

Minerals and Waste Local Plan: Core Strategy, Consultation Draft February 2014 – Respondents and Issues Raised

A. Respondents to Consultation Draft Core Strategy February 2014 by Category (respondent number and name)

District / County / Unitary Councils

0006 Milton Keynes Council
 0008 Northamptonshire County Council
 0010 City of London Corporation
 0018 Oxford City Council
 0024 Gloucestershire County Council
 0038 West Berkshire Council
 0045 Wokingham Borough Council
 0051 Cumbria County Council
 0056 Aylesbury Vale District Council
 0087 North London Waste Plan
 0089 South Oxfordshire District Council
 0095 Vale of White Horse District Council
 0098 Cherwell District Council
 0101 Surrey County Council
 0107 Cotswold District Council
 0122 Vale of White Horse District Council
 0124 Mayor of London
 0131 Wiltshire Council and Swindon Borough Council
 0145 West Oxfordshire District Council
 0147 West London Waste Plan

Parish and Town Councils

0004 Berrick and Roke Parish Council
 0013 Marcham Parish Council
 0014 Pyrton Parish Council
 0017 Charlbury Town Council
 0019 Middleton Stoney Parish Council
 0021 Hanborough Parish Council
 0031 Drayton St Leonard Parish Council
 0035 Benson Parish Council
 0040 Warborough Parish Council
 0055 Dorchester Parish Council
 0069 Eynsham Parish Council
 0071 Aston, Cote, Shifford & Chimney Parish Council
 0085 Sutton Courtenay Parish Council
 0086 Stadhampton Parish Council
 0091 Hinton Waldrist Parish Council
 0100 Alvescot Parish Council
 0108 Caversfield Parish Council
 0115 Northmoor Parish Council
 0126 Nuneham Courtenay Parish Council

- 0128 Stanton Harcourt Parish Council
- 0132 Wallingford Town Council
- 0143 Newington Parish Council
- 0149 Brightwell-cum-Sotwell Parish Council
- 0154 Shiplake Parish Council

Other Statutory Consultees / Public Bodies

- 0002 Police and Crime Commissioner Warwickshire
- 0007 North Wessex Downs AONB
- 0022 East Midlands AWP
- 0026 Highways Agency
- 0033 Natural England
- 0036 High Speed Two (Ltd)
- 0046 The Coal Authority
- 0057 The Chilterns Conservation Board
- 0063 English Heritage
- 0088 Environment Agency
- 0119 Thames Water
- 0134 Marine Management Organisation
- 0135 The Cotswolds Conservation Board
- 0144 Anglian Water

Local Action Groups

- 0023 AGGROW
- 0052 Parishes Against Gravel Extraction (PAGE)
- 0067 Sonning Eye Action Group (SEAG)
- 0092 OUTRAGE
- 0103 Burcot And Clifton Hampden Protection Of River Thames (BACHPORT)
- 0153 Communities Against Gravel Extraction (CAGE)

National or Local Environmental Organisations / Groups:

- 0029 British Horse Society, Oxfordshire
- 0037 Oxford Green Belt Network
- 0044 CPRE
- 0059 Oxfordshire Architectural and Historical Society
- 0061 GreenTEA
- 0074 The Eynsham Society
- 0077 Oxford City and County Archaeological Forum
- 0121 RSPB
- 0146 Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust

Minerals or Waste Companies:

- 0005 RWE Npower
- 0032 United Kingdom Atomic Energy Authority
- 0039 Earthline Ltd
- 0041 Sheehan Haulage and Plant Hire Ltd
- 0047 Grundon
- 0053 Hills Quarry Products Ltd
- 0054 FCC Environment Ltd
- 0090 Mineral Products Association

0094 Oxfordshire Mineral Producers Group
0105 Lafarge Tarmac Ltd
0114 Raymond Brown Minerals and Recycling Ltd
0136 Smith and Sons (Bletchington) Ltd
0138 Oxford Aggregates (a collaboration between Hanson and Smith & Sons)
0142 Research Sites Restoration Limited (RSRL)
0151 Hanson UK

Other Businesses / Landowners:

0001 David Wilson Homes South
0028 Eskmuir Properties Ltd (local business)
0049 Corpus Christi College
0070 Synergy Global Consulting
0072 Blenheim Estate
0109 Stanton Harcourt Estate
0111 Exeter College

Local Residents.

0003 Mr Partridge
0009 Mr and Mrs Buch
0011 Mrs Rosemary Parrinder
0012 Peter Cannon-Brookes
0015 Dr Stuart Brooks
0016 Dr Anne Thomson
0020 Sean Nicholson
0025 John and Christine Dowling
0027 Richard Wright
0030 Nick Hutton
0034 CRW Leonard
0042 W J Bannister
0043 Alan Briggs
0048 Graham Griffiths
0050 Dr Graham Shelton
0058 Prof Alan Atkinson
0060 Philip Rogers
0062 Susan Chapman
0064 Vincent Goodstadt
0065 Susan Eysackers
0066 Dr Don Chapman
0068 Neil Bailey
0073 Mr TD Henman
0075 Greta Rye
0076 Mrs Helen Sandhu
0078 Sally Rowley-Williams
0079 Mrs Wilkinson
0080 Mrs Mary Fletcher
0081 Dr Duncan Reed
0082 Robert Florey
0083 Jennifer Harland
0084 Mark Watson

0093 Linda Barlow
0096 Jane Thompson
0097 Peter Winder
0099 Richard Bakesef
0102 Anne Wrapson
0104 Lynda Hillyer
0106 Henry Pavlovich
0110 Robin Mitchell
0112 Mrs Clare Simpson
0113 Robin Draper
0116 Charles Dickerson
0117 Valerie Ryan
0118 Alison Gomm
0120 R H Atkinson
0123 John Nagle
0125 Dr Judith Webb
0129 Iona Millwood and Simon Hall
0130 Marshall Leopold
0133 Peter Fry
0139 Mr N Brading
0140 Mr & Mrs RD Sharp
0141 Toby G Marchant
0150 Peter C Power
0155 Mrs Justine Higgin

Oxfordshire County Councillors

0127 Cllr Charles Mathew
0152 Cllr David Bartholomew

Oxfordshire County Council Internal Consultees

0137 Oxfordshire County Council Archaeologist
0148 Oxfordshire County Council Ecologist Planner

B. Summary of Issues Raised in Responses to Consultation Draft Core Strategy February 2014 by Policy

Mineral Policies:

Policy M1: Recycled and secondary aggregates

- General support for greater recycling of aggregates;
- Support the removal of a target for the amount of recycled and secondary materials and flexibility of policy;
- The policy is contrary to the NPPF as no target is set for the supply of recycled and secondary aggregates;
- Over-reliance on temporary recycled facilities at quarry and landfill sites may result in loss of capacity as host sites are completed;
- Well located temporary recycling facilities sites should be retained;
- Reliance on CDE waste to provide a quantified contribution to a steady and adequate supply of aggregates is risky.

Policy M2: Provision for working aggregate minerals

- Lack of provision figures is not in accordance with the NPPF and National Planning Practice Guidance (NPPG) and provides no assistance to delivery of a steady and adequate supply of aggregates;
- The lack of quantified provision creates uncertainty and will make delivery and monitoring of the policy difficult;
- It is unclear whether the aggregate provision required in the plan is deliverable;
- The policy should not imply that permission will only be granted for new where the landbank is close to or below the 7 year minimum for sand and gravel;
- Reliance on landbank levels to determine the granting of planning permission ignores the need to maintain productive capacity to ensure a steady and adequate supply of aggregates;
- There is no definition of 'balance in annual production capacity';
- It is unclear how a balance between western and southern Oxfordshire will be achieved and enforced;
- Rebalancing between west and south could constrain supply, limit the ability of the industry to respond to demand and increase travel distances – there should be at least 3 active quarries in each area to ensure continuity of supply and competition between operatorsThe South/West balance;
- Existing permissions mean western Oxfordshire will continue to be the main source of sand and gravel over the plan period;
- The cumulative effect of past sand and gravel extraction in western Oxfordshire has not been taken into account.

Policy M3: Locations for working aggregate minerals

- Areas of search do not accord with government guidance, which places priority on identifying specific sites for future mineral working;
- Areas of search will result in piecemeal development; the plans should provide a more detailed steer and not rely on broad areas of search;
- The areas of search exceed what is needed to meet supply requirements;

- Lack of site identification causes uncertainty about where mineral working will take place and consequently whether the interests of communities will be affected and whether the aims of the plan can be delivered;
- The methodology for selecting the areas of search is unclear and the selection of the areas of search has not been justified; important environmental and transport factors have not been considered;
- Object to the extraction of sand or gravel near Eynsham and Thames Valley;
- Concern about the impacts on residential areas, the environment, road network, health and flooding;
- Any proposal should consider the likely environmental and amenity impact and include a buffer zone to safeguard residential amenities;
- Some support for the Areas of Search approach;
- The Corallian Ridge area of search should be extended.

Policy M4: Working of aggregate minerals

- There is uncertainty over how the policy will work with policy M2 in delivering a steady and adequate supply of aggregates;
- The policy is too restrictive and doesn't give certainty or assist in the delivery of sufficient sites to meet demand; the policy should be flexible to allow for additional reserves and additional productive capacity;
- Restricting western Oxfordshire to 3 sand and gravel sites is anti-competitive and lacks justification;
- Concern about the south/west balance being unsettled by capping the number of sites in West Oxfordshire;
- There is capacity for more quarries in the Thames Valley (Oxford to Goring Gap) area of search as it has significant workable reserves and good access to the road network and markets; provision should be made for two new quarries;
- The requirement that mineral workings shall not result in a change in water levels in the Oxford Meadows SAC is simplistic and unqualified;
- Prevention of working in AONBs is contrary to the NPPF and contradicts draft plan policy C8;
- Object to the extraction of sand or gravel near Eynsham;
- The Sutton Courtenay area of search should be deleted as it has limited remaining life;
- Priority should be given to extensions at Sutton Courtenay over new quarries in southern Oxfordshire;
- The Thames Valley (Oxford to Goring Gap) area of search should be deleted due to environmental constraints;
- The policy should give specific protection to designated sites and areas, e.g. heritage designations;
- Concern about flooding, local road network and impact on nearby residential areas.

Policy M5: Aggregate rail depots

- New aggregate rail depots should be located close to source;
- Consideration should be aggregates available from china clay working in Cornwall;

- Appleford Sidings rail depot at the Sutton Courtenay landfill should not be safeguarded.

Policy M6: Non-aggregate mineral working

- With regards to clay extraction, the Lower Windrush Valley and Thames Valley areas should be protected.

Policy M7: Safeguarding mineral resources

- Lack of plans – without plans it is not possible to consider this matter and the Core Strategy deficient;
- Accompanying plans should cover both existing sites and potential resources.

Policy M8: Restoration of mineral workings

- The policy is open to interpretation;
- The policy needs to be strengthened to have stronger aspirations for biodiversity; all mineral sites should be required to deliver net gains in biodiversity;
- The policy provides limited coverage of social and community benefit.

Waste Policies:

Policy W1: Management of Oxfordshire waste

- The aim should be for self-sufficiency in all waste streams (including hazardous and radioactive wastes);
- It is not clear what is meant by the concept of self-sufficiency;
- Reliance should not be placed on facilities located elsewhere, existing or future, to manage Oxfordshire waste;
- Consider making a commitment to over-provide capacity for certain waste streams to compensate for expected deficiencies in others;
- The policy aims for self-sufficiency in agricultural waste but there is no policy to help achieve this;
- The forecast growth of 50% in construction, demolition and excavation (CDE) waste arisings between 2012 and 2020 is unlikely to be seen;
- Not clear whether waste generated by HS2 and Bicester Eco-Town has been considered in forecast waste arisings;
- Need to make sure that forecast waste arisings take account of population and household numbers.

Policy W2: Management of waste from other areas

- Acknowledgement that London has a shortage of landfill capacity is welcomed; Support for recognition of need to provide capacity for disposal of waste from London and elsewhere (consistent with NPPF para. 182); policy is consistent with the West London Waste Local Plan;
- Better explanation needed of what is meant by the intention to not make provision for 'facilities which provide *substantially* for the treatment of residual non-hazardous waste from outside Oxfordshire'; the policy appears to preclude the provision of facilities for the treatment of waste from other areas;
- It is not possible for London to become self-sufficient in managing its waste needs in the period covered by the plan;

- Not clear where the forecasted waste import figures are derived: the adopted London Plan does not contain this information;
- The Further Alterations to the London Plan anticipate a 30% reduction in the amount of waste originally forecast for London in the period to 2031, and this should be reflected in Oxfordshire's waste policy ;
- Pleased to see that waste imported into the county is, in general, reducing year on year;
- Waste should be treated as close to its source as possible; allowing large amounts of waste to travel from London to Sutton Courtenay does not achieve this;
- The plan is contradictory in making provision for disposal of waste from London whilst saying (paragraph 5.17) that transporting waste from elsewhere for disposal in Oxfordshire is unsustainable; the policy should discourage the importation of waste from other areas for disposal in Oxfordshire
- Further discussion needed on options for meeting the unmet demand for disposal of non-hazardous waste from West Berkshire; concern that the policy may not allow for fulfilment of the contract for disposal of Central Berkshire waste in Oxfordshire;

Policy W3: Diversion of waste from landfill

- The plan fails to consider that the Vale and SODC are already close to the 70% recycling household waste levels.

Policy W4: Waste management capacity requirements

- The capacity requirements are expressed in vague terms and cannot be identified from the material provided; it is unclear what facilities are needed;
- It is difficult to establish how the waste capacity shortfalls will be met and whether the proposed strategy is capable of delivering the level of capacity required; as a result, the strategy may not be sound or consistent with PPS10 or compliant with the European Waste Framework Directive;
- The policy is inconsistent with PPS10;
- The apparent waste capacity shortfalls appear significant, and it may be challenging to progress the plan further without better clarification of how the shortfalls are to be met;
- Relying on the Annual Monitoring Report to identify capacity requirements is not appropriate as these reports cannot be challenged;
- The statistical basis for CDE forecasts for both recycling and landfill need to be thoroughly reviewed;
- Additional commercial and industrial (C&I) recycling and transfer capacity is definitely required;
- The majority of CDE recycling capacity is temporary and located in quarries and landfill and will be difficult to replace.

Policy W5: Locations for waste management facilities

- The general locational strategy is overcomplicated; the broad area approach is not specific, overcomplicated and does not accord with PPS10.
- Clarification is required for how the broad area for strategic waste facilities was defined;

- Greater clarity is required in locations for waste facilities: provision should be made for specific deliverable sites; identification of strategic waste sites should only be through the development plan process;
- Lack of provision for specific sites may increase pressure outside Oxfordshire;
- The broad area defined as appropriate for the location of strategic waste facilities should be re-defined to omit rural communities, include existing strategic sites; make better provision for facilities east of Oxford; acknowledge that significant parts are Green Belt; and better reflect the locational requirements of waste facilities;
- Concern about impact on AONBs;
- Banbury should be included as one of the growth areas better able to accommodate new waste facilities;
- The need for CDE waste recycling facilities should not be met in the Oxford Green Belt;
- Better household waste recycling centre (HWRC) facilities are required close to Bicester; Ardley HWRC should remain open until one can be provided.

Policy W6: Siting of waste management facilities

- Reliance on temporary recycling facilities at quarry and landfill sites results in loss of capacity when the host sites are completed; in some instances there may be a good case for retaining the recycling facilities.

Policy W7: Landfill

- The difficulties of protecting ('husbanding') non-hazardous landfill void (paragraph 5.62) are not reflected in the policy approach; clarity is needed over the term "husbanding";
- The plan should recognise that Sutton Courtenay landfill is a temporary site which should close in 2030 and no further extension of time be allowed;
- Bring forward the closure of Ardley landfill from 2019 to 2017;
- The recognition given to the importance of non-recyclable inert waste for the restoration of mineral workings is welcomed;
- In addition to the priorities listed, disposal of inert waste should be targeted at rail linked sites to avoid the harmful impact of road traffic.

Policy W8: Hazardous waste

- The policy conflicts with what paragraph 5.73 of the plan says about self-sufficiency in managing hazardous wastes;
- Sutton Courtenay should be protected from excessive hazardous waste;
- Consideration should be given to developing capacity which could meet a need for the management of hazardous wastes arising outside Oxfordshire;
- The second part of the policy does not make allowance for sustainable or environmentally preferable alternatives.

Policy W9: Management of radioactive waste

- General support for this policy.

Policy W10: Waste water and sewage sludge

- General support for this policy, in particular safeguarding existing waste management sites and the inclusion of a policy on waste water and sewage sludge.

Policy W11: Safeguarding waste management sites

- It should be specified that the Sutton Courtenay site will close in 2030.

Core Policies:

Policy C1: Sustainable development

- General support for this policy.

Policy C2: Climate change

- General support for this policy.

Policy C3: Flooding

- The Strategic Flood Risk Assessment is outdated; and a level 2 study is required;
- The supporting appendix in the plan does not accurately reflect the NPPF in relation to water compatible use;
- Concern about impacts of mineral workings on local communities, associated economy and the environment; mineral developments should be restricted to areas which are not at risk from flooding;
- Concern about enforcement of the policy;

Policy C4: water environment

- General support for this policy.

Policy C5: General environmental and amenity protection

- Restrictions should be set to minimise pollution and further protect neighbourhoods and businesses.

Policy C6: Agricultural land and soils

- The policy provides an appropriate level of flexibility on the way in which mineral sites on best and most versatile agricultural land should be restored.

Policy C7: Biodiversity and geodiversity

- Support for the aspiration to conserve and enhance biodiversity;
- The policy should require all developments to deliver a net gain in biodiversity;
- Support for the level of protection given to international, national and local designations and to priority habitats and species;
- The policy uses confusing and inconsistent terminology;
- The wording in relation to SSSIs is inconsistent with the NPPF;
- The policy should be reworded to better reflect the mitigation hierarchy expressed in the NPPF.

Policy C8: Landscape

- The policy is not consistent with the paragraph 116 of the NPPF;

- The policy should not restrict mineral development in AONBs to that which is small scale and serves local needs;
- Development within the AONB should be considered in light of its potential effects on the purposes of the AONB, and whether these can be satisfactorily mitigated;
- Support for the protection of AONBs.

Policy C9: Historic environment and archaeology

- The policy does not fully accord with the NPPF.

Policy C10: Transport

- Further consideration should be given to the transport impact of minerals and waste movements by road.

Policy C11: Rights of way

- Consideration should be given to impacts on the amenity value of the public right of way;
- Working and restoration affecting equestrian rights of way should be undertaken with horses in mind;
- Sections of the rights of way network are not well maintained, e.g. at Sutton Courtenay.