where they are to be used. The proposed strategy in the current consultation draft conflicts with this. In the plan period sites for the extraction of an additional 14 million tonnes of sand and gravel have to be identified (this being in addition to sites where permission for further extraction already exists). The strategy proposes to extract the majority of this - 80% or 11.2 million tonnes - from land in West Oxfordshire; the Lower Windrush Valley and areas around Eynsham, Cassington and Yarnton. Some of this will be</p>

	<p>needed for local development, particularly the new homes proposed for West Oxfordshire, but the vast majority of the minerals extracted will be for use in the south and east of the county, for the large developments at Didcot, Wantage, Grove, Bicester, Oxford and Banbury, and most significantly for the new Enterprise Zone proposed for the Milton and Harwell area south of the River Thames. It is inefficient, costly and unsustainable to extract minerals from West Oxfordshire and transport them by road to other district areas. The transportation of minerals outside of West Oxfordshire is rendered all the more unsustainable and undesirable when the problems of getting the loads over the river Thames are taken into account. Many of the river crossings between the Lower Windrush Valley and the south of the county have weight restrictions on them. This means that the thousands of lorry journeys which the proposed strategy will require will all be routed along the A40 and A34. These roads are already extremely congested and routing further large commercial traffic on them will negatively impact on the communities dependent on them.</p> <p>Page 1 of 2 Page 2 of 2</p> <p>The importance of localism is gaining prominence under the coalition government. Local resources should be used to meet local needs, and where environmental burdens and short term detrimental impacts on residents' quality of life are necessary, they should as far as possible be borne by the communities which are going to benefit from the positive outcomes achieved.</p> <p>The County Council's proposed minerals strategy needs to be amended to ensure that the downsides of the proposals are not concentrated on areas which are not going to directly benefit from the new jobs, new housing, new infrastructure and new resources that the proposals will deliver.</p> <p>The Parish Council understands that minerals can only be extracted from areas in which they occur. However, the map of sand and gravel deposits included as Figure 2 in the consultation document clearly shows that sand and gravel can be obtained from all the river terrace areas of the Thames. The consultation document states that a new extraction site will be opened in Cholsey, but only after the Sutton Courtenay site has been exhausted. The Parish Council can see no justification for the delay in identifying and opening up new sites south of the river Thames, which will be much closer to the development sites than the extraction areas in West Oxfordshire. The Parish Council's concerns extend beyond the time frame when the minerals are being actively extracted to the point at which the sites are fully extracted and attention switches to their after use. The Lower Windrush Valley already has a large number of areas of open water created by previous minerals extraction. The proposal to continue extracting sand and gravel from the same geographic areas will create numerous additional bodies of open water. West Oxfordshire already has sufficient artificially created lakes for all the potential recreational and commercial uses imaginable. What West Oxfordshire needs and what its residents deserve is the retention of its varied and rich landscape of open countryside, agricultural fields, coppices and woods, rivers and lake areas, and this is put in significant jeopardy by the minerals extraction strategy proposed.</p> <p>Increasing the area of land under water will also substantially increase the risk of bird strike on the aircraft flying out of RAF Brize Norton, the largest operational RAF base.</p> <p>In summary, Aston, Cote, Shifford & Chimney Parish Council opposes the minerals planning strategy on the basis that minerals should be extracted from the areas they exist nearest to the locations in which they will be required, and this will not be delivered if the proposed strategy is passed.</p>
833	<p>We believe this strategy should take account of , rather than disregard, the initial principles it set out in the papers that accompanied this consultation.</p>

	<p>West Oxfordshire already suffers from the cumulative effect of quarrying sand and gravel over more than half a century and continuing for another twenty years will remove most of the remaining countryside. The lakes that replace the fields will fill with water fowl and cause serious problems for aircraft operating at the recently increased aircraft facility at RAF Brize Norton.</p> <p>The majority of the proposed development is in the south of the County and that is where the sand and gravel should come from.</p> <p>The routing of the HGVs north along the A40 and A34 is madness with both roads seriously congested already, and will greatly increase the carbon emissions than are necessary</p> <p>Our recent experiences following the recent Appeal over Stonehenge does not make us feel confident that the issue of flooding has been appreciated and with so much within the flood plain fear that our homes will become more vulnerable to flooding than before.</p>
756	<p>If OCC are going to adhere to its stated of policies of</p> <p>Minimising distances to be transported by road Mineral workings to be close to areas of development Not increasing sand and gravel extraction in West Oxfordshire and, given that the projected development during the life of the plan is to be mainly south of the Thames, then the extraction should be made in sites south of the Thames.</p> <p>The transport infrastructure across the Thames from north to south is totally inadequate for the amount of minerals proposed and will have social and traffic implications far beyond what is contemplated in the draft Plan. There are only two bridges to service this transport, Newbridge or Swinford Bridge, and these are already subject to restrictions or congestion that could not sustain he proposed mineral road traffic.</p> <p>No further extraction should be contemplated for south of the Thames for the Eynsham/Cassington/Yarnton sites.</p>
719	<p>Please receive our official complaint concerning the plan to extract gravel from Eynsham for use miles away in another county. The disruption to local roads and services would be intolerable. The increased traffic on the roads, which are already congested, would be a serious problem, the toll bridge is already jammed up as is the A40. The noise and disruption to residents is also a cause for concern.</p>
723	<p>We are emailing from our peaceful home in our pleasant peaceful village (up till now) of Eynsham which once again is being threatened with noise and blight from proposed gravel extraction. We live in Dovehouse Close which is very close to the proposed quarry. We aren't nimbys but this proposal is wrong for many reasons beside the dust, noise and dirt that this would generate. The proposed site is very close to the elementary school, it would be close to the Siemens factory (one of Eynshams gems) and it is also under the flypath of Brize Norton airfield. Because of the threat of bird strike, the empty quarry could never be developed as a recreational area, so productive farmland will be destroyed and an attractive country area would be left forever as a dusty, ugly abandoned eyesore.</p> <p>Also the final reason and probably reason enough, the existing roads (especially the A40) can't cope with anymore traffic, let alone the tens of thousands or even hundreds of thousands of extra lorry loads which will be needed to remove the gravel. So to sum up, we object to this proposal in the strongest possible way.</p>

745	<p>As resident in Stanton Harcourt, West Oxfordshire (5&6 Steadys Lane, Stanton Harcourt OX29 5RL) I write to you in the strongest possible terms about your plans for sand and gravel extraction in the Lower Windrush.</p> <p>In particular, I object to:</p> <ul style="list-style-type: none"> · The massive increase in traffic, i.e. lorries, this will inevitably have - both on the A40 and local roads around Stanton Harcourt. Given the 'bottleneck' of Newbridge and Swinford, this increase in traffic is inevitable. · Production will be in the hands of one company, i.e. Hanson. · Is no apparent evidence of the policing of traffic movements if and when the sand and gravel extraction goes ahead. · Is no account of carbon emissions and the cost of the impact of increased traffic on the road system. · There is a massive bias towards extraction of sand and gravel in the Lower Windrush area - which isn't where the sand and gravel will be utilised. <p>On the above grounds, I urge you not to go ahead with the plan as it is currently formulated.</p>
739 (Natural England)	<p>4.28 Eynsham / Cassington / Yarnton area is 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.</p>
794 (Bladon Parish Council)	<p>The major concern of the members of Bladon Parish Council is the high volume of vehicles travelling along the A4095 through Bladon: H.G.Vs for which the village roads are unsuited, and also other vehicles.</p> <p>The sentiments expressed in the transport and rights of way policy C7 are welcomed, but the impact of H.G.V. traffic is wide reaching. "Routeing agreements will direct development traffic onto the primary road network by the most appropriate route available", but if development results in more H.G.V. movements of minerals or waste on the A40, it must be recognised that there will also be an increase in all types of vehicles using the A4095 to avoid the congestion on the A40.</p> <p>The "safety of all road users including pedestrians", and "residential and environmental amenity" must be considered over a wider area than just the convenient access to the primary route.</p> <p>The members of Bladon Parish Council are wholly in favour of the Local Transport Plan 3 policy of minimising the distance minerals need to be transported by road. Proposal b) of the transport and rights of way policy C7 is less decisive, and should be strengthened. More weight should be given to potential extraction nearer to development sites.</p>
834	<p>We are writing to object to proposed gravel extraction in the Cassington Road area of Eynsham.</p> <p>Gravel extraction would severely affect the quality of life in Eynsham village, ruining farmland and what is a tranquil rural area enjoyed by many villagers. The impact of the work on local people, especially those in residential areas close to the ring road, as well as the primary school and the Siemens plant, would be dreadful. Can you imagine living or working in such close proximity to vibration, noise, dirt and dust, especially over a protracted amount of time?</p> <p>The roads around Eynsham, especially the A40 and the A34, are already severely congested. The short A40 stretch from Eynsham roundabout to the Wolvercote roundabout can take up to 40 minutes to drive during peak periods! Local roads surely cannot take any further traffic, especially many thousands of lorry runs generated by the proposed gravel extraction.</p> <p>What will happen to the land when extraction is complete? It is our understanding that the land cannot be returned to its former state or purpose, and villagers would be left with an ugly eyesore that would be prone to subsequent flooding. What a waste! And what local benefit will there be resulting from all this? Again, our understanding is that most of the gravel extracted will be transported to other areas, because existing stocks are already adequate for projected local need.</p>

	We appeal to you to take heed of local people's objections to the proposed gravel extraction and to put a stop to it.
839	As a resident of Dovehouse Close , Eynsham I wish to register my protest against the proposed gravel extraction plans to be considered in the above consultation . I fully support the " Save Eynsham from Gravel Extraction "
836	<p>We are writing to express our objection to the proposed mineral extraction in the Cassington Road area of Eynsham. Eynsham is a tranquil village which offers residents the best of rural living yet is close enough to the ammenities a city centre has to offer - gravel extraction would result in an increase in both noise and dust pollution, and an increase in traffic congestion, the essence of what residents are escaping from.</p> <p>The residents of the newly built development at Swinford Green would be exposed to all of this, not what they had in mind when they moved in to the development. Our children would suffer from the extra dust and dirt that would be created, and be subjected to a greater risk of developing asthma and other chest related illnesses. All this suffering and for what local benefit?</p> <p>Please keep Eynsham the village that residents know and love, a place to be proud of, a safe and picturesque home that has made Eynsham a village that generations grow up in.</p>
845 (Cllr Anne Purse)	<p>I have for many years believed that West Oxfordshire has taken a very big hit in terms of providing a large part of the gravel to fulfil Oxfordshire's quota. The preferred strategy does not take account of this, and of the v4ry many views expressed to this end in the previous consultation.</p> <p>Much of the countryside around the proposed extraction is has narrow roads, and fragile bridges unsuitable for carrying extracted gravel. In addition, the bulk of the expected house building is in a different part of Oxfordshire necessitating longer road journeys against our own policies.</p> <p>As well as the degradation of some very lovely landscape and valuable lowland meadows, fossil remains have been badly affected. Please consider these views</p>
286	<p>(iv) In addition the evidence within the background reports and documents does not justify the selection of the Preferred Strategy Areas identified in Policy M3. I consider that the assessment of these locations has not been undertaken to a level that gives me confidence that these locations fulfil the objectives of the strategy. As such it is inappropriate to describe them as 'preferred' until this work has been done. These concerns arise, for example, from the following considerations;</p> <ul style="list-style-type: none"> a. Extensive parts of the preferred strategy areas suffer from a level of flood risk that makes them potentially unsuitable for development; b. The transport impacts of the scales of potential development that will arise has not been assessed; c. The full range of environmental issues has not been taken into account, for example, the impact on the Green Belt and Conservation Target Areas ; d. The areas shown are so broad-brush that they are open to interpretation and debate. <p>In addition it is not evident that the cumulative effect of the multiple impacts from the number of sites in any particular locality has been taken into account. This has particular significance in Lower Windrush Valley where there is a large proportion of the 'nominated' mineral sites.</p> <p>It is therefore considered that the Preferred Strategy Areas in Policy M3 should be refined now not left to a later stage . This is quite feasible since the locations of the resources and the potential constraints are already known and mapped. In addition they should be renamed to indicate the need for them to be tested.</p>

	<p>(v) The distribution of the Preferred Strategy Areas in Policy M3 is also imbalanced and is not consistent with the principles in paragraph 10 of the Strategy, namely: "Principles which underpin the strategy for sand and gravel extraction include: - not increasing the rate of sand and gravel working in west Oxfordshire; - 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>This concern about Policy M3 arises from the following considerations: a. On the one hand, most of the Preferred Strategy Locations are located in West Oxfordshire yet only about 10% of the demand for minerals would appear to be generated there . On the other hand, there are areas excluded from the list of potential preferred areas in the south and east of the county which have workable deposits which are less constrained than some of the ones chosen ; b. Despite the importance given to transport in the principles set out in the draft Strategy, the areas selected are those that appear most likely to add to the routes in WODC with the worst congestion in the County (refer Background Paper 5: Transport). This problem will be exacerbated by the local constraints on the bridge capacity for heavy lorries (at Newbridge and Swinford); c. Similarly the choice of the Preferred Strategy Areas does not meet the requirements of the sequential test for flood risk. The background report on this subject makes it clear that this consideration has been over-ridden by commercial interests; and d. The proposals give undue weight to sites and locations nominated by developers. As a result the proposals exclude other areas in Oxfordshire that, from the evidence presented, would better meet the principles set out in the draft Strategy. Implications: The County Council have not justified the identified Preferred Strategy Areas at this stage; any locations identified should be presented as potential locations requiring further investigation. The wording of Policy M3 needs to be changed accordingly ; c. The Preferred Strategy Areas within Policy M3 should be modified to include all potential areas that have workable deposits without an over-riding constraint, and constrained, as it currently is, by the current aspirations of developers; d. The balance in the distribution of resources will increase the pressure and impacts on West Oxfordshire in particular. This is contrary to the stated principles of the Strategy. The proposed distribution of locations therefore should be reviewed to rebalance future workings taking pressure off West Oxfordshire;</p>
168 (PAGE)	<p>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. 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>

	<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.</p>
<p>399 (Grundon)</p>	<p>Location (M3) 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"> - Eynsham/Cassington/Yarnton 7 areas containing 3.82mt to be worked at 180,000 tonnes over 21 years - Lower Windrush 12 areas containing 14mt to be worked at 500,000 tonnes over 28 years - Sutton Courtenay 4 areas containing 2.05mt to be worked at 330,000 tonnes over 6 years - Cholsey (to replace Sutton Courtenay) 3 areas containing 4.86mt to be worked at 180,000 tonnes over 24 years - Caversham 1 area containing 4mt to be worked at 130,000 tonnes over 30 years <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> <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. 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>

489 (Savills Ltd)	Savills acts on behalf of the Stanton Harcourt Estate, which owns land affected by the Minerals Plan Consultation. The Estate supports continued extraction of sharp sand and gravel in the Lower Windrush Valley. The Estate believes that further areas should be considered within the established mineral reserves at Sutton Farm, nr Eynsham.
326 (Cllr M Stevens)	<p>Policy M3 is complicated and appears misleading.</p> <p>4.28 Policy M3: Strategy for the location of mineral working</p> <p>The principal locations for sharp sand and gravel working, as shown in figure 7, will be at:</p> <p>existing areas of working at:</p> <p>Lower Windrush Valley;</p> <p>Eynsham / Cassington / Yarnton;</p> <p>Sutton Courtenay; and</p> <p>Caversham;</p> <p>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;</p> <p>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.</p>
985	<p>The majority of the future demand for mineral extraction is going to be for areas south of the river Thames, estimated at around 70%, yet the current proposals are for about 80% to be extracted from north of the Thames, i.e the Lower Windrush/lower Evenlode Valleys and Yarnton.</p> <p>This is totally illogical and contravenes the County Council's Policy C7 which clearly states that extraction of minerals will only be permitted where there is access to a primary road network that is safe and efficient, and should minimise travel distances by road if other means of transport (rail, water, pipeline or conveyor) are not possible.</p> <p>The only way to transport minerals from the areas of greatest extraction to the areas of greatest need is by road, yet this seems to ignore the fact that the only bridges across the Thames are at Newbridge (which has a weight restriction) and Swinford (which is a narrow Toll Bridge) and all the roads leading to and from these bridges are narrow B roads and dangerous. Alternative longer routes via the A40 and A34 are already over-congested, and the County Council itself has resolved that there should be no further extraction in the area until the A40 has been dualled, which is never likely to happen in the foreseeable future.</p> <p>Most, if not all, of the HGV's used to transport minerals are not owned by the gravel companies but are franchised, resulting in each driver attempting to carry out as many journeys per day as possible. They ignore restrictions or advice and find the quickest routes, as nobody will take responsibility for controlling them.</p> <p>Wet or dry digging</p> <p>The minerals industry held a conference in Oxford earlier this year at which it was recommended that no further wet digging should take place in order to allow visual inspection for the benefit of archaeology and palaeontology, which I full support.</p> <p>However, this will produce more dust which would not only create an eyesore to the surrounding countryside with virtually everything</p>

	<p>being covered in layers of off-white dust, but will mean that any extraction in the vicinity of the Siemens magnet factory in Eynsham, which is of world-wide importance, cannot take place without serious repercussions and threat to maintaining product quality.</p> <p>Flooding/Agriculture/Restoration/Compensation</p> <p>Flooding The Evenlode Valley was particularly badly affected by the flooding in July 2007, right up to and across, the eastern bypass to Eynsham itself. I am sceptical as to what research has been made into digging in an area that is susceptible to such sudden flooding.</p> <p>Agriculture The agricultural environment of the whole of the area is being lost with such massive areas of mineral extraction gradually squeezing in on the village of Eynsham from both sides.</p> <p>Restoration restoration to lakes further adds to the loss of agriculture and has an enormous impact on the character of the landscape. It also seriously increases the risk of bird strikes to low flying aircraft which are very prevalent over the Eynsham area, particularly with being on the Brize Norton flight path.</p> <p>Compensation Local communities should be compensated for the damage to their environment and their reduction in quality of life.</p>
793	<p>In response to the above, I would be grateful if you could take into account our views on the extraction of minerals: I understand that 40-45% of the Lower Windrush Valley has already been dug and that this will increase to ca 70% under the draft policy. The Local Planning Authority must surely take into account the cumulative effect and the loss of amenity for local people if such a huge proportion of the local area is dug. Aerial photos demonstrate most clearly how much of our countryside has been lost to water. The post extraction management replaces our natural agricultural landscape, flora & fauna with lakes and reed beds. There must be a limit to how much more of this changed landscape we can accommodate. In our opinion, the cumulative impact proposed is excessive and should be the basis for limiting additional extraction.</p> <p>It is current policy that digging should take place close to where the minerals are required. With the growth areas identified as Didcot, Wantage, Grove, Bicester, Oxford & Banbury as well as Carterton & Witney and with the creation of the new Enterprise Zone at Milton, in particular, and with it the associated new jobs and increase in housing requirements, it must surely follow that gravel should be extracted in the areas closeby to supply local need. Distance to market is a critical factor for consideration. In our opinion, the digging should be concentrated close to these new areas of demand.</p> <p>With the high cost of fuel it does not make economic sense to transport gravel any further than necessary. This, combined with the fact that to gain access to South Oxfordshire, for instance, the two local bridges, both Grade I Listed, are not suitable for the predicted extra HGV traffic: Newbridge is closed to lorries in excess of 18 tonnes and the alternative is Swinford bridge - a narrow toll bridge. Routing agreements have consistently been breached in our local area for economic reasons, the recommended A415/A40/A34 adding many miles and increased costs for the haulage companies. In addition to the mileage, these major roads are already highly congested, with the A40 from Eynsham to Oxford and the A34 being reported daily as suffering from traffic queues. The direct and indirect costs of longer transport routes (environmental impact, commercial impact of congestion) should lead to extraction taking place as local to demand as possible.</p> <p>Local people do not appear to have benefitted from the extraction in the area. Should more of the Windrush Valley be dug, serious consideration must be given to how local people can be compensated for the disruption to their lives, the noise, pollution and general</p>

	<p>loss of amenity.</p> <p>In addition to the more general points made above, we are concerned that the nominated site SG27 would appear to extend so close to the boundaries of our property. Vicarage Pit to the south of our boundary has already been dug and is now partly a large area of water and partly a former BBONT Nature Reserve. It is to be hoped that this area, so rich in wildlife, will be preserved and that there would be a suitably large buffer zone between our property and any gravel extraction activity.</p>
700 (Mineral Products Association)	<p>The MPA recommends that the locational strategy be more flexible.</p> <p>The strategy should continue to identify the principle locations for production of sand and gravel, but we are aware from operators that while there are 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 this 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.</p> <p>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.</p> <p>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 proposed.</p>
711 (OMPG)	<p>The MPA recommends that the locational strategy be more flexible.</p> <p>The strategy should continue to identify the principle locations for production of sand and gravel, but we are aware from operators that while there are 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 this 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.</p> <p>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</p>

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<p>728 (Smiths Bletchington)</p>	<p>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>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>We support the preference to be given to extensions to existing soft sand and crushed rock quarries.</p> <p>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>419 (Hanson Aggregates)</p>	<p>Policy M3: Strategy for location of mineral working</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>

