

**Draft Minerals and Waste Planning Strategies Consultations (Sept 2011)  
Comments on Background Papers 1 - 4 + Preliminary Minerals Sites Assessment**

ID No (& name of org)	Comment/issue raised
<b>Background Paper 1 - Environment</b>	
RSPB	<p>While acknowledging that the background papers are there to provide evidence and justification for the Core Strategy DPD itself, we have a few comments which we hope will help clarify their content and focus all parties' attention on the main issues.</p> <p>Chapter 4 – Sites in Oxfordshire designated for their environmental importance</p> <p><i>Paragraph 4.1</i></p> <p>This paragraph discusses the approach required to assessing potential impacts of mineral quarrying on European sites. Unfortunately it does not quite fully or accurately reflect the process required by the Habitat Regulations 2010. Firstly, the appropriate assessment has to be carried out by the <i>competent authority</i>, not the developer. The developer does however have to provide the information needed to allow the competent authority to carry out the appropriate assessment.</p> <p>Secondly, if the competent authority cannot conclude that there will be no significant effect on a European site from a project (taking into account any mitigation measures), then that project must be <i>refused</i>. Such a project could only proceed if there were no alternative solutions and if there are imperative reasons of overriding public interest (IROPI), in which case, compensation would be required. But in reality, if a mineral application in Oxfordshire was likely to have a significant effect on a European site that could not be mitigated, then the applicant would find it extremely difficult to demonstrate that there were no alternative solutions and the subsequent IROPI test probably would never even be considered. We suggest that the advice of Natural England should be sought on appropriate amendments to paragraph 4.1, to reflect the actual requirements of the law.</p> <p>Chapter 6 – Issues for consideration</p> <p><i>Paragraph 6.2</i></p> <p>When considering proposals affecting best and most versatile land the choice is not simply between agriculture or nature conservation after-uses, but between agriculture and any other form of after-use. The key point about some forms of nature conservation after-use though, is that these may allow for the preservation of soils allowing for the future return of the land to agriculture if such a national need ever arose. (Please see also our comments on Policy M6.)</p> <p><i>Paragraph 6.5</i></p>

	<p>We are slightly concerned that paragraph 6.5 could be construed as allowing consideration of a balance or ‘trade-off’ between allowing damage to occur to designated sites, and enhancing CTAs by restoring mineral sites for nature conservation. We are sure this was not the Council’s intention but we suggest revising this section to disentangle protection of designated sites from consideration of the scope to create new habitats. As the appropriate level of protection of designated sites is already mentioned under paragraph 6.4, the following revisions would resolve our concern:</p> <p><i>The balancing between the potential indirect impacts of mineral working on existing area of biodiversity interest and designated sites and the opportunities afforded by Conservation Target Areas to conserve and enhance and increase biodiversity in the long term through restoration to nature conservation.</i></p>
Env Agency	<p>We welcome the presence of this paper as it addresses a number of environmental constraints. Particularly in respect of biodiversity and landscape. We have the following comments to make:</p> <ul style="list-style-type: none"> <li>• With reference to <u>Section 3.2</u> the European Water Framework Directive and the subsequent River Basin Management Plans are important. Minerals and waste schemes should not cause an environmental impact which would result in the failure of a watercourse to achieve good ecological status/potential. This should be noted.</li> <li>• In <u>Section 5</u> impacts are discussed. We welcome the recognition that minerals and, in particular, waste activities, can have an impact on vulnerable receptors if appropriate mitigation is not put in place. This provides justification for strong policy to ensure impacts are mitigated for any proposals. We will ensure through planning and where applicable, environmental permitting, that risks to the environment are minimised.</li> <li>• <u>Section 6</u> discusses buffer zones. We would normally require at least a 16 metre buffer zone between mineral workings and a main river. These are consultation zones where consent may be required, NOT total stand-off areas where no activity may take place at all. Although it may not be sensible for practical reasons to quarry within this area, it may be desirable for works to take place close to the river, particularly during site restoration, which may enable linkage of the river corridor with the restored landscape and enhancements to the river corridor itself to take place. This might include wetland habitats, creation of flood flow routes or in-channel improvement works, for example, and would be need to be considered on a site-by-site basis to ensure any proposal is appropriate, leading to a high quality operation and restoration, taking advantage of any enhancement opportunities that the proposal presents.</li> </ul>
BBOWT	<p>4.1 It is stated that the developer must carry out an appropriate assessment where development is likely to have an impact on Natura 2000 sites. However, it should be the ‘competent authority’ (Oxfordshire County Council in this case) which undertakes the appropriate assessment and the developer should be responsible for providing all necessary information. This section should be reworded to make this correction.</p> <p>5.7 The Trust supports the principle of considering the requirements for buffer zones on a case by case basis. These decisions should be based on complete baseline environmental information for specific sites and the likely</p>

	<p>predicted severity of impacts.</p>
<p>Natural England</p>	<p><b>4 Sites in Oxfordshire designated for their environmental importance</b></p> <p><b>4.1</b> states that the developer must carry out an appropriate assessment (AA). However, the ‘competent authority’, in this case OCC, must carry out the AA, and the developer must provide sufficient information to allow this to be carried out. Suggest amendment to wording as follows:  ‘...if proposed development is likely to have an impact on these sites, the developer must provide sufficient information to allow Oxfordshire County Council to carry out an appropriate assessment.’</p> <p><b>5.7</b> – We strongly support the principle of buffers being considered on a case by case basis. These should be decided using up to date environmental information.</p> <p><b>6 Issues for consideration</b></p> <p><b>6.2</b> The wording used should reflect that in paragraph 3.6.3 from the Restoration paper for consistency. This states: ‘Agricultural land can be restored to an amenity or nature conservation afteruse such as species rich grassland, but where ‘best and most versatile’ land is involved the methods used in the restoration and aftercare should aim to preserve the long term agricultural potential of the land for the future.’</p> <p><b>6.3</b> we support the comments made by Camilla Burrow, Oxfordshire County Council’s ecologist planner. It would be useful to give a list of things which may require a buffer as examples.</p> <p><b>6.5</b> – we support the comments made by Camilla Burrow. We are concerned that the paragraph as it stands implies that impacts on designated sites could be acceptable in some circumstances. We therefore suggest revising this paragraph for clarification and to highlight that there should be no direct impacts on areas of biodiversity interest as follows:  <i>The balancing between the potential indirect impacts of mineral working on existing area of biodiversity interest and designated sites and the opportunities afforded by Conservation Target Areas to conserve and enhance and increase biodiversity in the long term through restoration to nature conservation.</i></p>
<p>341</p>	<p>The national Minerals Policy Statement 2006 states that 'policies should seek to protect and enhance the character of surrounding rural and urban areas by careful planning and design of any proposals for minerals development'. I cannot see anywhere in the consultation document where there is comment on this important issue, particularly as the Caversham development will significantly alter in a negative manner the Sonning Eye designated conservation area.</p>

There is further comment in clause 3.4.13, that there should be incorporation of buffer zones into the design of a potential mineral working site. Again this is a critical issue in the Caversham selection debate, which is not dealt with in any material way within the document.

2. Clause 5.4 makes specific reference here to one of the major problems in continuing to develop the Caversham site on such a massive scale. It is a well established fact that even without further working of the site, there is a significant flood problem in Sonning Eye. OCC are I believe required to ensure that mineral extraction proposals do not have a significant adverse impact on water quality, watercourses flood flows or storage, and yet this is precisely what will inevitably happen following the OCC selection of the site for further development. Again a point which has received little material attention in this document.

In the description of RAS16, there is a comment that the western area has poor access, and therefore will not be considered for development. We would certainly argue that given the increased traffic impact to an already very busy road through Sonning Eye, access is hardly good already in the eastern area. This is an important point which has been glossed over in this document.

The comment in Table 4 in relation to RAS 16, is sadly typical of the general attitude throughout this document to the Caversham site. Commercial considerations out-weigh the flood problems indicated by the data. Clause 10.4 emphasises this point. We would have thought that given the serious flood issues here, a Flood Risk Assessment (FRA) should precede selection of the site.

Clause 10.5.5 is an astonishing statement. Even though the area is primarily in flood zone 3b, extraction would go ahead even should the FRA deem the site to be unacceptable!

3. Clause 8.3 states that use of inert fill in mineral restoration in place of porous gravel should be prioritised, but does not state why? As this is likely to increase the flood and environmental risk arising from the Caversham site development, we would seriously question this point.

4. In Appendix 2 clause 3.1, there is more evidence of commercial issues outweighing other issues in the meeting with certain interested stakeholders, in that the material within the Caversham site is apparently an important scarce gravel/stone resource in Oxfordshire. Does this include resources in Berkshire?

5. Patently the materials transported from the Caversham site, are exported to Berkshire. How does this benefit Oxfordshire residents, and how does this meet one of the OCC key challenges to support planned development in the county? There is no material information in this document at all as regards resource requirements and resources in Berkshire.

Strangely given the significant traffic issues already in Sonning Eye, there is no mention in clause 7 of a transportation or environmental issue relating to further development of the Caversham site. This is a

	<p>particular problem when the road leading to the Sonning Bridge over the Thames is flooded causing chaos.</p> <p>Conclusion</p> <p>We have read the document in full on two separate occasions, and it is apparent that very little due diligence has been carried out by the OCC, in relation to the implications for the residents of Sonning Eye, of continued working of the Caversham site over the next thirty years. Selection of the site has been made largely ignoring relevant planning issues, the seriousness of the current and potential future flood scenario, traffic congestion and of course deterioration in the environment. We would hope that as the strategy progresses, there is more consideration of these issues, and a little less consideration for commerciality.</p>
OCC Natural Env team	<p><b>4.1</b> This states that the developer must carry out an appropriate assessment but in fact this must be done by the 'competent authority', which in this case would be Oxfordshire County Council. Suggest amendments to wording as follows, but this should be discussed and agreed with Natural England.</p> <p><i>The precautionary principle is applied to Natura 2000 site; if proposed development is likely to have an impact on these sites, the developer must provide Oxfordshire County Council with the information they require to carry out an appropriate assessment. <del>to identify the full range of impacts.</del></i></p> <p><b>5.7</b> Strongly support the principle of considering the requirements for buffers on a case by case basis. These decisions should be based on up to date environmental information on the area and its surroundings.</p> <p><b>6.2</b> When considering proposals affecting best and most versatile land the choice is not simply between agriculture or nature conservation after-uses, but between agriculture and any other form of after-use. Some forms of nature conservation after-use are acceptable on BMW if they allow for the preservation of soils allowing for the future return of the land to agriculture if required. The wording used should reflect that in paragraph 3.6.3 from the Restoration paper for consistency. This states: 'Agricultural land can be restored to an amenity or nature conservation afteruse such as species rich grassland, but where 'best and most versatile' land is involved the methods used in the restoration and aftercare should aim to preserve the long term agricultural potential of the land for the future.'</p> <p><b>6.3</b> It could be useful to insert a list of what might require a buffer zone, without giving actual distances e.g. residential dwellings, water courses, areas of biodiversity interest , landscape features (e.g. ponds, hedgerows, woodland, mature trees, bat roosts, badger setts etc)</p> <p><b>6.5</b> Suggest re-wording of this paragraph to highlight that there should be no direct impacts on areas of biodiversity interest as follows:</p> <p><i>The balancing between the potential indirect impacts of mineral working on existing area of biodiversity interest and designated sites and the opportunities afforded by Conservation Target Areas to conserve and enhance and increase biodiversity in the long term through restoration to nature conservation.</i></p>

<b>Background Paper 2 - Flooding</b>	
Environment Agency	<p>Overall the paper incorporates many of our previous comments. As specific sites do not intend to be allocated as a part of this plan it is difficult at this stage to confirm whether we have reservations about certain sites coming forward or not. Having said that, the paper correctly identifies that sand and gravel working is a water compatible activity and is appropriate in all flood zones. Any infrastructure and built development associated with the processing of minerals should, however, not be located in Flood Zone 3b. With this in mind and also your minerals safeguarding proposed policy, sites with a high proportion of flood zone 3b may be more viable when associated processing and stockpiling facilities are in close proximity to present sites. You may therefore wish to consider the long term viability of sites should, for example, a present site choose not to extend and as a result, a sterilised mineral resource in the functional floodplain exists with no adjacent processing facilities.</p> <p>It will be for the Sequential Test to direct development to areas at lowest risk of flooding. We note that the Sequential Test which has been undertaken to date, has considered the principle of differing resource areas and either accepted or rejected areas based on flood risk and other planning reasons. The principles of this approach are sound and we understand that the difficulty posed by minerals in respect of flood risk is that they can only be worked where they are found. We therefore have no overall concerns at this stage in relation to the Sequential Test but we do have the following comments:</p> <ul style="list-style-type: none"> <li>• It would be useful on <u>Page 4, Paragraph 3.2</u> to show any additional maps developed through the Strategic Flood Risk Assessment. Those maps will show additional flood risk information which will help inform sequential testing at the site allocations DPD stage.</li> <li>• The box presented under <u>Paragraph 4.1, Page 5</u> should be expanded slightly to make it clear that in Flood Zone 3a a 'more vulnerable' use may be appropriate subject to the Sequential and Exception tests being passed. A sentence stating that development in any flood zone would require the application of the Sequential Test would also be sensible. This would make it clear that one is not just matching compatibility to flood zones.</li> <li>• In <u>Table 2, Page 8</u> it would again be useful to show that a proposed vulnerability may be compatible in a given flood zone, subject to the exception test being passed. This would apply only to the first two rows, where development of landfill sites and waste management facilities in Flood Zone 3a may be appropriate, subject to the exception test</li> </ul>

	<p>being passed.</p> <ul style="list-style-type: none"> <li>• In relation to <u>Section 5</u> we would emphasise that every opportunity should be sought, through the development of minerals sites in Flood Zones 3a and 3b, to reduce flood risk. We welcome the inclusion of policies C1 and M6 in the preferred options report.</li> <li>• With reference to <u>Section 7</u> we would recommend appending maps contained in the SFRA to this background paper. This will help to create a more complete picture of flood risk and will assist you in establishing whether any of the broad areas are subject to flood risk from any other sources of flooding.</li> <li>• A level 2 SFRA may be required for any sites which are intended to be bought forward which would trigger the Exceptions Test. Reference should be made to this in <u>Paragraph 7.4</u>. Also, a level 2 SFRA may be required where a significant proportion of a site is at risk of flooding and identified as being at high risk by your own sequential test and evidence base contained in <u>Table 4</u>.</li> <li>• We note the exclusion of various Resource Areas due to lack of mineral and/or other planning reasons. The Sequential Test which has been undertaken notes the very high risk of some resource areas, notably RAS 6 and 16. It will be important to ensure that robust flood risk policy is developed in the core strategy to ensure that any applications which come forward do not increase flood risk and make important steps, through restoration, to reduce flood risk.</li> </ul> <p>A further factor is the need to set clear policy on the principle of fill at the given sites which are to be chosen. Landfill is considered a more vulnerable activity and so the Sequential Test in relation to filling of voids may be necessary. Principally, this means that any development of minerals activity in flood zone 3b will have to have a water compatible restoration and after-use phase.</p>
	<p>Page 21 item 6 Eynsham/Cassington/Yarnton.</p> <p>You state that there is flood risk in this area but that this is outweighed by the need to work gravel efficiently by using existing sites and infrastructure, good location for proximity to markets, closeness to A40 and good road infrastructure, with few other environmental constraints.</p> <ol style="list-style-type: none"> <li>1. Eynsham is NOT an existing site and is well separated from the Cassington/Yarnton sites by the A40.</li> <li>2. Eynsham is not near the sites where it will be used. I understand that most of the gravel will be taken by A40/A34 to Harwell/Didcot/ Wantage/Grove areas.</li> </ol> <p>No mention is made of the cost of transporting the gravel by lorry to places 20 plus miles distant. Fuel costs are always rising and I would like to know when OCC believes it will be uneconomic to transport gravel so far.</p> <ol style="list-style-type: none"> <li>3. The A40. It is beyond belief that anyone could plan to put more lorries on to an already congested road. Now that the A40</li> </ol>

	<p>has been de-trunked and comes under the care of OCC will the county now up grade this road? Are the County suggesting that the lorries use the Swinford Toll bridge? Again an over used road.</p> <p>4. The alternative route is via Swinford Toll Bridge a grade one listed structure which is already over used and narrow.</p> <p>5. OCC to state that flooding does effect the area of Eynsham but that this is of secondary importance to the need to extract gravel. Eynsham is surrounded by flood plain to the east west and south, residents know that houses flood. We have recently had an additional 100 houses built on the flood plain and these magnify the risk.</p> <p>6. The area suggested for gravel extraction at Eynsham is an area used for recreation.</p> <p>Why no mention of the social problems created by gravel extraction? I believe that the whole plan gives precedence to the Gravel Exaction Company and takes little notice of the local population.</p>
M55	<p>Thank you for sending me a copy of 'Background Paper 2: flooding ...' It was in relation to a paragraph similar to one in this paper that I had sought clarification in order to be able to comment in your consultation. Firstly, however, may I take the opportunity to point out what appears to be a mistake in the paper you sent me.</p> <p>-----</p> <p>In Section 4.1, Key definitions, in the definition of Flood Zones, there is,</p> <p>"Flood zone 3a: High Probability. This zone comprises land assessed as having a 1 in 1000 or greater annual probability of river flooding (&gt;1%). The water-compatible and less vulnerable uses of land are appropriate in this zone. "</p> <p>I think this should read, ".. 1 in 100 or greater ..."</p>
SEAG	<p>This paper is supposed to justify the preferred strategies for the selection of sites for mineral extraction. It particularly attempts to justify the selection of sites more susceptible to flooding. PPS 25 is frequently quoted but not given due regard or adhered to.</p> <p><u>3.5 Section 2.2</u> describes the inclusion of PPS 25 The Sequential Test, The Exception test, and the Vulnerability of minerals development to flooding. A letter from Hydrologist Ian Brazier from Abington Consulting (Appendix F) is attached to this document and has been already submitted to the consultation process. He makes the point that the whole ethos of PPS 25 has been ignored in site selection. He states "There is a marked over preponderance of sites in zone 3 versus those in zones 1 and 2. The whole point of the Sequential Test is to avoid this". He goes on to say, "Whilst I understand that much of the sand and gravel resources are located in the fluvial flood plains, it would appear from these statistics that the ethos of the Sequential Test has been ignored in the allocation of sites in favour of other planning issues."</p> <p>Although the Exception Test is quoted in detail, 4.2 states it is "only required for landfill and sites used for waste management of hazardous waste located in zone 3a". This is not completely true. PPS 25 makes it quite clear (see section 1 f above) it applies to any development, and although gravel workings are "water compatible", workings infrastructure in the floodplain that have an impact on housing that is adjacent would justify the application of this test to the development. Within the definition of zone 3b (PPS 25 annex D8) states that water compatible uses are permitted, but with the previous caveats of floodplain storage, impedance of water, and no increase of risk elsewhere. Infrastructure must pass the Exception Test. The current infrastructure for the proposed development lies in zone 3 and the new area RAS16 has nowhere to site it out of the flood</p>



plain.

3.6 Section 3.5 Acknowledges the likelihood of wetter winters and increased risk of flooding, but then ignores this important point in relation to its choice of Caversham to be included.

3.7 Section 5.4 Quotes MPS1 paragraph 17 “..Local Authorities should ensure that in areas at risk of flooding mineral extraction proposals do not have a significant adverse impact on flood flows or flood storage capacity. The County Council therefore has a duty of care to the residents of Sonning Eye to ensure that any risk from gravel development is minimised and not just accept a proposal from a developer that is suboptimal in these respects.

3.8 Section 5.5 MPG7 is quoted without stating the very important issue relating to top soil and sub soil storage. Annex 44 states unambiguously that “these materials should not be stored in the floodplain”. This has been disregarded by the developers at Caversham, and apparently allowed without question by the District Council and the Environment Agency. RAS 16 has no significant area out of the floodplain where these materials could be stored. OCC’s failure to take this into consideration will inevitably lead to non compliance with MPG 7

3.9 Section 7.4 states that the level 1 Flood Risk Assessment did not identify the need for a level 2 study to inform work on the MWDF. Scott Wilson’s SFRA done for OCC actually appoints out that “there are 30 – 40 properties experiencing fluvial flooding” This is reason enough for a level 2 FRA to be mandatory. It is further supported by the data presented in Section 2 of this document.

3.10 Despite this apparent oversight the flooding of houses is mentioned in the evaluation of RAS 4, Brampton. RAS 5 Standlake, RAS 6 “local villages”, RAS 13 local village flooding is noted but the gravel sites nominated are outside the floodplain. Remarkably, despite some consideration being given to flood risk to local housing in the above areas, it has been completely ignored in RAS 16. This is either an incompetent oversight or it has been done wilfully to justify the conclusion in section 10, which has proposed solely on the basis of commercial criteria.

3.11 Section 10.4 The excuse for including Caversham, and the overriding of the Sequential Test, is because “*it is considered it meets the need for a high quality flinty sand and gravel in the Reading area, and is a sustainable location because of its proximity to the markets it serves in Reading*”. County Councils have a duty to collaborate with adjacent councils whilst developing regional plans for mineral resources. It is therefore remarkable that no mention is made of the deliberations from south of the river. Joint Minerals and Waste policy for Berkshire, includes sites actually within Reading itself.

R M01 Smallmead within Reading business park.

R M02 Little John Farm

R M03 Part of the Kennet Valley site north of the M4..

There are of course others but the first two are likely to have the same alluvial deposits as Caversham and would be far more accessible to Reading as no Thames bridges would need to be crossed. Without having investigated whether these options are being pursued, the original contention relating to Caversham is not valid.

3.12 Section 10.4 Goes on to state “There is only one site in this area and a draft planning application has been received by the Council for that site”. However this is again not true. The developer has proposed a site that is convenient for them but it is a smaller component of a much larger area originally identified in work done by Oxfordshire County Council itself in 2007 (Minerals Site Proposals and Policies Document) On page A12 site SG 11 shows a large tract of land along the river which

	<p>could also deliver the necessary sand and gravel (Appendix G).It is noticeable that the developers proposal specifically identifies land that is wholly within the floodplain giving no scope for the siting of infrastructure soil etc outside this. It is the County Council's legal duty to make sure that any site included within a strategic development plan is able to comply with planning policy. This is not, but could be made to do so. One is left to draw the conclusion that this policy has been drafted for the convenience of the developer at the expense of local householders. The County Council should primarily be representing the interests of the householders whilst allowing developers to access the necessary resources. They have not only failed to represent their interests, but appear to have overlooked them completely.</p> <p><u>3.13 Section 10.5.5</u> This final paragraph seems to hint at last at the possibility of a flood risk but still does not identify the housing as the issue. Making the extraction site smaller does still not get over the difficulties of virtually the whole site being in the floodplain. What is needed is an area outside the floodplain to be included in the minerals strategy at this stage. There should be no problem with this as there is clearly open space immediately to the north of the proposed area which would fulfil this requirement. (See Appendix G).</p> <p>The Oxfordshire County Council's SFRA was carried out by Scott Wilson. Their drawing of the "mineral site SG-11 Land to the East of Spring Lane" (Drawing D126605/SG-11) contains the following comments, "<i>The Upper Thames flows north to south to the east of the site forming the district boundary.</i>" And, "<i>There are around 30 - 40 properties experiencing fluvial flooding ... just up stream from the site.</i>" It is remarkable that such experts on flooding should be unable even to determine the direction of flow of the river. It gives one little confidence in anything else they may have to say. The have however picked up on the risk to local housing which OCC have ignored. This surely should have been sufficient to demand a level 2 FRA. The Environment Agency's comment recorded here is "The site is located upstream of Reading and in the functional flood plain". No its located downstream of Reading! And how can they ignore the houses when their data included on the map shows the whole site and village to lie in the "historic flood outline" Its no wonder local people have absolutely no faith in any of the supposed experts giving advice on the likelihood of their houses flooding.</p>
M341	<p>Preliminary Assessment of Minerals Site Nominations</p> <p>Clause 2.12 and the reference in the accompanying Annex 2 table show that 91.6% of the Caversham site is within Flood zone 3b). Any infrastructure required for the development would need to be located within the flood plain, which would certainly increase the flood exposure still further. Add to this the massive soil banks which impact flood flow and contravene existing planning policy. This is another very important point in relation to Caversham which receives scant attention in the document. There is a further question mark over archaeology on the site, which has not been investigated as yet, and could be material.</p>
<p><b>Background Paper 3 - Restoration</b></p>	

<p>Environment Agency</p>	<p>We support the aims of restoration, particularly when additional flood storage areas and valuable wetland habitats can be created. One issue that perhaps should be covered in the policy sections is the impact of PPS25 on restoration mechanism. Within the functional floodplain any land fill or waste activity is an incompatible use according to Table D3 of PPS25. After-use should also be considered in this context and we will seek that after-use associated with mineral sites is appropriate to the flood zone. There should be no land raising within the functional floodplain.</p> <p>The impact of restoration on groundwater flow and quality should also be considered. We will review sites which lie in a Source Protection Zone, or in an area of high groundwater vulnerability (Principal/Major Aquifers) in line with our Groundwater Protection: Policy and Practice.</p> <p><u>3.6.3</u> – All site restoration should seek some biodiversity gain, even if biodiversity is not the prime after-use.</p> <p><u>3.7.4</u> – We support the approach taken in the lower Windrush valley area and see no reason why a similar approach should not be taken in other areas of intensive working too. This could be further supported by provision of additional planning guidance (Supplementary Planning Guidance or through an Area Action Plan approach, for example).</p> <p><u>5.6</u> – Flight safeguarding and the implications for site restoration should also be discussed with nature conservation bodies and charities too, in order to ensure the biodiversity opportunities /implications are fully considered.</p> <p><u>6.2</u> – It is important to stress that if sand and gravel workings lie in the functional floodplain, then inert fill is not appropriate. Many current restoration schemes obtained planning permission prior to PPS25.</p> <p><u>8.3</u> -There is an acknowledgement that the inert wastes often required to restore mineral working sites is getting harder to source. It would be wise to consider phased development of mineral extraction operations as opposed to parallel development. This should reduce competition for inert wastes and lead to faster restoration of sites.</p> <p><u>9.3</u> – There should be a sequential approach to mitigation, wherever possible it should be on-site, then closely off-site. Mitigation distant from the site of impact should be a last resort, in most circumstances.</p> <p><u>Strategic approach</u></p>
---------------------------	---

	<p>Although we recognise that concentrations of mineral workings within similar areas can lead to issues such as groundwater movement and flooding issues, we also realise that a strategic approach to site selection can result in better solutions for mitigation to these issues as well as resulting in higher quality restoration, if a holistic approach to the overall objectives to the area is taken. In this way, it will be possible to restore sites with single end-uses – rather than a patchwork of amenity, agriculture and nature conservation on each site. (so each site may not achieve all of the overall restoration objectives, but taken strategically within the county, the objectives will be met).</p> <p>The alternative dispersed working approach, of choosing new areas to work, may lead to the original sites being approached at a later stage and a more ‘piecemeal’ approach to mitigation and restoration meaning less successful outcomes during operation and subsequently. Of course, as a more concentrated approach in any one area gives opportunity for operational impacts to be greater, a phased approach should enable these issues to be addressed and resolved.</p>
Defence Estates	<p>It is evident from Background Paper No 3 that MOD safeguarding interests are clearly identified within the draft plan. Chapter 5 outlines the potential birdstrike risk associated with restoration schemes within an MOD safeguarding consultation zone and acknowledges that mitigation will be necessary to reduce the birdstrike risk.</p> <p>I can therefore confirm that the MOD has no objections to the draft plan however it is crucial that the MOD is invited to comment further once specific sites have been allocated to ensure that the birdstrike risk is appropriately addressed.</p>
RSPB	<p>While acknowledging that the background papers are there to provide evidence and justification for the Core Strategy DPD itself, we have a few comments which we hope will help clarify their content and focus all parties’ attention on the main issues.</p> <p>Chapter 3 – Restoration  <i>Paragraph 3.2</i></p> <p>It would be helpful to clarify that the types of restoration listed here are not mutually exclusive and that where possible, restoration should be multifunctional.</p> <p>Restoration should have a primary end-use, but all restoration schemes have the potential to enhance biodiversity, improve access and the local landscape. (Please see also our response to Paragraph 4.41 of the draft Core Strategy.)</p>

*Paragraph 3.3.9*

Correction: paragraph 3.3.9 should cross refer to Section 6, not 5.

*Paragraph 3.3.10*

Please could you refer to “The RSPB and Natural England’s ‘Nature After Minerals’ programme...” as it is a partnership initiative.

Section 5 – Airfield safeguarding

*Paragraph 5.6*

Some nature conservation organisations like the RSPB have considerable experience of working with mineral operators and aviation authorities to minimise birdstrike risks arising from operational and restored quarries. It would therefore be good to see paragraph 5.6 include nature conservation stakeholders alongside the MoD and Oxford Airport when referring to the consultation process.

Section 6 – Inert fill

The availability of inert fill is a critical issue in achieving high quality restoration of many sites (especially large-scale quarries within floodplains) to high priority habitats and some other land uses, and its use to reduce the area of open water left behind can help mitigate issues like birdstrike risks. Working with mineral and waste operators and other local planning authorities, the mineral planning authority should give serious thought to whether, and how, permeable inert fill can be directed preferentially into mineral quarries to facilitate these outcomes, rather than being used in less important ways.

Mention is made of this in paragraph 8.3 and again in 9.6 but there is little detail and the issue is not really picked up on in the draft Core Strategy.

Please see our comments on paragraph 4.39 of the Core Strategy, wherein we suggest that a cross-reference to policy W7 of the Waste Strategy would be helpful.

*Paragraph 8.3*

Following on from the previous comment, there are two issues around the prioritisation of inert fill which we feel should be teased out in this paper.

Firstly, inert fill should be prioritised towards mineral quarry restoration (rather than be allowed to go to less critical end-uses). And secondly, as achieving particular finished ground levels is critical to the delivery of certain BAP priority habitats like reedbed and wet grassland (and much less so to the establishment of, for example, angling or water-sports lakes), inert fill should be prioritised towards those quarries with nature conservation after-uses.

*Paragraph 8.4*

We assume this refers to the current funding arrangements for the Lower Windrush Project. We suggest additional text to clarify that the intention is to

	<p>roll these arrangements out across the County as follows (new text underlined):</p> <p><i>“The current funding mechanism for nature conservation should be continued and extended to cover each strategic mineral extraction area.”</i></p> <p>Section 9 – Possible policies approaches considered</p> <p><i>Paragraph 9.3</i></p> <p>We are not clear what this means.</p> <p><i>Paragraph 9.4</i></p> <p>The RSPB strongly supports the proposal for a local aggregates levy. It would be worth noting in the paper that while the aggregates levy still applies at £1.50 per tonne to minerals arising in Oxfordshire, it is no longer being re-invested locally by the UK Government to redress the social and environmental impacts of quarrying, which was its original purpose. Now that this money is no longer spent locally, a contribution of 30p per tonne is required to ensure that local communities benefit from minerals extraction through the enhancement of the natural environment. This approach should be explored further in the forthcoming Sites DPD.</p>
<p>Frobisher Renewables Ltd</p>	<p>Wicklesham Quarry is subject to a restoration strategy. The “Restoration” background paper identifies that <i>„mineral workings are considered a temporary land use; the land should ultimately be restored to a positive land-use when extraction has been completed”</i>. (para 1.4). The paper identifies that a <i>„positive land-use”</i> could be the resumption of a former land use or a new use, there is no exhaustive list of appropriate uses and it is implied that many uses could be acceptable.</p> <p>The paper identifies the correlation between quarry sites and geological SSSI’s and considers that a site may be restored in a manner that ensures a useful resource for the public and researchers. The paper mentions a number of types of restoration (amenity uses, agricultural uses and biodiversity enhancements) but does not acknowledge that there may be suitable alternatives that could re-use the land in a positive way that will still secure increased biodiversity and ensure appropriate public access. 6</p> <p>In the case of Wicklesham Quarry for example, the site’s designation as a regionally important geological site and SSSI means that restoration of the land back to its condition prior to mineral extraction taking place is neither practical nor desirable.</p>

BBOWT	<p>3.2 The possible purposes of site restoration listed in this paragraph are not mutually exclusive. It should be stated that restoration schemes can frequently have numerous functions, and that all restoration schemes have the potential to make biodiversity enhancements, even if that is not the intended primary end-use of the scheme</p> <p>7.3 It should be clarified whether annual reimbursement to the organisation undertaking management of a restoration site from the OCC-held fund is a single annual payment and whether this is in arrears. If this is the case, such a policy can make it prohibitive for 'national or local wildlife organisations' to undertake management, even though that may be the most appropriate option based on experience and technical resources.</p> <p>8.4 BBOWT would strongly support continuation and wider application of the current funding mechanism for nature conservation in mineral extraction schemes.</p> <p>9.4 It should be noted that the aggregates levy is currently £1.50 per tonne. Now that this money is no longer spent locally, a contribution of 30p per tonne is required to ensure that local communities benefit from minerals extraction through the enhancement of the natural environment. This approach should be explored further and agreed in the forthcoming Sites DPD.</p>
Natural England	<p><b>3 Restoration</b></p> <p><b>3.2</b> It should be clarified that the types of restoration listed in this paragraph are not mutually exclusive and that restoration should be multi-functional (provided this does not result in very small, low quality parcels of land being restored such that they become difficult and expensive to manage). Restoration should have a primary end-use, but all restoration schemes have the potential to enhance biodiversity, improve access and the local landscape. Restoration for any purpose can and should include small amounts of biodiversity gain such as ponds (or pond complexes), new or gapped-up hedgerows, wildflower margins.</p> <p><b>3.3.1</b> Suggest re-wording to include priority species and habitats not included in the Conservation Target Area approach (e.g. ponds). <i>'Nature conservation after-use' is defined as restoration which meets the aims of the Biodiversity Action Plan delivered through the Conservation Target Areas approach and/or conserves and enhances other priority species and habitats and is managed primarily for the benefit of biodiversity for the long-term (e.g. 25 year) aftercare and management period.</i></p> <p><b>3.3.3</b> We support the comments made by Camilla Burrow.</p> <p><b>3.3.10</b> Nature after Minerals is a jointly funded by RSPB and Natural England so suggest amendment as follows: <i>The RSPB and Natural England's 'Nature after Minerals' programme...</i></p> <p><b>3.4 Geodiversity</b></p> <p>3.4.6 – suggest adding to this to state that we should be looking for protection of geodiversity sites during workings, and looking at ways to enhance them after works have finished – by, for example, opening it to local groups, and providing interpretation, and possibly viewing platforms. Please also see comments under 3.7.1 below.</p>

### **3.5 Landscape**

While we support everything that is said in this section, Oxfordshire contains part of 3 different Areas of Outstanding Natural Beauty (AONB). Some acknowledgement of this would seem appropriate in this section, in order to highlight how special, and specially protected, these areas are. At the end of paragraph 3.5.1, a sentence could be added to say: '*Additionally, 3 different AONB's cover significant areas of land in Oxfordshire. In these areas we should seek to further the conservation and enhancement of the natural beauty of the AONB's.*'

There should be a separate paragraph outlining how this designation and need to conserve and enhance the natural beauty of the AONB's means that generally, minerals and waste operations will not be permitted, except in exceptional circumstances. These might be smaller waste facilities, as outlined in the Waste Plan, or small scale quarrying for rarer minerals which may allow the restoration of traditional buildings in these protected landscapes (eg clay workings in the Chilterns AONB).

### **3.6 Agricultural land quality**

Natural England is pleased to see that our comments from July have been taken on board in respect of the Map at figure 3 and paragraph 3.6.3.

Restoration to agriculture should include some biodiversity enhancement such as creation of ponds (or pond complexes), new or gapped-up species rich hedgerows, wildflower margins and bird and bat boxes. All such enhancements should be committed to with relevant management regimes for the long term.

### **3.7 Leisure and recreational development and rights of way**

3.7.1 No need to mention bird-watching specifically, suggest deletion of *and affording opportunities for bird watching* and addition of *Community benefits can be realised during the operational phases of quarrying, such as creating view points of the workings with interpretation boards explaining, for example, the geology of the area and what mineral is being extracted, the biodiversity using the active site (e.g. sand martins) and what the mineral will be used for (e.g. house-building).*

3.7.2 Suggest addition as follows:

*If planned and managed well, a scheme to manage access in the construction and operational phases...*

3.7.4 We support Camilla Burrow's comments

### **5 Airfield Safeguarding**

5.6 Several of the nature conservation bodies working in this area have specialist knowledge of working with minerals operators and aviation authorities to minimise the risk of birdstrike associated with restored quarries. It would be a shame if this knowledge were not utilised in finding the best solutions for these restored quarries. We therefore suggest the addition of '*In considering the restoration of sites in these areas, the issue of bird strike will need to be considered and restoration carried out appropriately, in consultation with the Ministry of Defence, Oxford*



	<p><i>Airport and nature conservation bodies.'</i></p> <p><b>6 Inert fill</b>  We support the comments made by Camilla Burrow and by the RSPB. Permeable inert fill should be directed to restoration of mineral workings which are earmarked for nature conservation afteruses.</p> <p><b>7 Funding for restoration for nature conservation to date</b></p> <p><b>7.2</b> Support Camilla's comments</p> <p><b>8.3</b> Suggest addition to emphasise that inert fill should be prioritised for use on sites restored to nature conservation as follows:  <i>The availability of inert fill for restoration is limited and decreasing which may constrain the types of restoration possible. Use of inert fill in for mineral restoration should therefore be prioritised over other uses, and within the context of minerals restoration, it should be prioritised for restoring sites to a nature conservation after-use.</i></p> <p><b>8.4</b> Suggest additional text to clarify that the mechanism should be rolled out more widely across the County as follows:  <i>The current funding mechanism for nature conservation should be continued and extended to cover each strategic mineral extraction area.</i></p> <p><b>9.4</b> We strongly support the comments made by Camilla Burrow and the RSPB, advocating the proposal for a local aggregates levy.</p>
Peter Bennie Ltd	<p>The restoration background paper gives guidance ...and is of particular concern. Sections 7.2 and 9.4 cover the subject of funding and has been written as if Oxfordshire's practice is well established and wide ranging; we are only aware of one example and if the fund was set up for this it was done 20 years ago. It has been estimated that it will need 30p/tonne to provide for 20 years of conservation management, however there is no proof to substantiate this figure. This method seems to be an arbitrary one size fits all method, which takes no account of site circumstances or detailed requirements. The County Council are to hold the funds and sign off the works, roles that are outside of its remit, experience and competence. This issue will need to be dealt with in detail in subsequent mineral policy documents, where there will be the opportunity for formal consultation.</p>
Lafarge Aggregates	<p>However, we wish to express concerns regarding Background Paper No. 3, which deals specifically with quarry restoration and its potential relationship with Policy M6.</p> <p>2.8.3 There is no indication of the status of the Background Papers and how they are reflected in policy. However, we are concerned with regard to the statements contained in sections 7.2, 7.3 and 9.4 of Background Paper No. 3 and the potential implications for the minerals industry within the County.</p>

	<p>2.8.4 Section 7.2 of the Backgrounds Paper states that Oxfordshire County Council set up a scheme in 1991 to fund post mineral restoration for nature conservation purposes. This fund is considered in addition to a section 106 agreement and is stated in a manner that suggests it is well established and wide-ranging across the County. However, we are only aware of one area to which the fund applied.</p> <p>2.8.5 Section 9.4 of the Background Paper goes on to state as follows: "For nature conservation after-use, the developer will fund the restoration and the 5 year after care period. The County Council proposes to gain the developer's consent to funding a further 20 year management period. The money to fund the 20 year period will be collected by OCC from the developer on an annual basis at the end of each year in which the quarry has been operational. The amount will be based on a figure per tonne of mineral. The County Council suggests that this figure could be 30 pence per tonne (index linked from 2012), but this needs further discussion. Any money not spent on management of the site by the end of the 20 year period can be spent on enhancements to biodiversity, landscape &amp; access within the Conservation Target Area."</p> <p>2.8.6 It is our contention that there is no justification for this provision for an operator that has such obligations enshrined in a section 106 agreement and who has demonstrated competence in delivering satisfactory aftercare management. We are unaware of any other Authority that takes such an approach. Indeed, we consider this inconsistent with Government planning policy. Lafarge funds restoration and aftercare on an accrual basis as minerals are worked and consider that there is no reason for a Planning Authority to intervene in this way. In light of this, we respectfully request clarification on the role of this statement within the context of the Council's Draft Minerals Strategy.</p>
<p>Smiths Bletchington</p>	<p>7.3 The Draft Plan and Background Paper 3 recognise the shortage of inert wastes suitable for the restoration of mineral workings. However it should also be noted that the use of inert wastes for this purpose is subject to separate regulation by the Environment Agency which is outside the influence and objectives of land use planning policy. For this reason the restoration options available for any particular site may be more a decision for the EA than an aspiration of the Minerals Plan.</p> <p>7.4 We strongly support the prioritisation of the use of inert fill in the County in the restoration of mineral workings (Para 8.3) and would welcome policy support to deliver this. There should also be further emphasis to ensure that all planning applications to Districts which involve the use of inert wastes for non mineral related developments should be raised with the County Council in order to "safeguard" this resource for priority mineral related uses.</p> <p>7.5 We acknowledge the now well established expectation of the County Council for operators and landowners to contribute towards the management of mineral workings restored to nature conservation for an extended period beyond the statutory 5 years of aftercare. However the current wording of the policy is imprecise both in the nature</p>

of the afteruse to which the contribution should apply and the length of time involved. This uncertainty is further increased by the statements made at sections 7 -9 of the background paper.

7.6 Funding of the extended aftercare period has not solely been secured by the method described in the Background Paper and such an approach should not be prescriptive in the future.

7.7 If the objective is to ensure that sufficient funds, accessible by both the operator/landowner and the County, are available to meet the annual management requirements then alternate funding mechanisms should also be acceptable. The provision of bonds or insurance policies may also be a suitable mechanism to secure guaranteed funds. Cash held in a low interest account below the level of inflation may not be fit for purpose. The simple objective should be the proper management of the nature conservation interest for the agreed period and how this funding is delivered should be agreed with the operator/landowner on a site by site basis. In the event of any default by the operator/landowner then guaranteed funds should be released to the County Council.

7.8 Also the objective is confused. It is unclear whether the funding is for the extended management of the restored mineral working or as a source of eventual revenue for neighbouring Conservation Target Areas. These two ambitions will be counterproductive in negotiations between the County Council and operators/landowners. In the time period under consideration, 25 years beyond the end of mineral working, the assessment of the level of funding to be generated during active mineral working can at best be guesswork. The policy should encourage the provision of more than adequate fund availability throughout the extended management period. This will not be achieved by the risk that surplus funds will be used by the County Council without reference to the operator/landowner on unrelated projects. This is unacceptable. Once the objectives of the extended management period have been fully complied with any money remaining in the fund should be returned to the operator/landowner.

7.9 Reference to a funding provision of 30p per tonne (Para 9.4) is made without any supporting evidence related to either the type of conservation management envisaged or to the ratio of the mineral yield and the area of land restored. It is also not clear whether the original figure of 10 per tonne (Para 7.2) established in 1991 is the correct level of provision and whether this has delivered satisfactory levels of extended management at the sites where it has been secured. Therefore the indexed value of 19 per tonne is also uncertain.

7.10 It is also not clear, but is assumed with reference to Para 9.4, that the extended management period is solely for nature conservation and not for any other approved afteruse. Extended management may not be not appropriate on other afteruses. The period for extended management for nature conservation is also assumed to be for 20 years post aftercare. This requires clarity in the Draft Plan.

7.11 Smiths do not disagree with the need for long term funding but believe that the means by which the actual money is secured is a decision for the operator, submitted for scrutiny and approval by the County Council. We

	<p>recommend that this matter is researched and discussed further by all relevant parties; the County Council, mineral operators and appropriate NGOs with the aim to come up with a flexible funding mechanism that guarantees the management outcomes for extended periods of aftercare.</p> <p>7.12 We believe that provision for securing funding from an operator should be delivered through a standalone policy which separates it from the overarching aspirations of Policy M6.</p>
Hanson Aggregates	<p>The requirement for high quality progressive restoration is supported.</p> <p>However, the mechanism for securing satisfactory restoration, aftercare and afteruse of restored mineral workings requires further clarification. In particular, the circumstances under which operators and landowners are justifiably expected to contribute to long term management require further detailing and discussion. These should concentrate on major schemes for nature conservation where their successful establishment is dependent on a longer period of active management.</p> <p>The Council should not be prescriptive in the mechanism for securing financial provisions for long term management. The source of funding should not be limited to the method described in the background paper, where other options may be available such as bonds and insurance policies.</p> <p>Reference to a fund of 30p/t is not supported by sufficient evidence and should be deleted. Funding should necessarily be geared to the individual size, complexity and characteristics of each site.</p>
OCC Rights of Way Officer	<p>Para 3.7 of the background paper 3 for restoration of quarry sites is supported - but I would also encourage the provision of a set amount of the Levy to be used to fund access and rights of way mitigation measures - and not just inside the CTAs . I would suggest that some graphics to show the rights of way network would be included in this document - as per the full LTP. I am happy to work with you to develop a 'blueprint' type approach for access and public rights of way provisioning.</p>
OCC Natural Environment Team	<p><b>3 Restoration</b></p> <p><b>3.2</b> It should be clarified that the types of restoration listed in this paragraph are not mutually exclusive and that restoration should be multi-functional (provided this does not result in very small, low quality parcels of land being restored such that they become difficult and expensive to manage). Restoration should have a primary end-use, but all restoration schemes have the potential to enhance biodiversity, improve access and the local landscape. Restoration for any purpose can include small amounts of biodiversity gain such as ponds (or pond complexes), new or gapped-up hedgerows, wildflower margins.</p> <p><b>3.31</b> Suggest re-wording to include priority species and habitats not included in the Conservation Target Area</p>

approach (e.g. ponds). 'Nature conservation after-use' is defined as restoration which meets the aims of the *Biodiversity Action Plan delivered through the Conservation Target Areas approach and/or conserves and enhances other priority species and habitats* and is managed primarily for the benefit of biodiversity for the long-term (e.g. 25 year) aftercare and management period.

**3.3.3** Suggest adding a sentence at the beginning of this paragraph to set the context, such as:

*The Conservation Target Areas approach did not include ponds as a target habitat because they were not priority habitat at the time. However, UK BAP priority ponds can and should be created on any restored minerals site, not just those restored for nature conservation. UK BAP priority ponds are defined as...*

**3.3.10** Nature after Minerals is a jointly funded by RSPB and Natural England so suggest amendment as follows: *The RSPB and Natural England's 'Nature after Minerals' programme...*

### **3.4 Geodiversity**

Geodiversity sites should be protected during workings, and be enhanced after works have finished e.g. by opening the site to local groups, and providing interpretation, and possibly viewing platforms.

### **3.6 Agricultural land quality**

Restoration to agriculture should include some biodiversity enhancement such as creation of ponds (or pond complexes), new or gapped-up hedgerows, wildflower margins.

### **3.7 Leisure and recreational development and rights of way**

3.7.1 No need to mention bird-watching specifically, suggest deletion of *and affording opportunities for bird watching* and addition of *Community benefits can be realised during the operational phases of quarrying, such as creating view points of the workings with interpretation boards explaining, for example, the geology of the area and what mineral is being extracted, the biodiversity using the active site (e.g. sand martins) and what the mineral will be used for (e.g. house-building).*

3.7.2 Suggest addition as follows:

If **planned** and managed well, a scheme to manage access in the construction and operational phases...

3.7.4 Strongly support the extension of the Lower Windrush Valley Project to cover each of the strategic areas for minerals extraction in Oxfordshire. The exact proposal should depend on the area and include the flexibility to contribute to existing projects and be explored and agreed in the forthcoming Sites DPD.

## **5 Airfield Safeguarding**

5.6 Suggest amendment to highlight that safeguarding does not rule out working and restoring minerals sites to nature conservation after-use and discussions on restoration schemes should be iterative. Nature conservation bodies (e.g. RSPB) have experience of bird strike issues at a national level and can help by sharing this knowledge. Pond Conservation has produced guidance on creating wetlands in safeguarding areas.

*In considering the restoration of sites in these areas, the issue of bird strike will need to be considered and restoration carried out appropriately, in consultation with the Ministry of Defence, Oxford Airport **and nature conservation bodies.***

#### **6 Inert fill**

A major issue with inert fill is its permeability. To restore a site to UK BAP priority flood meadow habitat, the substrate must be permeable to allow ground-water flows to continue. Permeable inert fill should be directed for restoration of minerals sites to nature conservation after-use.

#### **7 Funding for restoration for nature conservation to date**

Suggest re-wording of this section as follows:

*7.2 In 1991, Oxfordshire County Council set up a scheme to fund **the management of sites** post mineral restoration for nature conservation purposes. Developers are currently asked to sign a section 106 agreement which commits them to **funding the management of the restored site for a minimum of 20 years, following the statutory 5 year after-care period. Contributions are calculated based on the estimated costs of managing the habitats on the site for the 20 year period. The calculations include the cost of an estate worker and equipment to carry out most work, plus specialist contractors where required e.g. for the reed bed management and bird management required by the MOD.***

*~~make a contribution of 10 pence per tonne of mineral extracted. This figure is index-linked and is currently (2011) 19 pence per tonne. Management of the site for a 5-year period after restoration is a statutory requirement, but the fund pays for continued management of the site after this time for a further 20-year period.~~ The funding arrangement is discussed at pre-application meetings and has been successfully implemented at quarries within the Lower Windrush Valley and in other areas of the county. **In the Lower Windrush Valley area, funding is also provided to the LWV project for work to improve biodiversity, landscape and access for the local community within the whole project area. Calculations of funding for the Lower Windrush Valley Project include the salary costs and overheads of a warden and a capital budget to carry out works. Minerals operators contribute to the project for the period which the quarry is active (extracting mineral and restoring sites) as this is when the impacts of quarrying will be experienced by the local community and wildlife.***

8.3 Suggest addition to emphasise that inert fill should be prioritised for use on sites restored to nature conservation as follows:

*The availability of inert fill for restoration is limited and decreasing which may constrain the types of restoration possible. Use of inert fill ~~is~~ **for mineral restoration should therefore be prioritised over other uses, and within the context of minerals restoration, it should be prioritised for restoring sites to a nature conservation after-use.***

8.4 Suggest additional text to clarify that the mechanism should be rolled out more widely across the County as

	<p>follows:  <i>The current funding mechanism for nature conservation should be continued and extended to cover each strategic mineral extraction area.</i></p> <p><b>9.4</b> Strongly support the proposal for a local aggregates levy. While the aggregates levy still applies at £1.50 per tonne to minerals arising in Oxfordshire, it is no longer being re-invested locally by the Government to redress the social and environmental impacts of quarrying, which was its original purpose. Now that this money is no longer spent locally, a contribution is required to ensure that local communities benefit from minerals extraction through the enhancement of the natural environment.</p> <p>Calculations for the long term management of restored sites should be based on the estimated costs of managing the habitats which the sites will be restored to (including the cost of staff to supervise the management works and equipment plus specialist contractors as required e.g. reed bed cutting and bird management required by Defence Estates). Calculations for the projects for each strategic area should be based on the salary costs and overheads of a warden and a capital budget to carry out works for the period which the quarry is active (extracting mineral and restoring sites) as this is when the impacts of quarrying will be experienced by the local community and wildlife. Developer contributions for the long term management of restored sites and a project for each strategic area will ensure that local communities benefit from minerals extraction through the enhancement of local biodiversity, landscape, heritage, geodiversity and access to the countryside. Based on current work, the contribution is likely to be in the region of 50p per tonne but this should be explored further in the sites DPD.</p>
<b>Background Paper 4 – Safeguarding</b>	
Cemex UK Ltd	Para 3.2; the word <i>potentially</i> should be removed. Table 1 and 2 do not clarify why other areas of non-resources have been excluded. It is considered a 4 <sup>th</sup> option should have been investigated safeguarding mineral resources through the plan period.
<b>Preliminary Minerals Sites Assessment</b>	
OUTRAGE	The table of Preliminary Site Assessments contains a column that gives for each site its distance from the main road network. Given the severe limitations of Oxfordshire's road network (see above), this is not a useful measure. The table contains no estimate of distance to market, and no estimate of carbon emissions. The columns for Overall Planning Status, Deliverability, and Comments are inadequate, so that it is unclear why so

	<p>many sites in South Oxfordshire are rejected even though they lie very close to the areas where development will be concentrated during the plan period.</p> <p>With these flaws, the table of Preliminary Site Assessments gives no confidence that the proposed strategy is based on sound evidence.</p>
Hanson	<p>The Preliminary Assessment of Minerals Site Nominations is presented as a background paper to assess the likely deliverability of sites nominated for inclusion in the MWDF. Whilst it is acknowledged that detailed assessments will take place later in the MWDF process, Hanson wishes to make representations on the preliminary assessment and, in particular, the strategic overview of archaeological assets, which appears to be one of the principal selection criteria. The background archaeological reports were not published as part of the consultation package but, having obtained these separately from the Council, Hanson wishes to comment on the reports relating to two of its nomination areas; namely land around Clanfield/Bampton (SG15, SG58 and SG58a) and Shillingford (SG13). The archaeological overview for both nomination areas indicates that these sites should not be considered for mineral extraction. Hanson believes that these reports are too generalised and the arguments for ruling out these sites are flawed and based upon insufficient evidence:</p>
Lafarge	<p>2.5.8 In addition to supporting the inclusion of Caversham in Policy M3, we wish to comment briefly on a specific aspect of the 'Preliminary Site Assessment' (Annex 2) that was undertaken as part of the Preferred Minerals Strategy.</p> <p>With reference to 'SG-12' (Land South of Chazey Wood), the 'Preliminary Site Assessment' states that these lands are precluded on the grounds of deliverability, proximity to the AONB and access. By way of clarification, we would respectfully point out that these lands will be available from 2020 which is within the Plan period, thereby meaning that they are deliverable. Further, it is submitted that the points relating to the proximity of the AONB and access are not sufficient to preclude this site, as there is an opportunity to transport aggregates by barge to the processing plant at Sonning for wider distribution to the market. The site is outside the AONB and is capable of being worked in a manner that is policy compliant and consistent with the maintenance of an acceptable landscape and visual impact.</p>