ANNEX 2

Consultation on Spatial Strategy Options for Mineral Working

Initial Minerals Strategy Options

Following discussions with the Minerals and Waste Plan Working Group during 2009, an initial set of spatial strategy options for mineral working was drawn up for focused consultation with key stakeholders. Consultation was carried out in February and March 2010. Independently facilitated workshop meetings were held with District and County Council members, groups of parish councils (3 area events, at Benson, Standlake and Stanford in the Vale), environmental groups and mineral operators. Technical and statutory bodies were also consulted. The responses to this consultation are summarised below.

Responses to February / March 2010 Consultation

Some general themes of the responses were:

- The options were not thought to be sufficiently distinct. Some options included the same areas as other options; this was particularly the case for the sand and gravel phased option (option 3).

- The areas covered by some options were thought to be too extensive and included areas thought unlikely to be economically viable to work or are constrained by national environmental designations.

- Stakeholders expressed concerns about the sand and gravel concentration strategy, particularly potential transport impacts, impacts on local communities and environment, and local acceptability.

Sand and Gravel Strategy Option 1a – Concentration of sand and gravel working to the west / north west of Oxford:

a) The Environment Agency expressed concern about concentrating mineral extraction in this area, as it could have hydrological impacts particularly on the Lower Windrush Valley, where low river flow is a concern.
b) The Highways Agency was concerned that a concentration strategy in this area could result in a potential increase in trip generation which could increase congestion at the Peartree junction on the A34.
c) Natural England was concerned that this option included part of Oxford Meadows SAC and other SSSIs.
d) The biodiversity group recognised that concentrating development in this area could offer the greatest opportunities for landscape scale restoration and to create joined up areas for nature conservation.
e) Oxford Airport noted that birdstrike could potentially be a problem for aircraft, should this option be brought forward for mineral development.

f) Parish Councils noted the cumulative impact of working on local communities and the lack of flexibility that the concentration strategy offered.

Sand and Gravel Strategy Option 1b – Concentration of sand and gravel working to the south / south east of Oxford:

a) OCC transport officers noted issues of accessibility of some of this area to the strategic road network. The Highways Agency noted that this option could lead to an increase in mineral miles and that the impacts of mineral traffic on Marcham junction of the A34 would need to be assessed.
b) Natural England expressed concern that this option includes Little Wittenham SAC and is in close proximity to Cothill Fen SAC. The setting of the North Wessex Downs AONB also needs to be taken into account.
c) There are a number of archaeologically significant sites in this area which may pose a potential constraint to mineral extraction.
d) The biodiversity group recognised that concentrating development in this area could offer opportunities for landscape scale restoration and to create joined up areas for nature conservation.

Sand and Gravel Strategy Option 1c – Concentration of sand and gravel working in both the areas identified in Options 1a and 1b:

a) The same issues were identified as in Options 1a and 1b, but stakeholders recognised that the concentration would be less intense in either area.

Sand and Gravel Strategy Option 2 – Dispersal of sand and gravel working across resource areas which are close to markets:

a) A truly dispersed option would encompass all potentially available resources and not be limited to areas close to markets.
b) Some stakeholders thought this option would lead to many communities being affected by the impacts of mineral extraction. Some also thought that any decrease in current impact on communities caused by a dispersal strategy was unlikely to be in proportion to the principle of dispersal.
c) Operators recognised the benefits of dispersing working to reduce impacts on any one area but thought that a dispersal strategy would give fewer opportunities for developer funding of highway and amenity and biodiversity improvements.
d) The Environment Agency and the Highways Agency expressed a preference for a dispersed strategy to reduce the potential impacts of mineral working in any one area.
e) The dispersal option was not favoured by the biodiversity group as it reduces the potential for landscape scale restoration from sites.

Sand and Gravel Strategy Option 3 – Phased approach with continued sand and gravel working from extensions to existing areas of working during the plan period and identification and planning of a new area or areas of working for beyond the plan period:

a) Stakeholders commented that the strategy should only address the need for minerals during the plan period, not beyond it, and that in any case the issue of longer term provision is common to all options. But the minerals industry favoured long term planning for new sites.
b) Stakeholders thought there was too much overlap with options 1b and 1c, with currently unworked resource areas to the south east of Oxford being included in both (and also in option 2).
c) The Environment Agency preferred this option because it would enable strategic planning for ecologically viable habitat restoration and would reduce the concentrated impact of extraction on any one area.
d) The Highways Agency expressed concern that this option still includes the area north and west of Oxford and therefore their concerns about the impacts of working in this area on the strategic road network remain.

Soft Sand Strategy Option – Sand working within a single extensive area in the south west of the county:
a) The technical consultees had no major concerns about this option.
b) Stakeholders noted that the area identified was very extensive and suggested that it could be made smaller.
c) Stakeholders noted that the option did not take into account the soft sand resource in the North of the county.
d) Stakeholders voiced concerns about the ability of local roads to cope with minerals lorries.

Crushed Rock Strategy Option – Crushed rock working within three areas: an extensive area between Bicester and Chipping Norton: the Burford area; and the soft sand strategy option area in the south west of the county:
a) The technical consultees had no major concerns about this option other than the Highways Agency, which voiced concern about the potential impact of this option on the Peartree junction on the A34.
b) Stakeholders noted that the area between Bicester and Chipping Norton was very extensive and suggested that it could be reduced in size, taking into account the location of workable resources.

Revised Minerals Strategy Options

The output from the February / March consultation was considered by the Working Group and revisions were made to the options. Further consultation was carried out on the revised set of spatial strategy options in July 2010. Two independently facilitated workshop meetings were held, at Benson and Standlake, and a workshop was held with mineral operators. Technical and statutory bodies were again consulted. The responses to this consultation are summarised below.

Responses to July Consultation

The main themes from responses at the workshops at Benson and Standlake were:

Sand and Gravel Strategy Option 1 – Continue working in existing areas:

a) This option would take advantage of existing infrastructure and existing working arrangements.
b) The option would result in continued and cumulative impact of mineral working on some local communities.
c) Caversham should have been included in this option.
d) The option could result in many applications for extensions to existing sites, which could result in the use of long conveyors to move material back to plant for processing.

Sand and Gravel Strategy Option 2 – New areas of working:

a) Relief for communities currently experiencing working.
b) New workings may be more efficient that old workings.
c) This option is likely to result in need for new and improved infrastructure and therefore represents an inefficient use of existing infrastructure.
d) This option represents a higher risk to deliverability than the existing sites option.
e) This option may lead to an increase in mineral miles between working and markets.
f) Concern that there are many bridges over the River Thames in the new areas which are not capable of carrying mineral lorries and many roads which are not suitable for HGV traffic.
g) Some of the new areas have extensive archaeological remains within them.
h) Many of the new areas are in close proximity to airfields, raising concerns about safeguarding to prevent birdstrike.

Sand and Gravel Strategy Option 3 – Dispersed pattern of working:

a) This option would lead to disadvantages of scale; small operations with few opportunities to seek funding from operators for infrastructure improvements or high quality restoration.
b) This option could lead to an increase in the number of sites for OCC to manage and monitor effectively.
c) Lack of focus for infrastructure developments or planning.
d) Will increase the number of areas affected by ‘planning blight’.

Soft Sand Strategy Option:

a) Common sense approach, based on existing areas of activity.
b) Good transport links except in Marcham and Newbridge.
c) Issue of archaeology at Marcham/Frilford.
d) Potential issue of cumulative impact of development in this area if the reservoir goes ahead.

Crushed Rock Strategy Option:

a) Advantages of basing the strategy on existing sites recognised, eg infrastructure in place.
b) Advantages of combining soft sand and crushed rock extraction on the same sites recognised.
c) Ardley; transport issues around Bicester and ancient woodland NW of Bicester.

In addition to the feedback received from the stakeholder workshops, separate responses were also received from PAGE, AGGROW, CPRE, Nuneham Courtenay Parish Council and 240 individuals.

Responses from Mineral Operators

Overall, mineral operators prefer a dispersed option which they note offers more flexibility and enables working to be located closer to markets. In summary, their responses were:

a) General Comments on All Options

The market is not constrained by county boundaries and there are some cross boundary movements of aggregates. This is especially the case when aggregates have been processed to make value-added products, which increases their value and the economic viability of them travelling longer distances.

The number and location of new areas proposed needs to consider the spatial picture of neighbouring counties and the associated impacts on supply in relation to any existing and/or future minerals operations close to Oxfordshire's county borders.

b) Crushed Rock Option

It may be preferable to have a mixture of both small and large facilities to make provision for crushed rock, and also to maintain an adequate provision of building stone for the historic built environment, over the plan period.

c) Sand and Gravel Option 1 – Continue working in existing areas

Concern was expressed that if option 1 concentrates development in a few, large sites, the strategy will be dependent on few operators.

It is more difficult to maintain supply from large production units because a large permitted reserve needs to be maintained.

It was also noted that there could potentially be difficulty in delivering sites within a concentration strategy, in the face of well organised, significant local opposition.

It was suggested that concentrating working around Oxford may not necessarily be the most efficient strategy to supply the market, as the Oxfordshire market is much more than just Oxford.

d) Sand and Gravel Option 2 – New areas of working

It was suggested that greater clarity is needed on the aims of this option to make it clear that existing sites will effectively be shut down when permissions expire and that new areas would be phased in.

There was broad support for this option in so far as it would move production closer to the demand centres. However, it was pointed out that more of the areas featured in this option lie further away from the primary road network and that access must be one of the most important criteria by which the options are assessed.

Option 2 was generally thought not to be deliverable in the shorter term. Operators also thought that concentration on new areas should focus on what is deliverable in the plan period, not beyond.

e) Sand and Gravel Option 3 – Dispersal pattern of working

Option 3 was considered to be more favourable than Option 2. A dispersed approach would allow a mix of existing and new working areas; it would relate well to markets; and it could be delivered within the required timescale.

There are advantages of concentrating working in a large number of small areas. It was noted that local communities often prefer the development of small sites, which will only have a life of a few years. However, the operators recognised the difficulty of ensuring that such sites do not subsequently apply for extensions, thereby extending their period of working and undermining the local community's goodwill towards them.

Land ownership issues can also make larger sites more difficult to deliver than smaller sites.

But operators noted that both options 2 and 3 could result in planning blight on several areas of the county, with continued uncertainty as to when mineral development may take place in those areas.

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