

**From:** Douglas Symes [mailto:dks@dksymes.co.uk]  
**Sent:** 10 June 2016 11:30  
**To:** Minerals and Waste Plan Consultation - E&E  
**Subject:** Topic Paper - Preliminary Assessment of Mineral Site Options 0535

Minerals and Waste Policy Team

For the attention of Sue Scane:  
Environment & Economy

Dear Madam,

Oxfordshire Minerals and Waste Core Strategy - Consultation on Additional Documents  
Topic Paper - Preliminary Assessment of Mineral Site Options

Please find attached comments on sites,

SS-01 - Tubworth Barn  
SG-09 - Land north of Drayton St. Leonard  
SG-59 - Stadhampton

I would be pleased to discuss these with you and would be grateful for confirmation of safe receipt.

Regards,  
D.K. Symes

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**To:**

**Oxfordshire County Council**

**Site Ref. SS-01 Tubworth Barn**

This site has a proven reserve of 'soft sand' that is suitable to contribute to the supply of construction aggregates in Oxfordshire. The Topic Paper sets out the RAG Assessment approach from which it is noted that the site is classed as 'Amber' which means that it may be suitable for mineral development. The Assessment Results show there are 5 topics where an Amber score was given which are commented on below.

**Risk to SSSI** - Reference is made to the site being located within the Outer Impact Zone to Frilford Heath, Ponds & Ferns. These are located some 300 - 400 metres to the south east and separated from the site by the A420. This and the distance indicates there will be no impact from noise, dust or air pollution. Regarding ground and surface water, the mineral deposit is dry, but there may be limited pockets where groundwater is present. Whilst it was previously indicated there may need to be very limited dewatering of any deeper 'wet' pockets, if restricting the development to 'dry' working only would address any perceived impacts, this would be acceptable.

**LWS** - The extent of the land holding adjoins Appleton Upper Common LWS, but the Illustrative Development Plan makes it clear that the extent of the minerals is 50 metres away at its closest with a 100 metre distance along the majority of the boundary. In addition a potential ecological improvement zone is indicated to ensure that full protection can be provided to the LWS as well as increasing the ecological interest within this zone to enhance the setting of the LWS. This approach, together with the suggestion of dry working should fully protect the integrity of the LWS.

**Agricultural Land** - It is noted that the results indicate that the site is predominantly Grade 2 and some Grade 3. This is surprising in view of the sandy nature of the soil which results in it being very droughty. That said, the restoration proposed is to return the area to agricultural (apart from the

potential ecological improvement zone) through retaining and using the full existing soil resource. This will ensure that the potential for the land to return to its existing grade is not lost.

### **Properties**

- The site boundaries were drawn to follow field margins and as such are within 10 metres of a residential property. However, the Illustrative Development Plan clearly shows a 100 metre buffer zone to this property as well as an acoustic screen bund.

Regarding the reference to being within 100 metres of Tubney, it is relevant to note that the A420 separates the site from the majority of the village. This road is a 'noise corridor', as well as a visual 'break', with the proposed site being very well screened by the boundary vegetation.

These site specific criteria and mitigation measures should be given weight in carrying out the assessment and this topic should be assessed as green.

### **Existing Quarry**

- At the time the assessment was made Tubney Wood Quarry was probably active. Mineral workings have now ceased at this site and this topic should be reassessed as green.

### **Summary**

- Whilst it is accepted that there are some amber scores, the location of this reserve is such that mineral working of the site will not result in any unacceptable impacts. With mitigation the impacts can be further reduced, with the restored area being returned to agriculture thereby avoiding any permanent loss of good quality land / soils, as well as providing an ecological buffer zone to the LWS.

### **Availability**

- The landowners confirm that the land is available for mineral extraction and can be delivered during the plan period.

**To:**

**Oxfordshire County Council**

**Site Ref. SG-09 Land north of Drayton St. Leonard**

This site has a proven reserve of sand and gravel and the Topic Paper assesses the site as Amber, with specific reference to ensuring suitable protection to an important archaeological feature (a cursus) which is very limited in area. The amber / red assessments on the RAG results are commented on below.

**SSSI**

- The Little Wittenham SSSI is over 3 km distant from the site, it is on rising ground south of the River Thames, lies within the River Thames Catchment rather than the River Thame and is up gradient of the ground and surface water. The 'Amber' assessment on potential impact on this SSSI is strongly questioned as no justification can be seen for this interpretation. Distance alone would suggest that this topic should be currently assessed as 'Green'.

**Archaeology**

- It is noted that there is a cursus within the site, which is considered to warrant a similar status to a SAM. The assessment notes that the extent / footprint of the feature is small in extent and takes a practical approach in recognising that it can be fully protected should the site be developed. This is supported by the landowner.

**Agricultural Land**

- It is acknowledged that the site is likely to have best and most versatile soils over a large area. The landowner recognises the importance of this resource, both nationally as well as in his long term interest which is why the restoration proposals include a large area being returned to agriculture by carefully replacing the existing soils. This should ensure that the restored area has the potential to return to a similar quality.

**Residential**

**Properties**

- The property boundaries were drawn to follow field boundaries and it is acknowledged they are adjacent to properties. This was done to demonstrate the extent of the ownership to provide assurance that there is

control of the buffer zones / limit of working that were shown on the Illustrative Development Plan submitted with the details. The proposed limit of the workings do not adjoin residential properties, and a similar practical approach to that for archaeology should be taken. This would suggest the assessment could reasonably be reassessed as 'Green'.

**Summary**

- The above comments may not change the 'Amber' status of this site, but they demonstrate that by restricting the extent of the mineral site will satisfactorily address any adverse impacts of mineral development.

**Availability**

- The landowner confirms that the site remains available for mineral development and can be delivered within the plan period.

DKS/yw/  
9 June 2016

**To:**  
**Oxfordshire County Council**  
**Site Ref. SG-59 Stadhampton**

This site has a proven reserve of sand and gravel and is put forward for mineral extraction as an extension to Site SG-09. It is noted that the site is assessed as Amber which is supported, and further comments are set out below with regard to the RAG Assessment.

**SSSI** - The comments submitted on site SG-09 regarding the potential impact on Little Wittenham SSSI also equally apply to this site. In addition the site SG-59 lies to the north of the River Thame which provides an additional hydrological buffer. It is considered that the assessment for this topic should be 'Green'.

**Listed Building** - It is recognised that Chiselhampton Bridge is adjacent to the site but there will be no direct impacts as it is proposed there will be a separate temporary 'mineral' crossing of the River Thame so no vehicles will need to use the bridge. Any impacts on the setting will be temporarily mitigated (by bunds or landscaping) and once restored there will be no residual impacts.

**Groundwater** - The comment that the site is in a 'Principal Aquifer' is not supported by the E.A. website and is therefore considered to be an incorrect assessment.

Being underlain by gravel, the site will have a secondary aquifer but again the E.A. website does not recognise this as having any significance.

In the absence of any evidence to support this 'Amber' assessment this topic should be classed as 'Green'.

**Agricultural Land** - It is recognised that there is best and most versatile soils present on the area and the potential of these soils will be protected through their

Careful reuse in restoring at least an equivalent area back to agricultural use.

**Residential  
Properties**

- The boundaries of the site are based on the ownership which demonstrates that there is control of any buffer zones that are considered necessary to protect the amenity of nearby and adjacent properties. The Illustrative Development Plan shows a landscape zone where early planting could take place as well as a buffer zone to protect the properties that are across the A329 from the site. These are illustrative and the appropriate level of protection can be agreed at the detail design stage to satisfactorily mitigate any impacts.

**Availability**

- The landowner confirms that the site remains available for mineral development associated with site SG-09 and can be delivered within the plan period.

DKS/yw/  
9 June 2016