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22<sup>nd</sup> September 2015  
Your Ref: S:\SPED\15.12\4.12  
Our Ref:

Dear Ms Scane

**OXFORDSHIRE MINERALS AND WASTE LOCAL PLAN  
PART 1 – CORE STRATEGY PROPOSED SUBMISSION DOCUMENT  
August 2015**

Thank you for notifying Kent County Council of the above consultation

We welcome the opportunity to comment on the emerging Oxfordshire Local Plan (the Plan). Having considered the documents the Kent County Council has the following observations and comments to make.

**Policy M2: Provision for working aggregate minerals**

It is noted that Oxfordshire County Council is seeking to move away from the importation of sand and gravel which has been the historical manner in which local needs were met. Moreover, during the Plan period, local production is expected to increase to allow the area to meet its own needs of this important aggregate mineral type. Policy M2 states that the Plan area will be able to maintain a 7-year landbank for both sharp sand and gravel and soft sand, and at least a 10-year landbank for crushed rock based on the Local Aggregate Assessment projections. Therefore the Plan is in accordance with national planning policy as set out in the National Planning Policy Framework (NPPF). However, quantification within the policy would enhance the policy's 'certainty' in terms of how much material will be provided over the Plan period and what a maintained land-bank will constitute per aggregate mineral type.

Katie Stewart  
Director of Environment, Planning and Enforcement

While Policy M2 seeks to increase the production of aggregate minerals within the County, with a commensurate decrease in the area's reliance on imports, the accompanying policy text continues to recognise the importance of cross-boundary movements of aggregates. This is particularly relevant to the provision of soft sand which, according to the explanatory text to the policy, reserves will run out in 2024, unless other sites are permitted for extraction.

Kent County Council understands the importance of continued cross-boundary relationships, as this recognises that circumstances can change over the course of a plan's lifetime. It is therefore considered prudent for such a policy to demonstrate an element of flexibility to allow for the import/export of aggregate minerals if necessary.

### **Policy M7: Non-aggregate mineral working**

Oil and Gas (conventional and unconventional) is included within Policy M7 (and is not a standalone policy). While it may be the case that there is currently no exploration for or production of oil and gas within Oxfordshire, given the Government's clear backing for onshore oil and gas exploration it is considered that it would be prudent for the authority to develop a more comprehensive policy setting out more detailed development criteria, unless there are unequivocal grounds based on geological evidence that would render this approach unnecessary.

### **Policy M8: Safeguarding mineral resources**

The Plan does not define the extent of the nationally important economic minerals that occur in the plan area with Mineral Safeguarding Areas, according to the available British Geological Survey (BGS) data, as required by the Planning Acts. I note that this will be, addressed by the Minerals and Waste Local Plan: Part 2 – Site Allocations Document. It is considered that the primary plan document, which sets out the vision and overall strategy for sustainable minerals provision and waste management in Oxfordshire, should define the extent of the Mineral Safeguarding Areas and provide a context for future sites work. This is due to the need for the overall Development Plan (that includes the Plan and Oxfordshire's borough and district plans) to provide a high level of certainty as to where sustainable development of all forms required for future growth will be acceptable in terms of the right development, in the right place at the right time.

### **Policy W3: Provision for waste management capacity and facilities required**

It is noted that that Oxfordshire County Council considers that the area will experience an overall increase in waste arisings across the representative waste sectors during the Plan period. To address this, the Plan seeks to ensure that new waste management capacity of some 316,300 tonnes per annum (tpa) for non-hazardous waste recycling and 120,400 tpa of inert waste recycling is delivered. The enhanced waste management capacity provision will ensure the area achieves net waste management self-sufficiency. Kent County Council supports this approach that is in accordance with national planning policy and the Planning Practice Guidance on Waste 2014 (as amended).

I trust that the above is helpful. If you require any clarification or further information, then please do not hesitate to contact me or my colleague Bryan Geake.

Yours sincerely



Sharon Thompson  
Head of Planning Applications