

Planning and Strategic Housing

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**WEST OXFORDSHIRE
DISTRICT COUNCIL**

Peter Day
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Your Ref: S:\SPED\15.1.2\4.12
Our Ref: KH/MB
Date: 16 October 2015

Dear Peter,

**Oxfordshire Minerals and Waste Local Plan: Part 1 Core Strategy
Consultation on Proposed Submission Document, August 2015**

Firstly, thank you for the opportunity to comment on the Proposed Submission Minerals and Waste Local Plan. The following comments were approved by the Council's Cabinet on 14th October 2015.

Duty to co-operate

In our previous response the District Council had questioned the extent to which the County Council had satisfactorily fulfilled the new duty to co-operate in preparing the Minerals and Waste Local Plan. The District Council is pleased to see that the County Council has prepared a Statement on Compliance with the Duty to Cooperate. This sets out the extensive discussions that have taken place with key bodies.

Vision and Objectives for Minerals

The proposed vision refers to minimising the distance that aggregates need to be transported by road. This approach is supported and is consistent with the District Council's view that there should be an increased focus on the south of Oxfordshire for future sand and gravel working given the major growth that is being proposed there.

However, to be consistent with the vision, the minerals planning objectives should explicitly refer to a shifting of the primary focus of sand and gravel working in the County from West Oxfordshire to the south of Oxfordshire in order to minimise the distance that aggregates need to be transported by road.

This is referred to later in the plan (paragraphs 4.29 and 4.30) but should be clearly stated as a strategic objective.

Policy M1: Recycled and secondary aggregate

The District Council welcomes the change to Policy M1 in the draft Plan to make it clear that the need for aggregate mineral supply to meet demand in Oxfordshire should be met from recycled and secondary materials in preference to primary aggregates. This is important in order to minimise the need to work primary aggregates.

However, the District Council is concerned at the omission of a target for the supply of recycled and secondary materials. Such a target (0.9 million tonnes) was contained in the now withdrawn Minerals and Waste Core Strategy and is omitted in light of the revocation of the South East Plan. However, the target was supported by the District Council because it provided greater force to the policy and certainty about how the objective would be achieved.

The District Council remains unconvinced that setting a target could be misconstrued as setting a maximum level to be achieved as it was already made clear in the early iteration of the policy that it was intended to be a minimum target. Setting a minimum requirement will have the advantage of allowing actions, including contingency measures, to be identified should this not be achieved. No explanation has been provided to explain why the County Council believe that a target would be misconstrued. As such, the District Council requests that a target is reincorporated into this policy through a proposed modification.

Policy M2 – Provision for working aggregate minerals

The District Council notes that the level of provision of sharp sand and gravel identified through the Local Aggregate Assessment (2014) has increased since the 2013 Assessment despite the previous figures providing “significant headroom to accommodate possible changes in local circumstances such as an increase in economic activity and consequent demand for aggregates”. As such, it considers that this increase should be explained more clearly within the supporting text.

The proposed intention to update the LAA annually is noted and supported in principle. It should be made clear however how this will be incorporated into the plan once adopted. Will Table 2 be updated as an annual addendum to the plan? What status will any such addendum have in statutory planning terms?

It should also be made clearer how the annual update of the LAA will feed into the proposed site allocations DPD and how that will be kept up to date in light of potentially different annual requirement figures.

Policy M3 – Principal locations for working aggregate minerals

As previously expressed, the District Council is concerned that the current situation whereby West Oxfordshire provides the majority of sharp sand and gravel will continue. The minerals local plan presents a genuine opportunity to shift the focus to other locations close to major growth areas and the District Council welcomes the acknowledgement that any requirement for additional sites for sharp sand and gravel should be met primarily in the southern part of the county to reflect the economic growth in this part of the county (paragraph 4.30). As stated previously, the proposed shift in the balance of sand and gravel working should be captured as one of the key strategic objectives that flow from the vision.

It is noted that the proposed shift will be delivered through the selection of sites to be undertaken through the follow-up site allocations DPD. This approach is supported in principle and the Council will seek to further input into that document at the appropriate time.

The supporting text at paragraph 4.33 regarding the potential for further sand and gravel working in West Oxfordshire is noted. In this regard, the Council wishes to make it clear

that it would only support additional sand and gravel working within the District in the later part of the plan period and then, only subject to it being robustly demonstrated that there is a requirement for additional working to take place, having first prioritised additional provision in the south of the County.

The District Council previously requested that the creation of 'buffer zones' to protect the local communities and other community facilities/ grounds should be implemented and the extent of these buffer zones should be clearly detailed, in accordance with National Planning Practice Guidance. Whilst the District Council welcomes the exclusion of larger settlements in establishing the strategic resource areas for working mineral deposits (paragraph 4.24), map(s) clearly detailing the exclusion areas would be beneficial.

Policy M4 – Sites for working aggregate minerals

The District Council welcomes the establishment of criteria by which sites for working aggregate minerals will be allocated including securing a reduction in overall journey distance from quarry to market and the need to achieve a change in the balance in production capacity for sand and sharp gravel between the strategic resource areas in western Oxfordshire and southern Oxfordshire to more closely reflect the distribution of demand within the county.

However, to effectively apply these criteria the policy should be more explicit that the change in the balance represents a higher proportion of supply from southern Oxfordshire at least during the first half of the plan period as is acknowledged in the supporting text. The Plan or the Site Allocations Document should also quantify the location of expected demand so that these two criteria can be effectively applied and monitored.

Policy M10 – Restoration of mineral workings

The District Council is concerned that Policy M10 simply requires the after-use proposals to take various criteria into account, rather than to ensure the proposal is appropriate and sympathetic. The policy should therefore be amended to make it explicit that after-use proposals should be appropriate in terms of the listed criteria.

Whilst the District Council is encouraged that reference has been made to the need for local communities to be consulted on the options for after-use in paragraph 4.74, it would be beneficial if this was included in the policy text itself. It is also disappointing to note that the previous suggestions made by the District Council, including the potential transfer of land to community land/wildlife trusts as a possible mechanism for securing long-term management arrangements and the need for a holistic and inclusive approach to restoration have not been inserted into the policy or supporting text.

Finally, as previously mentioned, we urge the County Council to reintroduce the requirement to restore best and most versatile agricultural land where practicable in the policy.

Vision and Objectives for Waste

A key underlying philosophy in the Waste Planning Vision is to reduce waste generation and to see waste as a resource, through maximising reuse, recycling and composting and the recovery of value from residual waste. This will ensure that only the minimum amount of

waste that is necessary is disposed of at landfill sites. The District Council supports this approach but comments that the levels of recycling envisaged by the plan can only be achieved if there are convenient waste recycling facilities for communities to use.

The District Council is concerned that the proposed closure of household waste and recycling centres from seven to three or four for the County, which is being consulted on separately, is a significant reduction in service provision for the public, and that this will undermine the vision and objectives of the Minerals and Waste Local Plan. Many residents of West Oxfordshire already have an unacceptable distance to travel to a recycling centre. The District Council has lobbied previously for the provision of replacement facilities in the north of the District since the closure of Dean Pit.

The closure of household waste and recycling centres will result in more waste being pushed into the kerbside collection refuse stream, which may increase collection costs for the District Council and these may outweigh the savings made by the County Council in site closure. It also may lead to increased fly tipping.

The County Council ought to consider a wider range of alternative options such as a mobile household waste and recycling centre service or the delivery of recycling centre by third parties to enable charges to the public to be levied. The District Council supports the reduction in opening hours to allow the provision of an additional site as we consider a reduced provision at a greater number of sites is the best option for the public.

Policy W1 – Oxfordshire waste to be managed

The District Council supports the principle that Oxfordshire should be net self-sufficient in the management of its principal waste streams (municipal solid waste, commercial and industrial waste, and construction, demolition and excavation waste). This is important to both reduce transportation costs and also the impact of transport movements.

Policy W2 – Oxfordshire waste management targets

The District Council supports the setting of challenging targets that seek to reduce the reliance on Landfill. But it comments that the ambitious targets set will be difficult to achieve if the proposed closure of household waste and recycling centres goes ahead.

Policy W4 – Locations for facilities to manage the principal waste streams

The District Council supports the general locational strategy for waste management facilities that looks to steer larger scale facilities towards locations close to the main centres of population and for facilities in the more rural parts of the county to be of a smaller scale.

Policy W4 states that non-strategic waste management facilities should normally be located in or close to Oxford, Witney, and other larger towns. It is important that this allows for the development of a new depot and bulking facility in or close to Witney if required. It is possible that a new waste depot will be required to run District Council waste collection services when the current waste contract with Kier Group expires. It would be useful if additional text could be added recognising the specific needs of districts to have such facilities to feed into the wider strategic provision of waste management facilities.

The District Council does have some concerns over the spatial extent of the Oxford area identified on the Waste Key Diagram.

Waste Key Diagram (Figure 12)

The areas identified as locations for strategic waste facilities are areas within a radius of Oxford (10 km), Bicester (5km), Abingdon (5 km) and Didcot (5 km). This reflects their status as larger settlements and significant growth areas. The District Council is concerned over the rationality of the indicative area shown for Oxford that crosses the River Thames into an area east of Stanton Harcourt. Much of this area falls within Flood Zone 2 and it has relatively poor accessibility to Oxford compared to the other parts of this area.

The County Council is requested to delete that part of the Oxford area notated as '*Locations for Strategic Waste Facilities Policy W4*' that lies beyond the outer boundary of the Green Belt in West Oxfordshire.

Policy C8 – Landscape

The District Council continues to support the need for proposals to be informed by a landscape character assessment and a relevant AONB Management Plan if the site falls within the AONB.

The District Council welcomes the revised wording within this policy and only wishes to suggest a minor amendment to make clear that major development in the AONB will only be permitted in exceptional circumstances.

Policy C10 - Transport

The District Council supports the principle of minerals and waste development having safe and suitable access to an advisory Lorry Route Map. However there are concerns over the Lorry Route Map included in the plan (Figure 13). The District Council requests the following amendments to the map:

- Removal of the local access routes shown at Newbridge and Radcot to reflect the heritage value of the bridges there, and their unsuitability for Heavy Goods Vehicle traffic.
- Addition of an '*Environmentally sensitive area: avoid if at all possible*' notation at Bladon on the A4095 to reflect the limited width of the carriageway, the close proximity to listed buildings, and the impact of heavy vehicles on the amenity and heritage value of the area.

West Oxfordshire wishes to participate at the oral hearing part of the examination. If you have any queries or require additional information, please do not hesitate to contact me.

Yours sincerely,



Giles Hughes
Head of Planning & Strategic Housing