

**From:** Davies, Sophie [mailto:Sophie.Davies@wiltshire.gov.uk]

**Sent:** 15 December 2015 14:16

**To:** Day, Peter - E&E

**Subject:** Oxfordshire Minerals and Waste Local Plan: Core Strategy: Part 1 – Core Strategy Proposed Submission Document, August 2015

Hi Peter

Please find below the comments of the proposed submission document:

**Oxfordshire Minerals and Waste Local Plan: Core Strategy: Part 1 – Core Strategy Proposed Submission Document, August 2015**  
**Comments submitted by: Wiltshire Council and Swindon Borough Council**

Thank you for inviting Wiltshire Council and Swindon Borough Council ('the councils') to comment on the emerging 'Minerals and Waste Local Plan: Core Strategy – proposed Submission Draft'. Please accept my sincere apologies for the delay in providing this response on behalf of the councils.

The councils consider that the Core Strategy has been prepared positively and in accordance with current national policy and guidance, and reflect similar policy themes as set out in the Wiltshire and Swindon Minerals and Waste Development Frameworks.

As stated in our previous consultation response in November 2014, the councils remain concerned with Oxfordshire's lack of acknowledgement and any strategy in respect of the supply of aggregate minerals to meet sub-regional markets/demands. In this regard, a more prudent approach future aggregate provision is needed in policy M2 that is based upon a clear commitment to meeting long-term requirements in accordance with the most recent Local Aggregate Assessment (LAA). Consequently, this would allow flexibility to accommodate market fluctuations. It is noted that imports of primary and secondary aggregates will continue to play an important role for Oxfordshire, in turn there is a potential to have an effect on Wiltshire and Swindon.

The councils support the proposals set out in policy M3 in terms of the distribution of mineral workings across the county. It is considered that this approach will enable the development of a balanced approach to aggregates supply through the allocation of areas of search to support local / sub-regional construction markets.

Policy M4 presents useful guidance for the consideration of minerals proposals. However, bearing in mind the geology of the county and the location of existing workings, the councils would again wish to question the statement that further workings within, or significantly affecting, the AONBs will not be permitted. This is not reflective of the "as far as practicable" approach outlined in the NPPF. There may be advantageous to be gained from identifying suitable areas and / or sites both within, and outside, the AONBs in order to meet long-term demand from proximal construction markets. If such an approach were to be followed, it would be prudent to work with minerals industry, landowners and local communities to identify these sites so that issues can be identified and addressed at the earliest opportunity.

Development within the AONB can be successfully managed through appropriate controls and potentially offer positive opportunities, for example, biodiversity / landscape gains.

We agree with the comments made from SWAWP members, particularly the final comment relating to Wiltshire and Swindon authorities:

The recent permissions at Gill Mill and Caversham and their contributions to the sand and gravel landbank will have a positive impact on supplies and may alleviate some of the pressure on the supply of sand and gravel from Gloucestershire/Wiltshire. Footnote 2 on page 42 which explains the reserve figure in line F of Table 2 could, however, be clearer. It is to be noted that the continuity of longer term supplies of sand and gravel from Gloucestershire and Wiltshire in to Oxfordshire may be adversely affected due to a proposed, strategically placed development at Down Ampney, which straddles the Gloucs/Wilts boundary, recently being abandoned by the landowners; had it gone ahead the site had a potential yield of c5.5mt that would have supplemented the few other potential sources of supply that are currently being promoted.

## **Waste**

It is generally accepted that waste, particularly merchant waste, often transcends geopolitical boundaries and, as such, Waste Local Planning Authorities (WLPs) must regularly monitor the local circumstances to ensure the appropriate and timely provision of facilities through local plan policies. Through the duty to cooperate the WPA needs to interrogate current data trends and carefully plan for waste accordingly through on-going dialogue with neighbouring WPAs, in particular both the London and Berkshire WPAs.

The location of waste management facilities in Policy W5 offers a broad range of locations that seek to form a framework for bringing forward sites that are proximal to the main centres of population. This approach is supported by the councils as it represents a sustainable option for future planning.

Whilst we look forward to the Minerals and Waste Local Plan Part 2 – Site Allocations document once it is prepared, the councils would agree that a ‘technology neutral approach’ towards future waste management decision making may also be advantageous in terms of ensuring the Plan does not fetter choice and innovation in the industry.

With regard to Policy W11 the councils would wish to emphasise and support the need to safeguard waste facilities and land required for such uses. The timely provision and maintenance of facilities is critical to the success of the WPA in meeting the demands associated with the long-term management of waste. Where existing waste management facilities are established on industrial estates these should also be safeguarded.

## **Core Policies**

The councils acknowledge the role and function of the proposed ‘Core policies for minerals and waste’ (policies C1 – 11). The policies appear to cover a range of

factors that are relevant to the consideration of minerals and waste proposals. As such, the package of proposed policy measures are considered to offer a level of certainty and flexibility to support development proposals for minerals and waste.

### **Summary**

At this stage, the councils welcome the proposals set out in the 'Minerals and Waste Local Plan: Core Strategy – Consultation Draft'.

The councils would like to continue to be consulted on the Plan through subsequent iterations.

Kind regards

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