

OXFORDSHIRE MINERALS AND WASTE PLAN – MINERALS AND WASTE CORE STRATEGY

Consultation on Draft Minerals and Waste Planning Strategies, September 2011

Summary of Responses to Consultation Draft Minerals Planning Strategy, September 2011 and County Council Responses May 2012

Ref	Summary of Comment	Organisation (ID) or Individual Respondent	County Council Response (any paragraph numbers refer to Minerals and Waste Core Strategy proposed submission document May 2012)
EXECUTIVE SUMMARY			
Supportive/Neutral			An
1	Support policy rigour at para 4 in respect of high quality environments	17 (National Trust)	Support noted.
2	Considers plan sound	269 (Cotswolds Conservation Board)	Support noted
3	Supports the general approach of the minerals strategy, specifically with regard to Policy M3 'Strategy for the location of mineral working' and Policy M5 'Mineral safeguarding'.	785 (Johnston Quarry Group)	Support noted
Concern/Objection			
4	Include reference to and protection of River Thames in Executive Summary & in para 2.2	258 (BaCHpoRT), 460 (Environment Agency)	Text has been amended in the vision and objectives to incorporate protection of R Thames.

5	Vision in Exec Summary; delete 2 nd line of 2 nd bullet point and insert 'harmful consequences of mineral extraction and transportation on the environment and communities'	571 (CPRE)	Text has been amended to reflect potential impact on communities.
6	Para 3 should be amended to refer to making provision for minerals to serve not only the needs of the county, but also the 'traditional regional market.'	664 (Hills Quarry Products)	Vision has been amended to make reference to contributing to meeting wider needs.
INTRODUCTION			
	Supportive/Neutral		
	None		
	Concern/Objection		
BACKGROUND			
	Supportive/Neutral		
7	General support for strategy, requested inclusion of some terms in the glossary for ease of reference.	140 (AGGROW)	Noted, amendments to glossary have been made.
8	Requested more emphasis on impact of minerals development on tourism	140 (AGGROW)	Lack of evidence base to enable this work to be carried out which is not essential to the Core Strategy.
9	Requested more emphasis on enforcement	140 (AGGROW)	Not appropriate in the Core Strategy.
10	Para's 2.22-2.24 will need to be reworded to describe the further work which is currently being carried out on Habitats Regs Assessment by consultants, in consultation with Natural England.	737 (Natural England)	Re-numbered paras 2.36-2.40 have been amended to reflect the findings of the HRA report.

11	The European Waste Framework Directive should be referenced in the policy section.	461 (Environment Agency)	Noted and actioned in para 2.19.
	Concern/Objection		
12	Policy context should refer to NPPF, which PINS advises 'is capable of being a material consideration'. NPPF has more emphasis on sustainable development. Vision, objectives and strategy should all be influenced by this.	331 (Barton Willmore LLP)	The implications of NPPF have been considered and the policy section (para 2.21) amended to refer to it.
13	ROMP sites should be identified and included as 'existing sites' in text and in Fig 3.	331 (Barton Willmore LLP)	Fig 3 has been amended to include ROMP sites.
14	Request inclusion of Carterton in Fig 5, to be consistent with its inclusion in para 2.9.	472 (David Wilson Homes Southern)	Fig 7 (re-numbered) has been amended to add Carterton and also Upper Heyford for consistency with the text.
15	Request amendment to para 2.4 so that preference for extensions to existing limestone quarries is removed and all proposals for limestone and ironstone quarries are considered on merit.	472 (David Wilson Homes Southern)	Not accepted; better quality aggregate is generally available from limestone deposits than from ironstone and extensions generally have less impact than new quarries. (Para 4.28)
16	Para 2.9 should be amended to note that the eco town at Bicester is 'potential development' as planning permission has not yet been granted in full.	522 (Bucknell Parish Council)	Para 2.14 (re-numbered) does already refer to the 'eco-development proposal'; no need for amendment.
17	Fig 4 should be amended to show that Worton Farm and New Wintles Farm now have permanent permissions and the permission for Wicklesham has expired, so Wicklesham should be removed from the diagram.	849 (John Sheehan Ltd) and 851 (Controlled Reclamation Ltd)	Fig 4 has been amended accordingly.

18	Structure Plan Policy M2 contains criteria for allocating sites and should be presented in full and Vale of White Horse DC Plan policy NE7 should be mentioned.	449 & 968	The criteria in Structure Plan Policy M2 have been covered by the core policies. It is not appropriate to include individual district plan policies in the Core Strategy.
19	Preliminary site assessment work should include assessment of groundwater vulnerability of a number of sites.	461 (Environment Agency)	Noted; an assessment of groundwater vulnerability has been included in the preliminary site assessment work.
20	Fig 1 should include agriculture and forestry; there is a false dichotomy between 'mineral resources' and 'agriculture'.	968	Fig 1 shows landscape and environmental designations; agriculture and forestry are not appropriate. Para 2.2 refers to agricultural land and a policy (C4) on protection of agricultural land and soils has been included.
21	Requested identification of 'stakeholders' referred to in para 2.29.	968	Stakeholders are defined in table 6 in the Implementation and Monitoring section under 'Implementation partners'.
VISION AND OBJECTIVES			
	Supportive/Neutral		
22	Approves of the three guiding elements of the vision, suggests a fourth to educate people and communities in Oxfordshire about the need for mineral extraction, the processes and impacts involved & opportunities for landscape & biodiversity enhancement. Also supportive of objectives ii and iv.	112, 113	Support noted. Proposed fourth element not appropriate for inclusion in a planning strategy.

23	Support for objective vi, vii and viii	679 (RSPB), 657 (BBOWT), 740 (Natural England)	Noted, although minor amendments may be required to address comments from other stakeholders.
24	Objective viii is supported and should add that planting trees has multiple benefits as part of the restoration of quarries.	235 (Woodland Trust)	Support noted; tree planting too detailed for inclusion in core strategy objective.
25	General support for the vision	738 (Natural England,), 546 (SODC), 361 (Bampton Parish Council), 394 (Bampton Env Watch Group), 725 (Smiths Bletchington); 689 (Lafarge), 657 (BBOWT), 565 (Vale of White Horse District Council), 855 (Shenington & Alkerton Parish Council), 456 (ONCF), 259 (BaCHpoRT)	Noted, although minor amendments may be required to address comments from other stakeholders.
26	Part c of vision should include a bullet point which seeks reduction in flood risk as a part of minerals restoration and this should be reflected in the objectives.	462 (Env Agency)	Noted; the vision and the objectives have been amended accordingly.
27	Seek clarification of status and future role of background papers in interpreting individual policies.	725 (Smiths Bletchington)	The background papers provide information and evidence; they are not part of the Core Strategy.

28	Objective v: supported, could be amplified by reference to potential of mineral sites to aid climate adaptation through biodiversity restorations.	679 (RSPB), 740 (Natural England)	Agree, objective v amended accordingly.
29	Objective v: should be re-worded to 'minimise the disturbance of quarrying operations on communities and keep to a minimum the impact on areas vulnerable to flooding'	572 (CPRE)	Objective v is about climate change, adaptation and flooding; impacts on communities dealt with separately in objective vii.
30	Objective iii is welcomed and supported	665 (Hills Quarry Products)	Support noted
31	Planning objectives are welcomed but should be re-ordered to alter their emphasis with restoration and minimising travel being before provision of sufficient resources.	523 (Bucknell Parish Council)	Not accepted; the objectives have a logical order but this does not imply any order of importance.
32	Support for objective ix, to safeguard resources, which would help achieve objective as set out in draft NPPF, to secure steady supply of materials.	333 (Barton Willmore LLP)	Support noted.
33	The 'restoration' vision to countryside access and recreation for the minerals policy is fully supported, as is objective vii.	OCC; RoW officer response	Noted.
34	Support objectives v and viii. Suggest amendment to vii to clarify that all ecological assets (not just sites) should be protected and all landscapes should be protected/enhanced.	OCC natural env team response	Noted, objective vii has been amended accordingly.

	Concern/Objection		
35	3.4a: the vision and objective to increase the use of secondary and recycled aggregates is not thought to be realistic or deliverable; should be amended to 'where practicable'.	696 (MPA), 708 (OMPG), 665 (Hills Quarry Products Ltd), 353 (Peter Bennie Ltd)	Vision and objectives are aspirational. The background paper on provision for aggregates supply provides evidence to support the target of 0.9mtpa in Policy M1.
36	Contradiction of the vision (a) and (b) in seeking a reduced proportion of locally produced aggregates and also seeking to minimise miles aggregates are transported. As the county was a net importer of aggregates in 2009, the plan should seek to increase the quantities of aggregates produced locally.	333 (Barton Willmore LLP), 270 (Cemex UK), 696 (MPA), 708 (OMPG)	Agreed; the wording of the vision has been reviewed and revised accordingly.
37	3.4a: the vision should refer to current and future development needs within and around Oxfordshire, to reflect Oxfordshire's role in aggregate production in the south east.	665 (Hills Quarry Products Ltd), 353 (Peter Bennie Ltd)	The text in the vision has been amended, as per ref 6.
38	The vision should be amended to ensure that minerals development will not take place in irreplaceable habitats such as ancient woodland.	235 (Woodland Trust)	Objective vii provides protection for all ecologically important sites; no need to identify woodland explicitly.
39	Objective vii should protect all biodiversity assets, not just designated sites.	679 (RSPB), 740 (Natural England)	Objective vii has been amended to cover all biodiversity assets.
40	Objective i should be amended so that it does not just address local need for aggregates, but recognises the role Oxfordshire plays as an aggregate producer to meet a wider need and future economic trends	725 (Smiths Bletchington); 725 (Lafarge), 696 (MPA), 708 (OMPG)	Objective i has been amended, as per ref 6.

41	Objective vi, to replace road haulage with water transportation is rarely possible. Rail importation may have a high carbon footprint.	665 (Hills Quarry Products)	Objective vi is aspirational. Technologies may change over plan period and enable movement of aggregates by water.
42	The vision and objectives should be strengthened to ensure protection of local communities against unnecessary development.	583	Para 3.4b and objective vii provide protection to communities.
DRAFT STRATEGY (GENERAL)			
Supportive/Neutral			
43	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.	441 (DIO)	Noted; MOD (DIO) will be consulted when site allocation work takes place.
Concern/Objection			
44	The whole minerals planning strategy has not shown due regard to emerging draft NPPF which is capable of being a material consideration; policy in this framework is more positive towards sustainable growth and would lead to a different emphasis on Vision, objectives and policies.	337 (Barton Willmore LLP)	The implications of NPPF have been considered and the policy section (para 2.21) amended to refer to it.
POLICY M1: PROVISION FOR SECONDARY AND RECYCLED AGGREGATES			
Supportive/Neutral			
45	Support for policy M1	362 (Bampton PC), 396 (Bampton Env Watch Group), 35 (Earthline Ltd), 639	Noted

		(Surrey County Council), 165 (PAGE), 228 (Woodland Trust), 491 (Hinton Waldrist C)	
46	Support for principle of provision of land for recycling aggregates	566 (Vale of White Horse DC), 547 (South Oxon DC)	Noted
47	Supports principle but notes that transport and access very important when identifying future sites	526 (CPRE W Oxon)	Noted; these matters will be considered at planning application stage.
48	Supports principle but an energy and sustainability assessment of aggregate recycling is required to understand the carbon footprint relative to aggregate extraction	114	Resources are not available to undertake this work which is not essential to the Core strategy.
49	Supports principle but the plan should set out how this will be achieved; an action plan is needed to work with stakeholders to increase rates of aggregate recycling.	260 (BaCHpoRT), 165 (PAGE), 141 (AGGROW)	Support noted. The strategy provides a framework to enable operators to increase the rates of aggregate recycling.
	Concern/Objection		
50	The plan should demonstrate how the target figure for secondary and recycled aggregate relates to the proposed level of provision of primary aggregates in policy M2, especially as the land-won figure has been reduced by the council. The target figure in policy M1 should be reviewed regularly throughout the plan period.	284, 373 (D K Symes Planning)	The background paper on provision for aggregates supply explains that there is no link between the target figure in M1 and the provision for land won aggregates in M2 and gives the reason for this.

51	Secondary and recycled aggregates cannot be seen as a substitute to primary aggregates as only 25% of secondary aggregates are deemed appropriate as a substitute.	271 (Cemex UK)	Partly agree that they largely have different end uses; the Core Strategy aims to cover all aggregate needs.
52	The targets in Policy M1 are neither realistic nor deliverable, nor is there an evidence base which supports the target figure of 0.9mtpa. There is no evidence in the Atkins report that this level of provision is achievable.	271 (Cemex UK), 667 (Hills Quarry Products Ltd), 395 (Grundon), 690 (Lafarge), 697 (MPA), 709 (OMPG), 373 (D K Symes Planning)), 414 (Hanson), 971.	The background paper on provision for aggregates supply provides the evidence base for the target figure of 0.9mtpa
53	The target figures in Policy M1 contradict the proposed figures in policy W1 in the waste plan	395 (Grundon)	See ref 52
54	The target figure in policy M1 is not sufficiently ambitious, if based on Oxfordshire's apportionment of the 2005-2020 National and Regional Guidelines, published in 2009. The plan should encourage new technologies which produce a range of high quality products such as soft sand and Type I aggregates which can substitute for land won primary aggregates.	845 (J Sheehan) and 850 (Controlled Reclamation Ltd)	The target figure in policy M1 is based on evidence which is explained in the background paper on provision for aggregates supply.
55	Policy M1 should be strengthened; as drafted, it only gives 'encouragement'.	635 (West Oxfordshire District Council)	This positive strategic policy provides for additional supply capacity to be permitted and for sites to be identified at a subsequent stage.

56	The plan should acknowledge that the availability of construction, demolition and excavation wastes is a limiting factor to the production of secondary and recycled aggregates. Availability reflects levels of economic activity, and the volumes and nature of CDE materials can be highly variable.	414 (Hanson), 726 (Smiths Bletchington)	Accepted; the background paper on provision for aggregates supply provides the evidence base for the target figure of 0.9mtpa.
57	There appears to be no evidence that increasing availability of secondary and recycled aggregates will result in a proportionate increase in its use by the construction sector. The minerals sector already has high recovery rates from CDE wastes.	726 (Smiths Bletchington)	The background paper on provision for aggregates supply recognises that there may not be an increase in the use of secondary and recycled aggregates.
POLICY M2: PROVISION TO BE MADE FOR MINERAL WORKING			
Supportive/Neutral			
58	Support policy M2	2, 308, (Carter Jonas) 452	Noted
59	Earthline supports Policy M2 but has concerns about the methodology used and the large reduction in the level of sand and gravel. The level of provision for crushed rock should be 0.66mtpa in line with the SE Plan. The plan should state that, even if the 10 year landbank has been achieved, further extensions to existing quarries will still be considered.	36 (Earthline Ltd)	Concerns noted. The 10-year landbank is not a ceiling. Policy M3 states a preference for extensions.
60	The policy is supported but needs to be reviewed regularly.	167 (PAGE), 261 (BaCHpoRT), 597 (Nuneham Courtenay Parish Council)	Noted.

61	The soft sand landbank should be flexible to allow for an increase in market demand over the plan period.	105	The level of provision for soft sand will be monitored regularly and if necessary will be reviewed to ensure that it is appropriate.
	Concern/Objection		
62	Objection to policy M2 because the assessment on which it is based does not use new or different information, as advised by Government, and is not based on a robust evidence base. The results of two methodologies proposed in the Atkins report were merged to reach a lower figure; there is no clear evidence base for 1.26mtpa. The level of provision does not allow for a contribution towards a regional aggregates figure and therefore puts pressure on neighbouring authorities to provide extra resources to make up the shortfall.	130 (Buckinghamshire CC), 444 (Northamptonshire CC), 272 (Cemex UK), 397 (Grundon), 548 (South Oxon DC), 567 (Vale of White Horse DC), 638 (Surrey CC), 668 (Hills Quarry Products), 691 (Lafarge), 699 (MPA), 710 (OMPG), 727 (Smiths), 418 (Hanson)	The Atkins report uses figures based on consumption, related to forecast population growth. The figure selected was based on an average of this figure and past sales, which the Council considered to be a robust method. Engagement with other mineral planning authorities and the minerals industry is continuing.
63	The Atkins study was premature in that more up to date data for 2009 (published in 2010) shows that Oxfordshire is a net importer of aggregates. Additional work is required to update the findings of the Atkins report in the light of the 2009 figures.	727 (Smiths), 548 (SODC), 567 (VoWHDC), 272 (Cemex UK), 397 (Grundon)	A review of the findings of the Atkins report has taken place and other mineral planning authorities and the minerals industry have been consulted further.
64	The plan does not show how the preferred areas will contribute to the supply of minerals throughout the plan period.	285	This information is provided in the background paper on provision for aggregates supply.

65	The plan does not adequately address the likely impacts of reducing provision or of quarries closing on neighbouring authorities. Further work is needed with neighbouring authorities to gain their support and to ensure that cross-boundary movements are properly managed.	691 (Lafarge), 397 (Grundon), 418 (Hanson), 548 (SODC), and 567 (VoWHDC)	Engagement with other mineral planning authorities is continuing.
66	The plan should seek to restrict the movement of minerals out of the county. The words 'at least' (as in, at least 7 years) should be deleted so that no applications are approved if the landbank has been achieved.	492 (Hinton Waldrist Parish Council)	The county cannot operate as a closed market; flows of aggregates in and out of the county are necessary to ensure adequate supplies of different materials. National policy is that the landbank is a minimum level, not a ceiling.
67	The commitment to maintain a landbank of at least 7 years for sand and gravel and for 10 years for crushed rock is supported. The rate of extraction should be removed from the policy as it is too restrictive; it is sufficient to have it in the supporting text.	374 (D K Symes planning)	Support noted. Rates of extraction are included to give certainty about the amount of mineral working that the plan is providing for.
68	The plan needs to ensure that policies M2 and M3 provide an adequate mechanism to maintain supply throughout the plan period so that unallocated sites with potentially greater impact on the environment do not come forward to make up the shortfall.	548 (SODC), and 567 (VoWHDC)	This is adequately addressed in policies M2 and M3 and the provisions in section 7 for monitoring and review of supply and the level of provision needed.
69	The level of provision for sand and gravel is too high; it should be approx 870,000 tonnes, or 30% less than the 1.26mtpa proposed.	572 (CPRE Oxfordshire)	The level of provision is based on an independent assessment of supply requirements; and it has subsequently been reviewed in light of consultation responses and further information received.

70	The plan should add a contingency of approx 10% to the level of provision, as recommended in the Atkins report, to meet the soundness requirement for flexibility. The significant reduction in provision is likely to lead to a significant impact on other counties in the SE region.	638 (Surrey CC)	The proposed level of provision does include a degree of flexibility for meeting needs as it is significantly higher than current sales.
71	The lower level of provision will lead to an increase in imports by rail and road, which goes against policy in MPS1 and the strategy's vision and objectives, which all seek to minimise the transportation of minerals.	668 (Hills) and 691 (Lafarge)	The level of provision proposed is significantly higher than current sales and should be sufficient to meet the need for local production.
72	The proposed annual extraction rates should take into account the current low level of permitted reserves in the county.	691 (Lafarge)	These have been taken into account in para 4.15 of the plan.
73	OCC's unilateral position could lead to a risk of under-provision on a wider regional basis and threatens delivery of the Managed Aggregates Supply System. The proposal to reduce provision is politically motivated and the results of the Atkins report have been selectively quoted and misinterpreted. The MPA recommends at least a 10 year data series of past sales is used as the basis on which to assess future provision and account should be taken of inter-authority patterns. This would give a figure of approx 1.50mtpa for sand and gravel.	699 (MPA) and 710 (OMPG)	Policy M2 has been reviewed to ensure that the proposed level of provision is sufficient to enable Oxfordshire to meet its own needs and contribute appropriately to wider needs; and other mineral planning authorities and the minerals industry have been consulted. Evidence is contained in the background paper on provision for aggregates.

74	Gloucestershire is concerned about the proposed level of provision of sand and gravel; sand and gravel resources in Gloucestershire are close to the county border and a shortfall in Oxfordshire is likely to lead to exports from Glos, leading to unsustainable transport of large quantities of aggregates.	840 (Glos County Council)	See ref 73
POLICY M3: STRATEGY FOR THE LOCATION OF MINERAL WORKING - GENERAL			
Support/Neutral			
75	Strong support for whole of policy M3	363 (Bampton PC) & 398 (BEWG)	Noted
76	There should be a link between policy M3 and the latter development control policies to ensure that the principle of allocation is only acceptable if it is compliant with the development control policies.	463 (Environment Agency)	Agree; but this does not need to be stated because the Core Strategy should be read as a whole.
77	The identification of a new working area at Cholsey is broadly supported to replace Sutton Courtenay.	168 (PAGE), 351 (Newington PC)	Noted.
78	Support for exclusion of sites at Benson, Drayton St Leonard, Shillingford & Stadhampton but objection to identification in preliminary site assessment of SG-09 under the archaeology criterion as amber; and SG-59 under the flooding criterion as amber; both sites should be red.	168 (PAGE), 351 (Newington PC), 511 (Drayton St Leonard PC)	Noted. However, the identification of SG-09 and SG-59 as amber is appropriate as the archaeological assets and extent of the area in FZ3 do not completely preclude working, but rather act as potentially significant constraints.
79	Radley has an active ROMP site in the SW of the parish. There are a number of issues as yet unresolved from the legacy of previous working and these should all be resolved before there is any new mineral working in the parish.	216 (Radley Parish Council)	Reference to ROMP sites has been included (para 2.3 and Fig 3). Site specific issues are matters for a ROMP application. New working areas are not proposed at Radley.

80	Any new minerals workings should be on the same side of the River Thames as the markets for aggregates. Transport distances should be kept as short as possible.	262 (BaCHpoRT)	It is possible to transport aggregates by sustainable means such as conveyors across the Thames. The plan seeks to minimise the impact of transporting aggregates on the environment.
81	Recognises need for mineral workings, notes that continued working should afford proper protection for the parish and the road network. Policy should refer to current operations such as clay extraction and identify when these are expected to finish.	512 (Sutton Courtenay PC)	Noted. The plan identifies that sand and gravel extraction at Sutton Courtenay is likely to finish around 2020 and that clay can only be worked as part of a sand and gravel extraction operation.
82	The Parish Council welcomes exclusion of a site at Nuneham Courtenay.	596 (Nuneham Courtenay PC)	Noted
83	The identification of broad areas for future mineral working outside the AONB is supported.	636 (Surrey County Council)	Noted.
84	General support for spatial strategy	728 (Smiths Bletchington)	Noted.
85	Broadly agree with strategy but note the proximity of the Eynsham/Cassington/Yarnton area to Oxford Meadows SAC and that HRA is expected.	OCC natural env team	The results of further HRA assessment have been incorporated into a revision of policy M3, in consultation with Natural England.
	Objection/concern		
86	The Eynsham/Cassington/Yarnton area is very close to Oxford Meadows SAC. The boundary of the area may need to be refined if the HRA concludes that there could be potential impacts on the hydrology of Oxford Meadows.	740 (Natural England)	As ref 85.

87	Current areas identified for sand and gravel extraction are restrictive. Current areas and areas around Faringdon and Wantage should also be promoted.	273 (Cemex UK)	The strategy option process has considered the Faringdon and Wantage areas but they would be unlikely to make a significant contribution to the need for resources over the plan period.
88	Sand and gravel extraction should not compromise the green corridor of the River Thames through visual or noise intrusion. Working and restoration should not impede the free flowing of water in the floodplains.	601 (River Users Society)	See ref 4.
89	Objection to exclusion of Sutton/Stanton Harcourt as a potential new area.	168 (PAGE), 351 (Newington PC), 511 (Drayton St Leonard PC)	This area was excluded from the strategy when the spatial options were revised in Jul 2010 in response to concerns about the extent of the area previously identified, cumulative impacts of working in W Oxon and access.
90	The policy to restrict rates of working in west Oxfordshire is objected to. No evidence base for this and clarification required as to the 'past levels of working'. Lack of flexibility.	399 (Grundon), 168 (PAGE), 351 (Newington PC), 511 (Drayton St Leonard PC)	Clarification of the 'rate of working' is provided in the background paper on provision for aggregates supply. The plan recognises there are permissions in this area that will not expire until the 2020s. After then, the plan seeks to achieve a better balance between working in W and S Oxfordshire.
91	The policy is excessively complicated and loose in its wording; the term 'extensions' is used loosely. It will be difficult to implement the policy which states that 'areas	286	A definition of 'extension' has been included in the glossary. Also see ref 90.

	will not be permitted if it would lead to an increase in the overall level of mineral extraction or mineral lorry traffic above past levels within these areas combined.' The background reports and documents do not justify the selection of the Preferred Strategy.		
92	To expect W Oxon to supply the bulk of the county's needs, when only around a quarter of the demand is north of the Thames is totally unreasonable.	290	The background paper on provision for aggregates supply gives information on the supply / demand balance and shows there is fairly even distribution of demand across the county.
93	Lack of flexibility in the plan, basing it on 4 existing and 1 new area of working. Identification of only one additional site is inadequate and inflexible. Applications from elsewhere should be treated on their merits and granted permission if they meet the Plan's other criteria. The policy seeks to refuse working outside of the identified areas unless the required provision cannot be met from within those areas; no-one will know this until the end of the plan period, by which time it is too late to rectify.	399 (Grundon), 669 (Hills)	Flexibility can be achieved through the choice of site options within each strategy area. The policy to refuse working outside of the identified areas will be monitored and if necessary reviewed to ensure that sufficient mineral supply can be provided.
94	Does not support the current wording on policy M3 re the overall level of mineral extraction or lorry traffic. No base line for this proposal defined. Smiths may support a form of words in which the Lower Windrush Valley would not significantly increase its overall permitted contribution of sand and gravel to the county, if the overall contribution figure were defined and was based on robust data from a sufficient number of pre- and post-recession years.	728 (Smiths Bletchington)	The background paper on provision for aggregates supply sets out the proposed levels of provision for sand and gravel working during the plan period and provides an evidence base to support the proposals.
95	Clarification on status of background papers required and	399 (Grundon)	The background papers have been

	how they influence policy. No background paper on archaeology to enable this issue to be examined.		prepared to provide information and evidence to support the Core Strategy. They are not part of the plan. A background paper on heritage has been prepared.
96	Policy gives rise to competition issues by preventing other companies from entering the market.	399 (Grundon)	The strategy includes areas containing sites nominated by several different operators.
97	Policy M3 is misleading; it refers to existing areas including Eynsham but there is currently no extraction here and only one area in Cassington. It then says permission will not be granted if it would lead to an increase in mineral lorry movement.	326	The Eynsham/Cassington/Yarnton area includes the existing quarry at Cassington and potential further working areas around it, including between Cassington and Eynsham. The policy seeks to ensure there is no increase in mineral working above historic levels of activity.
98	The plan makes insufficient provision for production of sharp sand and gravel south of Oxford; limited in terms of location and operator. The plan should identify one and possibly two further areas for extraction south of Oxford and the R Thames.	322 (Savills)	The plan makes sufficient provision to meet the assessed need. This will be regularly monitored and, if necessary, reviewed. If further areas are needed, these could be brought forward in a review of the plan.
99	The plan for replacing S Courtenay is too restrictive and a wider area of search which includes land at Drayton St Leonard/Berinsfield should be included.	375 (D K Symes)	The Council considers that only one new area is needed. The Drayton St Leonard area has been assessed as being a worse option than Cholsey, in particular due to

			distance to markets and archaeological assets.
100	Finmere Quarry is identified in Fig 3 of the plan as an existing site but we would like it to be included on Fig 7 as a location for sharp sand and gravel working. The northern extension of Finmere Quarry should be considered in the specific sites allocation document.	629 (Premier Aggregates)	The Finmere area has not been included because it is thought unlikely to be able to make a significant contribution to provision of sand and gravel through the plan period.
101	The locational strategy should be more flexible and for applications elsewhere to be treated on their merits. Concern about current 'rate of working' referred to re Lower Windrush Valley. Should be 'maintained but not significantly increased.'	711 (MPA) and 700 (OMPG)	See ref 90 and 98.
POLICY M3: STRATEGY FOR THE LOCATION OF MINERAL WORKING – SOFT SAND			
	Support/Neutral		
102	Recognition of different grades of sand at Tubney and at Faringdon; different markets	108	The Core Strategy recognises this at para 4.24.
103	Para 4.22 restricts extensions to existing quarries to the period from 2020; should be for the whole of the plan period.	57 (Kingston Bagpuize with Southmoor PC)	Existing permissions provide sufficient resource to 2020. The preference for extensions in policy M3 applies throughout plan period.
104	Support for identification of soft sand area south east of Faringdon. Preference for extensions noted but only 2 soft sand sites (SS-07 & SS-08) in the Prelim Site Assessment meet the criteria of the archaeology key and the overall planning status key.	110	Six sites of eight are annotated amber in the Prelim Site assessment. This means there are constraints on each site which will need to be taken into account when they are assessed for the sites document.

105	Welcomes preference for extensions. Area identified for soft sand extraction at Tubney extends too far west; no existing sites here.	493 (Hinton Waldrist PC)	Noted. The soft sand strategy areas are broad indicative areas where there are believed to be workable deposits, based generally around existing working sites.
106	Land at Pusey has workable reserves and should be included in the soft sand strategy area. Where further expansions of existing sites may cause unacceptable environmental impacts, alternative sites should be considered.	748 (Green & Co)	See ref 105. The soft sand strategy areas do not have defined boundaries. Land at Pusey could be considered as part of the A420 area.
	Objection/concern		
107	Concern at density of operations and impact on local roads and landscape of more than one quarry being active at any one time.	135 (Appleton with Eaton PC) , 226	No increase in the rate of soft sand extraction or transportation is proposed; a continuation of the existing pattern of working and supply is proposed.
108	The area showing soft sand extraction south east of Faringdon should include the area of Shellingford quarry, west of A417 and south of the B4508. The plan should clarify that extensions to soft sand quarries will need to be granted within the plan period to maintain production.	37 (Earthline Ltd)	The soft sand strategy area is indicative; it includes the area around Shellingford quarry. Para 4.14 refers to extensions to existing quarries.
109	Extent of soft sand area is vast and is nearly all covered by Vale policy NE7: protection of Corallian Ridge landscape.	451	The strategy areas reflect the extent of the potentially workable resource. Impact on landscape would need to be considered when specific sites are identified.
110	Policy section of plan should include saved policy NE7 of the Vale Local Plan; protection of Corallian Ridge landscape.	972	It is not appropriate to include individual district plan policies in the Core Strategy.

111	Extensions to Bowling Green and Shellingford Quarry should not be considered due to the traffic impacts and noise impacts. The Council should closely monitor the current working.	1005 (Shellingford PC)	The merits of extensions to particular quarries is a matter to be considered when specific sites are identified.
POLICY M3: STRATEGY FOR THE LOCATION OF MINERAL WORKING – CRUSHED ROCK			
	Support/neutral		
112	Plan should acknowledge importance of routeing agreements for both limestone quarries near Burford.	325 (Burford Town Council)	This is a matter to be considered at planning application stage.
	Objection/concern		
113	The plan should include reference to the major ironstone resource which is under a Review of Mineral Permissions (ROMP) at Shenington, as part of the provision for crushed rock over the plan period.	23, 335	See ref 13.
114	The ROMP site should also be acknowledged as an existing resource in Fig 3 of the plan.	23, 335	See ref 13.
115	The plan should identify the likely significant adverse impact of the proposed development at Shenington on the local environment and the local community.	507	Impacts of individual proposals will be considered at the planning application stage.
116	The area described as 'N of Bicester and E of the River Cherwell' for further crushed rock extraction should identify within it actual sites. Any new quarry, and associated improvements to junction 10 of the M40 which would be required, should be identified in the plan.	661 (Croughton Parish Council)	Specific sites will be identified in the Sites Allocation document which will be prepared when the Core Strategy has been adopted.
117	The plan states that additional working of limestone will only be permitted in exchange for the revocation of an existing permission containing workable resources. It is not clear whether 'additional' means an extension to an existing quarry, or a new quarry, or both.	858 (Shenington with Alkerton Parish Council)	'Additional' means any proposal for further working, whether from an extension or a new quarry. This relates only to ironstone.

POLICY M3: STRATEGY FOR THE LOCATION OF MINERAL WORKING – SAND AND GRAVEL (West Oxfordshire)			
Support/neutral			
118	Support for the identification of resources in the Eynsham/Cassington area	490 (Savills Ltd)	Noted.
119	Support for proposals to continue sand and gravel extraction in the Eynsham/Cassington/Yarnton area on the basis of making efficient use of existing infrastructure, and using extensions to existing quarries in preference to new quarries.	309	Noted
120	Support for extending the Lower Windrush Valley project area to cover each of the strategic areas for minerals extraction in Oxfordshire to result in the long-term management and maintenance of restored sites for the benefit of local communities and the enhancement of the natural environment.	458	No plans to extend the remit of the Lower Windrush Valley project area at present although similar schemes may be possible in the future.
Objection/concern			
121	Many residents are concerned about the inadequacy of the local road network, the A40 and the A34 to take HGV's carrying minerals. The junctions of the major roads are also a concern and it is felt that these roads are heavily congested and already at capacity. Pressure on the roads is also increasing due to expansion of Carteron and RAF Brize Norton.	239, 256, 393, 94, 84, 79, 76, 43, 144, 882, 833, 756, 719, 723, 745, 834, 845, 151 (Hanborough PC), 434 (Ducklington PC), 319, 487, 533, 513, 542, 559, 618, 584, 585, 591, 800, 622 (Cassington PC), 627, 788, 538 (Northmoor PC), 62	Concerns are recognised. The Highways Agency and OCC transport officers have been consulted. Policy M3 requires no increase in mineral lorry traffic above past levels within the west Oxfordshire areas combined.

122	Many of the bridges over the River Thames including Swinford Toll Bridge, Newbridge and Tadpole Bridge are historic structures and are unsuitable for carrying HGVs, which means that the shortest way from quarries in west Oxon to markets in the south of the county cannot and should not be used. .	627, 564, 882, 633 (West Oxon DC), 845, 539, 542, 501 (Ducklington & Hardwick Charity), 94, 79, 58 (Outrage), 49, 487, 62, 41, 15, 12, 232, 359, 393, 881, 286	The plan recognises the constraints of the River Thames crossings and assumes that all HGV traffic from west Oxfordshire towards Oxford and southern Oxfordshire will go via the A40 and the A34.
123	The plan aims to reduce mineral miles but this is contradicted by the strategy which seeks to continue working in west Oxfordshire, providing aggregates to south Oxfordshire, which will result in aggregates being transported miles to south Oxfordshire.	94, 79, 76, 58 (Outrage), 54, 50, 41, 151 (Hardwick PC), 232	The plan seeks a balance between minimising mineral miles and making efficient use of existing infrastructure and resources; it includes a new area to provide for demand in southern Oxfordshire.
124	There is an imbalance between supply and demand in the plan. The plan identifies that the majority of sand and gravel will continue to come from west Oxfordshire, but it identifies new planned housing and economic development in the south of the county such as the Science Vale Enterprise Zone and the expansion of Didcot. It is estimated that 85% of the county's gravel will be extracted in west Oxfordshire but 80% of demand will be in south Oxfordshire.	559, 560, 633 (West Oxon DC), 539, 580, 589 (Stanton Harcourt PC), 793, 882, 600, 520 (Standlake PC), 641, 513, 533, 663, 542, 833, 756, 58 (Outrage), 745, 79, 538, 893 (Aston, Cote & Shifford PC), 538 (Northmoor PC), 54, 49, 50, 62, 15, 564, 144, 3, 12, 221, 222, 232, 26, 359, 393, 317, 881, 286	The background paper on provision for aggregates supply provides information on the balance of demand across the county and shows that demand for aggregates based on population forecast and economic development is fairly evenly balanced across the county.

125	The plan has not identified adequately the cumulative impact of previous working and attendant and reduced amenity for residents due to noise, dust, traffic, quality of life.	558, 79, 62, 834, 882, 520 (Standlake PC), 152, 434 (Ducklington PC), 242, 393, 286	Para 4.19 (renumbered) acknowledges the cumulative impact of past mineral working on communities in west Oxfordshire. The background paper on environmental and community protection covers impacts on local communities.
126	Para 4.18 of the plan is confusing; it should clarify that there will be further cumulative impacts of working even at the existing rate of working.	58 (Outrage), 525 (CPRE)	See ref 125.
127	There has been a significant cumulative impact on the landscape with the creation of open water bodies in restored gravel quarries; this now accounts for up to 40-45% of the area south east of Witney.	833, 893 (Aston, Cote & Shifford PC), 257, 297, 487, 538, 76, 539, 788, 793.	Landscape impact is recognised; the restoration section of the plan seeks to avoid creation of open stretches of water where possible.
128	Further working could impact on the Siemens factory in Eynsham, especially through vibrations and dust. Siemens make high technology precision magnetic devices. This factory is a prestigious and important part of the local economy.	558, 633 (West Oxfordshire District Council), 663, 881, 79, 239, 539, 723.	This is a detailed matter for consideration at planning application stage.
129	Further working could cause a risk of birdstrike for the expanding RAF Brize Norton.	62, 79, 881, 539, 542, 663, 723	MOD (DIO) have been consulted and the Council will continue to engage with them on proposals.
130	Further working should not be allowed to destroy best and most versatile agricultural land.	542, 881	New policy C4 provides protection for BMV agricultural land.
131	Significant archaeological assets have already been destroyed and no comprehensive study of the area exists. Further working could harm remaining assets.	62, 222, 501 (Ducklington with Hardwick Charity)	English Heritage has provided more information on archaeological assets which will be taken into account at site allocation stage.

132	Lorries going to and from quarries in west Oxfordshire should have strict routing agreements to adhere to. They should not be allowed through Bladon.	6, 794 (Bladon PC)	This is an issue to be considered at planning application stage.
133	Concerns about the impact of heavy traffic from proposed development on the A4095, Church Hanborough and Long Hanborough	151 (Hanborough PC)	Concerns are noted; HGV movements will be considered at planning application stage.
134	The plan should remove proposals for working south of the A40 and east of Eynsham due to the impact of such working on the Oxford Green Belt.	183 (Oxford Green Belt Network)	National policy is that, subject to safeguards, mineral extraction is not inappropriate development in Green Belt.
135	The town council is concerned about the HGV traffic generation between the A40 and the A4095 and seeks movements of aggregates by rail rather than by road.	220 (Woodstock Town Council)	Concerns are noted; HGV movements will be considered at planning application stage. Transport of aggregates by rail, would not be practical.
136	The inclusion of sites SG29 and SG31 at Sutton are objected to, on the grounds of their likely impact on flooding in the area and their proximity to residential areas.	221	These sites are not included in the strategy areas in policy M3.
137	Further working in the Lower Windrush Valley at Gill Mill could lead to de-watering of Ducklington SSSI; this should be protected.	434 (Ducklington Parish Council)	This is an issue to be considered at site allocations or planning application stages.
138	Objection to new areas of gravel extraction along Cassington Road on the grounds of traffic generation, flood risk and the amenity currently provided by this area for local residents.	317, 618, 836	These are issues issue to be considered at site allocations or planning application stages.
139	If 1 million tonnes sand and gravel is needed every year, before digging can commence the impact on local amenities, archaeology and wildlife must be subject to	501 (Ducklington with Hardwick Charity)	The plan provides a policy framework to ensure that these issues are addressed when

	survey, using criteria agreed by all parties beforehand. Solutions to transport problems must be found. Stronger requirements for restoration must be put in place.		planning applications are considered.
140	Local residents have not benefitted from restoration in the past.	538	Policy M7 seeks to ensure that restoration will benefit communities.
141	The plan undercuts localism and there is a presumption towards commercial extraction.	539	The Council must plan for mineral working to meet society's needs for aggregates but has engaged with both local communities and the minerals industry in doing this.
142	The surviving archaeological assets south of Hardwick assume a particular evidential value, as so much has been lost to date. There is a lower level of archaeological interest north of Hardwick towards Witney but the county council should seek further assessment of the relationship between alluvium and known archaeology before taking any decision here.	554 (English Heritage)	English Heritage has since provided more information on the area south of Hardwick which will be taken into account at the site allocations stage. This information does not prevent inclusion of the Lower Windrush Valley in the plan.
143	Objection to further working in the Lower Windrush Valley on the grounds of noise, visual pollution, dust, traffic and general environmental misery.	413	Objection noted and cumulative impact of previous and continuing working acknowledged.
144	Any increase or extension to mineral extraction in the Lower Windrush Valley is incompatible with the 12 objectives of the SA framework.		The SA objectives are used to assess all the plan proposals; proposals will be more compatible with some objectives than others.
145	The clarity of the figures which set out how much sand and gravel is needed is poor. There is a contradiction between the 20.2m tonnes needed over the plan period and the 33.25mt 'production capacity' alluded to in Annex 4 of the Cabinet paper.	882, 589 (Stanton Harcourt PC)	Clarification of the figures is provided in the background paper on provision for aggregates supply.

146	The use of the word 'extension' is sloppy and needs to be defined. The plan has not acknowledged the extent of the excavations in the Lower Windrush Valley to date nor the significant environmental impacts including increasing flood risk, which further excavation could cause.	882, 589 (Stanton Harcourt PC)	The term 'extension' has been defined in the glossary.
147	Objection to the recent abolition of the ALSF by Government.	589 (Stanton Harcourt PC)	Objection noted. This is not an issue for the Core Strategy.
148	The option to reduce the amount of working in West Oxfordshire does not appear to have been tested in the SA; this will be challenged. The Access to Oxford transport strategy has now been withdrawn, and with it the planned improvements to the A40 and the A34; this should be acknowledged and taken into account.	633 (West Oxon DC)	The latest SA includes appraisal of the option of reducing working in west Oxfordshire and the impacts this would have on the different areas of working.
149	There are potential hydrological impacts from mineral working in the Eynsham/Cassington/Yarnton area on the Oxford Meadows SAC.	658 (BBOWT) and 739 (Natural England)	Further work on Habitats' Regulations Assessment has led to revision of Policy M3.
150	There will be a monopoly on production by Hanson if the proposed development goes ahead.	745	The strategy areas contain sites nominated by different operators.
151	The plan should not propose to delay opening up a new quarry at Cholsey; this area is much closer to development sites in S Oxfordshire and should be developed as soon as possible.	893 (Aston, Cote & Shifford PC)	The strategy is for the Cholsey area to replace Sutton Courtenay in providing sand and gravel in the south of the county, when reserves there are exhausted.
152	Full support for the 'Save Eynsham from Gravel Extraction' campaign.	839	Noted.
153	Assessment of these locations has not been undertaken to a level that gives me confidence that these locations fulfil the objectives of the strategy. As such it is inappropriate to describe them as 'preferred' until this	286	The strategy areas have been assessed at a strategic level and have been the subject of Habitat's Regulations Assessment,

	<p>work has been done. These concerns arise, for example, from the following considerations;</p> <p>a. Extensive parts of the preferred strategy areas suffer from a level of flood risk that makes them potentially unsuitable for development;</p> <p>b. The transport impacts of the scales of potential development that will arise has not been assessed;</p> <p>c. The full range of environmental issues has not been taken into account, for example, the impact on the Green Belt and Conservation Target Areas ;</p> <p>d. The areas shown are so broad-brush that they are open to interpretation and debate.</p> <p>This has particular significance in Lower Windrush Valley where there is a large proportion of the 'nominated' mineral sites. The Preferred Strategy Areas in Policy M3 should be refined now not left to a later stage</p>		<p>sustainability appraisal and a preliminary site assessment and deliverability test. The Council believes that the level of assessment carried out is appropriate for a Core Strategy.</p>
POLICY M3: STRATEGY FOR THE LOCATION OF MINERAL WORKING – SAND AND GRAVEL (Caversham)			
	Support/neutral		
154	<p>Lafarge supports the inclusion of Caversham in Policy M3 based on 3 principles; the existing operation in the area and availability of resources, the location of the area and proximity to markets and the quality and end-use of aggregates.</p>	692 (Lafarge)	Support noted.
155	<p>The Council supports the principle of focussing on existing areas of working, extensions to existing quarries or new quarries to replace exhausted quarries. The council takes this to mean that significant increases in workings and traffic generation will not be likely to result</p>	837 (Reading Borough Council)	Noted. It is not the intention of the plan to increase the rate of working in the Caversham area over the plan period.

	from this policy. There are problems caused by capacity of the bridges to cross the R Thames and the need for additional crossing has been identified in Reading's LTP3 (2011) and Reading's adopted Core Strategy. The Council also supports the exclusion of Chazey Wood from the strategy and suggests that the remaining area should be re-named 'East of Caversham'.		
	Objections/concerns		
156	General objection to inclusion of this area in Policy M3.	164, 156, 789	Objection noted.
157	Objection to inclusion of this area in the plan on the grounds of the vulnerability of the area and of Sonning Eye village in particular to flooding. The severity and extent of flooding in the area has increased in recent years.	28 (SEAG), 481, 483, 649, 650, 101, 163, 138, 161, 139, 71, 33, 42, 147, 156, 181, 927, 651, 281, 282, 484, 644, 617, 479, 846 (Eye & Dunsden PC)	The vulnerability of the area to flooding is noted but extraction of sand and gravel is a development which is compatible in the functional flood plain. The Environment Agency has been consulted and has agreed the Council's approach to the consideration of flooding. The background paper on flooding provides further information.
158	The villages of Sonning and Sonning Eye are designated Conservation Areas and should therefore be protected from development which could negatively impact on this designation	138, 139, 42, 181, 1012 (SEAG)	The importance of protecting conservation areas is recognised. Policies C3 and C7 provide protection from adverse impacts of mineral working.
159	Properties vulnerable to flooding are difficult and expensive to insure and their value is reduced accordingly.	147, 650	This is acknowledged but policy C1 seeks to ensure that vulnerability to flooding will not be increased.

160	Objection to inclusion of the area on the grounds of traffic congestion, limited access to Reading over bridges, weight limit over Sonning Bridge, significant levels of traffic, and routing of lorries through Caversham or Henley.	649, 481, 650, 483, 101, 139, 71, 147, 181, 927, 644, 651, 628, 479, 484	The strategy does not plan to increase the rate of working at Caversham, so associated HGV movements should continue at the same level.
161	There are sources of gravel further downstream which would leave an area of untouched floodplain downstream from Sonning Eye.	1012 (SEAG), 160, 42	The Core Strategy includes a broad area extending along the Thames Valley to the north east of Caversham Quarry; it does not identify a specific working area(s).
162	There has been a lack of consultation with local residents and SEAG.	1012 (SEAG), 163, 154	The Council has consulted parish councils and all organisations and persons on the consultation database and has invited stakeholders to be involved in developing the minerals strategy.
163	There has been a cumulative impact of working previously, specifically loss of amenity due to noise from existing working, construction of earth mounds and vibration from working and lorries.	156, 649, 650	The council acknowledges that some areas have experienced the cumulative impacts of working.
164	The Parish Council supports the SEAG response, which raises a number of significant concerns to the council.	846 (Eye and Dunsden PC)	The Parish Council's response is noted.
165	The proposed area of working is objected to because it will impact on the public footpath along Spring Lane	649, 843 (Open Spaces Society)	This is an issue for consideration at planning application stage.
166	The proposed area is close to a Thames Water abstraction site at Playhatch	649	The Council is aware of this and has consulted the Environment Agency. Sand and gravel extraction is not precluded by a source protection zone.

167	Objection to the proposal by the operators to landfill further workings rather than to fill in the void with porous gravel.	628, 482, 649, 835, 163	Any specific proposal for landfill of mineral workings would be considered against the policies of the development plan, including policies on water environment; and the Environment Agency would be consulted.
168	Objection on the grounds of the likely impact of further working on the River Thames, its landscape and ecology and of the River Thames path and views from the path.	474 (River Thames Society)	Text of Core Strategy and objective viii have been amended accordingly.
169	Respondent provided detailed comments on the hydrological and hydrogeological report issued by MJCA on behalf of Lafarge Aggregates in 2004 ' <i>An assessment of the potential hydrogeological and hydrological impacts of the proposed sand and gravel extraction in the northern extension of Caversham Quarry, Oxfordshire</i> ' He concludes by noting that there is a real concern that the County Council will ignore the risks to people and housing in its flood risk assessment and in its consideration of the Sequential Test.	282	The Environment Agency has been consulted and has agreed the Council's approach to the consideration of flooding, including application of the sequential test.
170	The main thrust of the sequential test seems to have been ignored; higher priority should be given to the mitigation of risk to life and property posed by increased flood risk. The Council has failed to apply the exception test to infrastructure associated with mineral extraction. All infrastructure associated with extraction would have to be located in the flood plain, which could increase risk of flooding in Sonning Eye.	28 (SEAG)	The Environment Agency has been consulted and has agreed the Council's approach to the consideration of flooding, including application of the sequential test.
171	Suitable means of mitigation against the risk of flooding	28 (SEAG)	This is an issue for consideration

	would have to be provided. The raising of ground levels would be inevitable to accommodate overburden & topsoil mounds. Normally a flood compensation area would be needed to form a new area of flood plain; not achievable here as site falls entirely in flood plain.		at planning application stage.
	POLICY M3: STRATEGY FOR THE LOCATION OF MINERAL WORKING – SAND AND GRAVEL (Cholsey)		
172	M3: Cholsey Approximately 540 responses were received to the proposal to include the area between Cholsey and Wallingford as a new area for sand and gravel extraction. The majority of respondents identified a number of key issues, which are detailed below. These comments are not attributed to individuals as each was raised by several hundred people and by CAGE, mostly in virtually identical response letters. Where other organisations have made different comments on the Cholsey proposals, these are attributed below.		
	Support/neutral		
173	A routeing agreement would need to be in place to ensure that lorries do not pass through Cholsey village.		This is an issue for consideration at planning application stage.
174	Three respondents supported the proposal to extract gravel in the Cholsey area, recognising the need to plan for gravel extraction and the potential of the area to make a contribution to that need.		Support for the inclusion of the area noted.
	Objections/concerns		
175	Impact on historic settlements of Cholsey and Wallingford; proposed working lies in historic southern hinterland of Wallingford & would destroy the preserved setting of the historic town and its landscape archaeology.		The Council considers that mineral working would not have a direct impact on either historic settlement; and the landscape assessment indicates that mitigation measures could reduce any visual impact on the local area.

176	Sites proposed lie in close proximity to an area which has proved rich in archaeological finds, and is divided from this area by the bypass which has created a false barrier in the landscape. Gravel extraction would obliterate a large tract of this important landscape and destroy the historic and archaeological environs between Wallingford & Cholsey.		The Council acknowledges that there may be archaeological assets in the area, but considers that these are unlikely to preclude mineral working to the extent that the requirement for sand and gravel supply from this area could not be met.
177	Two listed buildings in the area; Cox's Farm and New Barn Farm are affected by the proposals. The access to Cox's Farm crosses the proposed site.		These issues would need to be assessed at the site allocations and planning application stages.
178	Preference for not including the Cholsey area in the plan because of its proximity to the AONBs but if these areas are carried forward, that the council undertakes a visual impact assessment of proposed working to determine likely impact on the AONBs and their setting.	721 (Chilterns Conservation Board), 21 (N Wessex Downs)	The Council has undertaken a landscape assessment study which study finds that there will not be a significant impact on the AONBs and their settings.
179	Impact of proposed working on the North Wessex Downs AONB and the Chilterns AONB and the setting of these landscape designations		See ref 178.
180	The three proposed extraction sites lie in the former channel and on the river terraces of the River Thames and could destroy valuable evidence about the history of the river valley and the influences of climate change.		Most sand and gravel resources in Oxfordshire are located in terraces of the River Thames; the scientific importance of any particular location is a matter for consideration at the site allocations or planning application stage.
181	A primary aquifer beneath the area and a secondary aquifer have high permeability and are highly vulnerable to pollution of groundwater. Consideration should also be		An assessment of groundwater vulnerability to pollution has been carried out of all areas. The

	given to the proximity to Cholsey sewage works and its potential to be a source of groundwater contamination.		Environment Agency has been consulted and has advised that this need not preclude working in any of the areas in the strategy.
182	Mitigation of the impact of any planned extraction operations will be required on flooding potential, chemical and ecological quality of the R Thames, Cholsey Brook and Mill Brook.		This is an issue for consideration at the planning application stage.
183	Impact on the Agatha Christie trail, a public footpath which runs along the western edge of the main nominated site from Agatha Christie's home in Winterbrook to her grave in Cholsey churchyard.		The Council acknowledges that there could be a visual impact on users of this footpath but the integrity of the route would not be affected. This issue would need to be considered in detail at the site allocations and planning application stages. Mitigation measures such as bunding and planting could reduce the impact.
184	Impact on local economy and tourism and contrary to the District & Town Councils' plans for the future.		The Council does not consider that mineral working in this area would adversely affect the local economy or tourism. Any proposal for working could be subject to mitigation measures to reduce visual impact and other impacts to acceptable levels; and restoration could afford opportunities for increased public access, amenity and biodiversity.

185	Lack of information about restoration proposals has led to misinformation and confusion about the final after-use of the site and there are concerns that the restoration would not be able to meet the demands of the MOD with respect to birdstrike, nor be restored to a suitable land-use to reflect the proximity of the area to the AONB. Lack of inert fill is also a concern.		The Council recognises that there is uncertainty over restoration, but it is not appropriate to specify the form of restoration in a broad strategy that does not identify specific areas for mineral working. Any restoration proposals should accord with policy M7 and would need to recognise the proximity of the area to Cholsey and Wallingford, the AONBs and RAF Benson. Consultation with the MOD would be necessary.
186	Impact on the Cholsey-Wallingford steam railway, which runs adjacent to the main nominated site for a distance of approximately 1.5 miles. This train line is a tourist attraction, maintained by volunteers.		The Council acknowledges that there could be a visual impact on railway travellers but the integrity of the route would not be affected. This issue would need to be considered in detail at the site allocations and planning application stages. Mitigation measures such as bunding and planting could reduce the impact.
187	Impact on amenity of local residents; potential impacts of noise, dust, traffic pollution. Objectors note that up to 10,000 people live within 1 mile of the Cholsey area.		These are issues for consideration at the site allocations and planning application stages, when the need for mitigation measures to avoid unacceptable adverse impacts would be addressed. The Council

			does not consider that these issues prevent inclusion of this area in the minerals strategy
188	Local roads are already under great pressure and are likely to be increasingly so due to the 'growth town' at Didcot, the designation of Milton Park and Science Vale as an Enterprise Zone, out of town development, increased visitor numbers and demographic change to smaller average household sizes.		The Council has assessed the road network as being adequate for the additional HGV traffic that mineral working would be likely generate; but this issue would need to be considered further at planning application stage when a detailed proposal with lorry numbers and movements would be available.
189	Many roads including the A4130 are unsuitable for significant heavy lorry movements. The bypass is not designed to take significant heavy lorry movements over a prolonged period.		The A4130 is included on the Oxfordshire Lorry Route Map as a link between the A4074, Didcot and the A34. Details of access from any specific site would need to be considered at the planning application stage.
190	The report to the County Council Minerals Working Party in 1987 stated that the gravel from Cholsey 'is not capable of producing structural concrete without the addition of stone. It does not replace the higher quality gravels at Sutton Courtenay.'		That report stated 'The sand and gravel appears to be a similar quality as that at Stanton Harcourt, but not as good as that at Sutton Courtenay.' There is mineral industry support for sand and gravel working in the Cholsey area which indicates that the mineral is of suitable quality.

191	Access to the proposed main site would be on the Wallingford-Cholsey Road, a single-track, straight, fast road where there have been a number of fatalities and accidents in the past. The roundabout on the Wallingford bypass is within 100m of a second roundabout at the junction of the bypass with the A329; this would create a dangerous convergence of traffic. An access directly onto the bypass would be equally dangerous.		The Council has assessed the road network as being adequate for the additional HGV traffic that mineral working would be likely generate; but this issue would need to be considered further at planning application stage when a detailed proposal with access location and lorry numbers and movements would be available.
192	Proximity of Mongewell Park nursery school on the Wallingford-Henley road; potential impact of noise and dust pollution on the children.		This is an issue for consideration at the sites allocations and planning application stages in the event of a site near to this school being identified, including the need for mitigation measures to avoid unacceptable impacts.
193	The site is unlikely to be economically viable as the quality of the resource is poor.		The Council is not aware of evidence that the resource would not be economically viable. There is mineral industry support for sand and gravel working in this area which indicates that the mineral is of suitable quality.
194	Proximity of SG-60 to the River Thames; impact on the national trail Thames path, wildlife habitats and tranquillity.		Objective vii of the plan has been amended to include reference to the River Thames. Policies C2, C3 and C9 seek to protect the River Thames, rights of way and the

			amenity of users.
195	Potential impact on local rights of way around and across the Cholsey area.		Impact on rights of way would need to be considered at the site allocations and planning application stages.
196	Potential impact of working on the proposed cycle path between Wallingford and Cholsey; potential for the cycle path not to be delivered at all and if it is, the hazard of the site entrance across the cycle path, and the proximity to mineral extraction could discourage use.		The Council does not consider that mineral working within the Cholsey area would prevent the cycle path being delivered; but this issue would need to be considered at the site allocations and planning application stages in the event of any specific proposal that affects the proposed cycle path route.
197	Potential destruction of hedgerows, disturbance to biodiversity and multiple species of birds and animals. Lack of opportunity to undertake more detailed ecological assessment or assessment of freshwater brooks and their wildlife, nor of ecology of site SG-60. Extraction and restoration would not enhance biodiversity but destroy it.		Further assessment of ecological impact and potential would be needed at the site allocations and planning application stages. An objective of the Core Strategy is to increase biodiversity through the restoration of mineral workings.
198	The proposed strategy would enable one operator to have at least half of the market share in Oxfordshire, which could be seen as a monopoly on production. Questionable whether this is deliverable or appropriate.		The strategy includes five areas for sand and gravel working, within which possible sites have been nominated by a number of different operators.
199	There has been a lack of consultation with the main stakeholders potentially affected by these proposals.		Cholsey Parish Council and other key stakeholders were involved in the Council's engagement events

			on development of the minerals strategy during 2010.
200	There has been a lack of transparency or logic supporting the decision making process and the option generation and revision of options process.		The background paper on development of the minerals planning strategy explains the process the Council has gone through in developing the strategy.
201	The Defence Infrastructure Organisation does not appear to have been consulted on the consultation; their main concern would be the creation of large areas of standing open water which can be attractive to large bird species.		MOD (DIO) was consulted and made a response (see ref 209). The MOD has indicated that some wetland restoration could be acceptable, subject to safeguards and a bird management plan.
202	Restoration would require importation of infill material; sunken depressions would be created which would be wet in winter and dry in summer. In excess of 3 million tonnes material would need to be imported to site SG-33; it is highly questionable whether this is feasible or desirable. Due to the availability of fill, restoration is likely to take place over a long time frame, meaning the site could be operational for well in excess of 50 years.		Restoration could involve infill with imported material but it is not appropriate to specify the form of restoration in a broad strategy that does not identify specific areas for mineral working. Any restoration proposals should accord with policy M7 and would need to recognise the proximity of the area to Cholsey and Wallingford, the AONBs and RAF Benson. Consultation with the MOD would be necessary.
203	The net capacity of the site, taking into account buffer zones is likely to be approx 3.4mt, not the 4.0mt proposed by the operator. This coupled with the poor quality of the		The Council believes there is sufficient potentially workable sand and gravel to deliver the 2 million

	material reduces the economic viability of the site.		tonnes that is estimated to be needed from this area within the plan period. There is mineral industry support for sand and gravel working in this area which indicates that the mineral is of suitable quality.
204	'Distance to market' cannot be justified as a criterion for selection of this site; much of the material will go to markets in Oxford; a 50%:50% split is proposed by the operator between Oxford and South Oxfordshire.		The area should contribute to meeting the need for aggregates in southern Oxfordshire, particularly those market areas which it is closer to than are the sources of supply in west Oxfordshire.
205	As the Cholsey area is so site specific, a more detailed assessment is necessary to confirm the viability of the site.		The Council considers that the strategic level assessment work that has been carried out is appropriate to the selection of broad areas for mineral working, including the Cholsey area.
206	The planning consultant for CAGE undertook an assessment of the potential sites which shows that the Cholsey/Wallingford sites score the least favourably, both in terms of positive scores and negative impacts.	CAGE	The Council does not accept the weighting that has been given to certain criteria in the consultant's assessment, which has resulted in different scoring.
207	Concerns about potential traffic generation and congestion on local roads should the Cholsey proposal go ahead.	Didcot Town Council	The Council has assessed the road network as being adequate for the additional HGV traffic that mineral working would be likely generate; but this issue would

			need to be considered further at planning application stage.
208	Object to the proposal and support the CAGE submission	806 (Cholsey Parish Council)	Objection noted.
209	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.	(441)Defence Infrastructure Organisation	Noted. Further clarification on the MOD's (DIO) views on potential restoration in the Cholsey area has been sought; they would prefer restoration to dry uses but some areas of open water are likely to be acceptable, subject to conditions.
210	Supports the existing locations for gravel extraction but the new area at Cholsey raises concerns as the transport infrastructure is inadequate.	E Hagbourne PC	The Council has assessed the road network as being adequate for the additional HGV traffic that mineral working would be likely generate; but this issue would need to be considered further at planning application stage.
211	Regret the damage to a historic landscape with high amenity value. If proposal goes ahead, suggests upgrading the bunk line to move aggregates to minimise HGV movements, especially those which would come through Streatley.	812 (Goring & Streatley Amenity Association)	Comments noted but the Council does not consider these to be strategic level constraints that rule out this area. Movement of minerals by rail is very unlikely to be feasible. See also ref. 210. Significant levels of HGV mineral movements through Streatley are not expected.
212	Concerned about proposals for Cholsey and associated HGV movements, particularly through Goring.	218 (Goring Parish Council)	Comments noted. See ref. 210. Significant levels of HGV mineral

			movements through Goring are not expected.
213	The identification of the new area of working at Cholsey is broadly supported as the southern site to replace Sutton Courtenay when supplies expire around 2020. Cholsey is closest to the demand nodes and has limited risk of flooding.	168 (PAGE)	Comments noted.
214	Objection to SG-60 in the Cholsey area due to proximity to the Thames river path and the potential impact of working on the green corridor of the River Thames.	601 (River Users Society)	Objective vii of the plan has been amended to include reference to the River Thames. Policies C2, C3 and C9 seek to protect the River Thames, rights of way and the amenity of users.
215	The proposed Cholsey Area of Search is subject to a number of potentially significant constraints and is in an area of locally significant tourism initiatives, which must be given careful consideration before any decision is taken to put the Cholsey area forward. Additional work by the county is needed in respect of the overall principles for the restoration of any sites worked in the proposed Cholsey Area of Search because of aircraft safeguarding issues and because of the impacts on the landscape in close proximity to Areas of Outstanding Natural Beauty.	549 (SODC)	The Council has undertaken a landscape assessment study which study finds that there will not be a significant impact on the AONBs and their settings. Further clarification has also been sought from MOD (DIO) on its views on restoration in relation to potential risk of birdstrike (see ref 209).
216	Objection to the proposal on the grounds identified above.	388 (Wallingford Town Council)	Objection noted.
217	Consultation process with Cholsey residents has been virtually non-existent	896, 928, 758, 771, 390, 869 (CAGE)	The Council considers that it has carried out an appropriate level of engagement with stakeholders and consultation with the public.

	POLICY M4: AGGREGATES RAIL DEPOTS		
	Support/Neutral		
218	CPRE supports policy M4 and notes that the plan should give consideration to the potential for transport of aggregates such as china clay from Cornwall to be imported by rail.	572 (CPRE)	Support noted. The Council considers the transport of aggregates such as china clay waste from Cornwall to Oxfordshire by rail unlikely to be practical; but policy M4 would enable this should it prove to be economically viable.
219	Support for policy	200 (E Hagbourne Parish Council), 274 (Cemex UK), 494 (Hinton Waldrist P C), 568 (VoWHDC), 640 (Surrey County Council), 693 (Lafarge Aggregates), 701 (MPA), 712 (OMPG), 729 (Smiths Bletchington), 550 (SODC), 420 (Hanson)	Support noted.
	Objection/concern		
220	The plan should examine the net costs of importing minerals by rail and should identify extra costs and savings.	442	The Council does not have the resources to undertake this work, which is not required for the Core Strategy.

POLICY M5: MINERAL SAFEGUARDING (re-numbered policy M6 in proposed submission document)			
Support/neutral			
221	The policy is supported.	111, 569 (VoWHDC), 670 (Hills Quarry Products Ltd), 694 (Lafarge), 551 (SODC)	Support noted.
222	The policy is supported. All sand and gravel and soft sand resources should be safeguarded irrespective of the findings of the Preliminary Site Assessment, which requires further investigation and evaluation.	421 (Hanson)	Support noted. Agreed; the preliminary site assessment is not relevant to safeguarding of resources.
223	The MPA supports the policy and recommends that the approach to safeguarding and identification of MSAs follows the BGS good practice advice (OR/11/046) Reference to safeguarding of rail depots should only be in Policy M4.	702 (MPA) and 713 (OMPG)	Agreed; the supporting text to policy M6 has been amended accordingly.
224	This policy is supported. Smiths recommends that a structured review of geological information for the county is undertaken on a regular basis, so that boundaries of existing MSAs can be updated and refined.	730 (Smiths Bletchington)	Noted; this will be considered as part of the monitoring and review of the plan but the resource implications will need to be considered.
Objection/concern			
225	The Lower Thame valley should be excluded from future safeguarding given the findings of the preliminary site assessment which records that all these sites are unsuitable on a variety of grounds.	169 (PAGE)	Resources should safeguarded for the long term; the preliminary site assessment is not relevant to establishing safeguarding areas.

226	Identifies potential conflict between safeguarding area around Wallingford, Berinsfield, Benson and SODC Core Strategy where 555 homes are proposed at Wallingford and a further 1154 dwellings in larger villages such as Benson, Berinsfield and Cholsey. Important that when detailed safeguarding maps are drawn up, they are not drawn tightly around these settlements.	229(West Waddy ADP)	Policy M6 sets a strategic policy framework for defining mineral safeguarding areas. The Council will consult the district councils and take into account local plan proposals in drawing up these areas.
227	Sand and gravel safeguarding areas exclude some deposits which should have been included. Suggest identifying MSAs from BGS data, removing urban areas and urban infrastructure. Mineral resources in AONBs should be included in MSAs.	275 (Cemex UK)	The MSAs have not yet been defined. BGS data will be used in doing this. The background paper on safeguarding mineral resources has been amended to make this clear.
228	Safeguarding areas should be clarified and mapped in the main document, not just in the background paper. Some of these areas may need to be refined to avoid unnecessary blight.	287	The background paper on safeguarding has been amended to make clear that it does not define safeguarding areas. These will be defined in the site allocations document.
229	This policy should also include areas covered by dormant or other planning permissions and the extent of these permissions should be shown clearly in the Minerals Site Allocations Document.	355 (Peter Bennie Ltd)	The safeguarding policy covers all important mineral resources, including areas with planning permissions.
230	The plan should define 'economic and sustainability considerations' and the process by which potentially encroaching development will be defined.	314 (Carter Jonas LLP)	These factors will need to be considered on a case by case basis and will depend on the mineral concerned and proposed development, and relevant local factors.

231	Request that the soft sand safeguarding area is reduced in size on Fig 7.	495 (Hinton Waldrist PC)	The safeguarding areas have not yet been defined; Fig 10 (re-numbered) shows the soft sand strategy areas.
232	The plan should allow for sand and gravel to be extracted where new development is taking place, prior to that development, to preserve resource elsewhere.	598 (Nuneham Courtenay PC)	Policy M6 requires prior extraction of mineral resources to be considered.
233	The policy does not reflect MPS1 which seeks to ensure there is a suitable balance between the need for development and the importance of the minerals that it might sterilise.	376 (D K Symes)	Policy M6 has been reviewed to ensure consistency with national policy.
POLICY M6: RESTORATION OF MINERAL WORKINGS (to be re-numbered policy M7 in proposed submission document)			
Support/neutral			
234	Support policy M6	202 (E Hagbourne Parish Council), 703 (MPA), 714 (OMPG), 364 (Bampton PC), 401 (Bampton Env Watch Group, 573 (CPRE), 695 (BBOWT)	Support noted.
235	Supports policy M6 but requests amendment of para 4.41 from 'water bodies' to 'wetlands' and insert after 'restoration schemes' 'Some areas of open water are likely but careful use of inert fill and other engineering techniques can sometimes lead to creation of wetland habitats that offer lower bird strike risk and are also of	116, 680 (RSPB), 740 (Natural England)	Agree; para 4.48 (re-numbered) has been amended accordingly.

	much greater value in terms of current biodiversity priorities. Most of ..'		
236	<p>Broad support for policy M6. Not sure why the plan has preference to restore to original land use; not consistent with vision. Consideration should not be given first to restoration to the original land use.</p> <p>Inert waste should be directed as a priority towards use in mineral site restoration projects. Para 4.39 should mention the need to prioritise inert fill for restoration and should cross reference with policy W7 as follows 'where restoration relies on infilling with inert waste it may take some years to complete restoration because of shortage of suitable fill material (due in large part to increased recycling).</p> <p>Suggest amendments to clarify that wetland habitats (rather than open water) are the most likely restoration in areas of high water table. Suggest that a paragraph is added after 4.41 to clarify that restoration schemes should have a coherent land-use strategy or set of agreed objectives to ensure that sites do not end up with many small parcels of land with different land-uses as this can result in low quality restoration which is difficult and expensive to manage.</p>	OCC Natural Env Team response, 680 (RSPB)	Agree that the plan should not have a preference for restoration to original land use; this has been amended. Long term management period has been clarified as 5 years statutory aftercare plus 20. Agree amendment from 'water bodies' to 'wetlands'. Agree addition of wording to ensure that each restoration scheme has a primary end use for the land.
	Objections/concerns		
237	The plan needs to define 'long-term', as in a 'long term' agreement. The term 'where appropriate' should be deleted from policy M6 (final paragraph). The definition should comprise a 5 year statutory management period	695 (BBOWT), 680 (RSPB), 740 (Natural England)	Long term management period has been clarified as 5 years statutory aftercare plus 20. It is appropriate for Policy M7 (re-numbered) to

	followed by a further 20 years period.		include 'where appropriate'.
238	The policy should clarify that each restoration scheme should have a particular primary end land use, to prevent a patchwork of small areas being proposed with different uses.	695 (BBOWT)	Agree addition of wording to ensure that each restoration scheme has a primary end use for the land.
239	Policy M6 should be amended to say rather than land should be restored to BMV where appropriate, BMV agricultural land should not be used for mineral extraction as it is a finite resource.	170 (PAGE)	New policy C4 has been added on protection of BMV land and soil quality. Policy M7 (re-numbered) on restoration has been amended to include restoration of BMV land to agricultural land where practical.
240	Policy M6 should be amended to say that restoring the character of the landscape to its pre-extraction site should be a condition of development of new quarries in scenically sensitive areas such as close to the River Thames or in the Green Belt. A further policy should explicitly seek to preserve the character of the Thames Valley.	264 (BaCHpoRT)	Policy C2 provides for protection of the River Thames but restoration of sites to their original landscape is not always possible.
241	Objection to the council's desire to tax future mineral works through a policy related to aftercare. Cemex also notes that there are other means of protecting soil quality in addition to agriculture	276 (Cemex)	Objection noted. Policy C4 on protection of soil quality has been added to the plan.
242	Policy M6 should be tightened to require contributions from developers rather than just 'expect'. There should be some mechanism for communities to benefit directly from the revenue generated by new developments in their area.	288	Policy should not be changed as contributions from developers cannot be a requirement of granting permission but should be by agreement.
243	No mechanism has been identified on how this fund	276 (Cemex), 356	This is a matter for the site

	would be managed, spent or reimbursed.	(Peter Bennie Ltd)	allocations document and individual planning applications.
244	The proposal for extended aftercare arrangements is unduly vague and onerous. Policy M6 is overly general and prescriptive, and could blight innovative schemes.	311 (Carter Jonas LLP)	Long term is now defined as 5 years statutory aftercare plus 20 years. The wording of policy M7 (re-numbered) has been reviewed.
245	The county does not have the experience or competence to manage funds for aftercare schemes; policy M6 is not supported	400 (Grundon)	Objection noted. Management of funds would need to be agreed with developers at the application stage.
246	Restoration should be timely and independent advice should be sought (eg from NFU) on the restoration proposals put forward by operators.	496 (Hinton Waldrist Parish Council)	Policy M7 states that restoration should take place in a timely and phased manner. Consultation will be undertaken on restoration proposals as appropriate.
247	The policy refers to BAP targets; this should be modified to make clear that this includes Conservation Target Areas.	859 (Shenington with Alkerton Parish Council),	Conservation Target Areas are more appropriately covered in policy C5 on biodiversity.
248	The policy is broadly supported, but after 'Mineral workings should be restored to a high quality', the following text should be inserted 'and in keeping with the character of the surrounding area.' The role of local communities in influencing the most appropriate type of restoration should be included in the supporting text.	570 (Vale of White Horse District Council), 552 (South Oxfordshire District Council)	The text already covers this point adequately. Agree that communities should have an input to restoration; para 4.43 has been amended accordingly.
249	Eventual restoration of sites and the attendant impact on the landscape should be considered when areas are proposed in the Core strategy. This is of particular relevance to Cholsey due to the proximity of the area to	552 (South Oxfordshire District Council)	The Council recognises that there is uncertainty over restoration, but it is not appropriate to specify the form of restoration in a broad

	the N Wessex Downs AONB and RAF Benson and the attendant issues of birdstrike.		strategy that does not identify specific areas for mineral working. Policy M7 sets general requirements for restoration, which should also take into account the sort of local factors mentioned.
250	Comprehensive restoration strategies should replace piecemeal plans for restoration in order to maximise long term benefits for landscape and communities. Restoration schemes should have regard to local landscape assessments.	634 (West Oxon District Council)	Para 4.49 notes the Council's intention to develop strategies for appropriate types of restoration in broad areas to avoid piecemeal restoration and this is reflected in policy M7.
251	The policy should be modified to make provision to include communities in decisions on the restoration of local sites.	859 (Shenington with Alkerton Parish Council), 634 (West Oxon District Council)	Agree that communities should have a say in restoration; and para 4.43 has been amended accordingly.
252	Financial measures to secure restoration should only be used where the applicant has an unsatisfactory track record in restoration. Essential to balance need for agricultural land against nature conservation, woodland and recreation. Not only BMV land should be able to be restored to agriculture; agriculture can be an important source of income after land is restored. MPA must ensure that objections to biodiversity schemes by Defence Estates are only upheld if soundly based.	671 (Hills Quarry Products Ltd)	The principle of agreeing financial measures to ensure long term management for restoration is appropriate in the plan but the details of this need to be agreed with developers; the background paper on restoration has been amended accordingly. Agree importance of agricultural after-use for BMV land but nature conservation should also be incorporated. The council will engage with MOD (DIO) on

			restoration proposals.
253	<p>A more detailed restoration masterplan is required in a sites DPD. Policy M6 should include a reference to this 'Restoration and after-use should be in accordance with the spatial strategy for the area as outlined in a Sites DPD. Planning permission will not be granted...'</p> <p>Policy M6 should be amended to recognise that for a BMV site, restoration of the site in a way that preserves the soils (or the potential for their re-use for agriculture) is an acceptable alternative to returning the land to agricultural use.</p>	680 (RSPB), 740 (Natural England)	Para 4.49 notes the Council's intention to develop strategies for appropriate types of restoration in broad areas to avoid piecemeal restoration and this is reflected in policy M7.
254	<p>Para 4.43; suggest the following re-wording 'Where restoration could assist or achieve <i>priority habitats or species targets</i>, Suggest addition of Where restoration could protect <i>and improve</i> geodiversity and remove 'where appropriate', from Operators and landowners will be expected to contribute....</p>	740 (Natural England)	Policy M7 has been amended accordingly.
255	The final sentence of para 4.38 should say 'measures to conserve <i>and enhance biodiversity</i>	740 (Natural England)	Suggested wording agreed; para 4.44 (re-numbered) has been amended accordingly.
256	<p>The list of acceptable after-uses in the supporting text is too narrow. A greater range of uses should be acceptable; after uses such as waste management and recycling can support the economy and create jobs.</p> <p>Suggest adding a sentence to the policy relating to the need to consider the individual merits and circumstances of a site when considering the appropriate restoration strategy.</p>	724 (Frobisher Renewables)	The Council considers that policy M7 and the supporting text adequately covers the range of after-uses that will generally be appropriate.

257	Policy should refer to phasing as 'where practical'. MPG 7 makes it clear that aftercare/management agreements beyond the statutory 5 year period can be made by mutual agreement, but this plan says that a long term arrangement will 'be required'.	377 (D K Symes Planning)	Retain wording on phased manner of restoration. It is appropriate for policy M7 to include stronger wording than MPG7 on management beyond the 5 year aftercare period.
258	Para 4.38 notes that 'consideration should first be given to restoration to the original land use'. This may not be appropriate if the site lies within a functional flood plain and if landfill is required to restore the site. Policy M6 should also promote the improvement of flood storage capacity when a site in the floodplain is to be restored and should ensure that the restoration and aftercare period caters for surface water management.	464 (Environment Agency)	Agree that restoration to original land use may not be appropriate, e.g. in the functional flood plain. Policy M7 has been amended to include provision for flood storage capacity. Detailed aspects of restoration are more appropriate to be addressed at the planning application stage.
259	Restoration back to original land use of soft sand quarries on the Corallian ridge is unrealistic as large deep holes down to the clay can only be restored if the hole is completely refilled, requiring the import of inert wastes, which is inconsistent with the emphasis on recycling aggregates. Conditions for restoration may need to be strengthened by s.106 agreements.	973	Agree that restoration to original land use may not be appropriate or realistic; para 4,44 (re-numbered) has been amended accordingly.
260	Restoration plans should be fully costed and supported with a realistic funding statement and guarantee, to protect the restoration scheme should companies go out of business or changing ownership. This guarantee should cover issues such as where infill will come from. The phrase 'adequate funding' should be added to the final para of policy M6.	141 (AGGROW)	Policy M7 covers the issue of developer contributions generally but specific details are more appropriate to be addressed on a case by case basis at the planning application stage.

261	Contradictions between discussion of restoration of sites and recycling of aggregates; needs re-working.	970	Para 4.45 has been amended to address the issue of availability of infill material and notes that this may be a constraint on the timescale and type of restoration.
262	Policy M6 fails to discuss the potential for restoration to influence flood plain capacity.	1014 (SEAG)	Policy M7 has been amended to include provision for increased flood storage capacity.
263	Para 4.37 regarding restoration is supported.	OCC RoW officer response	Noted.
KEY DIAGRAM			
Support/neutral			
	None		
Objections/concerns			
264	Maps can only be zoomed in on once and detail of underlying information varies. The County might want to consider using the sort of layered maps that authorities such as Oxford have used for their Core Strategy.	599 (Nuneham Courtenay PC)	The Council considers the mapping to be fit for purpose for this document having regard to the information shown and resources available.
IMPLEMENTATION AND MONITORING (re-numbered as section 7 in proposed submission document)			
Support/neutral			
265	Stakeholders should be defined and voluntary bodies listed as implementation partners in table 1. Para 6.8; policy of extensions should not lead to automatic,	977	Table 6 (re-numbered) identifies appropriate implementation partners, including stakeholders.

	unconditional permissions for extensions to existing quarries in preference to new quarries.		Para 7.8 notes that extensions to existing quarries are the preferred approach to continuation of supply but that new quarries will be permitted if insufficient supply can be made through extensions, which would include if options for extensions were environmentally unacceptable.
266	This section should highlight the importance of meaningful dialogue and consultation with local residents. A transparent process of dialogue with constructive comments being listened to will help to calm local opposition.	124	The implementation section has been amended to highlight the importance of dialogue and consultation with local residents.
267	Importance of structured relationships with districts and adjoining MPAs and AWPS.	280 (Cemex UK)	The section on implementation has been amended to highlight the importance of engagement with district councils and with other mineral planning authorities, including through the Aggregates Working Party.
	Objections/concerns		
268	Para 6.9 should make it clear that the site allocations document will include provision for quarry extensions to enable continuity of provision throughout the plan period.	39 (Earthline Ltd)	Paragraph 7.9 has been amended accordingly.
269	The plan should include a commitment by the Council to implement a monitoring system designed to ensure that planning conditions and other restrictions are respected.	268 (BaCHpoRT)	Such a monitoring system is already in existence.

270	Policy M6; Biodiversity gains and local benefits should be monitored separately so that targets relating to each can be measures separately. Target for achieving biodiversity gains in policy M6 and C4 should be 100% not 75% as all sites can contribute to biodiversity. Indicator and target for C8 should be extended to measure the success beyond just maintaining the existing Rights of Way network.	688 (RSPB), 744 (Natural England), OCC Natural Env team	Table 6 has been amended to reflect 100% target for creating biodiversity gains. A target for creation of new rights of way in association with restoration of mineral site has been added.
271	Plan should set out clearly how it intends to cooperate with other MPAs to ensure an adequate & steady supply of minerals is maintained; distant as well as neighbouring MPAs to enable demonstration of discharging the 'duty to cooperate.'	706 (MPA) & 717 (OMPG)	Agreed; the implementation section has been amended accordingly.
272	Para 6.8 is anti-planning; leaving supply to be engineered by the operator.	453	The plan is positive in identifying broad areas within which sites for mineral working should be located.
273	Plan should show how strategy will be implemented not just through determination of planning applications, but also in other ways. OCC should produce monthly reports for local communities, not just the annual monitoring report. Funds should be provided to local communities to enable them to carry out their own monitoring which would be independent of commercial interests.	863 (Shenington with Alkerton PC)	This would be unduly onerous both on the council and on operators. The Council's monitoring officers provide a regular schedule of monitoring checks on minerals and waste sites throughout the year.
274	Ideally table 1 would include targets not just to safeguard but also to create new rights of way for all users.	1015 (Oxon Countryside Access Forum)	A target for creation of new rights of way in association with minerals restoration schemes has been added.
275	Amend table 1 to include minerals and waste industries and district & parish councils as stakeholders and the	OCC RoW officer response	The list of implementation partners in table 6 has been revised.

	Ramblers and British Horse Society as implementation partners.		
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Summary of Responses to Consultation Draft Waste Planning Strategy, September 2011 and County Council Responses May 2012

Ref	Summary of Comment	Organisation (ID) or Individual Respondent	County Council Response (any paragraph numbers refer to Minerals and Waste Core Strategy proposed submission document May 2012)
EXECUTIVE SUMMARY			
Supportive/Neutral			
1	General support for the document, but some individual points need to be addressed.	CPRE (132)	Noted: the points that have been raised are referred to in the relevant section and addressed separately.
Concern/Objection			
2	Add new sentence to para 8 to include reference to Waste Hierarchy.	Oxford City (233)	Agree.
INTRODUCTION			
Supportive/Neutral			
	None	None	None.
Concern/Objection			
3	The Strategy would be clearer and more understandable if it identified specific sites for waste development.	Sutton Courtenay PC (97)	The Core Strategy sets a framework for site allocation. Sites will be allocated for waste in a later document following more detailed work.
4	Errors and omissions require correction and further consultation before submission of the strategy to the Secretary of State.	Sutton Courtenay PC (97): ID120	Agree: various have been made. No issues are raised that would benefit from further consultation to

			better inform preparation of the proposed submission document.
BACKGROUND			
	Supportive/Neutral		
5	The intention that the strategy should be consistent with District LDFs is noted.	Oxford City (171)	No inconsistencies with District LDFs have been pointed out.
	Concern/Objection		
6	Approved MRF at Finmere Quarry not shown on Map 2.	Premier Aggregates (179)	Facilities with planning permission to be shown (para 2.9). Relevance of each commitment to the overall strategy to be explained further in Waste Needs Assessment).
VISION AND OBJECTIVES			
	Supportive/Neutral		
7	The vision and objectives are actively supported.	Shenington with Alkerton PC (152): Surrey CC (182): Natural England (210): Bampton PC (76): BEWG (88): Banbury TC (246): ID61: ID185	Noted.
	Concern/Objection		
8	Link between objectives and policies needs to be clearer.	Bucks CC (7)	Links between policies and objectives are set out in Table 5 (now Table 6).
9	Waste hierarchy and reference to waste reduction should be part of the vision/objectives.	Didcot TC (29) Oxford City (170) OCC Waste Management	Waste hierarchy already referred to in objectives. Greater reference to waste reduction will be made (para 3.10 ii).
10	Strengthen to protect local communities from unnecessary	ID121	Objective (vi) already seeks to

	or excessive development and seek an even distribution of waste capacity across the County.		protect the amenities of local communities'. The Vision (para c) and objectives (iii) seek a broad distribution of facilities across the County.
11	Reduce Construction and Demolition waste by renovating more buildings.	ID74	Greater reference to waste reduction has been made (para 3.10 ii))
12	Recycle all building rubble to reduce reliance on primary aggregates.	ID74	Policy W3 already sets targets to maximise the aggregate and soil that can be recovered from CDE waste (para 5.24).
13	Limiting the use of Redbridge HWRC is in conflict with objectives iii and iv.	Oxford City (170)	The operational strategy for HWRCs is governed by the Councils HWRC Strategy (adopted following public consultation).
14	Amend objective vi to ensure that the use of brown field land in urban areas is not given priority over the use of green field land.	Oxford City (170)	Government policy gives priority to the use of previously developed land, and no evidence is put forward to justify any departure from this.
15	Include an aim to reduce waste from London in the Vision: strengthen objectives to include reduction targets for import of different wastes and types of facilities and the future management of this waste. Consult further on this.	South Oxon DC (103) Vale of White Horse DC (111): ID121	The Vision should focus on the way Oxfordshire waste will be managed. The aim to reduce waste from London is adequately covered in objective (v). Targets should be set through policy, not by objective (see policy W2 and supporting text which is supported by the London

			Plan). No issues are raised that would benefit from further consultation to better inform preparation of the proposed submission document.
	DRAFT STRATEGY (GENERAL)		
	Supportive/Neutral		
16	Strategy is generally sound/no comment.	Chilterns Cons. Board (196): Reading BC (244): ID199: Launton PC (259)	Noted: but some adjustments need to be made to meet concerns raised by others.
	Concern/Objection		
17	The document is confusing and many of its conclusions unsubstantiated or supported by poor data. Further consultation is required.	ID236: ID43	Waste Needs Assessment has been reviewed and updated. No issues are raised that would benefit from further consultation to better inform preparation of the proposed submission document.
18	More emphasis should be given to the potential for re-use of domestic waste.	ID 50	Agree: see para 3.9 (a) and 3.10 (ii)
19	No reference is made to the problem of fly-tipping.	CPRE (149)	Fly-tipping is an anti-social activity that is beyond the scope of this strategy and is controlled by the District Councils.
20	Difficult to comment on strategy without reference to potential sites that will deliver the strategy.	EA (189): Sherington with Alkerton PC (151)	See ref 3.
21	Include a policy to promote waste segregation, sorting and collection from large new developments.	EA (189)	Objective vii promotes sustainable waste practice. Policy W5 has been amended to give general

			encouragement to recycling facilities.
22	A policy should be included to encourage the provision of localised energy from waste facilities in light of PPS22's emphasis on the development of renewable energy resources.	ID209	Plan amended to say more on the possibility that smaller facilities may become more viable (para 5.40). The location of such facilities would be governed by the spatial strategy (policy W5) and policy W6 (land uses that may be appropriate for waste development).
23	Make provision in the Core Policies for consultation with local community on planning applications.	Shenington with Alkerton PC (160)	This is already set out in the adopted Statement of Community Involvement.
POLICY W1: WASTE TO BE MANAGED			
Supportive/Neutral			
24	Active support for principles of this policy.	Bucks CC (8): South Oxon DC (104): Vale of White Horse DC (112): Banbury TC (247): CPRE (133): ID200	Noted: estimates will also need to be kept under review through the Waste Needs Assessment and Annual Monitoring Reports.
25	Projections for Construction, Demolition and Excavation waste appear reasonable, especially if projected new housing materialises and the economy gains traction.	ID253	Noted: estimates to be kept under review through the Waste Needs Assessment and Annual Monitoring Reports.
	General approach to estimated MSW arisings is sound: the estimates for the early years are unlikely to fully reflect the lower tonnages being experienced during the economic downturn, but are likely to recover to the levels shown for the later years.	OCC Waste Management	Noted: no adjustment to long term estimates required. Detailed estimates by Oxfordshire Waste Partnership to be monitored and adjustment to be made in future

	Oxfordshire Joint Municipal Waste Partnership should now be referred to as Oxfordshire Waste Partnership (OWP).		reviews if necessary.
	Concern/Objection		
26	Ensure that policy does not lead to over provision of capacity, encouraging waste into Oxfordshire from elsewhere.	Banbury TC (247)	The estimates guide the minimum amount of waste management capacity required: explanation of this has been improved (para 5.10). Recycling facilities should generally be encouraged (para 5.39); but for treatment/disposal of residual waste, stricter control on capacity is appropriate (para 5.40).
27	Estimates of waste to be managed are too high and will lead to an over-provision of waste facilities in Oxfordshire.	Earthline (15): Didcot TC (30): ID 21: ID25: ID47: ID128: ID77	Estimates have been discussed further with Environment Agency and South East Waste Planning Advisory Group (para 5.7). No adjustment considered necessary at this stage.
28	Inadequate research/work has been undertaken or set out to justify the amounts of C&I waste estimated. Some concerns that these are too high; but also concern that arisings may have been underestimated by as much as 40%	Grundon (62): Sutton Courtenay PC (100): ID178:	See ref 27
29	No binding decisions on strategy should be made on the shaky evidence of waste needs that flow from the waste estimates presented.	ID177	See ref 27
30	Construction, Demolition and Excavation waste arisings are currently not as low as those presented.	ID214: ID220	Current estimate is based on housing construction rates and reflect the economic downturn. No

			alternative figures have been put forward. Noted that the Plan's longer term estimates are not being questioned.
31	Not clear how estimates for Construction, Demolition and Excavation waste have been derived. More work is needed on the recycled waste component (soils and aggregates) to better inform the Mineral Strategy target (M1) for secondary and recycled aggregate – which will then be found unachievable.	Grundon (62)	The methodology used is set out in the Waste Needs Assessment. The background paper on provision for aggregates supply explains the extent to which recycled aggregate (from waste) informs the secondary and recycled aggregate target in policy M1.
POLICY W2: WASTE IMPORTS			
Supportive/Neutral			
32	Support for the principle of disposing of a declining amount of waste from London and elsewhere	Bucks CC (9): ID48: ID122: Surrey CC (183): ID201: ID57: West Berks UC (230).	Noted.
33	Support for the principle of only allowing facilities that take substantial amounts of imported waste if there are clear benefits for Oxfordshire	ID22: ID48: CPRE (134): Sutton Courtenay PC (102)	Noted.
Concern/Objection			
34	Encourage a review of the rate at which the South East Plan apportions disposal of London waste; question whether provision should be made for disposal of waste generated elsewhere.	Bucks CC (9): Hinton Waldrist PC (73): Shenington with Alkerton PC (153)	Estimates of the rate at which waste is imported from London have been revised, in line with London Plan (para 5.15). Controls on Oxfordshire landfills do not preclude waste from other areas; an overall aim to reduce imports in

			long term is the most realistic.
35	Target figures for London imports should be included in the policy itself	Bucks CC (9): ID122: Shenington with Alkerton PC (153)	Guideline figures are in supporting text (para 5.15) to illustrate a potential rate of decline, but these rates cannot be prescribed and should therefore not be part of the policy itself.
36	Provide better information on current levels of imports from London	Bucks CC (9)	Agree: better data is included in the Waste Needs Assessment.
37	Accepting waste from London and elsewhere is contrary to other policies in the Plan.	ID234: Sutton Courtenay PC (102)	London generates a specific 'need' for final disposal because of its circumstances; helping to meet this need does not prejudice the Plan's overall approach to self-sufficiency
38	The policy is unduly prescriptive and requires clarification of terms like 'clear benefits' and 'substantially'; it should not apply to recycling or specialist facilities and could also preclude the disposal of waste at one of the nearest appropriate locations (contrary to PPS10).	ID243: ID63: ID78: Surrey CC (183): ID201: RSRL (232): Agrivert (57)	Amendment made to policy. The policy refers to residual non-hazardous waste only (para 5.17). A presumption against facilities treating substantial amounts of residual waste from elsewhere (para 5.16) is generally supported by PPS10, but a need to demonstrate clear benefits to Oxfordshire is difficult to justify as it undermines the proximity principle.
39	Objection: the policy is too vague and weak. Specific wording proposed, referring to all types of non-hazardous waste and to preclude disposal, recycling and transfer facilities that handle 'substantial' amounts of imported	South Oxon DC (105): Vale of WH DC (113)	PPS10 applies the proximity principle to disposal facilities, and a restrictive approach to the treatment of imported waste can

	waste unless there are clear benefits to Oxfordshire.		only reasonably apply to residual waste. See also ref 38 on scope of policy.
40	Evidence should be provided of co-operation with neighbouring authorities on cross-boundary waste issues.	EA (194)	Agreed: evidence is available.
POLICY W3: WASTE MANAGEMENT TARGETS			
Supportive/Neutral			
41	The policy is supported	South Oxon DC (106): Vale of WH DC (114).	Noted.
42	MSW recycling and general landfill diversion targets are fully supported	Oxford City (172)	Noted.
Concern/Objection			
43	The strategy is dependent on the delivery of major facilities not yet built (e.g. Ardley EfW) and requires a contingent scenario e.g. is there sufficient landfill should the required facilities not be delivered?	Bucks CC (10)	The Ardley EfW plant is now under construction. For Oxfordshire, estimates show sufficient landfill void to 2030 using current recovery rates: further residual waste treatment capacity also permitted at Finmere Quarry.
44	Household recycling rates in Vale and South Oxfordshire have already reached 70%: the proposed recycling targets for Municipal waste (MSW - 62%) and Commercial and Industrial waste (C&I - 60%) are too low.	ID249: ID250: Didcot TC (31): ID46: ID123: Sutton Courtenay PC (101): ID129: CPRE (135).	Recycling target for MSW and C&I has been increased: MSW targets also being reviewed by Oxfordshire Waste Partnership.
45	Further consideration needs to be given to whether the aim to send no more than 2% of non-hazardous waste to landfill is achievable.	Bucks CC (10): Grondon (64): EA (193):	Discussed with Environment Agency and Waste management Team. Target revised to 5%.
46	Targets for composting and food waste treatment are not ambitious enough.	Agrivert (70): Didcot TC (31)	Insufficient information to justify separate target for C&I waste;

			integrate with recycling target, but 'joint' target increased to 70%. Better data for MSW justifies separate target and overall increase in rates (see 44).
47	Much of this waste is unsuitable for re-use (soft clay, sandy clays etc). The nature of this waste needs to be better understood: the current view is that we are already achieving maximum recovery from this material.	ID79	Recycling target matches South East Plan, and is more challenging than that set by the National Waste Strategy. No change to target but more data to be provided in support document.
48	Facilities to promote recycling and preparation for reuse should be prioritised over incineration: we would not wish to see Ardley EfW preventing this.	EA (193)	Recycling targets increased; policy W5 amended to encourage recycling facilities. Corresponding reduction in future levels of residual waste negates the need to consider allocating additional strategic site(s) for residual waste treatment.
49	Targets for recycling Construction, Demolition and Excavation waste appear too low; they do not reach the target (0.9 mtpa) in M1 for secondary and recycled aggregate.	Didcot TC (31)	The M1 target addresses materials that arise from sources other than Construction, Demolition and Excavation waste (para 5.27).
50	Municipal waste is already being recycled at a rate of 62%, so targets should be raised. Oxfordshire Waste Partnership will publish new targets for consultation in 2012.	OCC Waste Management	Targets agreed by Oxfordshire Waste Partnership to be kept under review and checked for general conformity with the strategy's targets.

POLICY W4: CAPACITY GAP			
Supportive/Neutral			
51	The policy is supported	South Oxon DC (107): Vale of WH DC (115).	Noted.
52	Agree that uncertainties in future waste arisings requires a flexible approach: any figures should be regularly monitored and treated only as guidelines.	202	Noted: adjustments to figures made following a review of waste needs. The scale of the capacity gap is expressed in policy to make clear the Plan's commitment to the provision of additional facilities. This will be the subject of review as new facilities are built and others possibly close.
Objection/Concern			
53	<p>The capacity required for recycling Construction, Demolition and Excavation waste is too low. Concerns about the way the estimated figures have been derived include the following:</p> <ul style="list-style-type: none"> - the estimates do not agree with those given in the Waste Needs Assessment (table 24); - the capacity said to be provided by individual sites is not revealed so the totals cannot be challenged (and there is no reason to withhold such information); - it is believed that capacity already available has been over-calculated by some 120,000 tpa; - evidence put forward by the operator at a recent Planning Inquiry proves the estimates are too low; - target recycling capacity (0.86 mtpa) should be as 	Controlled Reclamation (Oxford) Ltd (215): John Sheehan (Oxford) Ltd (221)	<p>The capacity being provided for is no more than 6% below that which is claimed to be required. With regard to the specific points referred to:</p> <ul style="list-style-type: none"> - table 24 in the Waste Needs Assessment has been reviewed; - the site capacities submitted to the recent appeal are subject to on-going work and have not necessarily followed the methodology in the Waste Needs Assessment;

	<p>for Secondary and Recycled Aggregate (policy M1 – 0.9 mtpa).</p> <p>The outcome of these concerns is that the capacity gap has been underestimated and should be at least 50,000 tpa greater than that provided in the policy.</p>		<p>- a better correlation with policy M1 has been provided (para 5.27).</p>
54	<p>The duty to co-operate with adjoining authorities contributes to a need for capacity in excess of the 30,000 tpa indicated for the treatment of C&I green and food waste</p>	Summerleaze Ltd (19)	<p>The capacity requirement is already based on estimates that are 10% higher than needed to allow (inter alia) for uncertainty in cross-boundary movement (para 5.26). Recycling targets for this waste are now increased, and include for food waste treatment. General encouragement is now given to this type of facility in policy W5.</p>
55	<p>Limiting green and food waste capacity to that provided by existing and permitted sites is anti-competitive and creates an unacceptable monopoly.</p>	Summerleaze Ltd (19)	<p>Recycling and food waste target has been increased and general encouragement is given to such facilities in policy W5.</p>
56	<p>The new capacity requirements should make clear the effect of anticipated reductions in the waste imported from London and elsewhere (policy W2)</p>	ID251	<p>Estimates of the rate at waste will be imported for disposal have been taken into account in assessing the need for any further landfill (para 5.59). Otherwise capacity requirements are for Oxfordshire waste only (paras 5.10 and 5.26).</p>
57	<p>Seriously question the need for additional residual waste treatment capacity, especially given the capacity to be</p>	Didcot TC (32): Sutton Courtenay PC (99):	<p>Revisions to waste management targets and a review of the</p>

	provided at Ardley, uncertainties around Commercial and Industrial waste needs and the Planning Committee's recent rejection of a large MBT treatment plant at Sutton Courtenay.	ID235	capacity available at Ardley EfW plant results in no obvious capacity gap for residual waste treatment (see also refs 48 and 50).
58	The way in which the required levels of capacity have been calculated are not sufficiently well set out or explained (e.g. not clear whether Finmere MRF/Gasification facility has been taken into account as it does not appear on Fig 2) and may be too high in some cases.	ID44: Grundon (65): ID 124: Sutton Courtenay PC (99)	The Finmere gasification plant permission was not taken into account (as it had not been granted). Existing and committed capacity totals have been updated in the Waste Needs Assessment.
59	Recycling and transfer facilities should not be considered together for the purpose of calculating capacity. Individual site capacities should be published for transparency.	Grundon (65)	Many transfer stations contribute to recycling in some way. Capacities are assessed on the basis of individual site circumstances and these will be made available.
60	Landfill requirement appears to have been underestimated and relies on over-optimistic landfill diversion targets	Grundon (65)	Landfill targets have been reviewed (see ref 45). Revised landfill requirements are in the Waste Needs Assessment, but no change to overall conclusions (para 5.59).
61	The estimated requirement for recycling capacity relies significantly on the delivery of several large MRF facilities and requires careful monitoring.	Grundon (65)	Government guidance is that committed facilities should be considered (see para 5.30); further information on the relevance of each commitment is in the Waste Needs Assessment; contingency arrangements may be necessary in some cases.

OPTIONS FOR LOCATION OF WASTE FACILITIES			
Supportive/Neutral			
	None		n/a
Objection/Concern			
62	The Plan fails to take account of the full capacity to be provided by the Ardley EfW plant – giving rise to an unwanted and unnecessary requirement for further residual waste treatment capacity in south Oxfordshire.	ID252: ID126	Further discussion with adjoining Waste Planning Authorities has taken place. All of the capacity provided by Ardley EfW is being taken into account from 2020, as adjoining areas become increasingly self-sufficient.
63	The Plan assumes (probably correctly) that the Ardley EfW facility will import 90,000 tpa from outside Oxfordshire and should therefore assume that a similar amount will be exported for treatment elsewhere.	Didcot TC (254)	See ref 62
64	The supposed 'growth areas' are shown very differently on figs 4 and 6. Fig 6 is too simplistic and arbitrary, especially in relation to its depiction of the areas south of Abingdon and around Oxford.	ID238	Both plans are schematic and are not intended to show boundaries for intended growth. The plan does not make proposals for growth – the Key Diagram (amended) is the definitive diagram showing where waste development should take place.
65	We prefer a strategy of smaller facilities based on large and small towns and do not want to see large facilities on the outskirts of towns – especially in the Green Belt around Oxford.	CPRE (136)	The strategy follows this approach where possible, in line with plan objectives, but some flexibility is required (para 5.32+).
66	The strategy fails to spell out in sufficient detail the advantages and disadvantages of the limited options,	ID126: ID130	Noted; further information will be made available on options

	giving an unfortunate impression of having pre-judged the issues.		assessment.
67	As paras 4.48-4.49 make no reference to Caversham as an option for the disposal of CDE waste, it is assumed that restoration of any new pits would be to open water.	SEAG (157)	These paras deal with options for recycling, not disposal, of CDE waste. Restoration of any new or extended mineral working will be guided by Policy M7 (Restoration). See also para 6.9 (use of infill in the flood plain).
68	Current and proposed site capacities should be shown and totals cross referenced to relevant policies to demonstrate their relevance to the strategy.	ID126	The total capacity provided by facilities in each of the identified waste categories is shown in the Waste Needs Assessment. Individual site capacities will be made available.
POLICY W5: PROVISION OF FACILITIES			
Supportive/Neutral			
69	General support for strategy	ID 229: Lafarge (186): ID203: Earthline (16).	Noted.
70	The strategy has only minimal or no impact on our area.	Eynsham PC (18): Cholsey PC (34)	Noted.
71	Support for a HWRC to serve Banbury (but consultation would have been more effective if strategy were site specific).	Banbury TC (23)	Noted: sites will be identified in a subsequent sites document.
Objection/Concern			
72	Very little detail is given as to the scale of facilities proposed for particular areas or of the particular needs required in specific parts of the County	Wroxton PC (27): ID 45	Table 4 (now 5) helps illustrate the relative needs of different parts of the county. Figures 5 & 6 show the locations of existing facilities.

73	The policy should include a commitment to consider the suitability of specific sites in accordance with Core Policies C1-C8	EA (191)	Agreed: now included in policy W5.
74	The area of search for waste sites (2k) around small towns should exclude areas close to the settlement and/or be extended further.	Faringdon TC (239): Brightwell-cum-Sotwell PC (119).	Agreed: no justification for limiting certain facilities to be located close to small towns. Strategy adjusted to give greater flexibility.
75	The strategy implies that a second facility would not be welcome in locations where an existing facility already exists; this is anti-competitive and the policy should more relaxed.	Grundon (66)	The strategy is not prescriptive about capacity requirements for specific areas. See also ref 74.
76	The strategy does not take sufficient consideration of the interests of local people and is likely to be damaging.	ID26	Core policy C3 requires that consideration be given to the impact of development on residential amenity and other sensitive receptors.
77	If waste facilities for Oxford are located in the Green Belt they should only be small in scale	CPRE (137)	The scale appropriate for specific sites will depend on circumstances and need to be considered on their merits: the suggested refinement would be too prescriptive and could be justified (see para 5.56).
78	There is insufficient evidence of the need for a new residual waste treatment facility in southern Oxfordshire: such facilities have been refused recently and would rely on waste brought in from elsewhere.	Didcot TC (33): ID237: ID45: ID131: Sutton Courtenay PC (98): South Oxon DC (108): Vale of WH DC (116).	Policy amended to remove the intention to provide for an additional strategic residual waste treatment facility. A review of waste needs indicates there is no longer a need for such facility.
79	Priority should be given to examining the potential to meet	South Oxon DC (108):	Discussion with the operator

	any need for additional residual waste treatment capacity at Ardley. Further consultation should take place on this matter.	Vale of WH DC (116).	indicates that such option could be considered but re-assessment of waste needs makes this unnecessary (see ref 78).
80	Figure 2 shows a large concentration of existing waste facilities in the Abingdon/Didcot area: any further facilities should be at Oxford where there are few facilities at present.	Didcot TC (33): ID45: ID131: Banbury TC (23).	It is difficult to find potentially available sites in or close to Oxford. Didcot is quite near to Oxford and this area is a growing source of waste arising in itself. Several of the facilities in or around Didcot are temporary at present.
81	Faringdon should be referred to in the policy as a potential location for one of the two proposed MSW transfer stations – as implied in the Key Diagram.	ID203	Small towns are no longer referred to in the spatial strategy.
82	It is difficult to see how any waste facility sited close to Henley or Wallingford would not be harmful to the amenities of the Chilterns AONB.	Chilterns Conservation Board (197)	Policy C6 amended to make clear that impact on AONB is taken into account. Small towns are no longer referred to in the spatial strategy.
83	Any new waste facilities sited on the north side of Thame or the east side of Bicester are likely to have landscape and transport impacts on the Vale of Aylesbury (Bucks).	Aylesbury Vale DC (150)	Small towns are no longer referred to in the spatial strategy. Any impact of possible sites on Aylesbury Vale would be considered in the subsequent site allocations document (see ref 3).
84	Sites serving Henley or Wantage that are located in the AONB should only be small scale and utilise brownfield land.	CPRE (137)	Supporting text (para 5.54) already refers to an expectation that sites in AONB will only be small scale. Policy C6 amended to make clear the approach to be taken in AONB.

85	The Plan must provide some certainty about where waste development should take place. Evidence submitted with previous planning applications shows that Construction, Demolition and Excavation waste recycling sites cannot be found in Oxford and the policy should reflect this.	John Sheehan (Oxford) Ltd (222): Controlled Reclamation (Oxford) Ltd (216)	Review of waste needs indicates that the need for this type of recycling facilities is not immediate. No reason to exclude the Oxford area at this stage: suitable sites may become available during the Plan period.
86	The need for Construction, Demolition and Excavation waste recycling facilities to serve Oxford might be met at Shipton-on-Cherwell Quarry.	Oxford Green Belt Network (41)	Current planning application for this site. Suitability of sites will otherwise be considered in a site allocations document.
87	Land at New Close Lane (adjoining Witney Sewage Works) is well suited to the Waste Transfer Station(s) required to serve Ardley EfW plant. Site also suitable for Construction, Demolition and Excavation waste recycling to serve the Witney/Carterton area.	ID229	Operator will be invited to submit a site nomination. But see also ref 3.
88	The remote location of Alkerton Quarry (and that proposed at Shennington) is not suited to accommodating a facility for recycling Construction, Demolition and Excavation waste (as suggested by this policy).	Shennington with Alkerton Parish Council (154)	Individual sites to be considered in detail in a subsequent document. No change to policy required: all proposals would also need to satisfy the core policies.
89	A recycling facility for Construction, Demolition and Excavation waste is not required in the Wallingford/Cholsey area and would adversely affect people as a result of wind-blown dust/other noxious materials.	Brighton-cum-Sotwell PC (119)	Specific proposals for small towns are no longer included as result of adjustment to the spatial strategy (see ref 74).
90	If the proposed gravel extraction at Cholsey goes ahead, adequate opportunity should be given for comment on any proposals for associated Construction, Demolition and	Cholsey PC (34)	The draft strategy did propose Wallingford as an area for such facilities, but small towns are no

	Excavation waste recycling facilities.		longer referred to in the spatial strategy (see also ref 3).
91	The proposed safeguarding of existing landfill void (W7) is at odds with the Council's HWRC Strategy. The retention of the HWRC at Alkerton is preferred to a new facility elsewhere.	Wroxton PC (27)	Landfill sites are temporary facilities and will not be safeguarded under policy W10. Terminology in policy W7 amended to avoid confusion. The strategy for future HWRC provision has already been established in the Council's HWRC Strategy.
92	The proposed limitation on domestic use of Redbridge HWRC is contrary to plan objectives (iii) and (iv): amend policy to commit to the need for household recycling centres close to major centres of population, including one at Redbridge.	Oxford City (173)	The operational strategy for HWRCs is governed by the Council's HWRC Strategy (adopted following public consultation). The plan makes no proposals to limit the use of Redbridge HWRC. .
93	There is a need for a new HWRC at Bicester if the strategy is to be compliant with Core Policy C7 (Transport).	Middleton Stoney PC (14)	The strategy for future HWRC provision has already been established in the Council's HWRC Strategy. Other community waste facilities can be considered under policy W5, which now gives general encouragement to facilities for re-use and recycling.
94	Once necessary amendments have been made to the strategy, the Core Policies should be reviewed for conformity (to avoid unwanted planning applications).	ID127	Agree.
95	New waste transfer stations for Ardley Efw are shown at Witney/Carterton and Didcot/Abingdon/Wantage, but	OCC Waste Management	Policy W5 (amended and amplified in para 5.37 of supporting text)

	facility location remains uncertain pending the conclusion of contract discussions.		provides flexibility in locations for non-strategic facilities. Areas of search for these facilities are no longer restricted to the locations shown in the draft Waste Strategy.
96	Intensification of activity at Glympton Quarry is opposed.	Woodstock TC (258)	Specific proposals for this site are not made in this document (see also ref 3).
POLICY W6: SITES FOR WASTE FACILITIES			
Supportive/Neutral			
97	Support the principle that only small scale waste facilities should be considered in AONB, subject to: <ul style="list-style-type: none"> - impact on the setting of AONB also being referred to; - importing the guide figure of 20,000 tpa capacity into the policy itself; - no other suitable sites being available elsewhere 	North Wessex Downs Conservation Board (11); CPRE (138): East Hendred PC (165); Goring Heath PC (6).	Policy C6 expanded to set out policy for AONBs. 20,000 tpa is retained as a guide to scale that may be in line with policy, but it is not appropriate to include a prescriptive figure in policy. A 'no suitable alternatives' test would not be supported by national policy.
98	Support the approach to the possible development of waste sites in the Green Belt, subject to <ul style="list-style-type: none"> - such facilities serving Oxford only; - being only small in scale. 	Oxford Green Belt Network (ID40): CPRE (138)	The suggested requirements would be too prescriptive (see ref 77).
99	Support for the policy overall	Lafarge (187)	Noted.
Objection/Concern			
100	Limiting waste development opportunities to existing and permitted waste sites is anti-competitive.	ID20	The policy does not limit opportunities as narrowly as suggested (para 5.52).
101	Policy W6 is not adequate for the consideration of proposals for sewage treatment and a separate policy	TWA (39)	A specific policy is not necessary as proposals can be considered

	should be included		adequately under this policy. The supporting text has been expanded to explain more fully (para 5.48-49).
102	Suggest replacing reference to 'only small scale facilities' being appropriate in AONB with 'facilities of a scale appropriate to their location': this avoids uncertainty over the meaning of small-scale.	Cotswolds Conservation Board (51): Chilterns Conservation Board (198)	No change made but there is ongoing engagement with AONBs on meaning of 'small scale' and the guide to scale in para 5.54.
103	Strengthen the approach to waste development in the Green Belt. Some detailed wording suggested, including the need to protect green field sites in the Green Belt and that an alternative site search should not exclude land in categories of acceptable flood risk.	ID52: South Oxon DC (109): Vale of WH DC (117)	Policy strengthened to avoid the use of green field: applies with equal force in Green Belt. Explanatory text expanded (para 5.56). Policy C1 (flooding) is relevant in all cases.
104	Consult MoD on any proposals for waste that fall in aerodrome safeguarding zones.	MoD (228)	The comment is more relevant to landfill and site restoration. Added to supporting text to M7 (para 4.48)
105	Policy should make clear whether or not it presents a sequential approach to site suitability/the criteria presented represent a reasonable sequential test but should be added to then prioritise green field land over sites in AONB or Green Belt.	Viridor (240): ID53: ID80: ID204	Policy altered and supporting text expanded (para 5.52) to make clear a sequential test is not being applied (not supported by national policy).
106	Delete agricultural buildings and their curtilages as being suitable for waste development: also ensure that industrial premises cannot be used for waste without further permission.	ID125: Goring Heath PC (6)	Suitability of agricultural buildings for waste use is included in PPS10. The Use Classes Order determines whether the use of industrial premises for waste activity requires planning permission: the policy cannot influence this.

107	The policy is not adequate to guide site allocation: the process by which sites will be assessed should be made clear, to include reference to the full range of environmental criteria and particularly traffic issues.	ID53: East Hendred PC (165)	Policy W5 amended to give clearer guidance on locational strategy and the relevance of W6 and Core Policies to specific sites. Text (para 5.51) added to explain relevance of W6 to site identification.
108	Strengthen the approach to temporary facilities by requiring that such facilities are removed 'before' completion of the mineral working or landfill operation (rather than 'on').	South Oxon DC (109): Vale of WH DC (117)	This could prevent recycling facilities from processing material that is imported to the site after extraction to complete restoration.
109	Remote location and other environmental factors make Alkerton Quarry (and proposed Shennington Quarry) unsuitable for the accommodation of waste management/recycling facilities.	Shennington with Alkerton Parish Council (155): ID87	See ref 88.
110	The intention to give priority to land that is previously developed and suitable for employment purposes should be narrowed to exclude current or proposed B1 business uses.	Oxford City (174)	Amended to change 'employment land' to 'industrial' (para 5.52) to be consistent with policy.
111	Some mineral extraction sites may be suitable to accommodate permanent new waste management facilities and this should be recognised in the policy and supporting text	ID 204	Where there is an approved restoration scheme, proposals for new waste development would normally be expected to reflect this; facilities are expected to be removed when a site is restored (para 5.52). No change to policy required.
112	Amend the policy to require waste development in AONB to demonstrate how they conserve and enhance the area's qualities and contribute to its purpose.	Natural England (211)	Policy C6 sets out test for assessing suitability of sites in AONBs. Text (para 5.54) gives

			further guidance on appropriate scale of facilities in AONB.
113	Promote the fact waste does not have to be a bad neighbour, especially next to some industrial and commercial premises.	EA (248)	Policy confirms that waste uses are compatible with industrial areas.
114	Any additional recycling facilities at Shellingford or Bowling Green Quarries will create unwanted traffic and not comply with current restoration programmes.	Shellingford PC (256)	No specific proposals are made for these sites; these factors cannot be taken into account of at this stage. See also ref 3.
115	Para 4.57 (need to explore potential opportunities for waste facilities in the Oxford area) is inconsistent with paras 4.41 and 4.46 (which makes no provision for Oxford) and should be clarified.	Oxford City (175)	Policies W5 (amended) and W6 give deliberate flexibility to meeting Oxford's waste needs. Supporting text expanded (paras 5.36, 5.46, 5.55 and 5.56) to clarify the approach.
POLICY W7: LANDFILL			
	Supportive/Neutral		
116	Support the policy	Viridor (241)	Noted.
117	Support the intention to give priority to the use of inert waste for quarry restoration and the link with Minerals Policy M6.	Earthline (17): CPRE (139): RSPB (168): Lafarge (188): NE (212).	Noted: policy amended to make this intention clearer.
	Objection/Concern		
118	Mineral workings in the vicinity of Wroxton should be restored to their natural state.	Wroxton PC (28)	See ref 114.
119	Amend policy to make allowance for the use of waste in other beneficial circumstances e.g. land reclamation (commend approach taken by Northants CC).	ID58	Policy does not preclude disposal of waste where there are environmental benefits. Text (para 5.62 & 5.63) amended to clarify why priority needs to be given to

			quarry restoration.
120	A policy for non-hazardous and hazardous landfill is required to meet needs identified in earlier comment (see ref 44).	Grundon (67)	Review of waste needs confirms there is no need for additional non-hazardous landfill. Policy W8 allows for hazardous landfill proposals to be considered on their merits, as future needs are more difficult to assess.
121	The proposed safeguarding of landfill void is not consistent with policy W10 which seeks to safeguard only permanent waste facilities. Alkerton landfill is only temporary and should not be safeguarded.	Shenington with Alkerton PC (156)	Temporary facilities are not intended to be safeguarded under policy W10. Text (para 5.60) amended to avoid any confusion with the aims of this policy.
POLICY W8: HAZARDOUS WASTE			
Supportive/Neutral			
122	Support for the overall policy (including reliance on hazardous waste facilities outside Oxfordshire).	CPRE (140)	Noted.
Objection/Concern			
123	Although the need for hazardous landfill in Oxfordshire has been rejected as an option, Alkerton Landfill should be deleted from the list of sites that could be suitable to accept hazardous waste, because it is too remote.	Shenington with Alkerton PC (157)	The strategy does not identify any specific site(s) for hazardous landfill.
124	The Plan is contradictory, recognising (para 4.70) economical and operational constraints in meeting local needs whilst relying (policy W8) on facilities from elsewhere to satisfy Oxfordshire's needs. It is not correct to put forward a policy that appears to be positive but which relies on other areas for its success.	Northants CC (226): Grundon (68)	The policy has been amended to be clearer. Supporting text (paras 5.68 and 5.69) makes clear the aim for Oxfordshire to be as self-sufficient as possible for this waste stream.
125	Applying a similar test of 'benefits for Oxfordshire' (see	Surrey CC (184)	Agree: facilities for this type of

	policy W2) runs counter to the proposed 'duty to co-operate'.		waste may also need to take in waste from beyond Oxfordshire. Text (paras 5.68 and 5.69) amended to make clear this need not be unacceptable where there is adequate justification.
126	The policy as drafted reduces the ability of waste to be disposed of at one of the nearest locations, contrary to PPS10.	Viridor (242)	Although evidence is expected to be provided, the amended provides for this: see also ref 125.
POLICY W9: RADIOACTIVE WASTE			
Supportive/Neutral			
127	The policy is welcome, especially as it would avoid the need for facilities at Culham, which is in the Green Belt.	CPRE (141)	Noted.
128	Support the policy to exclude ILW from elsewhere for storage at Harwell; also support proposals to dispose of VLLW elsewhere because Harwell geology is not favourable and the facility would be required for thousands of years.	East Hendred PC (166)	Noted.
129	The approach to the disposal of LLW is supported (although the Plan does not set out an adequate explanation for this choice).	RSRL (231)	Text (para 5.79 – 5.82) amended to give better explanation for policy approach. LLW disposal strategy adjusted to focus on circumstances where it may (exceptionally) be necessary to accommodate disposal at Harwell (in response to other comments).
Objection/Concern			
130	Strengthen the policy to refer to Harwell's location in AONB and that any new facilities should only be small	North Wessex Downs Conservation Board (12)	Although situated in AONB, the nuclear licensed site is part of an

	scale.		established employment are identified in the local plan, where further development is planned Any waste development will need to address the core policies, including C6 which covers impact on AONBs.
131	The Plan does not give a compelling case as to why permanent disposal (of VLLW) is not appropriate at Harwell. No justification is given for only allowing disposal in Oxfordshire if no other suitable disposal site is available.	Northants CC (227)	See ref 129
132	The Plan is contradictory in so far as it supports the movement of waste from Oxon to Northants and Cumbria but does not allow movement from Dorset to Oxon.	Northants CC (227)	Policy has been amended to allow for any proposal to bring ILW to Harwell for long term storage from elsewhere to be considered on its merits, based on the circumstances applying at the time.
133	The policy is skewed toward disposal and management elsewhere, and fails to tackle the other sources of radioactive waste arising.	Grundon (69)	Policy has been amended to deal with the management of radioactive wastes at Harwell and Culham only (para 5.65). Policy W8 covers other more general radioactive waste issues.
134	Although not a favoured option, Alkerton Landfill should not be considered as a possible site for disposal of VLLW because it lies in an area of very high natural radiation.	Shennington with Alkerton PC (158)	Alkerton is not being proposed for disposal of this type of waste in the Core Strategy.
135	There is an over-reliance on the willingness of others to accept Oxfordshire's radioactive wastes; this neither accords with PPS10 (communities taking more	Cumbria CC (169)	See ref 129. The waste operator has also obtained the required permits for disposal of VLLW at a

	responsibility for their own waste) nor the Plan's aim (para 2.7) 'to make provision for facilities in Oxfordshire sufficient to manage all types of waste'.		suitable off-site facility, with no conditions on where this should be.
136	Use a sequential approach to disposal of VLLW, starting with Harwell as the best possible option (as supported by a previous assessment by RSRL). To obtain an EPPC from EA, RSRL will have to demonstrate that transporting waste to Northants actually is a best practicable environmental option.	Cumbria CC (169)	See ref 136.
137	Assume this is a Reg 25 consultation, not Reg 27: please advise if incorrect.	Cumbria CC (169)	Reg 25 consultation. Cumbria CC advised accordingly.
138	The approach to the storage of ILW at Harwell is not consistent with the Plan's approach to other wastes (in particular hazardous waste) or NDA strategy and is not sufficiently well explained. The requirement to show clear benefits for Oxfordshire in the event of ILW from e.g. Winfrith being stored at Harwell is not justified and should be replaced with a requirement to show 'clear economic or environmental benefits and the proposals are in accordance with the relevant national strategy'.	RSRL (231)	See ref 132.
139	There is no need for reference to broad locations for strategic waste facilities in the policy.	RSRL (231)	Agreed. The policy has been amended to remove this.
POLICY W10: SAFEGUARDING			
Supportive/Neutral			
140	Reserve comment for Site Allocations DPD (which is to provide greater detail).	CPRE (142)	Noted.
Objection/Concern			
141	Request confirmation that Alkerton landfill site will not be safeguarded under this policy.	Shenington with Alkerton PC (159)	See ref 121.

142	SEP policy W17 proposes the safeguarding of suitable temporary waste sites, and consideration should therefore also be given to safeguarding temporary waste sites	Controlled Reclamation (Oxford) Ltd (218); John Sheehan (Oxford) Ltd(224)	The suitability of temporary sites to host permanent waste facilities (which should then be safeguarded) will be considered in the subsequent site allocations document.
143	The relevance of the policy to the strategy is not clear; neither is it clear when it might become relevant or to what types of site it applies.	ID205	Paras 5.85 and 5.86 of supporting text explain the relevance of the policy. The safeguarding of permanent sites helps to guarantee sufficient capacity to meet waste management needs identified.
144	The policy should allow for alternative uses to be pursued if an owner can demonstrate that the waste site is no longer required.	ID205	Alternative uses will be allowed if it is established that there is no long term need for waste use (para 5.87).
KEY DIAGRAM			
Supportive/Neutral			
145	The Chilterns AONB should be taken into account in the selection of a site for a waste facility around Henley or Thames.	Natural England (213)	Small towns are no longer identified in the spatial strategy.
Objection/Concern			
146	The possible incinerator at Ardley gives rise to concerns about increased traffic and resultant pollution.	Bucknell PC (71)	The Ardley EfW facility is shown on the Key Diagram. The facility has planning permission and is under construction.
147	The broad locations for the proposed MSW transfer stations to serve Ardley are not shown.	South Oxon DC (110): Vale of WH DC (118).	See ref 95
148	The extent of the so called broad locations are not at all	Controlled Reclamation	Key Diagram has been amended

	clear e.g. is the black box south of Abingdon meant to encompass the shaded area between Didcot, Abingdon and Wantage; does the black box at Bicester encompass the Ardley landfill site?	(Oxford) Ltd (217): John Sheehan (Oxford) Ltd (223)	to accord with amended spatial strategy policy W5.
149	The approved MRF at Finmere (not shown) is inextricably linked to the landfill (that is shown) and should be included in the Key Diagram.	Premier (181)	Key Diagram has been amended to show key waste facilities only.
150	The Key Diagram correctly confirms the HWRCs that the Council intends to operate in future; but could also usefully consider showing the remaining sites as possible locations for community based recycling initiatives.	OCC Waste Management	Key Diagram shows strategic disposal sites: it is not appropriate to show small local (non-strategic) facilities on the Key Diagram. Policy W6 provides guidance on types of sites that may be suitable for new waste development.
151	Key diagram should show Redbridge and Kidlington HWRCs as joint household and trade waste facilities.	OCC Waste Management	See ref 150.
IMPLEMENTATION AND MONITORING			
	Supportive/Neutral		
	None		
	Objection/Concern		
152	The draft plan needs to be broken down into timed and manageable units (what would be done, where and when). Also no detail is given on the cost.	Bucknell PC (72)	Policy W4 shows when new facilities are required. The subsequent site allocations document will cover delivery of specific sites.
153	The proposed publication of an Annual Monitoring Report is inadequate, and should be made monthly (and/or resources made available to local communities to enable them to do this).	Shenington with Alkerton Parish Council (164)	This is not necessary and resources are not available to achieve this.

154	Would like to see more action in monitoring new development, and the protocol for applying penalties. OCC performance on this has been poor and should be put right with a thorough review of conditions on active permissions.	ID245	The supporting text (para 7.28) identifies the importance of planning conditions and legal agreements to achieving plan objectives – in particular (para 7.40) securing environmentally acceptable development.
ANNEX 1: OVERALL PROVISION OF FACILITIES			
	Supportive/Neutral		
	None		
	Objection/Concern		
155	The strategy lacks detail, is obfuscatory and has been inadequately publicised.	ID5	Policy W5 and text have been amended to clarify the strategy (see also ref 66). The Core Strategy sets out a broad spatial strategy and does not include detailed proposals; these will follow in a separate sites document. Consultation has been appropriate and adequate for a Core Strategy.
156	Alkerton HWRC should not be closed (endorsement of decision already taken by Draycot PC).	Sibford Gower PC (13)	The future provision of HWRCs by the Council is set out in its HWRC Strategy. See also ref 150.
157	Stanford-in-the-Vale HWRC should not be closed (risk of increased fly-tipping).	Faringdon TC (24): ID5	See ref 156.
158	The provision of a new C&I residual waste treatment facility in southern Oxfordshire needs to be reviewed: the need for the facility is extremely tenuous.	ID49	See refs 57 and 78.

Summary of Responses to Core Policies in Consultation Draft Minerals and Waste Planning Strategies, September 2011 and County Council Responses – May 2012

Ref	Summary of Comment	Organisation (ID) or Individual Respondent	County Council Response (any paragraph numbers refer to Minerals and Waste Core Strategy proposed submission document May 2012)
	CLIMATE CHANGE		
	Supportive/Neutral		
	Concern/Objection		
1	Include reference to opportunities for carbon sequestration through tree planting	Woodland Trust (M240)	Reference too specific for core strategy.
	C1: FLOODING		
	Supportive/Neutral		
2	Whole of policy C1 is supported	Bampton PC (W81; M365); BEWG (W89; M402).	Noted.
3	The policy accords with the requirement to steer development to areas at lowest risk of flooding, and is supported.	PAGE (M171)	Noted.
4	In areas liable to flooding, restoration to wetland habitat should be promoted because of its potential to offer flood alleviation.	RSPB (M681)	This comment was addressed in the draft policy: now included in policy M7 (restoration).
5	Make reference to the term 'ecosystem services' in the context of mineral sites restorations e.g. flood alleviation or flood storage can be delivered alongside nature conservation.	OCC Ecology	Inclusion of this term would require detailed explanation and would not add substance to the subject matter addressed.

	Concern/Objection		
6	Para 5.6 should make clear that waste treatment is not 'flood compatible development' and should be located in areas at lowest risk of flooding.	EA (W192): Hills (M672)	The flood risk posed by all categories of minerals and waste development is summarised in Appendix 1.
7	Make clearer the distinction between mineral working and mineral processing in terms of water compatibility. The section needs to say more about the impact of groundwater and surface water flooding – particularly where the desired restoration involves infilling. Policy should make reference to Sequential and Exceptions Tests and make clear where Flood Risk Assessment is required.	EA (M465)	Agree: Policy and supporting text amended following further discussion with Environment Agency. The flood impact of waste imported for restoration (para 6.9) is also covered in supporting text to policy M7 (Restoration) (para 4.45).
8	Policy needs to be clearer on the impact of landfill (including inert) restoration where extraction breaches the water table.	M117	Flood risk tables (Appendix 1) confirm flood risk associated with landfill. Policy C2 (Groundwater) and text (para 5.13) amended to address impact of landfill.
9	The Natural Environment White Paper recognises the impact of tree planting on reducing flood risk; this should be referred to.	Woodland Trust (M241)	Supporting text to policy M7 (restoration) refers to option of tree planting; preference is given (para 4.45) to wetland creation in locations close to watercourses.
10	Reference to the Sequential Test is not required in this policy since it is already enshrined in PPS25.	M378	Reference to Sequential Test now included in policy, as advised by Environment Agency.
11	No mineral operations should be allowed to commence in advance of agreement on a flood risk management scheme.	SODC (M553)	The policy identifies the main issues to be addressed in flood risk assessment. A more detailed

			management scheme can be secured by planning condition where necessary. Reference to this detail is more appropriate in the site allocations document.
12	Make clear the differences between waste and mineral development in terms of flood risk.	Hills (M672)	Agree this was not sufficiently clear. Text (paras 6.5 and 6.6) amended and flood risk tables for categories of development added in Appendix 1.
13	Para 5.9 expects that development associated with mineral working is situated in areas that pose the lowest risk to flooding: this cannot be achieved in RAS 16.	SEAG (M1013)	Text amended (paras 6.8 and 6.9) to make clearer the difference in levels of flood risk between mineral working and working involving processing.
14	The policy makes clear that development should only take place in an area of identified flood risk if (inter alia) a Flood Risk Assessment has been found satisfactory: this will not be possible in RAS 16.	SEAG (M1013)	RAS 16 comprises functional flood plain, but sand and gravel working can take place as flood compatible development. The outcome of a Flood Risk Assessment for a specific site proposal cannot be predicted.
C2: WATER ENVIRONMENT			
	Supportive/Neutral		
15	Whole of policy C2 is supported	BEWG (W90)	Noted.
16	The policy overcomes any concern about the scope of policy C1 (flooding) being too narrow and failing to address all of the relevant issues relating to the water environment.	M118	Noted.

	Concern/Objection		
17	The location of Shenington and Alkerton on high ground renders the area unsuitable for minerals or waste development because of the potential for pollution to water courses.	Shenington with Alkerton PC (W161; M861)	Detailed assessment would be required to establish whether or not this was the case; the strategy makes no specific proposal for development in this area.
18	Groundwater protection is important in Oxfordshire: reference should be made to the Agency's policy (GP3) against which any waste development will be assessed.	EA (W190)	Addition made to supporting text (para 6.16).
19	The policy should be consistent with the Agency's groundwater policies on mineral extraction, restoration and landfilling, and make clear whether it applies to restoration. Adjust text for accuracy regarding impact on groundwater abstractions.	EA (M466): M380	Addition made to supporting text (para 6.15).
20	Unclear what calculations have been undertaken to justify the conclusion that mineral working in the flood plain can offer opportunity to increase flood water storage capacity.	M55	The plan identifies a potential opportunity that is recognised by the Environment Agency.
21	The policy should acknowledge that canals are susceptible to pollution from groundwater, run off and wind blow.	British Waterways Board (M103)	The policy already provides protection to canals. Impact from wind blow is covered by policy C3 (Environmental and Amenity protection).
22	The policy should seek to avoid the drying out of adjacent land through any lowering of the water table.	Hinton Waldrist PC (M497)	Policy amended to take in this point; also referred to in supporting text (para 6.13).
C3: ENVIRONMENTAL AND AMENITY			
	Supportive/Neutral		
23	Policy supported, particularly the need to ensure that development should not have an unacceptable impact on	CPRE (W143; M575): Bampton PC (W82;	Support noted.

	the environment, residential amenity and sensitive receptors.	M366): BEWG (W91; M403)	
24	Support the approach to determining buffer zones on a case by case basis.	RSPB (M682): Smiths (M732): OCC Ecologist	Support noted.
	Object/Concern		
25	The proposals do not take adequate account of the intrusive effect of waste development on the local environment and its residents.	Oxford Green Belt Network (W42)	Policy provides for adequate protection. Text also refers to the potential impacts of development (noise, dust etc).
26	The potential loss of jobs at Sherington Airfield and local business parks caused by mineral extraction would be detrimental to those employed and to the Parish.	Sherington with Alkerton PC (W162)	No proposals for mineral extraction in this area are being made; reference is made only to existing dormant reserves. Potential impact on local economy would be taken into account in identifying specific sites in site allocations document.
27	Policy/ies should be modified to ensure that local communities are fully consulted and involved at the planning stage.	Sherington with Alkerton PC ((M860): M119	The adopted Statement of Community Involvement sets out provisions for community involvement. This is referred to in the Implementation and Monitoring section (para 7.1).
28	Avoiding standard buffer zones and defining them on a case by case basis is a retrograde step, and is completely unacceptable.	M59: M265: M974: M417: Hinton Waldrist PC (M498):	Current Minerals and Waste Local Plan policy PE3 does not include standard buffer zone distances and there is no support for standard buffer zones in national policy. Where appropriate, particular requirements for buffer zones

			could be included in the site allocations document.
29	Oxford Canal should be considered a 'sensitive receptor' for the purpose of this policy.	BWB (M952)	'Sensitive receptor' is defined in glossary. Protection of canals is covered by policy C2.
30	The policy should ensure that the best and most versatile agricultural land is protected by applying a sequential test – excluding from consideration development on grade 1 and 2 agricultural land.	PAGE (M173)	No support in national policy for excluding grade 1 and 2 land from extraction in all cases, but agree this issue not adequately covered at present. New policy (C4) with supporting text added on agricultural land and soil quality.
31	Although shown in maps (Figs 1 & 8) there is insufficient mention in text of the Green Belt: suitable environmental standards are expected where mineral extraction is accepted.	M265	For waste development, the approach to be taken in Green Belt is set out in policy W6. Policy on mineral working in Green Belt is in the NPPF.
32	There should be a presumption against new quarries in the Green Belt, provided there are alternatives elsewhere.	M265	There is no support for the suggestion in national policy. The NPPF says mineral extraction is no inappropriate in Green Belt subject to certain provisos.
33	More needs to be said on the need to avoid the impact of lorries from quarries on narrow rural roads and ensure the impact of traffic from both minerals and waste facilities on roads is considered.	Bucknell PC (M524)	This point is already covered in the policy C8 (Transport) and supporting text.
34	More should be said in the policy on the undesirable impacts of development on local residents – noise, airborne pollution, timescales for restoration etc.	Bucknell PC (M524)	See ref 25.

35	Land at Lodge Farm, Pusey would be a policy compliant location for soft sand extraction.	M749 (Green & Co Ltd)	The Core Strategy does not identify specific sites; these will be included in the subsequent site allocations document.
36	Make reference to the aims of the Agency's River Basin Management Plan (RBMP) in the context of this policy.	EA (M467)	Reference included in text (para 6.17).
37	Refer to 'landscape character' rather than 'landscape setting' in para 5.16.	OCC Ecologist	Para 6.20 has been amended accordingly.
C4: BIODIVERSITY/GEODIVERSITY (renumbered in proposed submission document as Policy C5)			
Supportive/Neutral			
38	Support for the policy as presented	CPRE (W144): BEWG (W92; M404): Cemex (M227)	Noted.
39	General support for the policy but clarity required as to the status of the proposal in Background Paper 3 to collect 30 pence per tonne per annum to fund 20 year maintenance of restorations.	MPA (M704): OMPG (M715).	Background paper on restoration amended to remove this. The principle of long term funding is covered in policy M7 (Restoration) and para 4.47.
40	Broad support for the policy but suggest amendment as follows: <ul style="list-style-type: none"> - first para to include Local Wildlife Sites; - second para "will not damage" to replace 'should not'; - third para to refer to 'priority species and habitats' (as para 5.23). 	BBOWT (M660)	Policy amended; supporting text refers to priority species and habitats.
41	Strongly support the principles laid out in para 3 of the policy concerning Conservation Target Areas and BAP targets	RSPB (M684)	Noted.

42	The policy is supported and could usefully make reference to seeking opportunity to record geological finds and provide access for educational purposes.	M120	Noted; included in supporting text (para 6.34).
	Objection/Concern		
43	The policy fails to adequately differentiate between the different levels of protection to be afforded to European, national and locally designated sites.	W59: Peter Bennie (M357): M381: RSPB (M684): NE (M741): OCC Ecologist	Agree; policy re-structured to reflect different levels of protection afforded in national policy to protected sites. Reference to European sites removed from policy as they are covered by specific legal requirements. Explanation provided in text.
44	The wording of the policy should more accurately reflect the terminology of the Habitats Directive.	National Trust (M18):	Reference to European sites removed from policy as covered by specific legal requirements. Explanation provided in text.
45	RIGs and Geomorphological Sites have no statutory designation and the policy should not afford them protection when there is no process for challenging their listing.	W59: Smiths (M733)	Agree; removed from policy but encouragement for the protection of such sites retained in the supporting text.
46	The importance of RIGs and SSSIs, as highlighted in the policy, is recognised but W10 should also allow for development of sites provided important RIG/SSSI features are retained.	W206: Hills (M673)	These designations do not necessarily preclude further development of sites.
47	Reference should be made to the Ancient Woodland Inventory as a source for assessing any impact on ancient woodlands.	Woodland Trust (M243)	Ancient Woodland already referred to in supporting text: added to glossary, making reference to the ancient woodland inventory.
48	The policy appears to suggest an expectation that	M381: Smiths (M733)	Policy amended to avoid

	operators will provide long term maintenance and after care: this goes further than national guidance and is already covered in policy M6.		duplication of policy M7 (Restoration) which covers long term maintenance of restored sites.
49	It will not always be possible to comply with para 3 of the policy (enhancement of Conservation Target Areas). Minerals extraction is not always able to contribute to BAP targets (e.g. when working agricultural areas).	Hills (M673)	Policy amended to refer to enhancement of CTAs and contribution to BPA targets where proposals are in or close to a CTA.
50	Tree planting may not be an appropriate screen when securing restoration to wet grassland: add 'as appropriate' to para 5.21.	RSPB (M684)	Agree; supporting text amended (para 6.31).
51	Woodland is referred to in BAP targets and does not need to be referred to separately (para 5.22).	RSPB (M684)	Agree; supporting text amended.
52	'Net gain in natural assets and resources' would be better achieved through contributions to BAP targets (including UK BAP targets).	RSPB (M684)	Agree: specific reference to Oxfordshire deleted from policy.
53	Reference to CTAs should be removed from para 1 of the policy as these are not 'designations' to be protected from development	RSPB (M684): OCC Ecologist	Agree; policy amended.
54	Make reference to 'conserving' rather than protecting (para 5.19) and maintaining (para 5.22).	NE (M741)	Agree; supporting text amended.
55	Refer to 'priority habitats and species' (para 5.23) rather than 'Local Biodiversity Action Plan'.	NE (M741)	Agree: supporting text amended.
C5: LANDSCAPE (renumbered in proposed submission document as Policy C6)			
Supportive/Neutral			
56	Support for the general policy (one comment questions OCC's commitment to these principles in light of the planning decisions made at Ardley and Finmere landfill facilities).	CPRE (W145): Bampton PC (W83; M367): BEWG (W93; M405): M121: RSPB (M685)	Noted.

	Objection/Concern		
57	The policy identifies that development should always protect or enhance landscape quality, failing to recognise that waste developments will inevitably have some impact on landscape.	W207	Policy amended to reflect the different approaches to be taken in AONB and elsewhere. Policy and text emphasise the importance of mitigation in reducing harm from the impact of facilities.
58	The policy should specifically refer to the statutory duty to conserve and enhance AONBs (S.85 CROW Act), the need to consider the setting of AONBs and also the scale of development that might be appropriate within them.	NWCB (M1; M22): Chilterns CB (M722): NE (M743)	Policy amended to include separate paragraph on impact of development on AONBs and their setting. Supporting text to policy W6 gives guidance on small-scale waste facilities appropriate in AONB.
59	Adjust policy wording to allow for effect of development on landscapes adjoining Oxfordshire to be taken into account.	Northants CC (M446)	Reference to Oxfordshire removed from policy.
60	Content on landscape is inadequate and limited to just one paragraph. The term 'landscape character areas' needs definition – see in particular Vale of WH policy on the Corallian Ridge.	M975	Text on landscape amended, to include reference to the relevance of landscape character studies.
61	Adjust policy to require that account is taken “ <i>of landscape character set out in the Oxfordshire Wildlife and Landscape study and other relevant character assessments</i> ”.	OCC Ecologist	See ref 60.
C6: HISTORIC ENVIRONMENT (renumbered in proposed submission document as Policy C7)			
	Supportive/Neutral		
62	Support the policy as worded	CPRE (W146): Bampton PC (W84; M368): BEWG	Noted.

		(W94); M406)	
	Objection/Concern		
63	Require that archaeologists be allowed to record evidence of sub-soil finds after top-soil stripping in all cases.	M122	The policy already allows for this to be required by planning condition if considered appropriate.
64	Require all archaeological finds, even if only of 'local importance' to be preserved in situ where appropriate.	M172	No support for this in national policy.
65	Require preliminary assessment of archaeological remains to be undertaken by an individual selected from a panel identified by the Council and paid for by the operator.	M266	The supporting text explains that preliminary assessment is required at the planning application stage: not appropriate to restrict the personnel to be employed.
66	Insufficient evidence presented of the locations of significant archaeological importance and their potential impact on the identification of preferred areas for extraction or safeguarding.	Cemex (M278)	Background paper on heritage assets prepared to provide more information, including a preliminary assessment of nominated sites and strategy areas.
67	Policy wording requires review to bring it into conformity with the draft National Planning Policy Framework and PPS5.	English Heritage (M545)	Policy amended to better accord with national policy (see also ref 64).
68	Policy should refer to the need to protect and conserve historic assets and their setting, including Oxfordshire's 58 registered parks and gardens (Historic Asset not included in Glossary).	Oxfordshire Gardens Trust (M646)	Registered Parks and Gardens are referred to in the policy. Amend policy to refer to 'heritage' (not historic) assets.
69	Amend policy to reflect the possibility of development impacting on historic assets outside Oxfordshire.	Northants CC (M447)	Policy amended to remove reference to Oxfordshire.

C7: TRANSPORT (renumbered in proposed submission document as Policy C8)			
Supportive/Neutral			
70	Particularly welcome the aim to avoid the use of narrow country lanes for the transport of waste (not always observed in the past)	CPRE (W 147)	Noted.
71	Policy is generally supported. Specific comment made on suitability of access to Wicklesham Quarry; suitability of Pusey Lodge Farm; the need for any measures that are imposed to be properly enforced).	W208: Bampton PC (W85; M369; M371): BEWG (W95; M408): Cemex (M279): M312: M976: M750: East Hagbourne PC (M201)	Noted: individual site access arrangements are a matter for the site allocations document or planning application stage. Measures to monitor the policy are in section 7. Enforcement of site specific requirements is carried out as part of development management.
72	Support the principles of the policy but add to text to ensure a balance is struck between sustainability objectives and the added lorry miles that usually result from a routeing agreement.	Earthline (M38)	This was addressed in the draft supporting text (para 5.34) and is retained (para 6.47).
73	Support the intention to promote the use of waterways for minerals and waste transport. The main rivers and canal should be highlighted on the key diagram and usage levels monitored to ensure there is no adverse effect on other waterway users.	BWB (M953)	Impractical to include appropriate waterways on Key Diagram or for the County Council to directly monitor usage of waterways and any impacts on other users.
74	The policy is consistent with the Council's Local Transport Plan (3) which seeks to minimise the distance minerals need to travel by road.	Cllr I Hudspeth (M4)	Noted.
Objection/Concern			
75	Mineral Operators pay huge road taxes and should not	W60: P Bennie (M358):	The policy does not introduce a

	have to pay commuted sums for road maintenance. Change policy to require access to, but not along, the primary road network.	Grundon (M407): Hills (M675): MPA (M705): OMPG (M716): Smiths (M734): Hanson (M423)	new requirement and allows for decisions on any maintenance payments to be made on a case by case basis.
76	The policy is too strict and should be more flexible e.g. it would be reasonable to require that development should cause 'no significant adverse effect' on road safety, but the policy requires that proposals should 'maintain or improve' road safety.	W60: M336: Grundon (M407): Hills (M675): MPA (M705): OMPG (M716)	Policy amended to make clear that 'improvement' is an aspiration, not a universal requirement. Development should not cause adverse effect on road safety; the test of maintaining safety standards – as proposed in the policy – is both necessary and fair. The suggested test of creating no 'significant adverse effect' is not appropriate.
77	Alter the policy to ensure that “safe and convenient access to and along the primary road network” is sought.	Hinton Waldrist PC (W75; M499)	Safety issues are covered adequately in the first bullet point of the policy.
78	The requirement that lorry traffic should not adversely affect residential amenity is meaningless unless control can be exercised on the intensification of existing waste facilities.	Ewelme PC (W55; M324)	Permission may not be required to intensify an existing use, but support text to W5 (waste strategy) refers to use of conditions (e.g. to restrict tonnages) as a means of controlling intensification if necessary.
79	The aim of reducing 'waste miles' (requiring waste facilities to be located as close as possible to waste arising) is unlikely to be met unless limits are placed on waste imports.	Ewelme PC (W55)	See refs 34 and 37 (policy W2) of Waste Responses. Restrictions on sources of waste are generally not justified.

80	Controls on lorry movements should be required and, where imposed, should be enforced.	Eynsham PC (W255)	Para 6.47 refers to the appropriate use of routeing agreements as a means of avoiding harm to amenity. See ref 78.
81	Need to improve transport links across the Thames to avoid mineral traffic from West Oxfordshire having to use the A40 to get to markets south of Oxford.	CPRE (M527): BaCHPoRT (M267)	See ref 122 (policy M3) of Minerals Responses. Improved bridges would be expensive and could lead to traffic on less suitable roads than A40 (e.g. A415 at Marcham).
82	The policy should make clear what 'roads suitable for lorries' actually means (e.g. minimum width 5.5m as stipulated by DoT). Access to the Sherington and Alkerton area can only be gained via narrow roads through villages, making it unsuitable for further development.	Sherington with Alkerton PC (W163; M862)	Figure 14 now provides a map of roads that are considered suitable for use by lorries.
83	The policy implies that new access will be allowed to a trunk road and this is normally not the case. Wording change advised.	Highways Agency (W167; M610)	Agreed: supporting text adjusted (para 6.45) to make clear that direct access to trunk roads is rarely possible.
84	Not clear whether the roads shown on Fig 8 (Key Diagram) are the same as the 'primary road network' referred to in the policy (which otherwise needs to be defined more precisely).	Controlled Reclamation (Oxford) Ltd (W219): John Sheehan (Oxford) Ltd (W225)	Figure 14 provides an updated map of roads suitable for lorries: not necessary to duplicate this in the Key Diagram.
85	The safety of cyclists should be referred to alongside that of pedestrians	Oxford City (W176)	Policy refers to 'the safety of all road users, including pedestrians'. Further emphasis is not considered necessary.
86	To be consistent with the policy, the strategy should identify more extraction sites in the south of the County (to satisfy demand and avoid excessive use of A40).	Cllr I Hudspeth (M4)	See ref 81.

87	The increasing use of weight limits on bridges produces more lorry miles and is counter to the intentions of the policy.	Grundon (M407): Smiths (M734)	Weight limits are determined by the structural stability of a bridge. The text (para 6.47) sets out the issues relevant to a routeing agreement.
88	<p>There are conflicts within the policy:</p> <ul style="list-style-type: none"> - the lack of alternatives to road transport is recognised but the policy hierarchy is for rail, water etc above roads; - locations for minerals are set by M3 yet the policy still seeks to minimise lorry miles; - the County acknowledges it is now a net importer of minerals: this adds to lorry miles, contrary to the intention of the policy to minimise lorry miles. 	Smiths (M734): M382	Policy amended to remove any impression of a transport hierarchy, but retaining reference to the environmental benefit of alternative means of transport. Supporting text adjusted (para 6.44) to acknowledge the reality that transport of materials will normally be by road and that a failure to use other means does not need to be justified. The policy guides the determination of all planning applications; the areas identified in policy M3 take account of the potential transportation impacts.
89	Detailed wording changes to text suggested (including making reference to waste as well as minerals in para 5.32). Replace Fig 9 (Main Roads) with new Advisory Lorry Routes map. Consider including a new policy to secure infrastructure improvements.	OCC Transport	Policy and supporting text (para 6.46) amended to make clear the approach to securing necessary infrastructure. Policy also adjusted to make clear the different transportation requirements of minerals and waste development. Fig 14 provides an updated map of roads suitable for lorries.

C8: RIGHTS OF WAY (renumbered in proposed submission document as Policy C9)			
Supportive/Neutral			
90	Support the policy as presented	CPRE (W148); M574): Bampton PC (W86); (M370): BEWG (W96); M409)	Noted.
91	Policy approach is supported: minor changes to text and policy wording suggested.	OCC Rights of Way	Noted.
Objection/Concern			
92	Full public access should be provided on all restored mineral workings. The policy should address impacts on 'informal' paths as well as the rights of way network. Temporary alternatives should be planned in conjunction with local residents.	M123: M313	Improvement to the rights of way network is already encouraged and access to restored mineral sites sought. Supporting text (para 6.51) expects that temporary diversions be shown in minerals applications and is amended (para 6.50) to refer to the benefits of discussing proposals locally.
93	The use of bridleways in/adjoining mineral workings by horses is often ignored when agreeing detailed siting of plant and equipment.	OCAF (M563)	Supporting text (para 6.49) already makes reference to horses: specific impacts are for consideration at the planning application stage.
94	Para 5.37 should be strengthened to commit the Council to actively seeking and implementing proposals from local residents for the rights of way network.	OCAF (M563)	Reference made in supporting text (para 6.50) to the benefit of operators discussing plans locally before submission to the Council.
95	The Plan should demonstrate a greater commitment to the	OCAF (M563)	The policy encourages

	creation of new public access areas/routes.		improvement and enhancement to the network.
96	“Green infrastructure” is not defined: the policy should simply refer to the “public rights of way network”.	Hills (M676)	‘Green infrastructure’ is defined in Glossary.
97	Amend the policy to ensure that the commitment to seeking public access does not compromise a primary end purpose linked to biodiversity e.g. heath land and grassland.	RSPB (M686)	Policy and supporting text (para 6.52) have been amended to allow for this.
98	The policy goes too far in requiring landowners to not only designate new rights of way but to also maintain them for a substantial period of time.	Smiths (M735)	Future maintenance of newly created rights of way continues an approach set out in the Minerals and Waste Local Plan (in particular policy PE12).