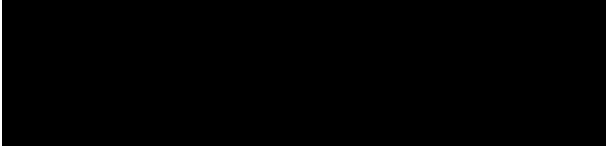


Part 1 – Respondent Details

1(a) Personal details									
Title	Mr								
First Name	Adrian								
Last Name	Duffield								
Job Title (where relevant)	Head of Planning								
Organisation (where relevant)	South Oxfordshire District Council								
1(b) Agent details <i>Only complete if an agent has been appointed</i>									
Title									
First Name									
Last Name									
Job Title (where relevant)									
Organisation (where relevant)									
1(c) Contact address details <i>If an agent has been appointed please give their contact details</i>									
Address Line 1	South Oxfordshire District Council								
Line 2	135 Eastern Avenue								
Line 3	Milton Park								
Line 4	Abingdon								
Postcode	OX14 4SB								
Telephone No.	07717 271 930								
Email address	Planning.policy@southoxon.gov.uk								
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 checked="" type="checkbox"/> A district council</td> </tr> <tr> <td><input type="checkbox"/> Minerals industry</td> <td><input type="checkbox"/> A county council</td> </tr> <tr> <td><input type="checkbox"/> Waste industry</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 checked="" type="checkbox"/> A district council	<input type="checkbox"/> Minerals industry	<input type="checkbox"/> A county council	<input type="checkbox"/> Waste industry	<input type="checkbox"/> Other (please specify)
<input type="checkbox"/> A resident	<input type="checkbox"/> A parish council								
<input type="checkbox"/> A local business	<input checked="" type="checkbox"/> A district council								
<input type="checkbox"/> Minerals industry	<input type="checkbox"/> A county council								
<input type="checkbox"/> Waste industry	<input type="checkbox"/> Other (please specify)								

Please tick the appropriate boxes if you wish to be notified of any of the following:	
Publication of the Inspector's report and recommendations	X
Adoption of the Oxfordshire Minerals and Waste Core Strategy	X

Please tick this box if you no longer wish to be notified of any updates regarding the Oxfordshire Minerals and Waste Core Strategy:

Please sign and date the form:			
Signature:		Date:	24/03/17

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 Proposed Main Modification you are making a representation about

Proposed Main Modification No.
(and part or policy no. or
paragraph if relevant)

2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications 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 incorporating the Proposed Main Modifications is unsound because it is not: (tick as appropriate)

- (i) Positively prepared
- (ii) Justified
- (iii) Effective
- (iv) Consistent with national policy

On the following pages, please set out why you think the Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications 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.

2(d) Please give details of why you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications 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 incorporating the Proposed Main Modifications is legally compliant and/or sound and wish to support this, please also use this box to set out your comments.

South Oxfordshire District Council (the council) welcomes the progress of the Minerals and Waste Core Strategy and recognises its importance as part of the overall Development Plan for the district and the county. The council has concerns about the approach to drafting the Minerals and Waste Plan and the detail provided in the supporting information.

The council therefore submits objections to the overall soundness – the justification and effectiveness - of the draft Core Strategy.

Since February 2014 it has been the preference of the council to see site allocations included within a single Minerals and Waste Core Strategy to aid the council's Development Plan production and to provide some certainty to both communities and developers. The council remains concerned that there are still no new specific mineral extraction sites identified and that the Mineral Strategic Resource Areas remain very widely drawn. This threatens the effectiveness of the Minerals and Waste Core Strategy by not being as clear as it can be about the intensions, which threatens the overall certainty of the Development Plans and Neighbourhood Plans across the county.

MM14 and Policy M2: Provision for working aggregate minerals, sets out the estimated figures of the requirement of the supply of sharp sand and gravel, soft sand and crushed rock for the period 2014 to 2031 inclusive. The supporting text in MM12 advises that the figures are based on the Local Aggregate Assessment 2014 annual provision figures. The text in MM10 states that regular monitoring of aggregates supply and demand in Oxfordshire will be carried out through the plan period and will be recorded in the Minerals and Waste Annual Monitoring Reports and used in the annual reviews of the LAA.

The council is concerned how the figures in the LAA 2014 have been prepared. The methodology for the LAA identifies that the plans for growth in Local Plans across the county and the Strategic Economic Plan will increase the need for aggregates but this is not explicitly quantified or drawn across into the draft Core Strategy, thereby omitting an important justification of special local circumstances.

The council is also concerned that the previous text in policy M2 relating to the "most recent LAA" and the source of these figures has been deleted in the proposed modifications in MM14 and that there is now no provision in the

policy to allow for the monitoring of the aggregates supply or review of the figures set out in policy M2.

The council has concerns regarding the need to open up new minerals extraction sites as it believes that previously used extraction sites have not exhausted all of the minerals reserves at these locations. Appendix G should therefore be revised to take into account previously used minerals extraction sites which could be re-used in order to meet demand. The council believes that these previously used minerals extraction sites could make a significant contribution to supply without the need for new sites.

MM15 and paragraph 4.29 suggest that there will be an equal split of construction activity between northern Oxfordshire and southern Oxfordshire (South Oxfordshire, VoWH and the southern half of Oxford City). MM16 and paragraph 4.30 suggest that there will be a similar equal split in the demand for aggregate.

MM20 and Policy M3: Principal locations for working aggregate minerals, states that the principal locations for aggregate minerals extraction will be within “strategic resource areas” as shown on the Policies Map, and that specific sites will be allocated in the part 2 plan. The issue of the uncertainty such a two-part plan causes has already been raised.

MM20 and Policy M3 also suggests a redistribution of sharp sand and gravel working with 75% of the additional tonnage to be provided in southern Oxfordshire (South Oxfordshire and Vale of White Horse Districts and the southern half of Oxford City) and 25% in northern Oxfordshire (West Oxfordshire and Cherwell Districts and the northern half of Oxford City). Other policies in the plan also refer to policy M3 and this redistribution. Appendix G provides further details and bases this split on “*the shape and geography of Oxfordshire, in particular the location of the river Thames with its limited crossing points and restrictions on many of the bridges, particularly upstream from Oxford*”. Policy M3 states that this “redistribution” or “balancing” will achieve an approximately equal split of production capacity for sharp sand and gravel between northern and southern Oxfordshire by 2031.

The council has concerns over the north/south split proposed in policy M3 and MM20 and concerns over the evidence behind this split. Appendix G provides virtually no justification for a north/south split which could equally have been split east/west or by any other multitude of distribution combinations. Whilst limiting the distance that minerals need to be transported by road is laudable the council believes that this is only one such factor in the selection of mineral extraction sites. Other factors associated with the location of mineral extraction sites should be considered as such factors may outweigh the benefits of reduced travel distances. The suggested wording in MM20 and policy M3 provides no explanation of how minerals extraction would be distributed between South Oxfordshire and the Vale of White Horse districts. The council can see no reason why minerals extraction sites cannot be located towards the west of Oxfordshire in the Vale of White Horse, West Oxfordshire and the western half of Oxford City in order to rebalance extraction in this part of the

county. The council therefore continues to object to policy M3 and modification MM20.

MM16 and paragraph 4.30 states that provision for additional sharp sand and gravel should be met in the first half of the plan period and evidence has not been provided for this timing and this text is not reflected in policy M3.

MM20 and Policy M3 provides the principal locations for working aggregate minerals as shown on the policies map. Mineral Strategic Resource Area 5 (Thames & Lower Thame Valleys – Oxford to Cholsey) covers extensive areas of South Oxfordshire and part of the Vale of the White Horse district. Area 4 covers an area from Caversham to Shiplake.

Area 5 covers an extent of land to the north-west, north and east of the village of Berinsfield. Policy CSEN2 of the council's Core Strategy (adopted 2012) states that a local review of the Green Belt will take place at Berinsfield. This review is to investigate how the potential release of Green Belt land can assist with the regeneration of Berinsfield. The council is currently undertaking a series of consultations and investigations to establish a way forward in this regard. The lack of certainty over the location of future mineral extraction sites would hinder progress in this regard.

Mineral Strategic Resource Area 5 is in a key area of "Science Vale". This has the potential to adversely impact South Oxfordshire District Council's emerging Local Plan and Vale of White Horse District Council's adopted Part 1 Local Plan and emerging Part 2 Local Plan. Science Vale is also supported by the Oxfordshire Local Economic Partnership (OxLEP) in their Strategic Economic Plan. The national significance of Science Vale is continually recognised through government initiatives and investment including the Oxfordshire City Deal.

Minerals extraction within area 5 has the potential to exacerbate traffic congestion at important road junctions, especially with the requirement for a significant number of lorry movements. This traffic congestion and additional movements could significantly impact the delivery of an identified strategic opportunity to relieve congestion and deliver planned growth.

A new north-south link road at Clifton Hampden including a bridge crossing the river Thames is important to the delivery of the Local Plans for both Vale of White Horse District Council and South Oxfordshire District Council and nationally important economic growth committed in Science Vale. Allowing mineral extraction at this location of area 5 could undermine the identification of opportunities to link strategically important areas of housing and employment growth, and directly impact the feasibility and viability of road and bridge construction.

The need for a new river crossing has been established through the Vale of White Horse Local Plan 2031 and land within area 5 within the Vale of White Horse District has been safeguarded for road development. This need is being examined through the drafting of the evidence base of the emerging South Oxfordshire Local Plan. The Vale of White Horse Local Plan includes this new

river crossing as a necessary piece of infrastructure to support development in Science Vale. It is also an important part of the Didcot Garden Town initiative.

The council expects any proposals to ensure that the delivery of the river crossing is not prejudiced or jeopardised in any way.

MM21 and Policy M4: Sites for working aggregate minerals, also advises that specific sites for working aggregate minerals will be allocated in the part 2 plan which causes the same issues as raised above.

MM22 and Policy M5: Working of aggregate minerals, further reiterates the issues of the “balancing” of the location of minerals extraction sites to the south which the council objects to.

MM46 and Policy W3: Provision for waste management capacity and facilities required, also relies on the production of the part 2 plan. Specific sites for strategic and non-strategic waste management facilities are to be allocated in the part 2 plan. The council objects to this approach for the same reasons of uncertainty set out above.

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 incorporating the Proposed Main Modifications 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.

Ideally the plan should include site allocations supported by robust evidence and consultation. However, we appreciate the need for expedience so a clear timeline for site allocations and an intended trajectory for their need and delivery should be included and committed to in the document.

A clearer explanation should be provided that links the increased demand for housing in the housing market area and the development forecast in the Strategic Housing Market Assessment 2014, and the need for land-won minerals especially at the expense of alternatives (such as recyclables) that would have a lesser impact upon local communities. A clearer explanation of how the figures used in the production of the Local Aggregates Assessment (LAA) should be provided. The opportunity to review the figures in policy M2 should be provided within the policy.

An analysis of previously used minerals extraction sites should take place with greater consideration of bringing previously used sites back into use. Appendix G should therefore be revised to take into account previously used minerals extraction sites which could be re-used in order to meet demand and the contribution these previously used sites can make to supply without the need for new sites.

A clearer justification of and the benefits of a north/south split should be provided. The possibility of an east/west split should be examined. A clearer explanation of the benefits of a redistribution of minerals extraction sites should be provided.

The minerals and waste core strategy should take into consideration the policies of the adopted South Oxfordshire Core Strategy, the emerging South Oxfordshire Local Plan along with the adopted Vale of White Horse Local Plan Part 1, any other adopted Development Plan Document or made Neighbourhood Plan in South Oxfordshire. The emerging Minerals and Waste Core Strategy should be adjusted to take into account of adopted policies, allocations and safeguarded land.

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

Please complete Part 2 of the form separately for each separate representation you wish to make, and submit all the Parts 2s with one copy of Part 1 and Part 3.