



## **CLIENT PROJECT REPORT CPR2366**

### **Oxfordshire Minerals and Waste Local Plan: Part 1 - Core Strategy incorporating Proposed Main Modifications**

#### **Sustainability Appraisal Report Update**

Appendix B: Consultation Responses

Appendix C: Development of the Local Plan to the Submission Stage

February 2017

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## **Appendix B   Consultation Responses**

This appendix includes consultation responses from 2012 to 2016 that relate to the Sustainability Appraisal documents.

The first set of consultation responses (Section B.1) relate to the Pre Submission Core Strategy SA Report from May 2012 (that was subsequently withdrawn).

Section B.2 provides details of the responses received during the consultation on the updated Scoping Report in Dec13/Jan14.

Section B.3 provides the responses that were received during the consultation on the new Minerals and Waste Core Strategy/Local Plan in spring 2014.

Section B.4 provides the responses that were received during the consultation on the SA Report to accompany the Publication Core Strategy in August/September 2015.

Finally, Section B.5 provides the responses that were received during the consultation on the SA Report Addendum in April/June 2016.

## B.1 Pre Submission Core Strategy Sustainability Appraisal Report March 2012- Consultation Responses

Table B-1 provides details of the consultation on the Pre Submission SA Report, which was consulted upon alongside the Proposed Submission Document in May/June 2012. The table shows the responses of the following organisations and interested parties:

- English Heritage;
- Communities Against Gravel Extraction (CAGE);
- Kemp & Kemp LLP;
- Wallingford Town Council (Mayor R. Lester);
- Cholsey Parish Council; and
- Oxfordshire County Council (Councillor P. Greene).

The table provides a summary of their response, and the action taken in response.

**Table B-1: Summary of the Consultation Responses on the March 2012 Sustainability Report**

| Summary of comments   | How the comments have been taken on board   |
|---|---|
| <b>English Heritage</b>   |   |
| In the summary of the Appraisal findings, reference should be made to the archaeological interest of the Lower Windrush Valley, as this is recognised in the full assessment on page 147. | The appraisal summary in section 6 of the February 2014 SA Report has been updated to reflect this issue.   |
| English Heritage does not understand why it is apparently not proposed to monitor Policy C7. The effects of the Core Strategy on the historic environment should be monitored.            | Table 6.1 suggested monitoring related to significant effects and as no significant effects were identified for C7 no monitoring was suggested in this table. However, it does not follow that effects of the core strategy on the historic environment will not be monitored. Table 6-2 of the 2012 SA Report included a baseline indicator related to the historic environment. Within the February 2014 SA Report potential monitoring indicators for the historic environment are proposed in the SA Framework, included in Appendix D. The draft monitoring framework will be proposed in the Sustainability Report to accompany the Submission Local Plan (Core Strategy). The final monitoring plan will be published in the SA/SEA Statement, alongside the adopted Local Plan (Core Strategy). |

| <b>Communities Against Gravel Extraction (CAGE)</b>   |   |
|---|---|
| <p>Inadequate Environmental Assessment.</p> <p>The failure to carry out a proper environmental assessment renders the Plan not legally compliant and unsound.</p> <p>The Environmental Assessment carried out was, in consequence, inadequate given the precision of the site selection process for Cholsey, and the whole approach remains tainted by the appearance of the bias.</p>  | <p>The Consultation Draft Local Plan (Core Strategy) takes a more strategic approach than the previous Pre-Submission Core Strategy, identifying broad areas of search rather than the more specific areas for extraction as was previously the case. Detailed assessments of sites will be undertaken at the planning application stage. An assessment has been undertaken of the revised policy within the February 2014 SA Report. No action is therefore required in relation to this response.</p> |
| <b>Kemp &amp; Kemp LLP</b>  |   |
| <p>Concerns about the Strategic Environmental Assessment (SEA) as it relates to Cholsey. The constrained nature of the “new area of working at Cholsey” is such that that “area” is in fact a specific site (SG33) located in the gap between Cholsey and Wallingford and situated to the south of the A4130 and to the west of the Wallingford-Cholsey road, and where consequently, a more detailed assessment is required.</p> <p>Failure to carry out a proper environmental assessment means that the Plan is neither legally compliant nor sound.</p> | <p>See above.</p>   |
| <b>Wallingford Town Council (Mayor R. Lester)</b>   |   |
| <p>See CAGE representation.</p>   | <p>See above.</p>   |
| <b>Cholsey Parish Council</b>   |   |
| <p>See the CAGE submission.</p>   | <p>See above.</p>   |
| <b>Oxfordshire County Council (Councillor P. Greene)</b>  |   |
| <p>See the CAGE submission. All references to Cholsey must be removed.</p>  | <p>See above.</p>   |

## B.2 Scoping Report December 2013 - Consultation Responses

Table B-2 provides details of the consultation on the Scoping Report, which was consulted upon during the development of the Oxfordshire Minerals and Waste Local Plan: Core Strategy Consultation Draft in December 2013/January 2014. The following organisations provided responses to the consultation:

- English Heritage; and
- Environment Agency.

**Table B-2: Summary of the Consultation Responses on the December 2013 Scoping Report**

| Summary of comments   | How the comments have been taken on board                 |
|---|---|
| <b>English Heritage</b>   |   |
| Add a reference to English Heritage’s publications in the Plans, Policies and Programmes.   | The plans, policies and programmes list has been updated. |
| The guidance suggests a specific sustainability appraisal objective of “conserve and enhance the historic environment, heritage assets and their settings” which we would prefer to SA objective 2.   | The SA framework has been updated.                        |
| The proposed indicators would be more informative if it was percentage of permitted applications rather than number, also add in some additional indicators.  | The SA framework has been updated.                        |
| <b>Environment Agency</b>   |   |
| The following suggestions were made with regards to the SA Framework:<br>Add in the following indicators for SA3: ‘Number of permitted applications using SUDS including pollution prevention measures’, ‘Number of permitted applications using SUDS including pollution prevention measures’.<br>Amend SA 6 to ‘to reduce the risk of flooding’ | The SA framework has been updated.                        |
| We are in agreement with the approach proposed.   | No action required.                                       |

### B.3 Sustainability Appraisal of the Oxfordshire Minerals and Waste Local Plan: Core Strategy Consultation Draft February 2014 - Consultation Responses

The following section provides details of the consultation on the Draft Plan, in February 2014. The list below shows who was consulted, while the table that follows shows who responded, provides a summary of their response and the action taken in response.

The following organisations responded to the consultation on the February 2014 version of the Sustainability Appraisal of the Consultation Draft:

- English Heritage;
- Environment Agency;
- Natural England;
- Oxford City and County Archaeological Forum (OCCAF);
- Oxfordshire Architectural and Historical Society (OAHS); and
- South Oxfordshire District Council

**Table B-3: Summary of the Consultation Responses on the February 2014 Sustainability Appraisal of the Consultation Draft**

| Summary of comments   | How the comments have been taken on board  |
|---|--|
| <b>English Heritage</b>   |  |
| <p>English Heritage has published guidance on Strategic Environmental Assessments, Sustainability Appraisal and the Historic Environment available using the following link:<br/> <a href="http://www.english-heritage.org.uk/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/">http://www.english-heritage.org.uk/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/</a>:</p> <p>Appendix 3 of the English Heritage guidance contains a range of possible decision-making criteria. Not all of these would be relevant to a Minerals and Waste Local Plan, but we would suggest that the following be considered:</p> <ul style="list-style-type: none"> <li>• Conserve and/or enhance heritage assets and the historic environment?</li> <li>• Contribute to the better management of heritage assets?</li> <li>• Improve the quality of the historic environment?</li> <li>• Respect, maintain and strengthen local character and distinctiveness?</li> <li>• Provide for increased access to and enjoyment of the historic environment?</li> <li>• Alter the hydrological conditions of water-dependent heritage assets, including paleo-environmental deposits?</li> </ul> | <p>The SA Objectives framework has been updated to provide a specific objective for cultural heritage, including the decision making criteria recommended by English Heritage.</p> |

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| <ul style="list-style-type: none"> <li>• Provide for increased understanding and interpretation of the historic environment?</li> <li>• Secure a supply of local building and roofing materials?</li> </ul>  |   |
| <p>The policies, plans and programmes should include the Ancient Monuments and Archaeological Areas Act 1979 and the Planning (Listed Buildings and Conservation Areas) Act 1990 and explain what key issues and considerations for the historic environment (including obligations on local authorities as regards the historic environment) arise from this legislation.</p>   | <p>These has been now been included in the review of policies, plans and programmes.</p>  |
| <p>As regards the baseline information, it is important that the historic environment is broadly defined. All designated historic assets and their settings should be considered, together with potential impacts on non-designated features of local historic or architectural interest and value since these can make an important contribution to creating a sense of place and local identity. We would also draw your attention to the need to tailor the information to the scale of the Plan, for it to describe the current and future likely state of the historic environment, and for it to allow meaningful conclusions to be drawn.</p> | <p>The baseline information has been updated to include the heritage assets that may be affected by the MWLP.</p>   |
| <p>Section 3.3 of the Sustainability Appraisal of the Consultation Draft refers to the baseline information in the most recent Scoping Report, which largely just sets out the designated assets in the County, with no indication of their location. There is little reference to the condition of heritage assets or the historic environment in the County (although it is noted that some areas have particularly experienced the cumulative impact of development).</p>   | <p>There is a map showing the location of cultural heritage designations in Oxfordshire. The baseline information refers to the English Heritage ‘heritage at risk’ list.</p>                                     |
| <p>More crucially, the SA does not specifically identify the historic environment baseline for each of the areas of search. The Assessment Matrix in Appendix D only does this very superficially.</p>   | <p>The baseline information has been updated to include the heritage assets that are located within the Strategic Resource Areas.</p>   |
| <p>In Table 4-1, we agree that minerals and waste development could result in the loss or destruction of some of the historic assets of the County, although neither geological SSSIs nor Local Geology Sites are historic assets.</p>   | <p>Noted and amended.</p>   |
| <p>We welcome and support, in principle, Sustainability Appraisal Objective 2 for its inclusion of the conservation and enhancement of the historic environment, but we would suggest that it be an objective in its own right. The English Heritage guidance suggests a specific sustainability appraisal objective of “conserve and enhance the historic environment, heritage assets and their settings”, which we would prefer. This would allow for more refined Sub-Objectives (or decision-making criteria).</p>  | <p>The SA objectives have been updated to provide separate objectives for landscape and the historic environment. The objective recommended by English Heritage is now Objective 2b in the updated framework.</p> |
| <p>The Assessment Matrix in Appendix D of the SA report indicates, under “Likely Effect” that Policy M3 would have some positive and some negative effects in relation to SA Objective 2, but all the effects identified under “Justification and Evidence” are potentially adverse or negative. It is very difficult therefore to understand what positive effects there might be!</p>  | <p>The assessment for Policy M3 has been updated and so this comment is no longer applicable.</p>   |
| <p>We welcome the “number/percentage of planning applications where archaeological investigations were required</p>  | <p>This indicator has now been added to the SA</p>  |



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| <p>prior to approval”, “number/percentage of planning applications where archaeological mitigation strategies were developed and implemented” and “number/percentage of permitted applications for Minerals and Waste development which include conditions for the protection or enhancement of the historic and prehistoric environment in Oxfordshire” as potential indicators identified in Table 8-1, although these relate to mitigation rather than direct effects. We therefore suggest that indicators be included that would actually monitor the effects of the Strategy on heritage assets e.g. “Area of highly sensitive historic landscape characterisation type(s) which have been altered and their character eroded”.</p>  | <p>Framework</p>   |
| <p>Paragraph 6.3.2 implies incorrectly that effects on heritage would be temporary and can even then could be avoided or mitigated, whereas in fact loss of archaeological heritage and historic landscape character is permanent. It fails to refer to policy C9 and also to consider the fundamental principle stated in paragraph 126 of the NPPF that LPAs “should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.”</p>  | <p>The SA Report (paragraph 6.3.3.) has been updated to reflect the fact that some impacts on heritage assets are permanent and to cross-reference to the mitigation provided by Policy C9.</p>  |
| <p><b>Natural England</b></p>  |  |
| <p>The following comments were made with regard to the Sustainability Appraisal:<br/>In the NTS, the key Sustainability Issues and Options in Oxfordshire do not include landscape protection, despite this potentially being a key constraint on siting development especially with respect to the AONBs. We advise you consider whether this should be added as a key issue.</p>   | <p>The importance of protecting the AONBs and the constraint that they provide to siting development are now reflected in the issues and opportunities section of the SA Report.</p>   |
| <p>We are not clear about the potential monitoring indicator “Minerals and Waste development which include conditions for the protection or restoration of statutory or non-statutory landscape designations.” As it is better to avoid impacts, and there is no certainty that conditions will be fully effective to fully mitigate impacts, it seems this indicator could be improved on. Perhaps an indicator such as “Minerals and Waste development where the anticipated residual landscape impact is neutral or positive” would be better.</p>  | <p>The suggested indicator has now been added to the SA Framework.</p>   |
| <p><b>Oxfordshire Architectural and Historical Society and Oxfordshire City and County Archaeological Forum (Joint Response)</b></p>   |  |
| <p>The SA/SEA report does not meet the requirements of the SEA Regulations and as such demonstrates that the Plan has not been developed with an adequate understanding of or consideration for the environmental sensitivities of the Areas of Search that the Plan promotes.</p> <p>The SA/SEA report on the Draft Core Strategy fails to identify and describe the real effects that the Strategy will have on the historic environment. The report is so deeply flawed that we further wish to object to the draft Strategy on the basis that its development has not been informed and supported by a properly iterative Strategic Environmental Assessment.</p> <p>The direct statutory requirement for SEA outweighs the guidance that ministers have issued regarding sustainability appraisal – but as with almost all such documents this is an SA that has sought to be correlated with SEA</p> | <p>The following aspects have all been updated to provide a more robust assessment of the impacts on the historic environment:</p> <ul style="list-style-type: none"> <li>-Baseline information now provides more detail on the heritage assets that may be affected by the Core Strategy;</li> <li>A separate SA Objective covering heritage has now been included in the framework;</li> </ul> |

requirements, not an SEA report that also fulfils SA needs.

The falls well short of the requirements of the SEA Directive in every respect of what the SEA Regulations require. It betrays a fundamental misunderstanding of the difference between the SA approach of comparing objectives with policies and the prediction of likely real effects on the environment that SEA requires. Like many deeply flawed SAs there is more coverage of Historic Environment issues in the strategy itself than this appraisal: and the crucial issues – that the Areas of Search should exclude major scheduled monuments and other key heritage assets; and the major cumulative impact on Oxfordshire’s archaeology from ongoing mineral extraction in areas already decimated by gravel working has not been addressed or taken into account as a strategic choice.

A detailed assessment of the severe shortcomings of the SA in respect of heritage issues is presented in the appendix. While this might appear technical, it highlights how little serious attention has been given to this important aspect of Oxfordshire’s environment. Many of these criticisms are methodologically generic and apply equally to other issues, and overall represent such a flawed approach that the Strategy itself may prove unsound.

The assessment methodology has been updated to provide a more detailed assessment of the policies in the Core Strategy,

-The Review of Plans, Policies and Programmes now includes heritage relevant legislation such as: UNESCO World Heritage Site Convention (1972); The Convention for the Protection of the Architectural Heritage of Europe (Granada Convention); Ancient Monuments and Archaeological Areas Act 1979 (as amended); Circular on the Protection of World Heritage Sites 07/2009; English Heritage Policy Statement: Mineral Extraction and the Historic Environment Consultation (EH, 2012); Heritage Protection Bill (Govt White Paper, Heritage for the Twenty First Century); Mineral Extraction and Archaeology: A Practice Guide (June 2008); National Heritage Protection Plan (English Heritage); Planning (Listed Buildings and Conservation Areas) Act 1990; PPS5 Planning for the Historic Environment – Practice Guide (DCLG, 2010); UK Government’s Statement on the Historic Environment for England (2010); and Strategy for the Historic Environment: Heritage Counts English Heritage 2014.

The SA coverage of heritage legislation is seriously deficient:

It does NOT identify a key relevant international convention (UNESCO World Heritage) or any current national heritage legislation (Ancient Monuments 1979, National Heritage 1983, Listed Buildings and Conservation Areas 1990) or associated Regulations which impose consent procedures and specific duties on Local Authorities in dealing with applications that affect ancient monuments and the setting, character and appearance of listed buildings and conservation areas and World Heritage Sites).

It does NOT explain what key issues and considerations for the historic environment arise from such legislation and policy in terms of constraints on search areas and future allocations.

The SA also fails to refer to or indicate the implications of other plans (especially housing and the central Oxford Growth Area) for demand in minerals.

See comment above

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| <p>The baseline description of the historic environment is entirely inadequate and does not indicate what scope of baseline data will be gathered or what methods will be used to predict archaeological potential to allow the effects of options to be compared.</p> <p>It does NOT identify all key historic environment resources that should inform future allocations and proposals (Historic Environment Record; National Monuments Record; including National Mapping Programme; emergent HLC; CA appraisals; WHS management plan etc. etc.)</p> <p>It does NOT identify or discuss issues of the different ways in which the historic environment would develop in each of the areas of search – not even drawing out the stark differences between areas already subject to a long history of mineral extraction and waste disposal from those that do not.</p>  | <p>The baseline information has been updated. In particular it now identifies the relationships between heritage assets and the Strategic Resource Areas. Information is also provided on where potentially important archaeological constraints exist.</p>  |
| <p>The SA report does NOT identify the baseline historic environment for the ‘areas of search’ identified in the strategy, except as very broad brush total numbers of assets for the county as a whole with no indication of the geographical location.</p> <p>The tabulated appraisal matrices in Appendix D attempts to indicate the heritage of the areas affected but only at a very superficial incomplete level – for example the baseline AND impact assessment AND suggested mitigation for all the areas of search for sharp sand and gravel extraction is covered in just 299 words. Similar or much shorter coverage is the pattern for other policy objectives. Indeed, these tables vary considerably in whether or not they cover heritage aspects and are very incomplete and vague about what is mentioned.</p> <p>The SA does NOT identify or map areas of heritage importance within the areas of search identified in the strategy, although they include several scheduled monuments, and other important archaeological sites, numerous conservation areas, many listed buildings and their settings</p> | <p>The SEA baseline now identifies the baseline historic environment that are located within the Strategic Resource Areas identified in the strategy.</p> <p>The assessment of heritage and historic environment is now in line with other policy objectives as it is an independent SA objective.</p> |
| <p>This requirement is not restricted to “areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC”. There is no analysis (or proposed analysis) of particular problems for the historic environment though they are numerous and raise particular issues, especially in terms of interactions with other topics – e.g. potential dewatering of well preserved nationally important archaeology; or the major effects in terms of cumulative loss of nationally important archaeology in areas such as the lower Windrush valley and Cassington).</p>  | <p>The assessment considers those potential effects that can be identified at the level of a Core Strategy.</p> <p>The SA of the Site Allocations Document will need to effects at a greater level of detail, including the cumulative effects that may result from groups of sites.</p>               |
| <p>For the historic environment, environmental protection objectives were not adequately defined at the scoping stage ; no attempt yet to show explicitly how those objectives will be taken into account in any assessment of site allocations. There is also clear evidence that such considerations have NOT been taken into account during the preparation of the strategy since the areas of search include several very large scheduled ancient monuments, including Northfield Farm Long Wittenham where mineral extraction was disallowed by a planning inquiry</p>  | <p>The SA framework has been amended to have a separate SA Objective ‘to conserve and enhance the historic environment, heritage assets and their settings’.</p> <p>The criteria for assessment are now as follows:</p>  |

- Will the Plan conserve and/or enhance heritage assets and the historic environment?
- Will the Plan contribute to the better management of heritage assets?
- Will the Plan improve the quality of the historic environment?
- Will the Plan respect, maintain and strengthen local character and distinctiveness?
- Will the Plan provide for increased access to and enjoyment of the historic environment?
- Will the Plan alter the hydrological conditions of water-dependent heritage assets, including paleo-environmental deposits?
- Will the Plan provide for increased understanding and interpretation of the historic environment?
- Will the Plan secure a supply of local building and roofing materials?

With the following indicators:

Number/percentage of planning applications where archaeological investigations were required prior to approval.

Number/percentage of applications where archaeological mitigation strategies were developed and implemented.


Number/percentage of permitted applications for Minerals and Waste development which include conditions for the protection or enhancement of the historic and prehistoric environment in



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|---|---|
|   | <p>Oxfordshire.</p> <p>Area of highly sensitive historic landscape characterisation type(s) which have been altered and their character eroded</p> <p>These will be taken forward to the site allocation stage.</p>   |
| <p>Likely significant effect (should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)</p> <p>This is not attempted in the main report, and the scoping report does not make clear how these different kinds of effects will be identified for the historic environment. The inadequacies of the baseline information and policy framework means that these matters the assessment is inevitably inadequate.</p> <p>In so far as this is attempted in the assessment matrices, they seek to simplify negative positive neutral or uncertain effects into a single tick-box for multiple aspects of the environment that have very different effects. There is no attempt to identify types of effect known from past experience to have occurred in the search areas;</p> <p>Even at a generic level the SA report does NOT describe the full range of likely effects that are well-known to arise from minerals extraction and waste disposal; it does NOT even attempt to distinguish how those effects differ as between these very different types of development</p> <p>It does NOT describe any beneficial effects likely to arise from the strategy (e.g. supply of stone for historic building restoration)</p> <p>It attempts only at the most superficial level to identify a few examples of synergistic effects and impact interactions though hardly any heritage related examples, and fails entirely to indicate which are most likely to be significant or why. Examples not covered include archaeology/hydrology; ecology/ archaeology/ landscape; built heritage/ visual/ landscape; the synergistic character of effects on the setting of heritage assets and places – e.g. including traffic dust and odour; climate/ conserving encapsulated energy/ heritage conservation. )</p> <p>It does not attempt to describe which well known generic types of effect are permanent (e.g. loss of archaeology) and which are temporary or long term (e.g. intrusion on built heritage from plant that will be removed in a few years)</p> <p>The requirement of the SEA Regulations to address cumulative effects is especially pertinent but the SA has failed to consider it in the light of EC definition as “Impacts that result from incremental changes caused by other past, present or reasonably foreseeable actions together with the [plan].”</p> <p>i) the effects of options in combination with past and reasonably foreseeable future minerals exploitation –</p> | <p>The assessment methodology has been adjusted so that heritage and the historic environment has its own SA objective, and effects are considered in terms of their temporal scale, spatial scale, reversibility and permanence. This gives a more robust assessment of the effects on the historic environment as a result of the Plan.</p> <p>The baseline information and policy framework have been updated to better reflect the current situation with regards to the historic environment in Oxfordshire.</p> |

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| <p>especially in areas where major losses of archaeological heritage and landscape have already occurred;</p> <p>ii) the effects of the minerals and waste strategy in combination with past and reasonably foreseeable future development of other kinds;</p> <p>iii) the cumulative cultural effect of the burden on hard-pressed county museum facilities to deal with the product of archaeological investigations and their long term preservation and display to the public</p>  |   |
| <p>The SA report and appendices make only very vague references to the need for mitigation and does not for example present a structured framework to indicate the implicit preferential hierarchy of preventing, reducing or offsetting effects. Since this is totally reliant on reliable identification of significant effects, as determined both by thorough baseline and full identification of likely effects, together with relevant policies the SA fails to propose effective measures.</p> <p>In addition, the known nature of the archaeological heritage in particular means that there is a substantial risk that significant unforeseen effects will occur. This means that a strategic mitigation strategy MUST provide policies for pre-determination evaluation, provision to prevent indirect effects caused by dewatering, and research frameworks and methodological protocols for archaeological investigation, reporting and archiving. Will also require a strategy and mitigation protocols for safeguarding the setting and amenity of historic places. Some of this is implicit in the Strategy but has not been applied in the SA to exclude highly sensitive areas form the Areas of Search.</p>  | <p>Following the consultation undertaken in 2014 the mitigation provided within the Plan has been enhanced.</p> <p>The SA of the Site Allocations Document will undertake a more detailed assessment on the potential effects associated with taking forward particular sites and groups of sites. This will need to provide a more detailed consideration of mitigation.</p>   |
| <p>At a high level, the SA does not clearly assess in any quantitative terms options for obtaining minerals by other means than extraction in Oxfordshire – notably greater reliance on marine minerals and recycled aggregates, although these are part of the Strategy. It does not explain how the proposed Areas of Search were selected or their boundaries drawn and what factors were considered in doing so – including why they include many highly sensitive heritage areas.</p> <p>To be effective any assessment requires a clear understanding of key effects and interactions, and the extent to which for different alternatives they might be addressed. The inadequacy of the heritage baseline, assessment of cumulative effects and strategic framework of mitigation proposals, means that the heritage can have had no influence on the choices made – as is evident from the inclusion of major heritage designations within the Areas of Search. Instead the appraisal assesses the chosen geographical options for siting new development (options 10 and 18) as positive because relevant policies will be applied, not what effects will actually be. Experience shows that while adverse effects might be reduced or offset by such policies – or even avoided, they will NOT be positive. This betrays a fundamental misunderstanding of the difference between the SA comparison of objectives and policies and the prediction of likely real effects on the environment that SEA requires.</p> <p>The account of difficulties encountered reveal a serious lack of expertise or experience in heritage matters on the part of the authors, but no understanding of genuine issues of assessment difficulty.</p> <p>The excuse that much uncertainty is down to not having final development sites is a standard means by which the</p> | <p>The SA work has undergone several iterations during the development of the Core Strategy (see Section 5 of the main report), with high level options on strategy having been considered during these stages.</p> <p>As described in comments above, the assessment methodology for the Proposed Submission Document has now been updated to provide a more detailed assessment of the potential effects on the historic environment and other SA topics.</p> <p>The planning and accompanying SA that will be undertaken during the development of the Site Allocations Document will provide further detailed assessment, in which the levels of uncertainty will be reduced given that individual locations, with known constraints and opportunities, will be being</p> |

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| <p>basic purpose of SEA is neutered: issues can only be assessed at project level. It also belies decades of experience of understanding and dealing with the very recurrent typical effects that are known at a generic level to arise from mineral and waste developments and how their different characteristics give rise to different but typical effects.</p>  | <p>considered.</p>   |
| <p>The proposed measures for monitoring the effects of the strategy on the historic environment are limited to the proportion/number of archaeological interventions which is entirely inadequate.</p> <p>There are no proposals for monitoring the effects of the strategy on the built heritage or historic landscape character, or people’s interaction with their heritage and its economic and social contribution.</p> <p>There are no proposals to monitor the effectiveness or otherwise of mitigation measures in relation to the SEA requirement to “avoid” and “reduce” rather than “offset” adverse effects, and no proposal to develop technical monitoring and actions that would be need to be developed to “avoid” and/or “remedy” indirect effects of dewatering on adjacent archaeological sites.</p> <p>The proposed measure relating to the number of archaeological interventions will only monitor the mitigation process (mainly reflecting offsetting action where significant effects have not been avoided, with no means of judging whether or not that was appropriate). There are no proposals to monitor how effectively significant effects are predicted and avoided; nor the cumulative qualitative archaeological impact on the county’s heritage or areas already subject to long term workings; nor the adequacy of mitigation measures to meet research objectives and public safeguarding of the results of investigations through museums and publication.</p> <p>Current identified ‘indicators’ for the achievement of historic environment objectives are thus very limited and will certainly not adequately cover the real effects that are most likely to be significant.</p> | <p>As described above the SA framework has been amended to have a separate SA Objective ‘to conserve and enhance the historic environment, heritage assets and their settings’. The criteria for assessment and proposed indicators have also been updated</p>   |
| <p>The NTS has utterly misrepresented the likely effects of the Strategy on the historic environment, stating “Whilst the operation of minerals and waste facilities has the potential to result in some adverse cumulative effects on local landscapes in the short-medium term, the measures in the common core policies along with the requirements of Policies W6 (Siting of waste facilities) and Policy M4 (Working of aggregate minerals) should help to avoid and mitigate these effects. The aim of the waste strategy to minimise waste arisings along with reducing the amount of waste sent to landfill will contribute towards the protection of local landscapes”</p> <p>This is not a nontechnical summary but a word-for-word transcription of paragraph 6.3.2 which supposedly deals with cumulative heritage and landscape effects. It implies incorrectly that effects on heritage would be temporary and can even then could be avoided or mitigated, whereas in fact loss of archaeological heritage and historic landscape character is permanent. It not only fails to refer to policy C9 but fails to consider the fundamental principle stated in NPPF para 126 that LPAs “should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.”</p> <p>Like the main report the NTS fails to identify the sensitivity of the historic built environment or the statutory constraints that apply beyond planning policy. By wrapping up heritage with landscape as if it were one issue the</p>   | <p>The SEA has been amended to consider ‘Landscape’ and ‘Historic Environment’ as two separate objectives (SA2a and SA2b). These are distinct objectives- the numbering is to avoid confusion with previous rounds of assessment that would potentially happen if all objectives were to be numbered differently.</p> <p>The assessment methodology has been updated to provide a more detailed assessment of plan elements against objectives. The assessment now includes the reversibility of effects and the permanence of effects. Where appropriate, effects for heritage and the historic environment have been identified as irreversible and permanent. Policy C9 has been referred to in relation to</p> |



NTS (like the main report) utterly fails to distinguish differences in the likely significance of effects.

mitigation of effects.



## B.4 Sustainability Appraisal of the Oxfordshire Minerals and Waste Local Plan: SA Report (August 2015) - Consultation Responses

As a result of the consultation on the Publication Core Strategy four representations were made in relation to the SA Report. These were all received from Suzi Coyne Planning on behalf of the following companies:

- Sheehan Haulage and Plant Hire Ltd (Representation no. 113/ac);
- M & M Skip Hire Ltd (Representation no. 114/ac);
- David Einig Contracting Ltd (Representation no. 115/ac); and
- Mckenna Environmental Ltd (Representation no. 116/ac).

The content of the four representations was identical with respect to the SA Report and so for the purposes of this Appendix have been treated as a single response. The response was provided as a 14 page document. This has not been reproduced in full in this Appendix, but instead a summary of the response has been provided under the relevant headings in the representation.

**Table B-4: Summary of the Consultation Responses on the August 2015 SA Report**

| Summary of comments  | How the comments have been taken on board  |
|--|--|
| <b>Suzi Coyne Planning on behalf of Sheehan Haulage and Plant Hire Ltd; M &amp; M Skip Hire Ltd; David Einig Contracting Ltd; and Mckenna Environmental Ltd</b>  |  |
| <p><u>Inadequate appraisal of the likely significant environmental effects of implementing the Plan</u></p> <p>The chief problem is the failure to identify and assess “opportunities lost” of other alternatives through adopting waste arisings figures, recycling targets and site capacities, which are too low, and a too restrictive locational approach.</p> <p>There have also been a significant number of material changes in the Plan to the approaches adopted in previous versions, and the effects of these changes have not been properly addressed. For example, whilst both approaches might have been assessed individually at different times against the SA objectives, there is no evaluation in the SA report of the different approaches in comparison to each other to determine whether one of them performs better than the other, and therefore no explanation as to why the selected option in the Plan is the most appropriate.</p> <p>The representation includes specific comments relating to the following topics/policies:</p> | <p>During the development of the Core Strategy a wide range of options has been considered for delivering the plan objectives across the full range of planning issues within the scope of the Core Strategy. At each stage the SA has undertaken an assessment of the likely effects of the Core Strategy against the framework of SA Objectives that was developed at the beginning of the process and updated to take account of consultation comments. The findings of the SA have been taken into consideration at each subsequent stage of plan development. Where minor changes were made to policies between different stages and where it was considered that the findings of the previous round of assessment remained unchanged, the previous assessment was carried forward to the next stage of SA.</p> |
| <ul style="list-style-type: none"> <li>• <u>Alternative Aggregates</u></li> </ul> <p>SA Report should have compared the approach of not having a target figure with the previous</p>   | <p>In his Interim Report (Examination document no. EX17) the Inspector has concluded that the figure of ‘at least’ or ‘a minimum of’ 926,000 tonnes</p>  |

|  |  |
|--|--|
| <p>approach of including a figure (at least 0.9 million tonnes).</p>   | <p>per annum should be incorporated in the revision of policy M1.</p> <p>At this stage in the development of Core Strategy there are not considered to be any reasonable alternatives to consider in relation to the figure to be included in the policy.</p>  |
| <ul style="list-style-type: none"> <li>• <u>Policy W2: CDE Waste Recycling Targets</u></li> </ul> <p>No appraisal has been conducted of the environmental effects (i.e. the benefit foregone) of choosing a reduction in target levels.</p>  | <p>During the preparation of the Core Strategy including Main Modifications, following the Examination hearings, alternatives relating to CDE waste recycling targets have been considered. These include the higher figures that were previously included in the February 2014 consultation draft.</p> <p>The assessments of the alternatives are provided in Appendix D to this SA Report Update. The reasons for selecting the alternatives and for choosing the preferred alternative are provided in Section 5 of this SA Report Update.</p>  |
| <ul style="list-style-type: none"> <li>• <u>Policy W4: The Locational Strategy for Waste Management Facilities</u></li> </ul> <p>There is no assessment or comparison in any of the SA reports following selection of the initial preferred option in 2011 of the different approaches then chosen, to explain why the new approach was now to be followed and why the previous proposals were no longer any good.</p>   | <p>During the preparation of the Core Strategy including Main Modifications, following the Examination hearings, a range of alternative strategies have been considered for the location of waste management facilities. These include the consideration of adding smaller towns as possible locations for non-strategic waste management facilities.</p> <p>The assessments of the alternatives are provided in Appendix D to this SA Report Update. The reasons for selecting the alternatives and for choosing the preferred alternative are provided in Section 5 of the main SA Report Update document.</p>   |
| <p><u>Failure to evaluate reasonable alternatives</u></p> <ul style="list-style-type: none"> <li>- ... whilst some reasoning is given as to the selection of the preferred approach going forward in the plan preparation process, full reasons have not been clearly given either for rejecting or selecting options</li> <li>- The report provides assessment matrices in an Appendix, which summarise how each option performs against the SA objectives, but does not identify any reasons for or come to any conclusions about selecting or rejecting alternatives.</li> <li>- no alternative options are considered for MSW recycling, MSW residual waste transfer or inert landfill, and no options are considered at all for MSW/C&amp;I waste composting/treatment or for non-hazardous landfill. Therefore for MSW recycling, MSW residual waste transfer and inert landfill no reasonable alternative spatial options have been considered and this is contrary to the SEA Directive and Regulations</li> </ul> | <p>Section 4 and Appendices 1 to 3 of the SA Report Addendum (April 2016) provided a summary of how alternatives have been considered during the development of the Core Strategy – in particular Appendix 3 included information previously included in the SA Report (March 2012) for the withdrawn Core Strategy.</p> <p>In addition, Annex A of the SA Report 2nd Addendum (August 2016) provides a summary of the alternatives that were considered throughout the development of the Core Strategy, including alternatives considered prior to 2012 in the development of the 2012 Core Strategy (Withdrawn). For each policy, the annex provides information on the reasonable alternatives that were considered, along with an outline of the reasons for selecting those alternatives, and then provides the reasons for choosing</p> |

- the options for recycling/transfer of MSW/C&I waste do not correspond to the spatial strategy now selected for the Plan, but there has been no comparison of the new preferred approach with these alternatives previously considered, or any reasons given in the SA report as to why they are no longer being pursued. Therefore the current Plan has not been subject to the correct SA process.

- alternative options were not always considered for all the policy elements, contrary to the SEA Directive and Regulations

- ... does not identify which alternatives should be preferred. The reasons for rejecting options, where alternatives are discussed, are also not identified.

- There is a comparison of the options, but no reasons for selecting or rejecting any particular option.

- it is apparent that in respect of waste management needs, the only alternatives that have been assessed relate to where new waste management infrastructure should be located, whether this should be done through identification of sites and/or locational criteria, and what size of sites should be provided. There has been no assessment of reasonable alternatives for other elements of the Plan, for example in relation to:

- Quantities and sources of waste to be managed;
- The levels that waste recycling targets should be set at;
- The level of provision for new waste management capacity that should be made to ensure that actual supply of the targeted recycling levels will be achieved;
- The options for recovery in permanent deposit of inert waste on land; and
- The options for safeguarding sites for waste management and mineral infrastructure.
- In addition no overall firm conclusions were actually reached with the exception of the approach to the provision of recycled/secondary aggregate.

#### Failure to give the reasons for the chosen proposals

Quite apart from the question of whether reasonable alternatives have at all been assessed, the outline reasons for the selection of any alternatives at any particular stage has not been clearly given, and there has been no discussion within the SA of why the preferred option came to be chosen, nor has there been any analysis on a comparable basis of the preferred option and selected reasonable alternatives. There is no evidence that these requirements have been met throughout the SA process and they are not apparent in the final SA report, which the judgements have ruled must be the case.

the preferred option and for rejecting other options.

This SA Report Update also summarises that information as well as providing details of how alternatives have been considered following the Examination hearings, during the preparation of the Core Strategy including Main Modifications.

#### Section 4 and Appendix 3 of the SA Report Addendum (April 2016)

provided additional information relating to how alternatives have been considered during the development of the Core Strategy – in particular Appendix 3 included information previously included in the SA Report (March 2012) for the withdrawn Core Strategy.

In addition, Annex A of the SA Report 2nd Addendum (August 2016) provides a summary of the alternatives that were considered throughout the development of the Core Strategy, including alternatives considered prior to 2012 in the development of the 2012 Core Strategy (Withdrawn).



|   |   |
|---|---|
|   | <p>For each policy, the annex provides information on the reasonable alternatives that were considered, along with an outline of the reasons for selecting those alternatives, and then provides the reasons for choosing the preferred option and for rejecting other options.</p> <p>This SA Report Update also summarises that information as well as providing details of the reasons for selecting the alternatives that have been included in the Core Strategy including Main Modifications.</p>   |
| <p>Moreover, it should not have been a case of having to look through former iterations of the SA to determine whether the SA had been carried out in accordance with the relevant planning and environmental assessment legislation.</p> | <p>In relation to the issues identified in the representation received, Section 5.1 of the SA Report Update (main document) provides the most notable of cross-reference to a former iteration. That cross-reference is to Appendix B of the Pre Submission SA Report (March 2012) (Examination document no. 9.14) which provides a summary of the options considered throughout the MWLP development up to 2012, with reasons being provided for selecting the preferred options/rejecting alternative options. It also provides a summary of the appraisal undertaken on the minerals spatial options (2010), the aggregates apportionment options (2011 and 2012), the waste spatial options (2011), other spatial options considered, and the minerals and waste preferred policies (2011).</p> <p>The information provided in that Appendix was copied into the SA Report Addendum (April 2016) and in addition it was summarised in Annex A of the SA Report 2nd Addendum (August 2016). It is also now incorporated into this SA Report Update, in Appendix C.</p> |

## B.5 Sustainability Appraisal of the Oxfordshire Minerals and Waste Local Plan: Consultation Responses

### Minerals and Waste Local Plan: Part 1 (Core Strategy): Consultation on Additional Documents May 2016

#### Summary of Responses

The following section provides details of the consultation on the SA Report Addendum in April/June 2016. The list below shows who was consulted, while the table that follows shows who responded, provides a summary of their response and the action taken in response. This information has been reproduced from Section K of Examination document no. 11.2.13.

The following organisations responded to the consultation on the SA Report Addendum in April/June 2016:

- OXAGE;
- Suzi Coyne Planning on behalf of Sheehan Haulage and Plant Hire, M&M Skip Hire Ltd., David Einig Contracting Ltd., and McKenna Environmental Ltd. NB; the same response was provided from each of these four organisations so have been treated as one response for the purposes of the SEA/SA response.

| Document Ref                                    | Summary Comment  | OCC response / How the comments have been taken on board  |
|---|--|---|
| <b>Sustainability Appraisal Report Addendum</b> |  |   |
| OXAGE (017/ac/5)                                | The SA does not evaluate the need to produce a single plan with sites against a two-stage process and any associated advantages/disadvantages of each approach.  | The role of SA is to consider the sustainability effects of a Plan and its reasonable alternatives during the various stages in the plan making process. There is no requirement to undertake SA on different approaches that the plan making process could take.   |
|   | The SA does not react to the changes introduced by the NPPF in 2012 for calculating the annual requirement rate by evaluating the alternatives of using a 10-year rolling average as opposed to the approach currently used.                   | In accordance with the NPPF the Council have based their LAA on a rolling average of 10 years sales data and other relevant local information. It is considered that there are no reasonable alternatives to this approach (see Section 5.4 and Appendix D of the SA Report Update).  |
|   | The SA effectively concludes that an environmental balance needs to be struck to reduce long-term pressures on West Oxfordshire. This appears to be a subjective or anecdotal conclusion rather than based on objective evidence and analysis. | The SA identified that rebalancing the geographical split in extraction, so that there will be increased working in South Oxfordshire close to areas of housing and economic growth, will have sustainability benefits as it will reduce the distances needed to transport aggregates.<br><br>Any resulting reduction of working in West Oxfordshire would reduce the cumulative impacts in that part of the County. Such conclusions are not |

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|--|---|---|
|  |   | anecdotal.  |
| Sheehan Haulage and Plant Hire Ltd. (113/ac/6) | The SA Report Addendum is not a new exercise providing a more detailed appraisal of the alternatives (and is therefore not the type of addendum endorsed by the 'Cogent case').   | The SA Report Addendum was prepared in order to improve the clarity of the information provided in the previous rounds of reporting and to aim to avoid the need for a 'paper chase'.   |
| M&M Skip Hire Ltd. (114/ac/5)                  | The assessment of alternatives for policies has not been undertaken since 2012. As this is the preparation of a new local plan the alternatives should have been identified and assessed and therefore the plan is not legally compliant.   | Whilst in procedural terms the Core Strategy is a 'new plan', in practice it is an evolution of the previously withdrawn Core Strategy and therefore the work undertaken in developing that Core Strategy, including the consideration of options in the SA process, remains relevant and valid.  |
| David Einig Contracting Ltd. (115/ac/5)        | The SA does not consider the consequences of changing from a single plan approach with no site allocations to a two part plan.  | This is a procedural issue. There is no requirement to undertake SA on the plan making process.   |
| McKenna Environmental Ltd. (116/ac/5)          | Assessing strategies in isolation does not satisfy the SA requirements that meaningful comparisons of reasonable alternatives are made, to ensure that the preferred approach is the most appropriate.  | Options have been considered at several stages during the plan making process and have been assessed to the same level of detail at each stage. The draft 2014 Plan and the 2015 Publication Minerals and Waste LocalPlan Part 1 – Core Strategy (that has now been submitted) took forward the preferred approach from the withdrawn 2012 Core Strategy. The approach has been updated but not to a degree where new alternatives were considered.                   |
|  | Reasonable alternatives need to be considered for all policies.   | The SEA Regulations and Guidance do not require alternatives to be considered for all policies.<br><br>For some policies in the Core Strategy 'reasonable alternatives' were not identified and therefore options were not considered (see Section 5 and Appendix C of the SA Report Update).   |
|  | In Appendix 2 the SA commentary for the 2014 Consultation draft in the sheet for Sharp Sand and Gravel refers to "the site allocations stage" yet at that point in time there was not to be a site allocations plan.  | This was an error. It should have referred to the "planning application stage".   |
|  | Table 2 does not provide the reasons why alternatives were rejected.<br><br>Table 2 does not provide specific details for the actual policy options, but just says that 'options were considered'.<br><br>Appendix 3 does not give clear reasons for rejecting alternatives (where they are considered) and provides no conclusions on the overall sustainability of the different options. | Table 2 was developed to provide a summary of how the policies were developed.<br><br>As specified in Section 4.2 of the SA Report Addendum the details of the options considered were provided in Appendices 1-3 of the SA Addendum (April 2016), including reasons for selecting or rejecting options.<br><br>Section 5 and Appendices C and D of the SA Report Update provide further information on the consideration of options during the plan making process . |



|  |   |   |
|--|---|---|
|  | <p>The Sustainability Appraisal Addendum does not provide any additional evidence to prove that the requirements of the SA process have been met.</p> | <p>The SA Report Addendum was prepared under the assumption that whilst in procedural terms the Core Strategy is a 'new plan', in practice it is an evolution of the previously withdrawn Core Strategy. It was therefore not considered necessary to provide additional evidence beyond that included in the SA Report (August 2015), further clarified in the SA Report Addendum.</p> |
|--|---|---|

## Appendix C Development of the Local Plan

### Introduction

This appendix provides information on the alternatives considered during the development of the Core Strategy, adding detail to the information provided in Section 5 of the SA Report Update.

The information provided in Appendix C1 is based on Annex A of the SA Report 2<sup>nd</sup> Addendum (August 2016). It provides information up to the Submission stage of the plan-making process. For each policy, text boxes have been added to provide a summary of how the policy has been updated during the post-Examination Hearing stage (see Sections 5.3 – 5.6 of the main SA Report Update document for further details).

### Appendix C1: Consideration of alternatives during the development of the Oxfordshire Minerals and Waste Local Plan: Part 1 - Core Strategy

#### Minerals Strategy - alternatives

#### Policy M1: Recycled and Secondary Aggregate

##### 1.1.1 Purpose of the policy

The policy is required in order to ensure that there is sufficient capacity in the facilities for the production and/or supply of recycled and secondary aggregate to meet the MWLP objective of encouraging the maximum practical recovery of aggregate from secondary and recycled sources for use in place of primary aggregates.

##### 1.1.2 Reasonable alternatives considered

Two options for the target for the provision of capacity of facilities for recycled and secondary aggregates were considered in 2011. These options were:

- 0.67 mtpa (based on an average of two figures from Method 2 ('median past sales with smoothing') and Method 4 ('population proxy for demand') in the 2011 Local Aggregates Assessment (Atkins, January 2011); and
- 0.9 mtpa (based on the apportionment figure for Oxfordshire in Policy M2 of the 2009 South East Plan (SEP)) as well as being close to the Atkins Method 3 figure (0.88 mtpa) based on 'housing proxy for demand'.

##### 1.1.2.1 Reasons for selecting the alternatives considered

The 0.9 mtpa option was the 'starting point' on the basis that it was the figure in the 2009 South-East Plan (which was revoked in 2013 but still in force in 2011). The figure also exceeded the figures in the 2011 Atkins LAA which was seen as a positive step toward maximising the supply.

0.67 mtpa was considered to be a reasonable alternative as it more closely aligned with levels that were considered to be achievable at that time. It was therefore subject to SA alongside the 0.9 mtpa figure. This lower figure reflected the Council's view at that time, that 0.9 mtpa could be an unrealistically high figure in terms of what could actually be produced in Oxfordshire.



### **1.1.3 Reasons for choosing the preferred option and for rejecting other options**

The preferred option selected for consultation in the Minerals Planning Strategy Consultation Draft (September 2011) was for provision to be made to enable the supply of at least 0.9 mtpa of secondary and recycled aggregates. The SA Report (July 2011) (Examination doc. No. 9.7) concluded that Option 2 (0.9 mtpa) would have a greater beneficial effect on promoting efficient use of natural resources.

The target of 0.67 mtpa was rejected as it was not considered to have the same level of sustainability benefits as the higher level of 0.9 mtpa, particularly in relation to the promotion of the efficient use of natural resources.

In the Draft Core Strategy (February 2014) the target for provision of capacity was removed as it was considered that a target was no longer appropriate (following the revocation of the SE plan from which the target was taken) but rather Policy M1 should seek to maximise the contribution to aggregate supply from recycled and secondary material sources, with the updated policy in effect enabling an unlimited level of new recycling capacity to be provided, subject to demand and only at locations that meet the criteria in Waste Planning Strategy Policies W4, W5 and Core Policies C1-C11.

For the 2015 Publication, the policy was updated to provide more detail on sources of recycled and secondary materials and where facilities should be located, but the fundamentals remained unchanged (i.e. that sufficient capacity could be provided to meet demand).

The final policy was selected as it encourages and enables the contribution of recycled and secondary aggregates, to help meet the demand for aggregate mineral in Oxfordshire, to be maximised, but without needing a target figure for provision of capacity to enable this to happen. The sustainability appraisal supported the approach to maximise the contribution to aggregate supply from recycled and secondary aggregates, although it noted that the nature of any adverse impacts will depend to a large extent on the location of sites for recycled and secondary aggregate facilities.

The inclusion of a target figure in the policy was rejected as an approach as it was felt to be unnecessary for achieving the Core Strategy objective of maximising the practical recovery of aggregate from secondary and recycled sources.

#### **■ Post-Examination Hearing consideration of alternatives**

No additional reasonable alternatives for this policy have been considered (see Section 5.4 of the main SA Report Update document).

## **Policy M2: Provision for working aggregate minerals**

### **1.1.4 Purpose of the policy**

Policy M2 makes provision for an adequate supply of sharp sand and gravel, soft sand and crushed rock in order to meet the Minerals Planning Objectives and also to meet the requirement in national policy and guidance for the provision to be made for the maintenance of landbanks for sand and gravel and crushed rock.

## **1.1.5 Reasonable alternatives considered**

### **1.1.5.1 Sharp sand and gravel**

A range of options for sharp sand and gravel provision have been considered, these changing over time to reflect the findings of subsequent Local Aggregate Assessments and the changing contexts and circumstances in which these have been developed.

Where the LAA provided levels of provision for Sand and Gravel, these figures were sub-divided between 'sharp sand and gravel' and 'soft sand' on the basis of the recent past production at the time using the following proportions, 80% sharp sand and gravel, 20% soft sand.

Three sharp sand and gravel provision options were considered in 2011, as follows:

- Option 1: 1.01 mtpa (based on an average of Atkins 2011 LAA Method 2 and Method 4)
- Option 2: 1.24 mtpa (based on an Atkins 2011 LAA Method 1 and Method 3)
- Option 3: 1.46 mtpa (based on SE Plan apportionment figure)

Details of the spatial assumptions for these three options were provided as follows:

- Option 1 was based on working 1.01 mtpa in the existing areas of Lower Windrush Valley (LWV), Eynsham/Cassington/Yarnton (ECY), Caversham and Sutton Courtenay. The Sutton Courtenay area is expected to cease production around 2020. The Cholsey area would be brought in to production post 2020.
- Option 2 was based on working 1.24 mtpa in the existing areas of LWV, ECY, Caversham and Sutton Courtenay and Cholsey. Post 2020, additional production would be required following the closure of Sutton Courtenay. This option proposes to either bring Clifton Hampden or Stadhampton in to production during this period.
- Option 3 was based on working 1.46 mtpa in the existing areas of LWV, ECY, Caversham, Sutton Courtenay and Cholsey. To meet the higher provision level, working in either Clifton Hampden or Stadhampton would be required before 2020 and both areas would be brought into production post 2020.

Option 1 was chosen as the preferred option for inclusion in the Minerals Planning Strategy Consultation Draft (September 2011). This was based on the figure from the then most recent Local Aggregate Assessment (Atkins, January 2011).

The other options were rejected as they would have provided for more sharp, sand and gravel than that supported by the most recent evidence at that time (the 2011 LAA) and they would have resulted in greater overall negative environmental impacts than Option 1. In particular, Option 3 would have resulted in working in more areas early on in the plan period which meant it was more likely to have more sustainability impacts in the short, medium and longer term.

Option 1 (1.01 mtpa) was therefore carried forward into the 2012 Publication Core Strategy (withdrawn).

In the 2014 Draft Core Strategy the specific figure for provision was removed as the policy was amended to be based on the requirement identified in the most recent Local Aggregate Assessment. The 2013 LAA had this requirement as 0.81 mtpa for sharp sand and gravel.

In the 2015 Publication Core Strategy the same principle was used. The 2014 LAA had a figure of 1.015 mtpa for sharp sand and gravel.

### 1.1.5.2 *Soft sand*

Three soft sand provision options were considered in 2011, as follows:

- Option 1: 0.25 mtpa (based on an average of Atkins 2011 LAA Method 2 and Method 4)
- Option 2: 0.31 mtpa (based on an Atkins 2011 LAA Method 1 and Method 3)
- Option 3: 0.36 mtpa (based on SE Plan apportionment figure)

The options were all based on concentrating production in the three existing areas (South east of Faringdon; Tubney/Marcham/Hinton Waldrist; and Duns Tew).

Option 1 was chosen as the preferred option for inclusion in the Minerals Planning Strategy Consultation Draft (September 2011). This was based on the figure from the then most recent Local Aggregate Assessment (Atkins, January 2011).

The other options were rejected as they would have provided for more soft sand than that supported by the most recent evidence (the 2011 LAA) and they would have resulted in greater overall negative sustainability impacts than Option 1.

Option 1 (0.25 mtpa) was therefore carried forward into the 2012 Publication Core Strategy (withdrawn).

In the 2014 Draft Core Strategy the specific figure for provision was removed as the policy was amended to be based on the requirement identified in the most recent Local Aggregate Assessment. The 2013 LAA had this requirement as 0.19 mtpa for soft sand.

In the 2015 Publication Core Strategy the same principle was used. The 2014 LAA had a figure of 0.189 mtpa for soft sand.

### 1.1.5.3 *Crushed rock*

Three crushed rock provision options were considered in 2011, as follows:

- Option 1: 0.63 mtpa (based on an average of Atkins 2011 LAA Method 2 and Method 4)
- Option 2: 0.81 mtpa (based on an Atkins 2011 LAA Method 3)
- Option 3: 1.00 mtpa (based on SE Plan apportionment figure)

The options were all based on concentrating production in the three existing areas (North of Bicester; South of A40 near Burford; and South east of Faringdon).

Option 1 (0.63 mtpa) was chosen as the preferred option for inclusion in the Minerals Planning Strategy Consultation Draft (September 2011). This was based on the figure from the then most recent Local Aggregate Assessment (Atkins, January 2011).

The other options were rejected as they would have provided for more crushed rock than that supported by the most recent evidence (the 2011 LAA) and they would have resulted in greater overall negative environmental and community effects than Option 1.

Option 1 was therefore carried forward into the 2012 Publication Core Strategy (withdrawn).

In the 2014 Draft Core Strategy the specific figure for provision was removed as the policy was amended to be based on the requirement identified in the most recent Local Aggregate Assessment. The 2013 LAA had this requirement as 0.47 mtpa for crushed rock.

In the 2015 Publication Core Strategy the same principle was used. The 2014 LAA had a figure of 0.584 mtpa for crushed rock.

#### **1.1.5.4** *Reasons for selecting the alternatives considered*

The reasonable alternatives were selected as they reflected the most recent evidence available at that particular stage in the planning process.

Given the switch of approach towards relying on the most recent LAA to provide the figures for provision of sharp sand and gravel, soft sand, and crushed rock, no other reasonable alternatives for levels of provision have been identified more recently than those that were considered in 2011.

#### **1.1.6** *Reasons for choosing the preferred option and for rejecting other options*

The SA/SEA of the options (July 2011) found that Option 1 for each aggregate type would have the least impact in terms of impact on road infrastructure and on requiring new areas of working and these were therefore chosen as the preferred options. The greater potential impacts from Options 2 and 3 meant that they were rejected.

The final policy approach has moved away from providing specific figures for provision and instead provides for land-won aggregate supply from Oxfordshire in accordance with the most recent Local Aggregate Assessment (as required by the NPPF) and provides for landbanks of reserves with planning permission to be maintained, again based on the most recent Local Aggregate Assessment.

The policy approach chosen enables the policy to remain flexible in responding to changes in demand, rather than including a figure that could quickly become obsolete in changing economic conditions – which is the reason from moving away from such an approach.

#### **■ Post-Examination Hearing consideration of alternatives**

No additional reasonable alternatives for this policy have been considered (see Section 5.4 of the main SA Report Update document).

### **Policy M3: Principal locations for working aggregate minerals**

#### **1.1.7** *Purpose of the policy*

The purpose of Policy M3 is to identify the broad locations (strategic resource areas) within which the extraction of minerals is likely to be able to take place acceptably. It will be through the subsequent Site Allocations Document that sites within these strategic resource areas will be allocated, taking into account all the other relevant policies of the Core Strategy.

#### **1.1.8** *Reasonable alternatives considered*

The reasonable alternatives considered for the principle locations for working sharp sand and gravel, soft sand, and crushed rock are detailed in the following sub-sections.

##### **1.1.8.1** *Sharp sand and gravel*

During the initial consideration of options in 2009, 17 potential resource areas for sand and gravel were identified. One area (RAS 12 – Sutton Courtenay) was subsequently subdivided along the River Thames to create an 18<sup>th</sup> area (Culham/Clifton Hampden). Of these, 7 potential resource areas were discounted for reasons relating to the poor quality of the resource and deliverability issues. The reasons for including or discounting the areas from the subsequent planning stages are provided in Appendix 1 of the SA Addendum (April 2016).

During the development of this policy, a range of options were then considered, including the concentration on different new and existing working areas across the county, as well an option for dispersed working. The different strategies considered in 2010 were as follows (SA of Initial Options May 2010):

### 1. The Concentration Strategy

This option was further broken into the following three options:

1a) Concentrate working to the north west of Oxford, in the Lower Windrush Valley, Stanton Harcourt, Eynsham and Cassington areas;

1b) Concentrate working to the south east of Oxford, in Radley, Sutton Courtenay, Culham, Dorchester, Warborough and Benson areas; or

1c) A combination of options 1a and 1b, concentrating working in both.

### 2. The Dispersal Strategy

This option sought to spread working areas across a number of areas to maximise the proximity of mineral supply to markets: Lower Windrush Valley, Stanton Harcourt, Eynsham, Cassington, Faringdon, Radley, Sutton Courtenay, Culham, Dorchester, Warborough, Benson, Wallingford, Cholsey and Caversham areas.

### 3. The Phased Strategy

This option sought to allow short term extensions to existing sites in the Lower Windrush Valley, Eynsham, Cassington, Faringdon, Radley, Sutton Courtenay and Caversham areas as well as long term planning for one or more new strategic sand and gravel working areas in one or more of the following areas:

- Clanfield – Bampton
- Culham
- Dorchester, Warborough, Benson
- Wallingford - Cholsey

Following consultation on the May 2010 options, in September 2010 additional strategy options were considered as follows (Revised Options SA Report September 2010):

#### Option 1: Concentration on Existing Working Areas

This option sought to concentrate sand and gravel working in areas where working was currently taking place or has taken place recently. This was a refinement of the previous Option 1c (May 2010) and included areas both to the west / north west and south / south east of Oxford. However, these were limited to areas around existing or recent sand and gravel working areas and included:

- Lower Windrush Valley (LWV);
- Eynsham/Cassington/Yarnton (ECY);
- Radley; and
- Sutton Courtenay.

#### Option 2: Concentration on New Working Areas

Many areas of existing working have experienced mineral extraction over a number of years, impacting on local communities and changing the local landscape. This option identified new areas where working would be concentrated, to replace existing areas of working. In the short term, while

the new areas are planned, some extensions to existing sites might be needed to maintain supply. The areas included in this option were:

- Clanfield/Bampton;
- Warborough/Shillingford/Benson (WBS);
- Cholsey;
- Sutton/Stanton Harcourt; and
- Culham/Clifton Hampden/Dorchester (CCD).

#### Option 3: Dispersed working

Working taking place within any of the areas of potential sand and gravel resource, so that it is a truly dispersed option. The areas included in this option were:

- Finmere;
- Clanfield/Bampton;
- Lower Windrush Valley (LWV);
- Eynsham/Cassington/Yarnton (ECY);
- Faringdon;
- Radley;
- Sutton Courtenay;
- Warborough/Shillingford/Benson (WBS);
- Cholsey;
- Caversham;
- Culham/Clifton Hampden/Dorchester (CCD); and
- Sutton/Stanton Harcourt.

In 2011 additional strategy options were considered as follows. These options were also relevant to Policy M2 in that they considered different levels of production as well as different spatial strategies. The assessments of these options were reported in the July 2011 SA Report.

Option 1 was based on working 1.01 mtpa in the existing areas of LWV, ECY, Caversham and Sutton Courtenay. The Sutton Courtenay area is expected to cease production around 2020. The Cholsey area would be brought in to production post 2020.

Option 2 was based on working 1.24 mtpa in the existing areas of LWV, ECY, Caversham and Sutton Courtenay and Cholsey. Post 2020, additional production would be required following the closure of Sutton Courtenay. This option proposes to either bring Clifton Hampden or Stadhampton in to production during this period.

Option 3 was based on working 1.46 mtpa in the existing areas of LWV, ECY, Caversham, Sutton Courtenay and Cholsey. To meet the higher apportionment level, working in either Clifton Hampden or Stadhampton would be required before 2020 and both areas would be brought into production post 2020.

Of these 2011 options, Option 1 was selected as the preferred option and this was included in the Minerals Planning Strategy Consultation Draft (September 2011). This was to undertake extraction at the following existing areas:

- Lower Windrush Valley (LWV)
- Eynsham/Cassington/Yarnton (ECY)

- Sutton Courtenay
- Caversham

plus a new area at Cholsey;

Following the consultation on the Minerals Planning Strategy Consultation Draft, further options were considered in early 2012 to consider alternative ways of achieving a reduction in provision from West Oxfordshire after 2020. The previously selected Option 1 was renamed Option 1a, with two additional options (1b and 1c) being considered, as detailed below:

Option 1a based on working in the existing areas of LWV, ECY, Caversham and Sutton Courtenay. The Sutton Courtenay area is expected to cease production around 2020. The Cholsey area would be brought in to production post 2020 but working would continue at the same rate from the sites in west Oxfordshire.

Option 1b would result in reducing working in the LWV (0.25 mtpa) and ECY (0.18 mtpa), with the difference made up from sites from Cholsey, Clifton Hampden and Stadhampton.

Option 1c would result in a reduced level of working in LWV (0.43mtpa), a cessation of working in ECY altogether (0.0mtpa), with the difference made up from sites in Cholsey, Clifton Hampden and Stadhampton.

A modified version of Option 1b, with continued provision from both LWV and ECY areas was taken forward as a basis for the minerals strategy in the proposed submission version of the Core Strategy (2012).

The preferred strategy taken forward in the 2012 Submitted Core Strategy (withdrawn) was to undertake extraction in the following areas:

- Lower Windrush Valley (LWV)
- Eynsham/Cassington/Yarnton (ECY)
- Sutton Courtenay
- Caversham

plus a new area at Cholsey.

In the 2014 Draft Core Strategy Policy M3 removed the specific reference to a new extraction area at Cholsey and instead included a wider area of search encompassing all the significant sharp sand and gravel resources in southern Oxfordshire. The 2014 Draft Core Strategy adopted a single-plan approach (unlike the two-plan approach from 2012) and included the following Areas of Search (which were identified using detailed maps) were included:

- Eynsham/Cassington/Yarnton (ECY)
- Lower Windrush Valley (LWV)
- NE of Caversham
- Thames Valley (Oxford to Goring Gap)

The 2015 Publication Core Strategy reverted back to taking a two-plan approach. The areas identified remained essentially as they were in 2014 consultation draft Core Strategy but were changed from areas of search to strategic resource areas within which sites would be identified in the site allocations document. The strategic resource areas covered the locations of the previous areas of search but were less defined and shown on a key diagram rather than having mapped boundaries. The principle locations for extraction would be within the following strategic resource areas:

- The Thames, Lower Windrush and Lower Evenlode Valleys area from Standlake to Yarnton
- Thames and Lower Thame Valleys area from Oxford to Cholsey
- Thames Valley – Caversham to Shiplake

### 1.1.8.2 *Soft sand*

There are more limited options for the locations of soft sand than for sharp sand and gravel and in 2009 only one potential area was identified (South West Oxfordshire). In response to consultation comments noting the presence of soft sand resources at Duns Tew, this was added as a second area, and both were considered for inclusion in the subsequent planning stages. Within these limitations, different options have been considered, including a single South West Oxfordshire resource area and different options for multiple resource areas.

The Sustainability Appraisal of Initial Options (May 2010 SA Report) considered the following option:

Plan for 0.309 million tonnes per annum (5.562 million tonnes to 2026) of soft sand (based on the SE Plan sub-regional apportionment) from a single soft sand resource area in the south west of the County.

Following consultation on the May 2010 option, in September 2010 an amended strategy option was considered as follows (Revised Options SA Report September 2010):

Plan for 0.309 million tonnes per annum (5.562 million tonnes to 2026) of soft sand (based on the SE Plan sub-regional apportionment) from soft sand resource areas in Duns Tew in the north of the county and two small areas located close to the A420 in the south west of the County.

The preferred option in the Minerals Planning Strategy Consultation Draft (September 2011) was to undertake extraction in the following existing areas:

- East and south east of Faringdon
- North and south of the A420 to the west of Abingdon
- Duns Tew

This strategy was taken forward into the 2012 Submitted Core Strategy (withdrawn) and was maintained in the Draft Core Strategy 2014 and the Publication Core Strategy 2015, although there were some name changes to the resource areas between these Plan versions.

### 1.1.8.3 *Crushed rock*

In 2009, four crushed rock resource areas were identified. The Cotswolds AONB and the ironstone resource were excluded and from the remaining two areas, three amended areas were taken forward for further consideration. There are more limited options for the locations for crushed rock than for sharp sand and gravel, however within these limitations different options were considered.

The Sustainability Appraisal of Initial Options (May 2010 SA Report) considered the following option:

Meeting the required provision by allowing crushed rock extraction in strategic areas in the:

- Witney-Burford area; and
- Chipping Norton - Bicester area

Following consultation on the May 2010 option, in September 2010 an amended strategy option was considered as follows (Revised Options SA Report September 2010):

Meeting the required provision by allowing crushed rock extraction in the:



- South of Burford area;
- East of River Cherwell, North of Bicester; and
- East/south east of Faringdon

The preferred option in the Minerals Planning Strategy Consultation Draft (September 2011) was that the principle locations for crushed working would be at the following areas:

- North of Bicester to the east of the River Cherwell
- South of the A40 near Burford
- East and south east of Faringdon

This strategy was taken forward into the 2012 Submitted Core Strategy (withdrawn) and was maintained in the Draft Core Strategy 2014 and the Publication Core Strategy 2015 although there were some name changes to the resource areas between these Plan versions.

#### ***1.1.8.4 Reasons for selecting the alternatives considered***

Minerals can only be extracted where they exist in the ground which limits the areas that can be considered as reasonable alternatives for the principle locations for working aggregate minerals. The process of selecting the locations which could be considered as reasonable alternatives for extraction was informed through engagement with stakeholders, for example the Mineral and Waste Stakeholder Forum, and through the consultation exercises undertaken on the emerging strategy (e.g. in Feb/Mar 2010, July 2010, September 2011, May 2012 and Feb 2014).

The alternatives were selected as they were seen to be the most appropriate locations to deliver the vision and objectives of the mineral strategy.

#### ***1.1.9 Reasons for choosing the preferred option and for rejecting other options***

Considering the outcome of the SA, the preferred approach option in September 2011 sought to make the most efficient use of existing working areas without increasing the rate of working in these areas. It also sought to locate mineral working close to planned development to reduce the impact of mineral working on transport infrastructure and communities. The SA of the strategy noted that continuing working in existing areas presents opportunities for coordination of large scale restoration projects but that there is potential for negative effects on local communities.

The final policy has been chosen as it includes strategic resource areas that are well located in terms of proximity to the markets and avoids areas with the greatest environmental constraints; and provides flexibility for suitable sites for mineral working to be selected in the Site Allocations Document.

## ■ Post-Examination Hearing consideration of alternatives

Alternatives have been considered for this policy in relation to the following areas:

- Whether or not to include the Bampton/Clanfield area as a strategic resource area in policy M3
- To achieve a change over the course of the plan period in the balance of production capacity for sharp sand & gravel between the strategic resource areas in western & southern Oxfordshire to more closely reflect the distribution of demand within the county.

See Section 5.4 of the SA Report Update for details of the alternatives, a summary of the assessment findings (for assessment detail see Appendix D) and reasons for choosing the alternative selected for inclusion in the Core Strategy incorporating Main Modifications.

## Policy M4: Sites for working aggregate minerals

### **1.1.10 Purpose of the policy**

This policy provides a series of criteria which will be used to assess potential sites for inclusion in the Site Allocations Document.

This was introduced as a new policy in the Publication Core Strategy 2015.

### **1.1.11 Reasonable alternatives considered**

The policy does not consider specific volumes of production or locations for mineral activities and therefore no alternatives were considered.

### **1.1.12 Reasons for choosing the preferred option and for rejecting other options**

This policy replaces and incorporates relevant parts of Policy M4 in the Core Strategy Consultation Draft February 2014 and draws on elements of other minerals policies and core policies in that and earlier versions of the Core Strategy, to now provide a series of criteria that will be used when allocating sites in the Minerals & Waste Plan: Part 2 – Site Allocations Document. It does not identify specific sites.

The policy includes the requirement that was previously in Policy M2 which seeks to achieve a change in the balance of production capacity for sharp sand and gravel between the strategic resource areas in western and southern Oxfordshire to more closely reflect the distribution of demand within the County.

The policy aims to balance the production capacity for sharp sand and gravel between the strategic resource areas to more closely reflect the distribution of demand within the county (as included in policy M2 in the Core Strategy Consultation Draft February 2014). This would have the effect of reducing the distances over which aggregates would need to be transported, which the SA had identified as having positive implications in terms of minimising greenhouse gas emissions and minimising the impact of transportation of aggregates on the local and strategic road network.

#### ■ Post-Examination Hearing consideration of alternatives

No additional reasonable alternatives for this policy have been considered (see Section 5.4 of the main SA Report Update document ).

### **Policy M5: Working of Aggregate Minerals**

#### **1.1.13 Purpose of the policy**

Policy M5 provides for permission to be granted for applications for mineral working within identified sites. It also sets out the circumstance under which permission may be exceptionally granted for mineral working in locations that are not identified.

This was introduced as a new policy (then Policy M4) in the Core Strategy Consultation Draft, February 2014.

#### **1.1.14 Reasonable alternatives considered**

Due to the largely procedural nature of this policy no options have been considered for this policy.

#### **1.1.15 Reasons for choosing the preferred option and for rejecting other options**

No options were considered for this policy. The final policy was included in its current form as it is required to enable the working of aggregate minerals.

#### ■ Post-Examination Hearing consideration of alternatives

No additional reasonable alternatives for this policy have been considered (see Section 5.4 of the main SA Report Update document).

### **Policy M6: Aggregate rail depots**

Policy M6 provides for existing aggregate rail depots and any new depot sites to be safeguarded and for new depots to be permitted at suitable locations.

This was policy M5 in the Core Strategy Consultation Draft February 2014 and policy M4 in the Core Strategy Proposed Submission Document May 2012.

#### **1.1.16 Reasonable alternatives considered**

No alternatives were put forward. The preferred policy takes its lead from national policy (in the NPPF) to safeguard rail depots in order to enable import of aggregates by rail. Also there are no alternative locations for rail depots as they can only be located where road and rail coincide and none have been nominated.

#### **1.1.17 Reasons for choosing the preferred option and for rejecting other options**

Policy M6 has been included in the Core Strategy as national planning policy (NPPF paragraph 143) requires mineral planning authorities to safeguard existing, planned and potential rail heads. The rail depot sites listed in the policy are all those in Oxfordshire that are covered by this requirement.

#### ■ Post-Examination Hearing consideration of alternatives

No additional reasonable alternatives for this policy have been considered (see Section 5.4 of the main SA Report Update document).

### **Policy M7: Non-aggregate mineral working**

#### **1.1.18 Purpose of the policy**

Policy M7 provides for the working, including exploration and appraisal, of the non-aggregate minerals that occur in Oxfordshire subject to the particular criteria that are relevant to each mineral.

This was policy M6 in the Core Strategy Consultation Draft February 2014 and policy M5 in the Core Strategy Proposed Submission Document May 2012; and it was included within policy M3 in the Consultation Draft Minerals Planning Strategy September 2011.

#### **1.1.19 Reasonable alternatives considered**

The proposed submission policy is in line with national policy in the NPPF and no alternatives have been put forward during the development of the policy.

#### **1.1.20 Reasons for choosing the preferred option and for rejecting other options**

Policy M7 has been included in the Core Strategy as national planning policy (NPPF paragraphs 146 and 147) requires mineral planning authorities to plan for a steady supply of industrial minerals.

#### ■ Post-Examination Hearing consideration of alternatives

No additional reasonable alternatives for this policy have been considered (see Section 5.4 of the main SA Report Update document).

### **Policy M8: Safeguarding mineral resources**

#### **1.1.21 Purpose of the policy**

Mineral planning authorities are required to define Mineral Safeguarding Areas in minerals plans so that resources are not sterilised by non-mineral development. Policy M8 safeguards what are currently considered to be the economically viable areas of the minerals resources in Oxfordshire.

This was policy M7 in the Core Strategy Consultation Draft February 2014, policy M6 in the Core Strategy Proposed Submission Document May 2012 and policy M5 in the Consultation Draft Minerals Planning Strategy September 2011.

#### **1.1.22 Reasonable alternatives considered**

In 2010 different options were considered for safeguarding mineral resources and the minerals industry was consulted on these options, with options including the safeguarding of the entire resource, or limiting safeguarding to certain areas – with sub-options being considered within this option. Options considered during the development of the policy were as follows:

### **Sharp sand and gravel**

It was considered that a distinction needed to be made between the main river valley deposits which are of strategic importance and the deposits of the upper river valleys and minor tributaries which are not. The options considered for safeguarding the different 'categories' of resource for sharp sand and gravel were as follows:

**Main river valleys:** Thames, Lower Windrush, Lower Evenlode and Lower Thame

Option 1 – Safeguard all these resources – regarded to be of significant commercial interest

Option 2 – Safeguard only areas where nominations for extensions to existing sites or new sites have been made, where the resource is proven

Option 3 – SE Plan policy approach – Policy M5 existing mineral sites, proposed sites and areas of search should be safeguarded

Option 1 was chosen as the preferred option for inclusion in the Draft Minerals Planning Strategy (September 2011).

**Minor river valleys:** Cherwell and Ock valleys and minor tributaries

Option 1 – Safeguard the entire resource – variable, uncertain and often poor quality deposits

Option 2 – Limit safeguarding to any economic resources that have been identified acceptable for extraction.

Option 2 was chosen as the preferred option for inclusion in the Draft Minerals Planning Strategy (September 2011).

### **Glaciofluvial sand and gravel**

Option 1 – Safeguard the entire resource

Option 2 – Limit safeguarding to resources proven by industry

Option 2 was chosen as the preferred option for inclusion in the Draft Minerals Planning Strategy (September 2011).

### **Soft sand**

The options considered for safeguarding the resource for soft sand were as follows:

Option 1 – Safeguard all resources

Option 2 – Limit safeguarding to potential extensions to existing soft sand quarries, permitted reserves, and other locations where resources are proven or where the industry has indicated there are likely to be workable resources.

Option 2 was chosen as the preferred option for inclusion in the Draft Minerals Planning Strategy (September 2011).

### **Crushed rock**

The options considered for safeguarding the different types of crushed rock were as follows:

#### **Limestone Aggregate**

Option 1 – Safeguard all of the limestone resource

Option 2 – Limit safeguarding to existing limestone quarries and permitted reserves, and new locations outside the Cotswolds AONB where there are proven resources

#### **Ironstone aggregate**

Option 1 – Safeguard all of the ironstone resource

Option 2 – Limit safeguarding to existing ironstone quarries, permitted reserves, and areas subject to Reviews of Minerals Permissions

For both limestone and ironstone Option 2 was chosen as the preferred option.

For building stone, chalk, clay and coal and coal bed methane the following options were considered:

#### **Building stone: Limestone and ironstone**

Option 1 – Safeguard all known building stone resources

Option 2 – No safeguarding because of the poor data on the resource

Option 2 was chosen as the preferred option due to the lack of geological data available, however in the Draft Minerals Strategy (Sept 2011) limestone and ironstone were included in the safeguarding policy, but with no distinction between aggregate (see above) or building stone.

#### **Chalk**

Option 1 – no mineral safeguarding area

#### **Clay**

Option 1 – no mineral safeguarding area

#### **Coal and Coal Bed Methane**

Option 1 – no mineral safeguarding area

#### **Fuller's earth**

No alternatives were considered for safeguarding the resource of fuller's earth.

##### *1.1.22.1 Reasons for selecting the alternatives considered*

The Minerals and Waste Core Strategy Issues and Options consultation (June 2006) sought feedback on the criteria which should be used to decide the criteria by which minerals should be safeguarded. Respondents noted that minerals identified in the then draft South East Plan should be prioritised for safeguarding and that fuller's earth is considered to be of strategic importance and should also be safeguarded.

The Minerals and Waste Core Strategy Preferred Options consultation (February 2007) responded to the consultation feedback and proposed to 'safeguard mineral resources of potential economic importance for possible future use, in particular sand and gravel, limestone, ironstone and fuller's earth.'

Further public consultation on which areas of mineral resource should be safeguarded was carried out as part of the Minerals Site Proposals and Policies Document Issues and Options Consultation (April 2007).

The alternatives that were selected in 2010 for consideration reflected the types of potentially workable minerals present in Oxfordshire and their distribution, taking into account the feedback from these consultations. The alternatives were further informed by and refined following a stakeholder consultation meeting with representatives of the minerals industry (March 2011).

For chalk, clay and coal and coal bed methane no alternatives were considered. This was for the reasons that:

- Chalk is not an economically important mineral in Oxfordshire and given its widespread occurrence it does not need to be safeguarded.
- Clay resources do not need to be separately safeguarded as brickmaking is no longer economically viable in Oxfordshire and the only current requirement for clay is for landfill engineering material. These current requirements can be met from working of clay in conjunction with sand and gravel extraction.
- For coal and coal bed methane there is no need to safeguard surface areas above coal seams or where coal bed methane could be processed, as the coal is of no economic interest and there is too much uncertainty to enable coal bed methane safeguarding areas to be identified.
- Fuller’s earth is a nationally scarce and potentially important mineral with a number of industrial uses. The proven resource between Moor Mill Farm, Fernham and Baulking should therefore be safeguarded.

### **1.1.23 Reasons for choosing the preferred option and for rejecting other options**

Overall the effects of the different safeguarding options were found to be neutral with regards to the social and environmental SA objectives as safeguarding does not mean that there is a presumption that any areas will be extracted or are environmentally acceptable for extraction. Safeguarding was seen as being important in terms of helping Oxfordshire meet its local needs for the minerals which have economically viable resources in the County.

The preferred option chosen is to safeguard what are currently considered to be the economically viable areas of the minerals resources that are currently, and will continue to be, worked in Oxfordshire, these being sand and gravel, soft sand and limestone. This option was selected following consultation with the minerals industry. In addition the economically viable areas of fuller’s earth, which is no longer worked in Oxfordshire, have been safeguarded due to their nationally important nature.

To deliver this option the final policy approach is to broadly identify the mineral resources that will be safeguarded, but define Mineral Safeguarding Areas in the Site Allocations Document. These will cover the strategic resource areas identified in Policy M3 for sharp sand and gravel, soft sand and limestone, as well as other areas of proven sand and gravel resource and fuller’s earth resources in the Baulking – Fernham area.

#### **■ Post-Examination Hearing consideration of alternatives**

No additional reasonable alternatives for this policy have been considered (see Section 5.4 of the main SA Report Update document).

## **Policy M9: Safeguarding mineral infrastructure**

### **1.1.24 Purpose of the policy**

Policy M9 safeguards the existing and permitted infrastructure that supports the supply of minerals in Oxfordshire.

This was introduced as a new policy in the Publication Core Strategy 2015.

### **1.1.25 Reasonable alternatives considered**

No reasonable alternatives were considered for this policy as the NPPF requires that minerals infrastructure be safeguarded.

### **1.1.26 Reasons for choosing the preferred option and for rejecting other options**

The policy provides for the infrastructure that supports the supply of minerals to be safeguarded (as required by the NPPF paragraph 143), but the actual sites to be safeguarded will be identified in the Site Allocations Document.

Policy M9 has been included in the Core Strategy as national planning policy (NPPF paragraph 143) requires mineral planning authorities to safeguard mineral infrastructure.

#### **■ Post-Examination Hearing consideration of alternatives**

No additional reasonable alternatives for this policy have been considered (see Section 5.4 of the main SA Report Update document ).

## **Policy M10: Restoration of mineral workings**

### **1.1.27 Purpose of the policy**

Policy M10 sets out the general approach to restoration of mineral workings to an appropriate after-use.

This was policy M8 in the Core Strategy Consultation Draft February 2014, policy M7 in the Core Strategy Proposed Submission Document May 2012 and Policy M6 in the Consultation Draft Minerals Planning Strategy September 2011.

### **1.1.28 Reasonable alternatives considered**

The preferred policy is in line with national policy and no alternatives have been considered.

### **1.1.29 Reasons for choosing the preferred option and for rejecting other options**

The final policy provides for mineral workings to be restored to a high standard and in a timely and phased manner to an after-use appropriate to the location and that delivers a net gain in biodiversity; and sets out the criteria to be taken into account.

Policy M10 has been included in the Core Strategy as national planning policy (NPPF paragraph 144) requires mineral planning authorities to use planning conditions to provide for restoration and aftercare at the earliest opportunity, which must be carried out to high environmental standards.

#### **■ Post-Examination Hearing consideration of alternatives**

No additional reasonable alternatives for this policy have been considered (see Section 5.4 of the main SA Report Update document).



## Summary of Minerals Strategy Alternative Considerations

As detailed above, reasonable alternatives were considered for the Minerals Strategy element of the Core Strategy. The policies that consider the quantity and location of activity have been subject to the most extensive consideration of alternatives as they are the policies that 'drive' the strategy and through which there is the greatest potential for significant effects to result, both positive and negative. For some of the supporting policies within the Strategy no reasonable alternatives were identified as the policies either follow national policy and guidance, and hence have no alternatives, or because of the procedural nature of the policy.

At the Submission stage the Council considered that the reasons for selecting the preferred options that were included in the Minerals Strategy element of the Publication Minerals and Waste Core Strategy remained valid, as did the reasons for rejecting other reasonable alternatives during the previous stages of the plan making process.

## Waste Strategy – alternatives

### Policy W1: Oxfordshire waste to be managed

#### **1.1.30 Purpose of the policy**

This policy sets the basis for managing waste in Oxfordshire by considering the amounts of waste that need to be managed and ensuring that provision will be made for waste management facilities that allow Oxfordshire to be net self-sufficient in the management of its principal waste streams.

#### **1.1.31 Reasonable alternatives considered**

Options were considered during the development of this policy (Waste Needs Assessment consultation draft, May 2011) for where to source appropriate estimates for the amount of waste to be provided for in relation to three different waste streams (Municipal Solid Waste (MSW), Commercial and Industrial (C&I) and Construction, Demolition and Excavation (CDE)).

For MSW four options were considered as follows:

1. Published forecasts in the Regional Spatial Strategy (the South East Plan - SEP);
2. Updated estimates using monitoring work from the South East Regional Assembly;
3. Published work undertaken by ERM for OCC (2008);
4. Updated estimates based on Oxfordshire Joint Municipal Waste Partnership's strategy.

For Commercial & Industrial (C&I) waste: three options were considered:

1. Published forecasts in SEP;
2. Published work undertaken by ERM for OCC (2008);
3. Work based on a study by the Environment Agency (2001), taking account of recent trends in national surveys.

For Construction Demolition and Excavation (CDE) waste two options were considered:

1. Work undertaken by ERM consultants for OCC;
2. Further work using data available from EA and studies by Capita Symonds for Defra of waste composition and end use.

#### **1.1.31.1 *Reasons for selecting the alternatives considered***

The alternatives were selected as they were based on the evidence that was current at that time, along with evidence from other studies and plans.

The evidence base utilised for the emerging South East Plan was considered, as well as surveys, and work undertaken by consultants for the Council.

#### **1.1.32 *Reasons for choosing the preferred option and for rejecting other options***

For MSW, Option 4 was preferred as it better reflected local circumstances, was consistent with other work published locally and was easily updated using reliable locally derived data.

For C&I, Option 3 was preferred as it was known that the basis for the South East Plan estimate (Option 1) had become outdated and the ERM study produced growth estimates that were too high (Option 2).

For CDE, Option 2 was preferred because it refined the work by ERM.

For the pre-submission consultation in March 2012 the estimates were updated but the same methodologies were used.

The final policy approach has moved away from providing specific figures for waste to be managed and instead provides for Oxfordshire to be net self-sufficient in the management of its principal waste streams – based on the most up to date evidence that provides the amounts of waste that need to be managed. That evidence will be provided by the Oxfordshire Waste Needs Assessment or any update of the amounts in the Waste Needs Assessment via the Oxfordshire Minerals and Waste Annual Monitoring reports. This enables the policy to remain flexible in responding to changes in these needs.

#### **Post-Submission consideration of alternatives**

No additional reasonable alternatives for this policy have been considered (see Section 5.5 of the main SA Report Update document).

### **Policy W2: Oxfordshire waste management targets**

#### **1.1.33 *Purpose of the policy***

Policy W2 sets targets for the percentage contributions of each waste management /waste type over the period of the MWLP, with the aim of achieving maximum diversion of waste from landfill.

This was policy W3 in the Core Strategy Consultation Draft February 2014 and earlier versions of the Core Strategy.

#### **1.1.34 *Reasonable alternatives considered***

Options for the targets to be used were considered. These covered targets derived from the South East Plan or national policy and more locally derived targets. The targets for Municipal Waste and Commercial & Industrial Waste remained unchanged between the 2012 and 2015 versions of the Core Strategy. The recycling target for Construction, Demolition and Excavation waste was increased from 60% to 70% between 2012 and 2014 to reflect a review of waste needs and what were

considered to be changes in local circumstances but was changed back to the earlier figure (60%) in 2015 in order to reflect what was considered to be practically achievable.

For the September 2011 consultation on the Waste Planning Strategy, options considered were as follows:

- Option 1 - use of targets in SE Plan or national policy;
- Option 2 - use of more locally derived targets.

#### ***1.1.34.1 Reasons for selecting the alternatives considered***

The alternatives reflect waste management targets in the South East Plan but also take into account local circumstances and an ambition to move waste management even further up the waste hierarchy to reflect:

- Higher recycling and composting targets for municipal waste that are considered achievable in Oxfordshire; and
- Maximum diversion from landfill of municipal waste and commercial and industrial waste.

#### ***1.1.35 Reasons for choosing the preferred option and for rejecting other options***

For MSW: Reliable local information was available on which to base local targets for recycling, composting, residual waste treatment and waste to landfill, and these were preferred (Option 2). To be consistent with work on a review of the Oxfordshire Joint Municipal Waste Management Strategy, targets for the proposed submission document were revised.

For C&I waste: SE Plan targets (Option 1) were initially preferred for recycling, but a more ambitious landfill diversion target was adopted, consistent with the Council's approach to disposal - as Waste Disposal Authority. For the proposed submission document (May 2012) a more ambitious recycling target was proposed, in common with other Waste Planning Authorities and the higher recycling targets already being achieved for MSW.

For CDE waste: SE Plan targets for recycling (Option 1) were used as no better alternatives were identified and studies on waste composition helped to show that the target is robust and that a more challenging target is likely to fail.

Following a review of the Waste Needs Assessment, the SE Plan target of 60% was increased to 70% as this was considered achievable and therefore comprised a combination of Options 1 and 2. In 2015 the target was reverted to 60% in order to reflect the current situation and what was considered practically achievable.

The final policy accords with the requirements of the European Waste Framework Directive and the targets included in the policy are considered to be achievable.

## ■ Post-Examination Hearing consideration of alternatives

Alternatives have been considered for this policy in relation to the following areas:

- Recycling targets for C&I waste
- Recycling targets for CDE waste.

See Section 5.5 of the SA Report Update for details of the alternatives, a summary of the assessment findings (for assessment detail see Appendix D) and reasons for choosing the alternative selected for inclusion in the Core Strategy incorporating Main Modifications.

## **Policy W3: Provision for waste management capacity**

### **1.1.36 Purpose of the policy**

Policy W3 ensures that sufficient provision will be provided for, in order to meet the need for management of the principal waste streams identified in Policy W1 and the waste management targets in Policy W2.

This was policy W4 in the Core Strategy Consultation Draft February 2014 and earlier versions of the Core Strategy.

NB: This policy now covers the management of waste from other areas that was previously in a separate policy (Policy W2 in the 2012 and 2014 versions of the Core Strategy).

### **1.1.37 Reasonable alternatives considered**

This policy provides a mechanism to respond to the requirements identified in other policies, in order to enable provision of the waste management capacity and facilities that will be required. Given the largely procedural nature of the policy, no alternatives have been considered, except in relation to the provision of waste management capacity for waste from other areas (previously considered in 'old' Policy W2).

For the management of waste from other areas three options that were considered in 2011 (September 2011 consultation) for future rates of disposal were to:

1. Refuse to take further waste from London and elsewhere;
2. Take waste from London at rates set by SE Plan and waste from elsewhere at a locally derived rate;
3. Take waste from London and elsewhere at locally derived rates.

#### **1.1.37.1 Reasons for selecting the alternatives considered**

The alternatives reflect the fact that Oxfordshire is a significant importer of waste for disposal from London and elsewhere, but that this can be expected to decline as other areas become more self-sufficient by increasingly divert waste from landfill over the period of the plan (in accordance with European Waste Directives).

### **1.1.38 Reasons for choosing the preferred option and for rejecting other options**

In relation to the management of waste from other areas (previously covered by 'old' Policy W2 in the 2012 and 2014 versions of the Core Strategy) Option 2 was preferred. Option 1 would be difficult to implement (even if found sound) and Option 3 would likely produce arbitrary results and would likely be found unsound.

It was proposed that this policy would continue to be based on Option 2 in the proposed submission document (May 2012), but more up to date estimates based on data in the more recent London Plan would be used: estimates of waste from elsewhere were also being revised from more up to date data that was then available.

The final policy text has been chosen as it provides the flexibility to respond to changes in the assessed capacity requirements for different types of waste management facility over the life of the Core Strategy. The prescription of the additional capacity requirements, that was included in the 2012 version of the Core Strategy, would not allow the necessary flexibility. Using the final policy approach waste management capacity requirements will be kept under review and updated in the Oxfordshire Minerals and Waste Annual Monitoring reports.

#### **■ Post-Examination Hearing consideration of alternatives**

Alternatives have been considered for this policy as follows:

- An approach to use any additional capacity requirement as a cap for the amount of provision to be made (as inferred by the wording of policy W3 in the Core Strategy).
- An approach to use any additional capacity requirement as a minimum amount of provision to be made which can be exceeded if suitable sites are available, with no cap on provision and no requirement for need to be demonstrated.

See Section 5.5 of the SA Report Update for details of the alternatives, a summary of the assessment findings (for assessment detail see Appendix D) and reasons for choosing the alternative selected for inclusion in the Core Strategy incorporating Main Modifications.

## **Policy W4: Locations for facilities to manage the principal waste streams**

### **1.1.39 Purpose of the policy**

This policy provides a locational framework for waste management facilities that reflects the needs and characteristics of different parts of the county, whilst also providing flexibility for the market to respond to waste management needs. The policy enables the capacity requirements provided through Policy W3 to be met through the allocation of sites for waste management development in the Site Allocations Document.

This was Policy W5 in the Core Strategy Consultation Draft February 2014 and earlier versions of the Core Strategy.

### **1.1.40 Reasonable alternatives considered**

Various spatial strategy options for the location of facilities for C&I recycling, C&I residual waste treatment and CDE recycling were considered during the development of the waste spatial strategy.

In March 2010 the Minerals and Waste Plan Working Group considered the development of spatial strategy options based on the location of new waste facilities within 5 kilometres of the periphery of the larger towns and 2 kilometres of the smaller towns.

The Working Group also discussed whether there was benefit in sub-dividing the county, with areas focussed on one or more of the large towns, with a view to apportioning waste needs equitably by area.

During the development of the Waste Planning Strategy Consultation Draft (Sept 2011), a series of options were considered for each of the major waste streams, with the findings of the sustainability appraisal being reported in the SA Report for the Waste Spatial Strategy Options, August 2011. For MSW, as new facilities are being provided in accordance with the Joint Municipal Waste Management Strategy and the Household Waste Recycling Centre Strategy, no alternative options were considered. The options considered for the different waste streams were as follows:

#### Recycling of C&I Waste

Option 1 - Concentration of additional provision at or close to Oxford

Option 2 - Additional provision at or close to large towns – northern and southern

Option 3 - Additional provision at or close to large and smaller towns in northern, southern Oxfordshire

#### Residual Treatment of C&I Waste

Option 1 - 1 large facility in the Abingdon/Didcot/Wantage and Grove area

Option 2 – 2 smaller facilities in the Abingdon /Didcot/ Wantage and Grove and Witney area

#### Recycling of CDE waste

Option 1 - Concentration of additional permanent provision at or close to Bicester, Didcot and Wantage & Grove; and temporary facilities at landfill and quarry sites across Oxfordshire.

Option 2 - Dispersal of additional permanent provision at or close to Oxford and large and smaller towns in: Northern Oxfordshire, Southern Oxfordshire and Western Oxfordshire and temporary facilities at landfill and quarry sites where opportunities arise across Oxfordshire.

Option 3 – Additional permanent provision only at or close to Oxford and towns large and smaller towns in: Northern Oxfordshire, Southern Oxfordshire and Western Oxfordshire.

#### *1.1.40.1 Reasons for selecting the alternatives considered*

For recycling of C&I waste, the alternatives were considered to offer opportunities for moving waste up the waste hierarchy as well as contributing to enabling Oxfordshire to be self-sufficient in the management of C&I waste. They also offered potential for local job creation.

For the residual treatment of C&I waste, the Council identified that any further provision would be required in the southern and western parts of the county. The alternatives were therefore based on this need.

For recycling of CDE waste, the Council identified that additional capacity was likely to be needed mostly in Bicester, Didcot, Wantage and Grove, but with some requirement also at Oxford, Banbury, Witney, Carterton, Abingdon and the smaller towns in southern Oxfordshire. The Council had also identified that half of the required additional capacity could be provided at temporary facilities at landfill and quarry sites across the county and the alternatives were based on this.

### **1.1.41 Reasons for choosing the preferred option and for rejecting other options**

For recycling C&I waste, Option 3 was chosen, as it best met the objectives of the MWLP, in particular objective iii (provide for waste to be managed as closely as possible to where it arises and objective iv (facilities to be located in or close to the communities they serve). It is considered that recycling facilities for commercial and industrial waste could be delivered by the private sector at the scale required such that objective ii (delivery of waste management facilities that will drive waste up the hierarchy) would also be met.

For residual treatment of C & I waste, option 1 was chosen, as it best met the objectives of the MWLP. Waste treatment plants need to be of sufficiently large scale to be economic and practical, and therefore capable of being delivered by the private sector. Although it was acknowledged that option 2 would reduce the distance waste needed to be transported, it was rejected as a more dispersed pattern of smaller facilities would be unlikely to be deliverable.

For recycling CDE waste, Option 2 was chosen as it best met the MWLP objectives, in particular objectives iii (provide for waste to be managed as closely as possible to where it arises) and iv (facilities to be located in or close to the communities they serve). It is considered that recycling facilities for construction, demolition and excavation waste could be delivered by the private sector at the scale required for a dispersed pattern of provision, such that objective ii (delivery of waste management facilities that will drive waste up the hierarchy) would also be met. There are potential synergies in locating recycling plants at quarries and landfill sites, in terms both of aggregates production and disposal of residues, and overall impacts can be lessened through a reduction in the number or size of new sites required.

The Waste Spatial Strategy has remained largely unchanged from the withdrawn 2012 version of the MWLP and the 2014 consultation draft. Following support for the principle of locating facilities close to the main source of waste, little change was made to this approach, although Policy W5 (now Policy W4) no longer made specific provision for certain facilities. The current spatial strategy, although defined slightly differently on the waste key diagram still aims to manage waste close to the sources of waste arisings.

The final policy identifies broad locations for future strategic and non-strategic waste management facilities that are well located in terms of proximity to the main sources of waste and transport routes and avoid areas with the greatest environmental constraints and the Green Belt. This provides flexibility for sufficient suitable specific sites to meet requirements to be allocated through the Site Allocations Document.

#### **■ Post-Examination Hearing consideration of alternatives**

Alternatives have been considered for this policy in relation to the location of new waste facilities.

See Section 5.5 of the SA Report Update for details of the alternatives, a summary of the assessment findings and reasons for choosing the alternative selected for inclusion in the Core Strategy incorporating Main Modifications.

## **Policy W5: Siting of waste management facilities**

### **1.1.42 Purpose of the policy**

Policy W5 identifies a number of land uses that are likely to be suitable for waste management and also makes clear the approach that will be taken in relation to any proposed development in the Green Belt.

This was policy W6 in the Core Strategy Consultation Draft February 2014 and earlier versions of the Core Strategy.

### **1.1.43 Reasonable alternatives considered**

During the development of the policy the requirements have been updated to provide greater clarity and to reflect changes in national policy, in particular on locations in the Green Belt. The policy now includes active mineral and landfill sites as suitable for siting waste management facilities.

The policy is based on previous regional and national policy and so no alternatives were put forward during its development.

### **1.1.44 Reasons for choosing the preferred option and for rejecting other options**

The waste spatial strategy, has remained largely unchanged from the withdrawn 2012 version of the MWLP and the 2014 consultation draft. Policy W6 (now Policy 5) continued to list land uses likely to be suitable for new waste management facilities but for facilities located at mineral workings or landfill sites the stipulation that they be related to those operations was dropped. The provisions relating to Green Belt were not changed; the provisions for AONB were moved to Policy C8 (Landscape).

The final policy is seen as the most appropriate approach for siting of waste management facilities, having taken account of consultation responses relating to previous policy versions and in line with national policy. The specific reference to facilities to serve Oxford has been removed as this is adequately covered by the more general wording on sites in the Green Belt in the final policy. The general presumption that new development should take place on previously developed land, avoiding green field sites, has been accepted by most and the approach changed little.

#### **■ Post-Examination Hearing consideration of alternatives**

No additional reasonable alternatives for this policy have been considered (see Section 5.5 of the main SA Report Update document).

## **Policy W6: Landfill**

### **1.1.45 Purpose of the policy**

This policy sets out how the remaining landfill void in the county should be managed and how restoration should be managed.

This was policy W7 in the Core Strategy Consultation Draft February 2014 and earlier versions of the Core Strategy.



NB: This policy now covers the waste from other areas that was previously in a separate policy (Policy W2 in the 2012 and 2014 versions of the Core Strategy).

#### **1.1.46 Reasonable alternatives considered**

No options were considered for this policy as it was established that there was no need for additional non-hazardous landfill. A need for additional disposal capacity for inert waste was identified but no options were put forward, provision being made through a permissive policy for disposal in quarries requiring restoration.

#### **1.1.47 Reasons for choosing the preferred option and for rejecting other options**

The final policy has been expanded to make clearer the separate requirements for 'non-hazardous waste disposal facilities' and 'inert waste disposal facilities'; and to include that sites required to ensure sufficient provision for disposal of inert waste will be identified through the Site Allocations Document.

#### **■ Post-Examination Hearing consideration of alternatives**

No additional reasonable alternatives for this policy have been considered (see Section 5.5 of the main SA Report Update document ).

### **Policy W7: Management and disposal of hazardous waste**

#### **1.1.48 Purpose of the policy**

Policy W7 enables the provision of facilities for the management and disposal of hazardous waste, where such facilities would meet the criteria in policies W4 and W5, as well as those in the Core Policies (C1 – C11).

This was policy W8 in the Core Strategy Consultation Draft February 2014 and earlier versions of the Core Strategy.

#### **1.1.49 Reasonable alternatives considered**

During the development of the waste spatial strategy, options were considered for meeting the required provision for landfill of hazardous waste, with the findings of the Sustainability Appraisal being reported in the SA Report for the Waste Spatial Strategy Options, August 2011.

Landfill:

Option 1-No additional provision: continue to rely on hazardous waste landfill facilities outside Oxfordshire, apart from disposal of nonreactive hazardous waste

Option 2 – Existing landfill: change one of Oxfordshire's existing non-hazardous landfills to hazardous landfill

##### **1.1.49.1 Reasons for selecting the alternatives considered**

These options were considered to be the only reasonable alternatives for meeting the required provision for landfill of hazardous waste.

### **1.1.50 *Reasons for choosing the preferred option and for rejecting other options***

A combination of the alternatives was selected. The policy approach put forward takes its lead from previous regional policy that for some types of facility there will be a need to serve wider than County areas.

#### **■ Post-Examination Hearing consideration of alternatives**

No additional reasonable alternatives for this policy have been considered (see Section 5.5 of the main SA Report Update document ).

## **Policy W8: Management of agricultural waste**

### **1.1.51 *Purpose of the policy***

This is a new policy introduced in the 2015 Publication version to provide policy detail on how Oxfordshire’s agricultural waste should be managed. It allows for the construction of facilities for the management of agricultural waste provided that they comply with the Core Policies (C1 – C11).

### **1.1.52 *Reasonable alternatives considered***

Options around this policy area have not been considered as no alternative approaches have been identified.

### **1.1.53 *Reasons for choosing the preferred option and for rejecting other options***

Policy W8 has been included in the Publication Core Strategy as national guidance (National Planning Practice Guidance, Waste) requires that Waste Local Plans should plan for the sustainable management of agricultural waste.

#### **■ Post-Examination Hearing consideration of alternatives**

No additional reasonable alternatives for this policy have been considered (see Section 5.5 of the main SA Report Update document).

## **Policy W9: Management and disposal of radioactive waste**

### **1.1.54 *Purpose of the policy***

Policy W9 enables the provision of facilities for the management and disposal of radioactive waste, where such facilities would meet the criteria in Core Policies (C1 – C11).

### **1.1.55 *Reasonable alternatives considered***

During the development of the waste spatial strategy (SA Report for the Waste Spatial Strategy Options, August 2011), options were considered for the management of ‘intermediate legacy waste’ and the management of ‘low level waste’, as follows:

Intermediate Level Radioactive Waste Storage

Option A - Storage at source of waste (Harwell and Culham).

Option B - Treatment and long term storage at Harwell pending transfer to a national disposal facility.

Option C – Treatment and long term storage for waste from Oxon and storage for waste from Dorset pending removal to a national facility.

#### Low Level Radioactive Waste Management

Option A - Storage Temporary storage (if required) and disposal in a bespoke facility at Harwell; and at Culham.

Option B - Temporary storage (if required) of waste at source of waste and disposal in a bespoke facility at Harwell.

Option C – temporary storage (if required) of waste at source of waste disposal in a suitable off-site landfill in Oxfordshire.

Option D – Temporary storage (if required) of waste at source of waste and disposal in a suitable off-site landfill site outside Oxfordshire.

#### *1.1.55.1 Reasons for selecting the alternatives considered*

These options were considered to be the only reasonable alternatives for managing these waste types.

#### **1.1.56 Reasons for choosing the preferred option and for rejecting other options**

The preferred options that were taken forward into the Oxfordshire Waste Planning Strategy Consultation Draft (September 2011) were as follows:

**Intermediate Level Radioactive Waste Storage:** Option B was the preferred option for inclusion in Policy W9. An intermediate level radioactive waste store is a specialist facility which would be costly to provide. The quantity of waste at Culham is small and there would be economies of scale involved in moving it to a storage facility at Harwell; and the need for a further building in the Green Belt at Culham would be avoided. The initial assessment is that Option B is the most practical and acceptable option. This requires the treatment and long term storage of Intermediate Level Radioactive Waste Storage from Harwell and Culham at Harwell pending transfer to a national disposal facility. The policy also allows for additional waste to be brought from outside Oxfordshire for treatment and storage at Harwell if there is an overriding need and there would be clear benefits within Oxfordshire.

**Low Level Radioactive Waste Management:** Option D was the preferred option for inclusion in Policy W9. This requires the temporary storage of Low Level Radioactive Waste Storage from Harwell and Culham at source. There was no indication that private sector proposals would come forward for disposal of low level radioactive waste at an existing landfill in Oxfordshire. It was not clear that the provision of dedicated disposal sites at Harwell and Culham, or just at Harwell, would be practical in terms of viability and availability of suitable site(s). Also, there was disposal capacity available outside Oxfordshire. The initial assessment was that Option D was the most practical and acceptable option, but there should be flexibility to reconsider the other options if disposal capacity proves not to be available outside Oxfordshire.

In the Proposed Submission Core Strategy, these two preferred options were carried forward, with the exception that the requirement to allow Intermediate Level Radioactive Waste to be brought from outside Oxfordshire for treatment and storage was removed and not carried forward.

The final Policy W9 in the Publication Core Strategy identifies the locations at which radioactive waste produced in Oxfordshire will be managed. The policy also now includes a policy approach to facilities that would take low level radioactive waste from outside Oxfordshire. It will be through the Site Allocations Document that specific sites will be allocated.

Previously a policy that concentrated on two main sites, the policy has been adapted in response to comments by other Waste Planning Authorities and more recently the Environment Agency and now recognises a possibility that proposals for management or disposal of this waste could come forward on other sites and that these should be considered positively if, as would be likely, they were designed to manage waste generated in Oxfordshire. As with hazardous waste, it is likely that any such facility might serve the needs of a wider area and where this is the case it would be expected that evidence be provided that a need is being addressed that is not adequately catered for elsewhere.

■ **Post-Examination Hearing consideration of alternatives**

No additional reasonable alternatives for this policy have been considered (see Section 5.5 of the main SA Report Update document).

**Policy W10: Management and disposal of waste water/sewage**

**1.1.57 Purpose of the policy**

Policy W10 enables the provision of facilities for the treatment and disposal of waste water and sewage sludge, where such facilities would meet the criteria in Core Policies (C1 – C11).

This was introduced as a new policy in the Draft Core Strategy 2014.

**1.1.58 Reasonable alternatives considered**

Options around this policy area have not been considered as no alternative approaches have been identified.

**1.1.59 Reasons for choosing the preferred option and for rejecting other options**

The policy provides the strategic approach to ensure that there is enough capacity to enable planned development in the County to be taken forward.

National Planning Practice Guidance, Waste requires that Waste Local Plans should plan for the sustainable management of waste water.

#### ■ Post-Examination Hearing consideration of alternatives

No additional reasonable alternatives for this policy have been considered (see Section 5.5 of the main SA Report Update document).

### **Policy W11: Safeguarding waste management sites**

#### **1.1.60 Purpose of the policy**

This policy sets out the types of waste management sites that will be safeguarded for waste use for the duration of the plan period. In addition, pending the adoption of the Site Allocations Document, Policy W11 safeguards all sites that contribute, or have permission to contribute, to Oxfordshire's waste management capacity.

#### **1.1.61 Reasonable alternatives considered**

Options around this policy area have not been considered as no reasonable alternative approaches have been identified.

#### **1.1.62 Reasons for choosing the preferred option and for rejecting other options**

The policy was developed from former regional policy. It provides for the safeguarding of the existing and planned facilities and waste management capacity that are needed to deliver the other plan policies.

#### ■ Post-Examination Hearing consideration of alternatives

Alternatives have been considered for this policy in relation to whether or not to allow for temporary waste management sites to be safeguarded where the planning permission expires before the end of the plan period.

See Section 5.5 of the SA Report Update for details of the alternatives, a summary of the assessment findings (for assessment detail see Appendix D) and reasons for choosing the alternative selected for inclusion in the Core Strategy incorporating Main Modifications.

### **Summary of Waste Strategy Alternative Considerations**

At the Submission stage the Council considered that the reasons for selecting the preferred options that were included in the Minerals Strategy element of the Publication Minerals and Waste Core Strategy remained valid, as did the reasons for rejecting other reasonable alternatives during the previous stages of the plan making process.

As detailed above, reasonable alternatives have been considered for the Waste Strategy element of the Core Strategy. The policies that consider the quantity and location of waste management activity have been subject to the most extensive consideration of alternatives as they are the policies that 'drive' the strategy and through which there is the greatest potential for significant effects to result, both positive and negative. For some of the supporting policies within the Strategy no reasonable alternatives were identified as the policies either follow national policy and guidance, and hence have no alternatives, or because of the procedural nature of the policy.

At the Submission stage the Council considered that the reasons for selecting the preferred options that were included in the Waste Strategy element of the Publication Minerals and Waste Core Strategy remained valid, as did the reasons for rejecting other reasonable alternatives during the previous stages of the plan making process.

## **Core Policies for Minerals and Waste**

The policies in the Minerals Strategy and the Waste Strategy are supported by a set of Core Policies include development management criteria that provide protection for those topics covered by the policies (e.g. landscape). These policies, and how they have evolved, are detailed below.

### **Policy topics and evolution**

#### **1.1.63 Policy C1: Sustainable Development**

New policy introduced in the Consultation Draft Core Strategy (February 2014). The policy was updated for the 2015 Publication to include a footnote providing examples of the policies in the NPPF that would be taken into consideration.

#### **1.1.64 Policy C2: Climate Change**

New policy introduced in the Consultation Draft Core Strategy, February 2014.

#### **1.1.65 Policy C3: Flooding**

This was policy C1 in the 2012 version of the Core Strategy. The policy was updated in the Consultation Draft Core Strategy (February 2014) to encourage opportunities to be taken to increase flood storage capacity in the flood plain, particularly through the restoration of sand and gravel workings.

#### **1.1.66 Policy C4: Water Environment**

This was policy C2 in the 2012 version of the Core Strategy. The policy has changed very little from the version in the 2011 Consultation Draft.

#### **1.1.67 Policy C5: Local environment, amenity and economy**

This was policy C3 in the 2012 version of the Core Strategy. This policy has been expanded between the 2012, 2014 and 2015 versions to now cover a wider variety of factors (e.g. human health and safety, and the local economy) and potential impacts. It also considers the introduction of separation distances or buffer zones between minerals and waste developments and sensitive receptors, which was previously only included in the supporting text.

#### **1.1.68 Policy C6: Agricultural land and soils**

This was policy C4 in the 2012 version of the Core Strategy; but it was not included in the 2011 Consultation Draft. The policy provides for the need to protect best and most versatile agricultural land and soil quality to be taken into account in line with national policy.

### **1.1.69 Policy C7: Biodiversity and Geodiversity**

This was policy C5 in the 2012 version of the Core Strategy. The policy was updated between the 2012 and 2014 versions to provide greater detail and certainty on how biodiversity would be protected and enhanced as part of minerals and waste developments. The policy was further strengthened and amended to accord with national policy for the 2015 Publication.

### **1.1.70 Policy C8: Landscape**

This was policy C6 in the 2012 version of the Core Strategy. The policy was updated for the 2015 Publication to accord with the NPPF to provide “great weight” to AONBs and to cover impacts on AONBs from developments outside the AONB. In addition a new paragraph was added on compensation to be provided where impacts cannot be avoided or mitigated.

### **1.1.71 Policy C9: Historic environment and archaeology**

This was policy C7 in the 2012 version of the Core Strategy. The policy was updated between the 2012 and 2014 versions to provide greater protection to heritage assets. It was further updated for the 2015 Publication version, to accord with national policy, including the addition of a reference to prior investigation where necessary and the addition of a requirement that proposals for mineral working and landfill contribute to the conservation and enhancement of the historic environment.

### **1.1.72 Policy C10: Transport**

This was policy C8 in the 2012 version of the Core Strategy. The policy was updated for the 2015 Publication to include a requirement for transport assessments/statements to be submitted, including mitigation measures where applicable.

### **1.1.73 Policy C11: Rights of way**

This was policy C9 in the 2012 version of the Core Strategy and has only been changed slightly from that document.

## **Reasonable alternatives considered for the Core Policies**

All the policies in their submitted form were considered to be in alignment with the NPPF.

No options for any of the policies were considered during the development of the Core Strategy as these ‘development control’ policies cover criteria and details relating to each topic, rather than setting ‘levels of activity’ or ‘locations for any activity’ the implementation of which could result in significant effects.

#### **■ Post-Examination Hearing consideration of alternatives**

No additional reasonable alternatives for the core policies have been considered (see Section 5.6 of the main SA Report Update document ).

A new core policy covering Green Belt (Core Policy C12) has been developed, but as with the other core policies the development of this policy did not consider alternatives.

## Development of the strategy for Sharp Sand and Gravel

### Minerals Spatial Strategy Initial Options – March – May 2010.

Option 1 concentration

- 1a NW of Oxford
- 1b SE of Oxford
- 1c Combination of 1a & 1b

Option 2 Dispersal

Option 3 Phased

Short term extensions to existing areas + 1 or more new areas at:

- Clanfield-Bampton;
- Culham;
- Dorchester, Warborough, Benson
- Wallingford-Cholsey

The SA highlighted that concentrating all working in one area could lead to unacceptable impacts on local communities, on the potential for flooding in local areas and on congestion on the transport network. This led to the identification of several areas for proposed working in the revised options, rather than just one area.

### Minerals Spatial Strategy Revised Options – July – Sept 2010.

Option 1 concentration on existing areas

- Lower Windrush Valley (LWV)
- Eynsham Cassington Yarnton (ECY)
- Radley
- Sutton Courtenay

Option 2 concentration on new areas:

- Clanfield-Bampton;
- Warborough, Benson, Shillingford;
- Cholsey;
- Sutton/Stanton Harcourt;
- Culham/Clifton Hampden/Wittenham

Option 3 Dispersal

The SA of the revised options noted the economic advantages of making efficient use of existing plant, infrastructure and labour force, although it noted the potential for cumulative negative effects on local communities.

### July 2011 – Aggregate Apportionment Options.

Option 1: 1.01 mtpa

Option 2: 1.24 mtpa

Option 3: 1.46 mtpa

Spatial assumptions provided

The higher the level of extraction the greater would be the adverse environmental and social effects.

### Mar 2012 – Aggregates Apportionment Options – SA Addendum Report.

Option 1a: from September 2011 M2 and M3.

Option 1b: reduced working in West Oxon v1

Option 1c: reduced working in West Oxon v2

Note: Table 2.2. in the SA Addendum Report should have '1b and 1c' post-2020 and not '1a and 1b'.

Option 1b includes working in five different areas, which is one more area than options 1a and 1c, which means it is likely to have on balance, more adverse sustainability impacts in the longer term across the county compared to options 1a and 1c.

### September 2011 – Minerals Planning Strategy Consultation Draft.

Policy M2: 1.01 mtpa

Policy M3: Existing areas at

- LWV\*;
- ECY\*;
- Sutton Courtenay;
- Caversham;

+ a new area at Cholsey

\* caveats relating to HGVs

The SA of the strategic minerals policies found that overall the policies supported the majority of the SA objectives. All of the common core policies were also found to be broadly in line with the SA objectives and likely to have significant positive effects upon the objectives most relevant to the policy.

### May 2012: Publication/Submission (withdrawn).

Policy M2: 1.01 mtpa

Policy M3: Existing areas at

- LWV\*;
- ECY\*+;
- Sutton Courtenay;
- Caversham;

and a new area at Cholsey

\* caveats relating to HGVs

+ caveat relating to SAC

For Policy M3 the SA recognised that 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. However, 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. Commencing work in a previously unworked area at Cholsey is likely to have adverse effects upon the local environment and community. Measures to mitigate negative effects should be required at site selection and planning application stages.

### February 2014: Consultation Draft.

Policy M2: volume based on most recent LAA (2013 = 0.81 mtpa). 7 years reserve for S&G. Balance of extraction between West and South of County

Policy M3: Areas of Search:

- ECY;
- LWV;
- NE of Caversham;
- Thames Valley (Oxford to Goring Gap)

The SA found that seeking to concentrate extraction predominantly in areas where working is currently taking place or has taken place recently has economic advantages. It also presents opportunities for co-ordinated large-scale restoration projects which would in the longer term lead to a degree of beneficial effects for the local communities (through recreation and leisure opportunities) as well as for local wildlife. However, there is still potential for ongoing cumulative negative effects on local communities especially with regard to traffic and amenity issues, unless these adverse effects are appropriately considered at the planning application stage and through the common core policies when new planning permissions are sought.

There is also potential for negative adverse effects on communities near to any new minerals workings in the Thames Valley as a result of dust, noise, disruption, adverse visual effects and traffic congestion. The extent of these adverse effects will depend on the mitigation measures put in place, proximity of workings to sensitive receptors and the duration of working – all of which will be addressed at the site specific level. Local effects should be addressed through the application of the common core policies at the site planning stage.

### August 2015: Publication.

Policy M2: volume based on most recent LAA (2014 = 1.015 mtpa). 7 years reserve for S&G.

Policy M3: Principle locations will be within the following strategic resource areas, as indicated on the Minerals Key Diagram:

- The Thames, Lower Windrush and Lower Evenlode Valleys area from Standlake to Yarnton – includes new area that was not in ECY or LWV
- Thames and Lower Thame Valleys area from Oxford to Cholsey
- Thames Valley – Caversham to Shiplake

Policy M4: allocate sites to achieve change in balance of production capacity between western and southern Oxfordshire to reflect distribution of demand

The SA found that the SRAs that are identified for the extraction of sharp sand and gravel have environmental constraints that could result in adverse effects against the objectives for biodiversity, landscape, heritage assets and water. However the criteria in Policies M4, M10 and the common core policies will ensure that these effects are either avoided or mitigated.

Some positive effects were also identified, as the extraction of minerals in these areas could offer opportunities to increase flood storage capacity, thereby reducing flood risk. The SRAs are also well located in terms of proximity to the markets and provide potential for investment and job creation which supports economic objectives.

The extraction of minerals from the SRAs will inevitably result in some adverse effects on local communities, particularly through transportation effects. However minerals can only be worked where they exist in the ground and therefore there is not the possibility of dispersing extraction across the County. The other policies in the Plan will help to mitigate adverse effects of extraction and will also seek to enhance the environment wherever possible, particularly through restoration activities.



## Development of the strategy for Soft Sand

### March-May 2010: Minerals Spatial Strategy Initial Options

Plan for 0.309 mtpa from a single soft sand resource in the SW of the County.

SA: No significant effects identified

### July-Sept 2010: Minerals Spatial Strategy Revised Options

Plan for 0.309 mtpa from two smaller resource areas in the SW of the County and a third area at Duns Tew.

SA: No significant effects identified. Identifying two areas of working in the south of the county and one in the north of the county will help minimise traffic impacts as well as spread the effects of soft sand working more equitably.

### July 2011: Soft Sand Apportionment Options

Option 1: 0.25 mtpa

Option 2: 0.31 mtpa

Option 3: 0.36 mtpa

Concentrate production in the three existing areas as follows:

- South east of Faringdon
- Tubney/Marcham/Hinton Waldrist
- Duns Tew

SA: No significant differences identified between the apportionment options. However lower levels of production are likely to be associated with fewer environmental impacts compared with higher production levels.

### September 2011: Minerals Planning Strategy Consultation Draft

Policy M2: 0.25 mtpa

Policy M3: Existing areas at:

- East and south east of Faringdon;
- North and south of the A420 to the west of Abingdon;
- Duns Tew.

SA: Identifying areas of working in the south and north of the county will help minimise traffic impacts as well as spread the effects of soft sand working more equitably. However, there will be some cumulative effects on local communities.

### May 2012: Publication/Submission (withdrawn)

Policy M2: 0.25 mtpa

Policy M3: Existing areas at:

- East and south east of Faringdon;
- North and south of the A420 to the west of Abingdon<sup>+</sup>;
- Duns Tew.

<sup>+</sup> caveat relating to SAC

SA: Identifying two areas of working in the south of the county and one in the north of the county will help minimise traffic impacts as well as spread the effects of soft sand working more equitably. However, there will be some cumulative effects on communities living close to existing sites and careful consideration should be given when identifying specific sites and permitting further extraction, so as to minimise the overall effects of continued working in these areas.

The two areas in the south west of the county have different quality sands and the policy appropriately allows for the working of the two types of sand. Continuing with the existing pattern provides certainty to industry and also takes advantage of existing infrastructure.

### February 2014: Consultation Draft

Policy M2: volume based on most recent LAA (2013 = 0.19 mtpa).

At least 7 years reserve for Soft sand.

Policy M3: Areas of Search:

- Corallian Ridge between Oxford and Faringdon\*;
- Duns Tew

\* An amalgamation of the 2 south west areas from previous stages, to encompass the whole of the potential soft sand resource.

SA: The SA Report provided the same findings as those for the withdrawn submission stage in May 2012.

### August 2015: Publication

Policy M2: volume based on most recent LAA (2014 = 0.189 mtpa). At least 7 years reserve for Soft sand.

Policy M3: Principle locations:

- The Corallian Ridge area from Oxford to Faringdon;
- The Duns Tew area

SA: In relation to Policy M2 the SA identified significant positive effects in the medium and long term for the 'self-sufficiency' SA objective. The effects on the environmental objectives were generally uncertain as they cannot be judged on the LAA provision figure alone. They depend on the location and distribution of mineral working sites which make up the provision.

A significant positive effect was also identified for this policy in the medium to long term for self-sufficiency (SA11), as the policy (like M2) makes provision to enable the supply of aggregate minerals from land-won sources within Oxfordshire in order to meet the requirement identified in the most recent Local Aggregate Assessment. Adverse effects (not significant) were identified in relation to the population and transport objectives due to the effects on local communities from the extraction and transportation of soft sand.

## Development of the strategy for Crushed Rock

### March - May 2010: Minerals Spatial Strategy Initial Options

Meeting the apportionment by allowing crushed rock extraction in strategic areas in the:

- Witney-Burford area; and
- Chipping Norton - Bicester area
- South west of county in conjunction with soft sand

SA: No significant effects identified

### July - Sept 2010: Minerals Spatial Strategy Revised Options

Meeting the apportionment by allowing crushed rock extraction in the:

- South of Burford area;
- East of River Cherwell, North of Bicester; and
- East/south east of Faringdon

SA: No significant effects identified

### July 2011: Crushed Rock Apportionment Options

- Option 1: 0.63 mtpa
- Option 2: 0.81 mtpa
- Option 3: 1.00 mtpa

Meeting apportionment from working in the three existing areas as follows:

- North of Bicester to the east of the River Cherwell
- South of the A40 near Burford
- South east of Faringdon

SA: Higher apportionment assumed to have potential for greater environmental and community effects – however not considered significant.

### September 2011: Minerals Planning Strategy Consultation Draft

Policy M2: 0.63 mtpa

Policy M3: Principle locations for crushed rock working will be:

- North of Bicester to the east of the River Cherwell;
- South of the A40 near Burford;
- East and south east of Faringdon

SA: The revised crushed rock policy would lead to a distribution of effects of crushed rock working in the county therefore potentially preventing adverse effects on a single locality.

### May 2012: Publication/Submission (withdrawn)

Policy M2: 0.63 mtpa

Policy M3: Principle locations for crushed rock working will be:

- North of Bicester to the east of the River Cherwell;
- South of the A40 near Burford;
- East and south east of Faringdon

SA: The policy would lead to a distribution of effects of crushed rock working in the county therefore potentially preventing adverse effects on a single locality. This policy takes advantage of existing infrastructure as well as continuing to provide local employment. This has positive economic benefits. In the long term, there is potential for adverse cumulative effects on the communities living near the identified areas.

### February 2014: Consultation Draft

Policy M2: volume based on most recent LAA (2013 = 0.47 mtpa).

At least 10 years reserve for crushed rock.

Policy M3: Areas for crushed rock working:

- North West of Bicester;
- South of the A40 near Burford
- East and south east of Faringdon

SA: The SA Report provided the same findings as those for the withdrawn submission stage in May 2012.

Careful consideration should be given to the exact location of sites and works, relative to housing and other sensitive receptors to mitigate potential additional adverse effects.

### August 2015: Publication

Policy M2: volume based on most recent LAA (2014 = 0.584 mtpa). At least 10 years reserve for crushed rock.

Policy M3: Principle locations will be within the following strategic resource areas, as indicated on the Minerals Key Diagram:

- The area north west of Bicester
- The Burford area south of the A40
- The area east and south east of Faringdon

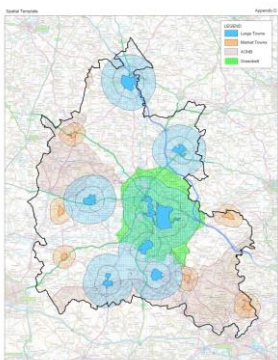
SA: In relation to Policy M2 the SA identified significant positive effects in the medium and long term for the 'self-sufficiency' SA objective. The effects on the environmental objectives were generally uncertain as they cannot be judged on the LAA provision figure alone. They depend on the location and distribution of mineral working sites which make up the provision.

A significant positive effect was also identified for this policy in the medium to long term for self-sufficiency (SA11), as the policy (like M2) makes provision to enable the supply of aggregate minerals from land-won sources within Oxfordshire in order to meet the requirement identified in the most recent Local Aggregate Assessment. Adverse effects (not significant) were identified in relation to the population and transport objectives due to the effects on local communities from the extraction and transportation of crushed rock.

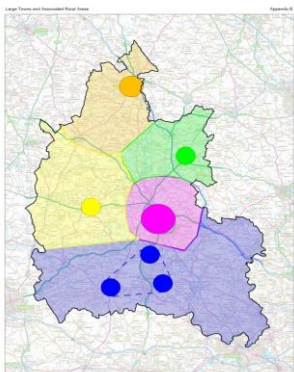
## Development of the strategy for Locations for facilities to manage the principal waste streams – Part A

### March 2010

In March 2010 the Minerals and Waste Plan Working Group considered the development of spatial strategy options based on the location of new waste facilities within 5 kilometres of the periphery of the larger towns and 2 kilometres of the smaller towns.



The Working Group also discussed whether there was benefit in sub-dividing the county, with areas focussed on one or more of the large towns, with a view to apportioning waste needs equitably by area.



### Waste Spatial Strategy Options – August 2011 (SA Report)

Spatial strategy options for all the principal waste streams.

**MSW:** New recycling facility to serve Banbury. The proposed locations of the two residual transfer stations are south (Abingdon/Didcot/Wantage and Grove) and west (Witney/Carterton) areas of the county.

**C&I:** 3 options for recycling C&I waste:

- Option A: concentrate additional provision at or close to Oxford
- Option B: make additional provision at or close to the large towns in the north and south of the county
- Option C: additional capacity to be made at or close to large and smaller towns in the north (Bicester) and south (Abingdon, Didcot, Faringdon, Henley and Thame).

2 options for residual treatment of C&I waste

- Option A : provision of a single large facility in the Abingdon/Didcot/Wantage and Grove area
- Option B: provision of 2 smaller facilities in the Abingdon/Didcot/Wantage and Grove area; and in the Witney area

**CD&E:** 3 options for recycling CD&E waste:

- Option A: concentrate additional permanent provision at or close to Bicester, Didcot and Wantage and Grove and temporary facilities at landfill quarry sites across Oxfordshire
- Option B: provide for dispersed additional permanent CD&E recycling capacity at or close to Oxford and large and smaller towns as well as make use of temporary facilities at landfill sites and quarry sites where opportunities arise across the county
- Option C: additional permanent provision at or close to Oxford and large and smaller towns in the county

Options were also included for landfill, hazardous and radioactive waste.

**SA:** The SA identified the effects of each of the options against the sustainability objectives. In relation to the principal waste streams the only significant effects that were identified were positive effects for the following options:

- For 'Recycling of MSW' related to SA11 'waste hierarchy', as the option makes additional provision for recycling; and
- For 'Residual Treatment of C&I waste', Option 1 in relation to SA12 'economic growth' as the option provides for economies of scale that would attract investment by the private sector.

The SA did not make recommendations as to which option should be taken forward.

### Waste Planning Consultation Draft - Sept 2011

The Consultation Draft presented a preferred spatial strategy in policies W5 and W6. This envisaged that sites for new facilities would be located within 5 kilometres of large towns or 2 kilometres of small towns. Policy W5 (Provision of additional waste management facilities) provided for new facilities in specific locations and these were illustrated on a Key Diagram:

- o a new household waste recycling centre at Banbury;
- o a waste transfer stations in the Witney/Carterton area;
- o a waste transfer station in the Didcot/Abingdon/Wantage&Grove area;
- o recycling facilities (largely for C&I waste) in Bicester, Abingdon, Didcot, Faringdon, Henley and Thame;
- o a residual waste treatment facility for C&I waste in the Abingdon/Didcot/Wantage&Grove area;
- o recycling for CDE waste at Bicester, Didcot, Wantage&Grove, Oxford, Banbury, Witney, Carterton, Abingdon, Faringdon, Wallingford, Henley and Thame.



Policy W6 (Sites for waste management facilities) was introduced to guide the identification of suitable sites. This specified appropriate land uses to which priority would be given for additional waste development and set a general presumption against development on green field land.

Policy W6 also addressed the approach to be taken to waste development in the Areas of Outstanding Natural Beauty and the Green Belt. In AONBs, development was expected to only be small scale (supporting text suggested 20,000 tpa throughput). In Green Belt provision was made for facilities serving Oxford where the need could be shown to be over-riding and no other alternative sites were available.

The approach to landfill (W7) confirmed that new non-hazardous waste facilities were not required but existing voids were to be safeguarded for on-going disposal needs. Inert waste that could not be recycled was to be used only for quarry restoration unless disposal elsewhere could demonstrate an environmental benefit.

Policies were also put forward for hazardous waste and radioactive waste. There was a general presumption in favour of facilities to manage hazardous waste, although a means test was to apply to facilities taking waste from outside Oxfordshire. Provision was made for the management of radioactive waste at Harwell and Culham (where facilities already existed) but there was a presumption against the development of facilities elsewhere.

**SA:** Identified strengths and weaknesses of strategic options and the need to carefully assess impacts in more detail at site selection. No options specifically ruled out at this stage.

Significant positive effects were identified for policy W1 against SA11 'self-sufficiency' as the policy directly supports this objective, and Policy W3 against SA10 'waste hierarchy' as the policy seeks to make provision for additional recycling, composting and recovery of resources and minimise disposal.

No significant adverse effects were identified.

## Development of the strategy for Locations for facilities to manage the principal waste streams – Part B

### May 2012: Publication/Submission (withdrawn)

#### **Policy W5: Provision of additional waste management facilities**

It was considered necessary to differentiate between locations for larger strategic facilities and smaller facilities, focussing strategic facilities close to the largest concentration of population and where most growth would take place. Bicester, Oxford, Abingdon and Didcot, closely linked by the A34, were thought to form a logical focus for such facilities. Smaller facilities did not need to be confined to this area, however, and if non-strategic facilities were focussed on the other main towns (Banbury, Witney and Wantage/Grove) a reasonable distribution of capacity should result. Much smaller facilities might be acceptable in more rural areas as these were more likely to meet local needs and need not be restricted to the immediate confines of the small towns.

The revised spatial strategy was shown in a revised Key Diagram (below) that defined a broad area within which strategic facilities should be located and key towns to which other non-strategic facilities should generally be steered. Policy W5 confirmed that strategic facilities would be defined as handling more than 50,000 tonnes annually and also made specific provision for: a household waste recycling centre to serve Banbury; Municipal waste transfer stations to serve the south and west of the county; and recycling plants for commercial and industrial waste and for construction and demolition and excavation waste (to produce recycled aggregates and soils).

#### **Policy W6: Sites for waste management facilities**

The approach previously taken by policy W6 was repeated, setting out types of land where facilities would normally be found acceptable and confirming the approach for sites located in Green Belt and AONB.



The approach to landfill and hazardous waste remained unaltered. Policy W9 continued to provide for the management of radioactive waste at Harwell and Culham but was modified to delete reference to the presumption against other facilities being developed elsewhere.

SA: the SA found that W5 was likely to have positive effects upon SA objective 11, enabling Oxfordshire to be self-sufficient and contributing towards moving waste up the waste hierarchy. Positive effects upon reducing greenhouse gas emissions and minimising the negative impacts of transporting waste by road were also identified.

For policy W6 the SA identified a range of positive effects. In addition for some SA objectives the effects were uncertain as they will be dependent upon development locations.

### February 2014: Consultation Draft

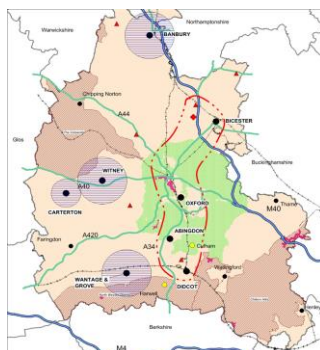
#### **Policy W5: Locations for waste management facilities**

Following support for the principle of locating facilities close to the main source of waste, little change was made to this approach, although policy W5 no longer made specific provision for certain facilities.

#### **Policy W6: Siting of waste management facilities**

Policy W6 continued to list land uses likely to be suitable for new waste management facilities but for facilities located at mineral workings or landfill sites the stipulation that they be related to those operations was dropped. The provisions relating to Green Belt were not changed; the provisions for AONB were moved to policy C8 (Landscape).

The draft plan took the same approach to landfill (W7), and hazardous waste (W8). The policy on radioactive waste (W9) was broadened to include a general presumption in favour of proposals for management or disposal of radioactive waste where they would make a significant contribution to the management or disposal of Oxfordshire waste. An additional policy (W10) was introduced to make provision for facilities for waste water and sewage sludge at existing facilities.



SA: The SA identified significant positive effects for Policy W6 in relation to the objective on land and soil quality. No significant negative effects were identified for any of the policies.

### August 2015: Publication

In the Proposed Submission Document, the waste spatial strategy is now effectively covered by policies W3, W4 and W5.

#### **Policy W3: Provision to be made for facilities**

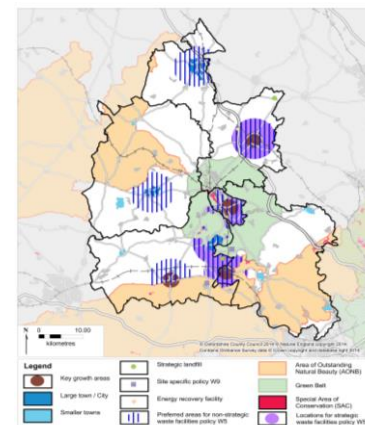
This policy commits to providing sufficient waste management capacity for Oxfordshire to be net self-sufficient in meeting its own needs for MSW, C&I and CDE waste.

#### **Policy W4: Locations for facilities to manage the principal waste streams**

In answer to concerns that earlier versions of the spatial strategy have been unclear in terms of the scale of facilities being provided for, the policy's supporting text defines facilities in terms of their scale - measured by reference to annual throughput (tonnes). The throughputs apply to strategic, non-strategic and small scale facilities. The area defined as appropriate for strategic facilities has been changed and now corresponds to the area defined as extending 5 kilometres from Bicester, Abingdon and Didcot and 10 kilometres from Oxford, excluding the Greenbelt.

#### **Policy W5: Siting of waste management facilities**

The general presumption that new development should take place on previously developed land, avoiding green field sites, has been accepted by most and the approach changed little.



SA: For Policy W3 a significant positive effect has therefore been identified against this objective on self-sufficiency (SA11). Effects upon the majority of SA objectives are dependent upon where this provision is located. This issue is addressed by Policies W4, W5 and the common core policies and the effects are more likely in the medium to long term when further capacity may be required.

For Policy W4, provision of facilities close to waste arisings of the County's future growth areas is likely to have positive effects as it should minimise adverse effects associated with waste transportation. However, it is recognised that there will be differing effects according to the exact location and type of facilities.

The SA identified significant positive effects for Policy W6 in relation to the objective on land and soil quality. Other positive effects were identified.

No significant negative effects were identified for any of these policies.