


**Part 1 – Respondent Details**

<b>1(a) Personal details</b>		
<b>Title</b>	Mr	
<b>First Name</b>	Peter	
<b>Last Name</b>	Canavan	
<b>Job Title (where relevant)</b>	Senior Planning Policy Officer	
<b>Organisation (where relevant)</b>	South Oxfordshire District Council Vale of White Horse District Council	
<b>1(b) Agent details</b> <i>Only complete if an agent has been appointed</i>		
<b>Title</b>		
<b>First Name</b>		
<b>Last Name</b>		
<b>Job Title (where relevant)</b>		
<b>Organisation (where relevant)</b>		
<b>1(c) Contact address details</b> <i>If an agent has been appointed please give their contact details</i>		
<b>Address Line 1</b>	135 Eastern Avenue	
<b>Line 2</b>	Milton Park	
<b>Line 3</b>	Milton	
<b>Line 4</b>	Abingdon	
<b>Postcode</b>	OX14 4SB	
<b>Telephone No.</b>		
<b>Email address</b>	Peter.canavan@southandvale.gov.uk	
<b>Are you writing as</b>	<input type="checkbox"/> A resident <input type="checkbox"/> A local business <input type="checkbox"/> Minerals industry <input type="checkbox"/> Waste industry	<input type="checkbox"/> A parish council <input checked="" type="checkbox"/> A district council <input type="checkbox"/> A county council <input type="checkbox"/> Other (please specify)

<b>Please tick the appropriate boxes if you wish to be notified of any of the following:</b>	
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	✓

<b>Please sign and date the form:</b>			
<b>Signature:</b>		<b>Date:</b>	28.09.2015

## 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

Whole 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?       Yes       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
- (iv) Consistent with national policy

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.**

This is a joint response from both South Oxfordshire and Vale of White Horse District Councils (hereafter referred to as 'the councils'). We welcome the progress of the Minerals and Waste Core Strategy and recognise its importance as part of the overall Development Plan for both the districts and the county. We are pleased to note that our previous comments have been considered but still have some concerns about the approach to drafting the Minerals and Waste Plan and the detail provided in the supporting information. The Councils therefore submit objections to the overall soundness – the justification and effectiveness – of the draft Core Strategy.

Point one refers to both the minerals and waste sections of the draft Core Strategy but point two more specifically refers to minerals.

**1. The approach to drafting**

In the February 2014 consultation response to the draft Minerals and Waste Local Plan: Core Strategy, South Oxfordshire District Council outlined their preference to see site allocations included to aid Local Plan production and to provide some certainty to communities and developers. Both councils are disappointed to see that there are still no new specific mineral extraction sites identified and that the areas of search are very widely drawn. Areas of search, as a way of identifying extraction sites, in accordance with Planning Practice Guidance, it is the third and lowest priority when considering the options. This threatens the effectiveness of the Minerals and Waste Core Strategy and by not being as clear as it can be about the intentions also threatens the overall certainty of the development plans across the county.

The councils are content that the previous confusion over whether the identification of sites was truly plan led or whether it was being left to speculative allocations (as in the earlier draft policy M3) has been resolved. Policy M4 provides some comfort, but a timetable must be committed to at the earliest possible opportunity and ideally enshrined in policy to deliver the site allocations document.

It is unclear from the drafted Core Strategy what the capacity limitations are at the waste management facilities. The councils are concerned that this creates uncertainty about the continued use of sites and what the impacts will be. It could also be a potential weakness when trying to manage the importation of waste from other authorities because if the capacities and environmental limits for sites are unknown then the need for new sites or the life span of site cannot be effectively planned for. We understand that some of this detail is intended to be included in the Site Allocations document but feel that its

inclusion now would help to create a more robust and effective plan. Examples include: in paragraph 5.11 and/or as an addition to Policy W2 some detail could be included about the proportional split of imported waste at the moment, and a comparison with other authority areas, and expected imported waste levels through the plan period. Figure 10 could also be updated to show a comparison with other authority areas. Policy W3 needs to be clearer about the expectations for waste management at existing sites and what future capacities might be. There could be a consideration of safeguarding land for facility extension. Similarly to policy M4 the mention of the Site Allocations is understood but a commitment to its completion is required.

The councils also seek clarification to Policy W9. Again the issue of no Site Allocation document is raised. Specifically there is no provision for the situation should no “national disposal facility” for intermediate level legacy radioactive waste be identified and therefore a lack of certainty for our communities, developers and economic partners in the districts. A time limit for the treatment and storage of radioactive waste or a commitment to review the policy should be included. A countywide position should be agreed on the disposal/storage of intermediate waste.

The County Council’s development scheme does not give great certainty to the production of the Site Allocations document:

*“Timetable: A timetable for preparation of this document will be drawn up after the Core Strategy has reached examination. At that time the timetable to complete the Core Strategy and the availability of resources to prepare this document will be clearer”*

## 2. Supporting information

The councils’ question the robustness of the statement at paragraph 4.30 that the broadly equal split in economic forecasts “...means changing the balance of production capacity between the strategic resource areas in western Oxfordshire (mainly in West Oxfordshire District) and southern Oxfordshire (in South Oxfordshire and Vale of White Horse Districts), even though remaining resources of sharp sand and gravel are more extensive in West Oxfordshire.”

Whilst we support the aspiration to reduce the need to move minerals by road surely it is equally important to reduce the impacts of mineral extraction on new communities, especially where there is already the infrastructure in place elsewhere.

Both councils’ are pleased to note that the requirements of the Oxfordshire Planning Policy Officers Group (OPPO) meeting 20.09.2013 have now been met.

*Item 15 of this action log states the following in relation to Minerals:  
‘Final Minerals report to take ‘Strategic Housing Market Assessment’ and ‘Strategic Economic Plan’ into account’.*

Both of these documents (the SHMA and SEP) are clearly referenced in the

Core Strategy but their importance to the requirements for mineral extraction are not explicitly shown.

The methodology for the Local Aggregates Assessment (LAA) identifies that the plans for growth in both the Local Plans across the county and the Strategic Economic Plan will increase the need for aggregates but this is not explicitly quantified or drawn across into the draft Core Strategy, thereby omitting an important justification of special local circumstances.

Both councils' strongly support the provisions of policy M1 that identifies a sequential approach to meeting the demand for aggregate from "secondary" sources before primary land-won resources. Greater emphasis should be placed on how, where and when these other sources might be available and also a provision should be identified from projects including the Oxford Flood Alleviation Scheme – the 'western conveyance' and the 'up stream storage solution.' If not as part of this plan then at least in the site allocations document the district councils wish to seek the inclusion of this supply and that that is likely to become available as a prelude to strategic development. Movement of primary and secondary source material by non-vehicular means should be explored to enhance air quality and reduce the risk of possible damage to the water environment.

The councils note that the LAA is dated November 2014. We look forward to seeing an up-to-date and regularly reviewed evidence base as soon as the data is available. This will help us all to understand the needs for the area and the deliverability of them through the eagerly awaited Site Allocations document.

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.**

1. Ideally the plan should include site allocations supported by robust evidence and consultation. However, we do appreciate the need for expedience so a clear timeline for site allocations and an intended trajectory for their need and delivery should be included and committed to in the document. Policies M4, W3 and W9 in particular need to be redrafted to reflect this.
2. A clearer explanation should be provided that links the increased demand for housing in the housing market area – identified in the Strategic Housing Market Assessment – and the need for land-won minerals especially at the expense of alternatives (such as recyclables) that would have a lesser impact upon local communities.

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

