

Part 1 – Respondent Details

1(a) Personal details		
Title	Mr	
First Name	David	
Last Name	Woodward	
Job Title (where relevant)	Chairman	
Organisation (where relevant)	Eye & Dunsden Parish Council	
1(b) Agent details <i>Only complete if an agent has been appointed</i>		
Title		
First Name		
Last Name		
Job Title (where relevant)		
Organisation (where relevant)		
1(c) Contact address details <i>If an agent has been appointed please give their contact details</i>		
Address Line 1		
Line 2		
Line 3		
Line 4		
Postcode		
Telephone No.		
Email address	chairman@eyedunsden.org	
Are you writing as	<input type="checkbox"/> A resident <input type="checkbox"/> A local business <input type="checkbox"/> Minerals industry <input type="checkbox"/> Waste industry	<input checked="" type="checkbox"/> A parish council <input type="checkbox"/> A district council <input type="checkbox"/> A county council <input type="checkbox"/> Other (please specify)

Please tick the appropriate boxes if you wish to be notified of any of the following:	
That the Oxfordshire Minerals & Waste Core Strategy has been submitted for independent examination	√
Publication of the Inspector's report and recommendations	√
Adoption of the Oxfordshire Minerals and Waste Core Strategy	√

Please sign and date the form:			
Signature:		Date:	30/9/15

Part 2 – Representation

Please complete this part (Part 2) of the form separately for each separate representation you wish to make.

You can find an explanation of the terms used below in the accompanying guidance on making representations.

2(a) State which part of the Oxfordshire Minerals and Waste Local Plan Core Strategy you are making a representation about

Part or policy no. or paragraph

OMWLP Core Strategy Proposed Submission Document

2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy is: (tick as appropriate)

- (i) Legally compliant? Yes No
- (ii) Sound? No

If you have answered **No** to question 2(b)(ii), please continue to question 2(c). In all other cases, please go to question 2(d).

2(c) Do you consider the Oxfordshire Minerals and Waste Core Strategy is unsound because it is not: (tick as appropriate)

- (i) Positively prepared
- (ii) Justified
- (iii) Effective

On the following pages, please set out why you think the Minerals and Waste Local Plan Core Strategy is legally non-compliant and/or unsound and any changes you are suggesting should be made to it that would make it legally compliant or sound.

Please note your representation should include as succinctly as possible all the information and evidence necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on your representation at this stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

2(d) Please give details of why you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

If you agree that the Oxfordshire Minerals and Waste Local Plan Core Strategy is legally compliant and/or sound and wish to support this, please also use this box to set out your comments.

As set out in the following section, we wish to take issue with the omission from the proposed Minerals Planning Vision (page 32, 3.3) of the need to protect residents and businesses from heightened flood risk.

Prevention of detrimental impacts on landscape values should also be a cornerstone of the policy.

We reject the inclusion in para 4.45 of The Thames Valley area from Caversham to Shiplake. Arguments in favour of site CS-4 based on proximity to out of county demand seem to us to be insufficient given the potential impact on nearby dwellings from extraction in this 94% FZ 3b high flood risk area. Matters of efficiency for the operator (in terms of the availability of existing plant) are not the proper business of a minerals plan. These are business decisions for the operator to take.

We do not believe there are over-riding reasons for this area to bypass its failure under the sequential test

A thorough methodology for the assessment of flood risk to buildings in proximity to potential mineral sites should be at the forefront of the assessment of the suitability of any potential site. This assessment should receive greater emphasis than market demand driven justifications for extraction.

When buildings nearby to potential sites such as this are ascertained to be likely to be at an increased risk of flooding as a result of minerals extraction and restoration, there should be an absolute presumption against minerals extraction. The burden of proof against this presumption should rest with applicants.

The strategy should ensure that the application of the sequential test is robust and guaranteed. To this end, justifying extraction for reasons of the non-availability of a specific grade of material locally should not be a sufficient criterion development in a high flood risk area.

In addition and in relation to current and future plans for this area, the strategy should presume that gravel extraction sites that include landfill will necessarily worsen flood risk. This because the replacement of gravel with landfill necessarily reduces sub-surface waterflow and storage capacity.

In a letter in June 2015 in relation to condition 52 of an application by Lafarge

Tarmac at Sonning Eye, the EA stated “The strategy assumes that once restored, site drainage will essentially act as it does currently. As this underlying geology will be changed significantly this is **unlikely to be the case**”. WA/2015/120605/01-L01 –MW.0058/15.

We have proposed some specific changes to section 7 – implementation and monitoring in order to ensure more rigorous application of the plan and to place environmental considerations at the forefront of the strategy.

Eye & Dunsden Parish Council is in full support of the arguments put forward by OXAGE. They provide a compelling case for a vastly decreased need for minerals compared to those presented by OCC.

We also note in the interests of accuracy that Appendix C records that there is 'no record' of flooding from groundwater or surface water for site SG-11 at Sonning Eye. There is considerable evidence locally for severe ground and surface water flooding in this area. This statement of 'no record' should not in any circumstances be read as being of evidential significance. Similarly the detailed mapping seem to imply that this site is at lesser flood risk than adjacent areas to the west. Long-standing personal testimony of local people contradicts this strongly. The flood risk is at least as great.

Continue on a separate sheet or expand the box if necessary

2(e) Please set out the changes(s) you consider necessary to make the Oxfordshire Minerals and Waste Local Plan Core Strategy legally compliant or sound, having regard to the reason you have identified at 2(c) above where this relates to soundness. You should say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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|-------------|---|
| 2.43 (p.27) | Amend last sentence to say "...creation of lakes from sand and gravel workings (<i>eg. in Sonning Eye</i>)". [ie. Add italicised words] |
| 3.3 (b) | After bullet point about use of unsustainable roads insert 2 extra bullet points:
* adverse impact on flood risk
* the significant permanent alteration of the local landscape; and
... |
| 3.4(vi) | Change to read "adaptation, including through <i>avoidance of landfill in areas of high flood risk and restoration schemes which provide ...</i> " [insert italicised words] |
| 4.3 | change to read "...the importance of <i>speedily</i> restoring sites to <i>preserve the character of the local landscape</i> , enhance the environment and to provide ..." [insert italicised words] |
| 4.22 | State where the Minerals Key Diagram is in the document. |
| 4.28 | At end of para. add "There are similar concerns about the extent of mineral working in and around Sonning Eye, extending as far as Shiplake, due to the consequent cumulative impact on local residents and community (including but not limited to increased traffic, congestion and noise), the permanent significant alteration of the local landscape and the impact on flood risk and groundwater flows." |
| 4.30 | After "at least over the first half of the plan period" insert "save where there has already been extensive mineral working and repeated extensions of the workings resulting in permanent substantial alteration of the local landscape and adverse impact on the local community whether by increased traffic flow, noise, increased flood risk and/or flooding and disturbance to groundwater flows (<i>eg. in Sonning Eye and towards Shiplake</i>)". |
| 4.45 | Delete in the third bullet point the words "from Caversham to Shiplake" |
| 4.46 | in para. (c) amend to say "existing quarries, <i>only</i> where environmentally acceptable, after taking into consideration criteria d) to m) and after consideration of criterion b)..." (ie. insert "only" and remove the brackets after the word "acceptable" as they make criteria (d) to (m) seem less important than criterion (b)) |
| 6.10 | In (k) add as (ix) air pollution or other disturbance (<i>eg. noise</i>)
change to say "a category of development that is <i>in principle</i> at the lowest vulnerability to flooding ..." and "...provided a sequential test <i>and in some cases the exceptions test</i> are undertaken <i>and passed</i> ." |

- | | |
|------|---|
| 7.2 | Change to say “The aim will be to ensure that development delivers the objectives of the minerals planning strategy. This will be done by taking due account of the policies and proposals in the strategy:
(a) when assessing site options for allocation in the Site Allocations Document;
(b) in pre-application discussions;
(c) when determining planning applications, including by commissioning independent expert assessments and reports and robustly scrutinising assertions made by applicants in support of planning applications;
(d) by imposing appropriate planning conditions;
(e) where necessary, negotiating legal agreements when permissions are granted; and
(f) by effectively enforcing planning conditions and ensuring restoration plans are properly implemented.” |
| 7.7 | Change so reads “Priority is to be given to further working through extensions to existing quarries <i>if it is environmentally acceptable to do so (policy M4(c) after applying criterion (b) and (d)-(m)).</i> ” |
| 7.18 | Change to say “as well as monitoring of mineral working sites <i>and compliance with planning conditions and restoration plans.</i> The Council...” |

Continue on a separate sheet or expand the box if necessary.

2(f) Written representations or oral hearing

If your representation is seeking a change to the Oxfordshire Minerals and Waste Local Plan Core Strategy, do you consider it necessary to participate at the oral hearing part of the examination? *(tick box below as appropriate)*

No, I wish to communicate through written representations	√
Yes, I wish to participate at the oral hearing part of the examination (go to 2(g))	

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated they wish to participate at the hearing part of the examination.

<p>2(g) If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.</p>
Empty space for user input
<p>Continue on a separate sheet or expand the box if necessary</p>

Please complete Part 2 of the form separately for each separate representation you wish to make, and submit all the Parts 2s with one copy of Part 1 and Part 3.