

CAGE
c/o Wallingford Town Council Office
9 St Martin's Street
Wallingford
OXON
OX10 0AL

admin@wallingfordtc.co.uk

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Minerals & Waste Core Strategy Consultation
Environment & Economy
Planning Regulation (Minerals & Waste)
Oxfordshire County Council
Speedwell House
Speedwell Street
Oxford OX1 1NE

OCC ref: X:\SPED\15.1.2\4\14

Dear Sirs,

Oxfordshire Minerals and Waste Core Strategy – Representation on Additional Documents

Communities Against Gravel Extraction (CAGE) fully supports the representation by Gardner Planning Limited (GPL) on behalf of Oxfordshire Against Gravel Extraction (OXAGE), the county wide alliance of community action groups against gravel extraction. We affirm our support of the conclusions of the GPL representation:

1. That the publication of these additional documents does not alter the case previously made by GPL for OXAGE in its September 2015 submission (which we continue to support) that:
 - the Plan is not legally compliant because it has not been prepared in accordance with the Statement of Community Involvement;
 - the Plan is unsound for reasons set out in the original GPL Representation (September 2015).
2. Rather, the Local Aggregate Assessment November 2015 update and the AMS2015 figures confirm that the Core Strategy is based on an annual production figure which is much too high. The 10-year average figure continues to drop and for sharp sand and

gravel is now (at 0.628 million tonnes per annum, which is just 57% of the Local Aggregate Assessment figure (1.015 million tonnes per annum) on which the Core Strategy is based.

3. The Local Aggregate Assessment takes no account of the proposed increase in recycled Construction, Demolition and Excavation Waste which (as proposed elsewhere in the Core Strategy) will yield an extra 4.463mt in the period up to 2031, an average of some 0.3 million tonnes per annum of raw material.
4. Figures in Assessment of Mineral Site options 2015 show that permitted reserves have risen and, when coupled with the future need for sharp sand and gravel (based on the new figure of 0.628 million tonnes per annum), reinforces the point that no new sites are required. There should be no Part 2 Plan, the Core Strategy should be complete and can now be clear about the lack of need for new sites within the plan period.

We attach the GPL representation as an appendix.

Turning to the **Topic Paper: Preliminary Assessment of Mineral Site Options** (ASMO), and notwithstanding our contention about the lack of need for new sites within the plan period, we wish to make the following additional representations:

5. The weightings for each criterion are based on a traffic light system of Red, Amber and Green (RAG). However, not all the criteria define a Red weighting (the site is unlikely to be acceptable for minerals development). An example of this is the Agricultural Land Classification, where National policy and the OCC Core Strategy direct development away from soils graded 1, 2 or 3a, to safeguard their long term potential for food production. Despite this, OCC has chosen Amber for all soils graded 1, 2 or 3a rather than a combination of Red (say for 1 and 2) and Amber (for 3a). This omission of a red weighting for all criteria creates an inherent bias in the weighting system in favour of development. In our opinion a red weighting should be defined for all criteria.
6. Paragraph 2.10 of the ASMO (Traffic Impacts) correctly reiterates the requirement of Policy M4 that allocated sites take into account the suitability and accessibility of the

primary road network. However, when ascribing the RAG weightings to be given to sites, only the accessibility is weighted. Specifically, weightings are given solely on the basis of proximity to the lorry network (a 'through route', 'link to larger towns', 'link to smaller towns' or 'local access route' as shown on Figure 13 in the Core Strategy). The weightings take no account of the suitability of the network, including whether or not current and projected congestion levels can accommodate the additional lorry movements that would be generated by the site. We therefore contend that the weightings for traffic impacts are deficient.

7. Paragraph 2.20 of the ASMO gives a criterion of Proximity to Residential Areas, stating that "*Mineral workings are unlikely to be acceptable in close proximity to residential areas. Where a site is within 100m of a residential area, the effects are likely to be such that they are unacceptable in terms of residential amenity*". It sets the Red weighting at "whole site within 100m (of residential areas)". This is fatuous, no economically viable sand and gravel working will have an area so small that the whole area will be within 100 m of residential areas, Consequently, all sand and gravel sites in the ASMO have an Amber or Green rating under this criterion, which increases the bias of the rating system in favour of development.
8. Under the Proximity criterion, no weighting is given for proximity to industrial and commercial properties (and areas zoned for future "Hi-Tech" development). We consider this a material oversight, given the number of "Hi-Tech" businesses in Oxfordshire and the sensitivity of many of these to vibration, noise and dust.
9. Under the proximity criterion, no weighting is given for proximity to sensitive receptors down wind of the site (in the prevailing wind direction) at distances greater than 100m to which particulate, gaseous pollutant and noise emissions from the site could be carried. We consider this a material oversight, given that there are sensitive receptors within 1km of some of the sites as well as Air Quality Management Zones.
10. There is no weighting given for proximity to a protected airfield. This is clearly a serious omission, as RAF Benson is close to many of the sites. The particular issue is the

prevention of bird strikes as a result of large water fowl being attracted to open water created by mineral workings. We therefore contend that the RAG analysis as currently presented by OCC is fatally flawed by this omission.

11. Site SG-33 Land South of Wallingford, New Barn Farm

Section 3.2 g) of the ASMO contains the Summary of Assessment Result for site SG-33 Land South of Wallingford, New Barn Farm. It states

“The site is located in the setting of (adjacent to) the North Wessex Downs AONB, within the IRZ for Little Wittenham SSSI (SAC), within a principal aquifer and close to residential properties, therefore the site has been assessed as Amber”.

This is drawn from Appendix 2 of the ASMO, which shows the following weightings:

Weighting	OCC Comment	CAGE Comment
Within 1km of main lorry network or adjoining a railhead or navigable waterway?(M4(e), M4(g), C10)	Adjoining A 4130	OCC Highways department has commented in relation Planning Application P14/S2860/O, Slade End Farm (Site “B”) that the roundabouts on the A4130 are already running at capacity (see below)
Within 1km of AONB? (M4(h), C8)	Adjoins North Wessex Downs and within 1 Km of Chilterns AONB	Adjoins North Wessex Downs and within 1 Km of Chilterns AONB
Within water catchment area or within 200m of SAC? (M4(i), C7)	No	No
Within or within Impact Risk Zone of SSSI? (M4(i), C7)	Within outer impact zone to Little Wittenham SSSI (i.e. Little Wittenham SAC)	
Within or adjoining locally designated areas of nature conservation?(Local Nature Reserves, Local Wildlife Sites, Sites of Local Importance for Nature Conservation - M4 (k)i, C7)	No	Presence of protected species on site; site in close proximity to Thames Wallingford – Goring Target Conservation Area (an Oxfordshire designation)
Within or adjoining World Heritage Site, listed building, conservation area, historic battlefield, registered park or garden(M4 (j)(k)i and C9)	Adjoins one Listed Building.	Grade II Listed Building is within the site. Access to second Grade II listed building (which is in close proximity to the site) passes through the site. The Cholsey and

		Wallingford heritage railway and the Agatha Christie Trail are immediately next to the northern boundary of the site.
Within or adjoining Scheduled Monument or non-designated assets equivalent to scheduled monument. (M4 (j)(k)i and C9)	There are no designated assets that may constitute a constraint.	The current landowner has not allowed access to independent archaeologists to investigate a potential Roman road and Iron Age earthworks on the site.
Percentage area in Flood Zone 3 (M4(k)iii, C3)	3.21%	
Source Protection Zone	No	
Groundwater vulnerability Zone (M4 (k)iii,C4)	Part of site in Principal Aquifer - High; rest of site in Principal Aquifer - Intermediate.	OCC has not considered the impact that excavation on this site may have on the aquifer and thus the Thames Wallingford – Goring Target Conservation Area
Agricultural Land Classification (M4 (k)iv, C6)	Grades 2 & 3a	National policy and the Core Strategy direct development away from soils graded 1, 2 or 3a, to safeguard their long term potential for food production.
Within 100m of a residential area? (M4(k) vi, C5)	Part of site within 100 m of residential property	
Will site result in a new quarry within 1km of an extant mineral planning permission? (Cumulative impacts - M4 (l))	No	No, but the assessment fails to note that this suite is within 1km of site SG 60.
Within the bird strike protection zone of a protected airfield	(omitted from the assessment criteria by OCC)	Site within the bird strike exclusion zone for RAF Benson
Notes	Part of site is likely to be submitted as a planning application for new quarry by Grundons in April 2016SG	
RAG Assessment		

11.1. Hydrology, Fauna & Flora

The site is located over a main aquifer which appears to flow towards the River Thames in a south-easterly direction. The distance from the eastern boundary of the site to the Thames ranges from 560m to 960m. This stretch of the Thames is part of the Thames Wallingford to Goring Conservation Target Area (“W-G CTA”), an Oxfordshire Designation. Operations will likely impact on the flora and fauna of the W-G CTA (which include nationally important protected plant and reptile species). The

reptile species, which is also found on the site, is particularly sensitive to vibration. Otters have been seen in the stream close to the proposed workings. The site itself is currently undisturbed and supports a rich variety of birds as is regularly recorded in the Cholsey Parish magazine.

11.2. Traffic

Oxfordshire County Council itself has pointed out in its responses to Planning Application P14/S2860/O, Slade End Farm (Site “B”), Wallingford regarding the impact of that development on the A4130,

“It was found, and acknowledged, that the Portway and Crowmarsh Roundabouts and to a lesser extent the Winterbrook Roundabout, are presently at capacity, with RFCs on some arms at or above 0.85. In the horizon year of 2024, baseline flows even without development (of 550 homes at Site B), were predicted to rise further, with 1.0 RFCs and above on some arms.”

The site will require approximately 70 vehicle movements per day to export won minerals and import fill materials. Additional movements will be required for staff and service vehicles. Together, these additional movements and the congestion already identified indicate that, under a suitability criterion, the site would be weighted Red.

11.3. Air Quality

Sensitive receptors within 1km of the site include the Mongewell nursery, the residential area of Winterbrook and Wallingford Hospital (which includes a maternity unit).

11.4. As a consequence of the foregoing, we conclude that the OCC RAG assessment for site SG-33 is incorrect and this should be revised to Red.

12. Site SG-60 White Cross Farm, Wallingford

Section 3.2 k) of the ASMO contains the Summary of Assessment Result for site SG-60 White Cross Farm, Wallingford. It states:

“The site is located in the setting of (adjoining) the Chilterns AONB, and is also approximately 1km from the North Wessex Downs AONB. It is within the outer IRZ for Warren Bank SSSI and adjoins listed buildings. It is also located on a principal aquifer and within 100m of residential properties. Therefore the site has been assessed as Amber.”

This is drawn from Appendix 2 of the ASMO, which shows the following weightings:

Weighting	OCC Comment	CAGE Comment
Within 1km of main lorry network or adjoining a railhead or navigable waterway?(M4(e), M4(g), C10)	Adjoins A329 & A4130	OCC Highways department has commented in relation Planning Application P14/S2860/O, Slade End Farm (Site “B”) that the roundabouts on the A4130 are already running at capacity (see below)
Within 1km of AONB? (M4(h), C8)	Adjoins Chilterns AONB. North Wessex Downs lies approximately 1Km to south.	
Within water catchment area or within 200m of SAC? (M4(i), C7)	No	No
Within or within Impact Risk Zone of SSSI? (M4(i), C7)	Within outer impact zone to Warren Bank SSSI.	
Within or adjoining locally designated areas of nature conservation?(Local Nature Reserves, Local Wildlife Sites, Sites of Local Importance for Nature Conservation - M4 (k)i, C7)	No	Site partially located in the Thames Wallingford – Goring Target Conservation Area (an Oxfordshire designation) with the remainder of the site immediately adjoining it. Presence of protected species on site.
Within or adjoining World Heritage Site, listed building, conservation area, historic battlefield, registered park or garden(M4 (j)(k)i and C9)	Listed Buildings in Mongewell Park to east of River Thames which forms boundary of site	Site located immediately next to the Thames Path (a National Trail)
Within or adjoining Scheduled Monument or non-designated assets equivalent to scheduled	There are no designated assets that may constitute a constraint.	

monument. (M4 (j)(k)i and C9)		
Percentage area in Flood Zone 3 (M4(k)iii, C3)	77.42%	The only viable location for processing equipment out of the flood zone would be 200m from the nearest residence.
Source Protection Zone	No	
Groundwater vulnerability Zone (M4 (k)iii,C4)	Part of site in Principal Aquifer - High; rest of site in Principal Aquifer - Intermediate.	Site mainly within Principal Aquifer - High
Agricultural Land Classification (M4 (k)iv, C6)	Grades 4	
Within 100m of a residential area? (M4(k) vi, C5)	Part of site within 100 metres of residential properties at Carmel College, Elizabeth House & Mead Furlong.	Processing plant will be within 300m of the nearest properties in Winterbrook
Will site result in a new quarry within 1km of an extant mineral planning permission? (Cumulative impacts - M4 (l))	No	No, but the assessment fails to note that this suite is within 1km of site SG 33.
Within the bird strike protection zone of a protected airfield	(omitted from the assessment criteria by OCC)	Site within the bird strike exclusion zone for RAF Benson
Notes	Close to the River Thames for potential water transport as well as adjoining A329 & A4130 but largely overlies Major Aquifer - High. Scoping Opinion and pre-application advice have been provided for mineral extraction and after-use as marina.	To gain access to the River Thames for water transport, dock facilities would have to be built within the Thames Wallingford – Goring Target Conservation Zone and along the Thames Path (National Trail). Such a dock facility would impact upon rowing on the longest stretch of the Thames without locks.
RAG Assessment		

12.1. Hydrology, Fauna & Flora

The site is located over a main aquifer. At the closest point, the eastern boundary of the site is just 30 m from the Thames. This stretch of the Thames is part of the Thames Wallingford to Goring Conservation Target Area (“W-G CTA”), an Oxfordshire Designation and approximately one third of the site will lie within it. Operations will negatively impact on the flora and fauna of the W-G CTA (which include nationally important protected plant and reptile species) through habitat destruction and removal. The reptile species is particularly sensitive to vibration and loss of habitat will have a

negative impact on the viability of the remaining population (removal of habitat will reduce the size of the population that the remaining habitat can support). Otters have been seen in the Thames and a stream close to the proposed workings. The site itself is currently undisturbed and supports a rich variety of birds.

12.2. Traffic

There is no realistic opportunity to use water transport for this site, as the docking facilities would:

- result in further removal of the W-G CTA:
- cross the Thames Path (National Trail): and
- have a negative impact on rowing on the longest stretch of the Thames between locks.

This length of this reach is the reason why three major national rowing clubs (Oxford Brookes Boat Club, Oxford University Boat Club and Wallingford Rowing Club) use it and have invested substantially in their local facilities. These clubs train here for the Boat Race, national championships and the Olympic Games, as well as training a very large number of juniors learning the sport.

The only viable option for transport of won minerals (and for the import of inert materials if these are to be used for backfill) would be road transport. As Oxfordshire County Council itself has pointed out in its responses to Planning Application P14/S2860/O, Slade End Farm (Site "B"), Wallingford regarding the impact of that development on the A4130,

"It was found, and acknowledged, that the Portway and Crowmarsh Roundabouts and to a lesser extent the Winterbrook Roundabout, are presently at capacity, with RFCs on some arms at or above 0.85. In the horizon year of 2024, baseline flows even without development (of 550 homes at Site B), were predicted to rise further, with 1.0 RFCs and above on some arms."

The site will require approximately 40 vehicle movements per day to export won minerals and import fill materials. Additional movements will be required for staff and service vehicles. Together, these additional movements and the congestion already identified indicate that, under a suitability criterion, the site would be weighted Red.

12.3. Air Quality

Sensitive receptors within 1km of the site include the residential areas of Mongewell and Winterbrook (including a nursing home). Winterbrook residents will be between 300m and 1000m from the processing plant. Wallingford Hospital (which includes a maternity unit) will be 1,200m from the processing plant.

12.4. As a consequence of the foregoing, we conclude that the OCC RAG assessment for site SG-33 is incorrect and this should be revised to Red.

Yours sincerely,

J Allen

On behalf of CAGE

Attachments:

1. Representation by Gardner Planning Ltd on behalf of OXAGE
2. Thames Wallingford – Goring Conservation Target Area