

Part 1 – Respondent Details

1(a) Personal details									
Title	Mr								
First Name	Matthew								
Last Name	Coplestone								
Job Title (where relevant)									
Organisation (where relevant)	Earthline Ltd								
1(b) Agent details <i>Only complete if an agent has been appointed</i>									
Title	Mr								
First Name	Stephen								
Last Name	Bowley								
Job Title (where relevant)	Director								
Organisation (where relevant)	Stephen Bowley Planning Consultancy								
1(c) Contact address details <i>If an agent has been appointed please give their contact details</i>									
Address Line 1	Ferndale								
Line 2	Tiddington								
Line 3	Thame								
Line 4	Oxfordshire								
Postcode	OX9 2LQ								
Telephone No.	01844 338636: Mob 07710 032722								
Email address	SBowleyPC@aol.com								
Are you writing as	<table border="0"> <tr> <td><input type="checkbox"/> A resident</td> <td><input type="checkbox"/> A parish council</td> </tr> <tr> <td><input type="checkbox"/> A local business</td> <td><input type="checkbox"/> A district council</td> </tr> <tr> <td><input type="checkbox"/> <u>Minerals industry</u></td> <td><input type="checkbox"/> A county council</td> </tr> <tr> <td><input type="checkbox"/> <u>Waste industry</u></td> <td><input type="checkbox"/> Other (please specify)</td> </tr> </table>	<input type="checkbox"/> A resident	<input type="checkbox"/> A parish council	<input type="checkbox"/> A local business	<input type="checkbox"/> A district council	<input type="checkbox"/> <u>Minerals industry</u>	<input type="checkbox"/> A county council	<input type="checkbox"/> <u>Waste industry</u>	<input type="checkbox"/> Other (please specify)
<input type="checkbox"/> A resident	<input type="checkbox"/> A parish council								
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<input type="checkbox"/> <u>Minerals industry</u>	<input type="checkbox"/> A county council								
<input type="checkbox"/> <u>Waste industry</u>	<input type="checkbox"/> Other (please specify)								

Please tick the appropriate boxes if you wish to be notified of any of the following:	
That the Oxfordshire Minerals & Waste Core Strategy has been submitted for independent examination	Yes
Publication of the Inspector’s report and recommendations	Yes
Adoption of the Oxfordshire Minerals and Waste Core Strategy	Yes

Please sign and date the form:			
Signature:	Stephen Bowley	Date:	17/9/15

Part 2 – Representation

Please complete this part (Part 2) of the form separately for each separate representation you wish to make.

You can find an explanation of the terms used below in the accompanying guidance on making representations.

2(a) State which part of the Oxfordshire Minerals and Waste Local Plan Core Strategy you are making a representation about

Part or policy no. or paragraph

Figure 5

2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy is: (tick as appropriate)

- (i) Legally compliant? Yes No
- (ii) Sound? Yes No

If you have answered **No** to question 2(b)(ii), please continue to question 2(c). In all other cases, please go to question 2(d).

2(c) Do you consider the Oxfordshire Minerals and Waste Core Strategy is **unsound because it is not**: (tick as appropriate)

- (i) Positively prepared No
- (ii) Justified No
- (iii) Effective No
- (iv) Consistent with national policy No

On the following pages, please set out why you think the Minerals and Waste Local Plan Core Strategy is legally non-compliant and/or unsound and any changes you are suggesting should be made to it that would make it legally compliant or sound.

Please note your representation should include as succinctly as possible all the information and evidence necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on your representation at this stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

2(d) Please give details of why you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy is not legally compliant or is unsound. Please be as precise as possible.

If you agree that the Oxfordshire Minerals and Waste Local Plan Core Strategy is legally compliant and/or sound and wish to support this, please also use this box to set out your comments.

Earthline Ltd currently has the following operations in Oxfordshire:

1. Shellingford Quarry: Limestone and sand extraction, inert landfill and recycling
2. Hatford Quarry: Limestone and sand extraction
3. Shipton on Cherwell: Limestone extraction, inert landfill and recycling

These operate under the following companies respectively: Multi-Agg Ltd, Hatford Quarry Ltd and Shipton Ltd

During the Plan Period the company anticipates the need to extend each of these sites, and possibly develop new sites for minerals extraction and waste management.

Overall, Earthline Ltd supports the Draft Core Strategy, particularly the preference for extensions to existing sand quarrying and limestone operations. The company submitted detailed comments to the previous Consultation Draft in April 2014 and are pleased to note that a number of detailed comments have been taken on board – for example the recognition that limestone meeting the specification for ‘Type 1’ is produced at Shellingford and Hatford Quarries.

There is, however, one submission that has not been accepted by the County Council relating to the suggested identification of an additional location for working aggregate minerals to the north of Kidlington. This would specifically cater for the future extension of the company’s existing limestone quarry at Shipton on Cherwell that has limited remaining permitted reserves. The company’s response to this omission is dealt with under Policy M3.

It is acknowledged that the Core Strategy is not site specific and will not allocate sites – these will be a matter for the subsequent Site Allocations Document. The Shipton on Cherwell site has been nominated for inclusion in the Site Allocations Document for limestone extraction and subsequent restoration by inert landfill. The company therefore wishes to see policies in the Core Strategy that:

- (i) Provide a favourable policy framework for the future allocation of extensions to Shipton on Cherwell Quarry
- (ii) Provide a favourable policy framework for any future planning applications for quarry extensions.

Two further responses are carried forward from the Consultation Draft Plan concerning the mineral site location plan and aggregates recycling. Policy M4 is supported.

Representation are submitted to the following Sections of the Draft Plan:

Figure 5 Location of Active Mineral Workings

Policy M1 Recycled and Secondary Aggregate.

Policy M3 Principal Locations for Working Aggregate Minerals

Policy M4 Sites for Working Aggregates Minerals

Individual forms have been completed for each section. The full representation is included in a separate Statement in order that the overall objection and connections between the individual policy objections can be understood.

Figure 5 Location of Active Mineral Workings

Figure 5 (Location of Active Mineral Working Sites) does not show Shipton on Cherwell Quarry. This is disappointing as this error was pointed out at the previous consultation.

Continue on a separate sheet or expand the box if necessary

2(e) Please set out the changes(s) you consider necessary to make the Oxfordshire Minerals and Waste Local Plan Core Strategy legally compliant or sound, having regard to the reason you have identified at 2(c) above where this relates to soundness. You should say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Correct Figure 5

Continue on a separate sheet or expand the box if necessary.

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2(a) State which part of the Oxfordshire Minerals and Waste Local Plan Core Strategy you are making a representation about

Part or policy no. or paragraph

Policy M1

2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy is: (tick as appropriate)

- (i) Legally compliant? Yes No
- (ii) Sound? Yes No

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2(c) Do you consider the Oxfordshire Minerals and Waste Core Strategy is unsound because it is not: (tick as appropriate)

- (v) Positively prepared No
- (vi) Justified No
- (vii) Effective No
- (viii) Consistent with national policy No

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Policy M1 Recycled and Secondary Aggregate

We responded to the Consultation Draft Plan as follows:

Reliance on temporary recycling facilities at quarry and landfill sites results in loss of capacity as the host sites are completed. For some locations there will be a good case for retaining recycling facilities after the host quarry or landfill is completed, particularly where the site is remote from housing and has a good access. The retention of such facilities may be preferable to locations in or around the main urban areas which may not be deliverable

Earthline operate significant aggregates recycling facilities within Shellingford and Shipton on Cherwell Quarries. Both of these operate under temporary consents:

- (i) Shellingford until 2019
- (ii) Shipton on Cherwell until 2025

To continue operation both consents will therefore need to be renewed during the Plan Period, either as continuing temporary consents or with permanent permissions.

Continue on a separate sheet or expand the box if necessary

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Please be as precise as possible.**

Policy M1 should be relaxed to provide for the retention of temporary sites on a permanent basis on their merits.

Continue on a separate sheet or expand the box if necessary.

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2(a) State which part of the Oxfordshire Minerals and Waste Local Plan Core Strategy you are making a representation about

Part or policy no. or paragraph

Policy M3

2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy is: (tick as appropriate)

(i) Legally compliant? Yes No

(ii) Sound? Yes No

If you have answered **No** to question 2(b)(ii), please continue to question 2(c). In all other cases, please go to question 2(d).

2(c) Do you consider the Oxfordshire Minerals and Waste Core Strategy is unsound because it is not: (tick as appropriate)

- | | |
|---------------------------------------|-----------------------------|
| (ix) Positively prepared | <input type="checkbox"/> No |
| (x) Justified | <input type="checkbox"/> No |
| (xi) Effective | <input type="checkbox"/> No |
| (xii) Consistent with national policy | <input type="checkbox"/> No |

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Policy M3 Principal Locations for Working Aggregate Minerals

We do not understand why the limestone resources north of Kidlington have not been identified as a strategic resource area under Policy M3 and shown on the Key Diagram. A request to have this area added was made in response to the Consultation Draft Plan in April 2014

The purpose of the additional area is to provide strategic policy support for the extension of the existing limestone quarrying operations at Shipton on Cherwell Quarry. The permitted limestone reserves have a life of approximately one year and extensions are required in order to maintain production from this site.

The limestone reserves at Shipton were worked for the production of cement since 1929 when the cement works opened, until 1986 when it closed. Since 1986 the site has passed through several ownerships and is presently owned by Shipton Ltd and operated by Earthline Ltd (as co-owners) Permitted reserves of limestone remained at the site, but the quarry was dormant until re-opened by Earthline Ltd in 2012 to supply limestone aggregates.

The limestone is worked under a comprehensive planning permission for the working and restoration of the site granted in 2009 for the demolition of the cement works, extraction of limestone, importation of inert fill and commercial development including rail sidings, rail aggregate depot, concrete batching plant and use for storage. The remaining limestone reserves within the quarry were located on the northern and eastern boundaries, including beneath the derelict cement works. These have been worked progressively from north to east, with the works being demolished as extraction progresses. The 74m metre high chimney was demolished on 30 August 2015. Less than one year of reserves remain.

Shipton on Cherwell Quarry is well located close to Oxford and to the strategic development corridor along the A34. In a short time the company has established a strong market for the use of the Shipton limestone as a lower specification aggregate at development sites, for example as a construction fill and road base material. There is a strong demand in Central Oxfordshire with major development sites including housing at Bicester and Didcot, commercial redevelopment in central Oxford, and the improvements to the Oxford – Bicester railway line. The company therefore wish to continue to supply such local markets through the extension of the quarry. The development of this new minerals resource area should be supported.

Historically there were permitted reserves to the north west of Bunkers Hill. However the company will be seeking to extend the quarry to the south into two areas identified

on the attached Minerals Site Nomination Plan. Area A is a small extension immediately south of the cement works. The major reserves lie in Area B to the south of the quarry. These areas contain an estimated 1.75 million tonnes of limestone (subject to detailed minerals assessment).

The basis for identifying strategic resource area is provided in Para 4.24 that states:

‘The strategic resource areas have been broadly drawn to encompass the potentially workable mineral deposits within each area. Natural boundaries such as roads and rivers have been used where possible but elsewhere geological mapping information has been used. AONB, SAC have been excluded but other designations and constraints have not been taken into account at this stage.

Shipton on Cherwell Quarry is located in the Oxford Green Belt, but the Green Belt is not a limitation on identifying strategic minerals resource areas. In any case the Green Belt is not a policy constraint to mineral extraction.

Three principal locations shown for crushed rock aggregates are identified. The areas near Burford, Faringdon and north west of Bicester contain active quarries with potential for extensions. However we can see no reason for not identifying the area north of Kidlington in the vicinity of Shipton on Cherwell Quarry that is also an active crushed rock quarry with potential for extension.

In the preamble to Policy M3 there is no reference to the Shipton on Cherwell quarry workings, and it has been omitted from the map of active mineral workings (Figure 5). It is possible that the significance of Shipton on Cherwell Quarry as an aggregates producing site has not been appreciated.

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Policy M3: Add a new location for crushed rock as a forth bullet point:

- The area north of Kidlington

Key Diagram: Add an additional Crushed Rock area. A suggested area has been annotated on the attached Key Diagram: 9. North of Kidlington

Continue on a separate sheet or expand the box if necessary.

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Policy M4

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- (i) Legally compliant? Yes No
- (ii) Sound? Yes No

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- (xiii) Positively prepared yes
- (xiv) Justified yes
- (xv) Effective yes
- (xvi) Consistent with national policy yes

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Policy M4 Sites for Working Aggregates Minerals

The priority given to the extension of existing quarries (Policy M4(c)) is strongly supported.

Continue on a separate sheet or expand the box if necessary

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.NA

