

Planning and Strategic Housing

Reply to : Chris Hargraves
Tel : 01993 861686
Fax : 01993 861450
Email : chris.hargraves@westoxon.gov.uk

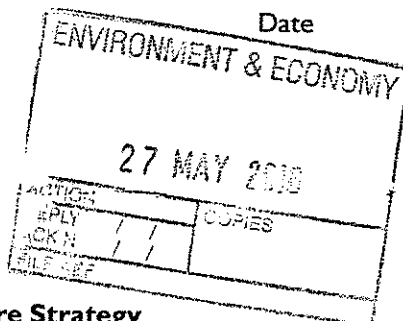
Elmfield
New Yatt Road,
WITNEY,
Oxfordshire,
OX28 1PB,
Tel: 01993 861000
www.westoxon.gov.uk



WEST OXFORDSHIRE
DISTRICT COUNCIL

Minerals & Waste Core Strategy Consultation
Environment & Economy
Planning Regulation (Minerals & Waste)
Oxfordshire County Council
Speedwell House, Speedwell Street
Oxford OX1 1NE

Your Ref :
Our Ref :
Date : 24 May 2016



Dear Sir/Madam

Minerals and Waste Local Plan Part 1: Core Strategy

I write in response to the additional topic papers which have made available for informal consultation prior to the examination of the Minerals and Waste Core Strategy later in the year.

Comments are set out below on three of the topic papers which I hope you find useful.

Development of the Minerals Spatial Strategy (April 2016)

The paper provides a useful overview and summary of the process by which the County Council has arrived at the proposed spatial strategy. The timeline at page 13 demonstrates that it has taken a considerable amount of time to reach submission and examination thereby providing adequate time for the most sustainable and robust strategy to be agreed.

In relation to Policy M1 – Provision for Secondary and Recycled Aggregates, the Council notes the evolution of the policy summarised in the topic paper including the original inclusion of a target of at least 0.9mtpa for the supply of recycled and secondary materials followed by the removal of the target as a result of the revocation of the south east plan and a change of policy view. The Council also notes that mixed views were received on the removal of the target.

The Council wishes to reiterate its concerns about the lack of a specific target in Policy M1. The County Council has provided no strong justification for the approach taken and the inclusion of a minimum per annum target would offer a number of advantages allowing clear benchmarking through annual monitoring as to whether the target is being achieved or not.

In relation to Policy M3 - Strategy for the Location of Mineral Working, it is particularly useful to highlight the process by which the County Council has concluded that new areas of working will need to be found within the southern part of the County to meet identified needs for sand and gravel.

This will be vital to achieving the stated objective of changing the balance of production capacity so that southern Oxfordshire plays a greater role, reflecting the extensive housing and economic growth planned for that part of the County.

It is noted that for the consultation on the draft minerals and waste strategy that took place in February 2014, the County Council removed the specific location for a new sand and gravel working at Cholsey. Whilst the rationale behind this is acknowledged it will be important to ensure that through the site allocations DPD that the County Council deliver enough specific sites within the southern part of the County to achieve the shift away from West Oxfordshire that the plan is seeking to deliver

spatially. The same principle applies to the decision to delineate strategic resource areas under Policy M3 of the pre-submission draft plan.

Interim Local Aggregate Assessment Update (2015)

It is noted that in the absence of complete data on imports and exports, it has not been possible to produce a full update of the LAA and that the update provided is an interim report.

It is also noted that despite several indications that the provision level for sharp sand and gravel identified in the 2014 LAA is too high (e.g. sales of sharp sand and gravel being only 63% of the annual figure of 1.015mtpa) no adjustment has been made and that further monitoring is proposed to be carried out to determine any such adjustment.

The District Council has no specific objection in this regard but clearly it will be sensible to determine a new 2015 requirement for sharp sand and gravel as soon as possible.

The Council also wishes to re-state its concern that whilst benchmarking Policy M2 against the latest annual LAA is not unreasonable, further clarity is needed as to how that will operate in practice and what status if any will be afforded to a document that is not formally tested through the development plan process.

Preliminary Assessment of Mineral Site Options (Revised April 2016)

The topic paper provides a useful overview of the process by which the Council has identified a long list of potential mineral site options and subsequently assessed their potential suitability and deliverability using a red, amber, green (RAG) system.

It is noted that the majority of site options nominated are classed as amber including a large number in West Oxfordshire and South Oxfordshire for sand and gravel extraction.

Whilst this is not surprising given the resource availability in those areas, when further work is undertaken by the County Council to determine site allocations through the follow-up site allocation DPD it will be essential that the sites taken forward are consistent with the overall stated plan objective of achieving a more even distribution of sand and gravel working across the County.

Considerably more potential aggregate reserves have been identified than are actually needed to meet forecast demand for sand and gravel to 2031 and this provides the opportunity to genuinely achieve a shift in emphasis away from West Oxfordshire which has historically been the main supplier of sand and gravel in the County.

We have no comments to make on the other topic papers published including those relating to waste. I trust you find these comments helpful but if you have any questions or require any further clarification please let me know.

Yours faithfully



Chris Hargraves
Planning Policy Manager