

Draft Minerals Planning Strategy Consultation (September 2011)
Comments on Sustainability Appraisal and Strategic Environmental Assessment

| Name of org | Comment/issue raised |
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| Env Agency | <ul style="list-style-type: none"> • Reference to groundwater resources and the need to protect groundwater quality should be identified as a Sustainability Issue. • It is surprising given the attention paid to flooding by the background papers that flood risk has not been highlighted as a sustainability issue. Please ensure that this is also added. • An appraisal criteria 'will the proposal promote the objectives of the River Basin Management Plan?' should be added to Objective number 1, the indicator could be 'Number of waterbodies achieving good ecological status/potential'. • The appraisal criteria sub-objective for flooding seems to read like an indicator. One criterion could be 'will the proposal seek to maintain or reduce flood risk?' the indicator then could be 'Number of proposals approved against the recommendation of Environment Agency advice'. • With respect to the assessment of flood risk against policy M3 we would suggest that a neutral impact is only likely if more clarification and the stronger flood policy wording noted above is bought out in the next stage of the core strategy. In particular, the strategy should have a clear position on mineral processing and restoration applicability in the functional floodplain. |
| 142 | <p>1. The negative impacts of new works at Cholsey on the local community, on its economy, transport network, archaeology & heritage, ecology and environmental characteristics have been greatly underestimated during the formulation of the proposed strategy. As a result, the evidence on which the OCC Cabinet has made its decision to include Cholsey in the preferred approach is fundamentally flawed. The nature of the investigations carried out to date (and documented in the consultation documents) is insufficient to justify a decision to include new works in Cholsey in the preferred strategy. A number of shortcomings in the evidence base are highlighted below.</p> <ul style="list-style-type: none"> • <u>Social impact on Cholsey, Wallingford and the surrounding area</u> – In excess of 10,000 people live within a mile of this site and many hundreds live adjacent to it. Discussions within the community during the short period to date since the beginning of the consultation period have shown that the likely levels of noise, disruption, dust and other negative |

impacts are not acceptable to the local community. The true extent of the negative effect of the proposals on the social fabric of our community has not been explored in the consultation documentation, or the decision-making process leading up to it. The underestimation of the negative impact of the Cholsey works on people and local communities in the consultation¹ is, at the very least, insulting and inflammatory and at worst, purposefully misleading (I refer to the 'Comments' column on p65 of the SA/SEA document, against '8. To minimise negative impacts of waste management facilities and mineral extraction on people and local communities', namely: "All but one of the proposed working areas are existing minerals working areas, the exception is Cholsey (sand and gravel). In this respect, while there will be no significant adverse effects of such workings on new communities (with the exception of the Cholsey area), those communities that are currently adversely affected by mineral workings are expected to continue to experience some effects for the long term, although once sites are fully worked out and restored, positive permanent effects are expected. The degree and nature of impacts is dependent on mitigation measures put in place, proximity to sensitive receptors and the duration of working.").

- Economic – the works and associated processing facilities and traffic into and out of the works will make Cholsey and the surrounding area a much less attractive place to live. A key attraction of Cholsey for many families (including those moving out of London, who bring with them wealth, investment and commitment to the local community) is the quality of the local environment. The proposal will greatly reduce the attractiveness of Cholsey for such families and will reduce house prices across the area. The consultation makes no estimate of the negative economic impact of the works on the local economy (eg amenity value, house prices etc) which would have served to produce a more balanced picture of the economic pros and cons of including Cholsey in the preferred approach.
- Transport – the proposals have not considered the hugely negative impact of increased HGV movement on the local roads between Cholsey, Wallingford and Didcot. Estimates of HGV movement on the road network in the area and the impact on traffic flows and road safety have not been included in the consultation documentation. I am also very concerned that the proposals will preclude the development of the Wallingford to Cholsey cycle path, which would allow families to avoid cycling on Wallingford Road – a route which has had a number of cyclist deaths and injuries on it over the years.
- Heritage and archaeological issues – the Cholsey site is immediately to the south of a complex archaeological area which has evidence of occupation from the Bronze and Iron Ages and the area around the listed building of Cox's Farm is also a known medieval settlement area. The potential of the site in terms of its archaeological value has not been explored or discussed in sufficient depth in the consultation documentation. Furthermore, the works will destroy two key attractions of our community – namely the Agatha Christie trail (which runs from her former home in

¹ Oxfordshire Minerals and Waste Core Strategy - Sustainability Appraisal/Strategic Environmental Assessment - Minerals Preferred Strategy (August 2011)

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| | <p>Winterbrook to her burial site in St Marys Church) and the Cholsey and Wallingford Steam Railway (like many other residents of Cholsey, I have enjoyed travelling on the railway many times with my children and I have taken friends and family who live outside the area on this amenity also).</p> <ul style="list-style-type: none"> • <u>Ecological and environmental impact</u> – it appears from the consultation documentation that insufficient work has been carried out to examine the ecological and environmental impacts of the works. The cursory examination of these impacts referred to in the consultation documentation (referencing the SA/SEA assessment) does not reference the fact that the site is currently a habitat for a number of bird and mammal species (including weasels, stoats, deer, hares foxes, possibly otters, buzzards, owls, red kites) and the works would lead to the complete destruction of this habitat. The associated loss of invertebrates, plants and trees (which warrant targeted surveys in their own right) would affect the biodiversity of the area, and have knock-on impacts for ecosystem services such as flood protection and carbon storage. Furthermore, it is not apparent from the documentation that sufficiently detailed/any modelling of the impact of the works on local air quality (and hence the health of the local population) has been carried out. Finally, I am gravely concerned about the legacy issues of these works. I understand that the site cannot be restored as a lake due to its proximity to the River Thames and that the site cannot be used for landfill. Further, the possibility of the site being used for the disposal of inert building waste is highly unlikely as this material is nowadays (quite rightly) recycled and re-used at source. The likely end state of the works – a depression that will seasonally fill with water, becoming marshy in Spring and Autumn and a dust bowl in Summer – is therefore completely unacceptable to me and to my family. |
| OUTRAGE | <p>Table 2.1 <i>SA Framework (objectives)</i> in the SA claims to set out a framework of detailed objectives, sub-objectives, appraisal criteria and indicators by which the performance of the MWDF can be monitored and tested. This looks and sounds good. But the indicators for almost every objective are loaded. For example:</p> <p><i>SA Objective Appraisal Criteria/Sub-objectives Possible Indicators</i></p> <p>2. Protect and enhance landscape character, local distinctiveness and historic and built heritage enhancement of RIGS or geological SSSIs.</p> <p>Will the MWDF conserve and enhance Oxfordshire's AONBs & their settings and take into account guidelines associated with specific landscape types?</p> <p>Number of permitted applications for Minerals and Waste development which include conditions for the protection or restoration of statutory or non-statutory landscape designations.</p> <p>With indicators of this kind, of which there are many, OCC could permit mineral extraction almost anywhere provided that the effect is to increase the number of planning conditions.</p> <p>But it is precisely the most difficult and controversial sites which require the most planning conditions. Nowhere does the table recognise that conditions are usually imposed to make the best of a bad job, nor does it acknowledge that every extraction site sacrifices an existing landscape and habitat. What might be good for a bittern is definitely bad for a lark, What pleases the</p> |

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| | RSPB may spoil the pleasure of residents and visitors. In any case, planning conditions have to be monitored and enforced. If OCC applies indicators of this kind, it will accumulate expensive commitments which it will be unable to meet. |
| 341 | <p>URS Report - SA of Aggregates Apportionment Options</p> <p>Pages 14 and 15 of this report raise certain issues in relation to the potential negative effects of working the Caversham site, which is sited on a major aquifer and of course close to the River Thames. This has not been addressed in any detail despite significant parts of the area lying within flood risk zone 3b area. The document quite correctly raises concerns as regards the local road network, and the corresponding inability to mitigate GHG emissions associated with road transportation. Again this point is not mentioned elsewhere in the document. There is also a strange comment regarding the potential for restoration benefits to the communities, which is not explained anywhere, and is very difficult to understand. It does however conclude by stating that 'working in this area has the potential for cumulative negative effects including on the water environment, visual and local landscape, noise and transport in the long term. This does not appear to have been taking into consideration at all in the selection of the Caversham site.</p> |
| 633 (WODC) | <p>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>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> |
| 548 (SODC) and 567 (VoWHDC) | <p>The issue of the locally derived apportionment, as assessed in the SA/SEA of policy M2, is arguably slightly more complex than expressed, in that the level of provision of land in the plan for future mineral extraction in line with a level of apportionment does not drive future demand or actual levels of mineral extraction. Furthermore, policy M2 (along with national mineral planning policy) also states at any particular time Oxfordshire will maintain a 7 year landbank of planning permissions for sand and gravel, and a 10 year landbank for crushed rock. This is a significant point, because should the overall provision of land in Oxfordshire be insufficient to meet actual future levels of extraction and maintain 7 or 10 year landbanks, then towards the end</p> |

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| | <p>of the plan period new, unallocated sites will need to be found to make up the shortfall. These sites may in fact have higher or different environmental or other impacts than sites which might be considered in advance and be included within this plan.</p> <p>Therefore the statement as currently expressed in the SA/SEA that 'the [expected] adverse environmental and social effects of the proposed apportionment level might be less adverse than those experienced under the delivery of the current policy [in the South East Plan]' may not necessarily hold true. Serious further consideration needs to be given in relation to ensuring policies M2 (and M3) provide an adequate mechanism for maintaining supply in accordance with plan objective 'iii'. It is likely that further information will need to be provided at the examination in public to support the level of the locally determined apportionment, and ensure that any issues are considered in time to allow their evaluation through the SA/SEA process. A slightly fuller evaluation of the implications of proposed policy M2 within the SA/SEA would potentially assist with improving the robustness of the plan's evidence base.</p> |
| <p>SA of Local Assessment of Aggregates Needs</p> | |
| <p>M341</p> | <p>URS Report - Aggregates Apportionment Options</p> <p>Pages 14 and 15 of this report raise certain issues in relation to the potential negative effects of working the Caversham site, which is sited on a major aquifer and of course close to the River Thames. This has not been addressed in any detail despite significant parts of the area lying within flood risk zone 3b area. The document quite correctly raises concerns as regards the local road network, and the corresponding inability to mitigate GHG emissions associated with road transportation. Again this point is not mentioned elsewhere in the document. There is also a strange comment regarding the potential for restoration benefits to the communities, which is not explained anywhere, and is very difficult to understand. It does however conclude by stating that 'working in this area has the potential for cumulative negative effects including on the water environment, visual and local landscape, noise and transport in the long term. This does not appear to have been taking into consideration at all in the selection of the Caversham site.</p> |