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Sue Scane
Minerals and Waste Core Strategy Consultation
Environment and Economy
Planning Regulation (Minerals and Waste)
Oxfordshire County Council
Speedwell House
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Dear *Sue*

I wish to make a representation about the Core Strategy as it concerns the abstraction of minerals in Oxfordshire.

This representation maintains that inadequate consideration has been given to the importation by rail into the County from sources elsewhere. If these sources and the railway supply arrangements were judged to be adequate to meet the needs of the County it would be unnecessary to despoil the landscape of the County.

A detailed submission about this will follow shortly. Meanwhile would you please acknowledge receipt of this representation? Please reply to my home address:

[Redacted]

Yours sincerely,

[Redacted]

or by email to [Redacted]

PLEASE REPLY TO:

[Redacted]

From: Bill Bradshaw

Sent: 29 September 2015 20:33

To:

Subject: Oxfordshire County Council - Publication of Minerals and Waste Local Plan: Core Strategy

Herewith my detailed submission referred to in my letter of objection to Sue Scane in September.

'The tonnage of minerals produced in Oxfordshire - just over 1m tonnes p.a. (tpa) in 2013 - is modest: rail movements from sources outside the county could eliminate **all** of this without difficulty. There are clearly specialist materials, such as ironstone and limestone for building and walling stone (and potentially fullers earth), that could not sensibly be replaced and the ash from Ardley is also logically used locally. However, that leaves a lot of sharp sand and gravel - and soft sand - that could easily be sourced from outside the county, thereby avoiding destruction of valuable landscape. Note that ash from Didcot power station has been replaced by a new rail movement from Drax to Appleford in tank containers, which are delivered to the block plants etc where the ash is required.

The Plan acknowledges the role of rail depots and the key objective should now be to increase throughput at the existing depots and, potentially, add a new facility at Bicester. There is also permission for a new rail aggregates depot at Shipton on Cherwell (the old Bletchington cement works site), although this does not look likely to be activated in the near future. Assuming 1m tpa would need to be imported, this would equate to around 20k tonnes per week (tpw) or around 10 standard size aggregates trains (or about 6 super trains) per week. Spread over the existing terminals at Appleford, Oxford Banbury Road and Banbury this is only 3 additional standard trains per terminal per week: add in a Bicester or Shipton terminal and it drops to 2.5 per depot. Even without Bicester or Shipton, there is ample capacity to handle the required tonnage at existing facilities with little or no investment. Finding paths for two additional aggregates trains a day would not be a problem, particularly as trains from the west (Cornwall or the Mendips) can be routed via Swindon or Newbury. Note that the long-standing waste movement from Brentford to Appleford has now ceased and capacity has been created by this - the ash flow from Drax is only using a small proportion of this capacity.

The County's obligations are set out in the NPPF and include a presumption in favour of sustainable development, with local planning authorities expected to 'positively seek opportunities to meet the development needs of their area'. Sustainable development is expected to 'contribute to building a strong, responsive and competitive economy' but also to 'contribute to protecting and enhancing the natural, built and historic environment'. Specifically, the NPPF recognises minerals as being 'essential to support sustainable economic growth and our quality of life' and that there needs therefore to be 'a sufficient supply of material to provide the infrastructure, buildings, energy and goods that the country needs'. Mineral planning authorities are to plan for 'a steady and adequate supply of aggregates (and industrial minerals)', but there is no requirement that such minerals have to be locally won and sufficient capacity at railheads to import aggregates from other areas would

satisfy this obligation. The fact that the importation of materials from elsewhere exists and is growing proves that they are a viable alternative.

The Council's Vision is that minerals should be supplied - in order of priority - from secondary and recycled materials where practical, then from locally won materials and lastly by importation of materials that are not available locally such as crushed rock. Two points emerge from this - that the preferred choice of secondary or recycled materials is not (locally) source-specific and the fact that crushed rock is a perfectly adequate substitute for gravel is ignored. There is no reason why imported crushed rock cannot be substituted for gravel in the vast majority of applications and hence no need to produce gravel locally when it could be replaced by imported crushed rock.

A further vision is that mineral workings and supply facilities will be 'located and managed to minimise the distance that aggregates need to be transported by road from source to market, and to minimise the use of unsuitable roads, particularly through settlements, plus other harmful impacts of mineral extraction, processing and transportation on Oxfordshire's communities and environment'. It would appear that the county's rail depots are located closer to where the aggregates are needed and are on better quality roads than exist in the rural areas where sand and gravel extraction typically takes place. The specific objective to 'minimise the transport impact of mineral development on local communities, the environment and climate change by minimising the distance minerals need to be transported by road and encouraging where possible the movement of aggregates by conveyor, pipeline, rail and on Oxfordshire's waterways' would seem to reinforce this point.

Para 4.7 notes 'there may also be opportunities for recycled or secondary aggregate materials to be supplied from outside the county. For example, china clay waste from Cornwall is supplied to London and use of this material as an aggregate in Oxfordshire could become economic in future, although there is no indication of this happening at least in the short term. In the interests of achieving an overall sustainable supply of minerals to Oxfordshire, where such material is sourced from distance it should where practicable be transported by rail rather than by road.' In fact, china clay sand is now moving by rail from Cornwall to East London and is expected to grow rapidly - there is every reason to expect that it would be economic to rail china clay sand to Oxfordshire, some 70 miles nearer the source. There is also potential to import other secondary or recycled materials, such as building and demolition waste from London and steelworks slag from South Wales. We have already noted the newly established long haul of another secondary aggregate - power station ash - from North Yorkshire to replace locally sourced material from Didcot.

Similarly, looking at other materials, soft sand is already being railed from Wool in Dorset to several locations in the London area and could just as easily meet Oxfordshire's need for binder sand in asphalt plants. However, the key issue is the 1m tpa of sharp sand and gravel which, as we have noted, could very largely be replaced with a combination of china clay sand and Mendip/Leicestershire crushed rock. It is also worth noting that sea dredged sand from the Thames has been railed to Theale for several years and is now starting to move to Appleford - a further demonstrably viable source of supply. Clearly, if concrete batching plants are located

at the railheads, and the ready-mix is delivered thence to site, a highly efficient and economic supply chain is created.

There is already a large bank of permitted sand & gravel reserves in Oxfordshire but, as the County note, these are mostly in the north and west of the county and the proposal is that new reserves should be permitted in the south of the county, particularly to meet the demands from planned housing and economic growth in this area. This is taken as the justification for a new area of extraction between Oxford and Cholsey. As demonstrated above, rather than despoil this area of virgin countryside, demand can be met by increased rail imports through Appleford. Similarly, the gravel extraction area around Caversham and Shiplake can be served instead via the two aggregates terminals at Theale.

Para 6.3 of the Plan states that 'Average per capita carbon dioxide emissions from Oxfordshire are higher than the South East and national averages. The County Council is committed to increasing energy efficiency and reducing emissions'. A highly effective way of reducing CO2 emissions would be to reduce/eliminate HGV moves of sand and gravel across Oxfordshire and replace them with far more energy efficient rail hauls of imported china clay and sea dredged sand, plus crushed rock from the Mendips.'

Bill Bradshaw