

BACHPORT  
(Burcot and Clifton Hampden Protection of River Thames)

RESPONSE TO THE OCC CONSULTATION ON ADDITIONAL  
DOCUMENTS

JUNE 2016

PROPOSED SUBMISSION CORE STRATEGY PART 1

## 1. Introduction

- 1.1. This response has been prepared by Burcot and Clifton Hampden Protection of River Thames (Bachport) to the consultation by Oxfordshire County Council (OCC) on the 'post-submission examination documents' in response to concerns raised by the Inspector in his letter to OCC of 22 January 2016.
- 1.2. Bachport represents the interests of Clifton Hampden & Burcot Parish Council, Long Wittenham Parish Council, Appleford Parish Council and Culham Parish Council.
- 1.3. Bachport is a participant member of Oxfordshire Against Gravel Extraction (Oxage) and fully endorses the representation on these additional documents made by Gardner Planning on behalf of Oxage.
- 1.4. However Bachport wishes to make some additional comments on the *Oxfordshire Local Aggregate Assessment Interim Update 2015* and the *Preliminary Assessment of Mineral Site Options* to those comments put forward by Oxage.

## 2. Oxfordshire Local Aggregate Assessment Interim Update 2015

- 2.1. Bachport fully endorses the view of Oxage that the Interim Update on production figures for sand and gravel (S&G), together with the absence of any consideration of the use of future alternative materials for aggregate, continues to underline the absurdity of the 2014 LAA figure for annual future demand for S&G, a figure on which the Oxfordshire Minerals and Waste Core Strategy (OMWCS) depends.
- 2.2. There is no new evidence in the Interim Update to support the continued stance of the 2014 LAA for a figure of 1.015mT pa for the period of the plan, a figure which is now 54% above the most recent 10 year average of sales. Rather the evidence in this document (and in the subsequent Annual Monitoring Survey published 2 June 2016) continues to support the evidence that the 2014 LAA figure of 1.015mT pa is far too high.
- 2.3. The 2014 LAA figure is based on an assumption that Oxfordshire's 10 year average has been artificially lowered by the recession and mothballing of quarries. However Oxfordshire's sales were steadily falling prior to 2007. They had in fact almost halved from 2001 to 2007 (1.612 mt in 2001 to 0.893 mt in 2007) in times of economic boom and before any mothballing of quarries. The 3-year average sales in the November update confirms that the trend is for sales continuing at a low level (0.533 mtpa 2012 – 2014), and below the 10 year average of 0.66mT (2005-2014). A sharp increase from 2013 to 2014 in production of S&G reflects the re-opening of Sutton Courtenay quarry in late 2013, a factor entirely consistent with a return to a

period of economic growth, but not in itself warranting a 54% increase in the average 10 year sales data over the lifetime of the plan.

- 2.4. Indeed the revised 10 year figure of 0.63mT (2006-2015) is 23% lower than the 2013 LAA forecast figure of 0.81 mT identified in the draft version of the OMWCS issued for consultation in February 2014, and which was at that time identified as providing significant headroom to accommodate possible changes in local circumstances such as an increase in economic activity and consequent demand for aggregates, and which would now appear to be a far more realistic provision for the plan based on the update.
- 2.5. At this previously assessed level of provision (0.81mT) there is sufficient existing supply to last for more than 16 years<sup>1</sup> which is the duration of the plan period, before taking into account any increase in other sources of aggregate from recycled materials. This reinforces our view that there is no immediate need whatsoever for new reserves to be identified until at least the end of the plan period to maintain ongoing supply.
- 2.6. Table 1 shows the GB growth of aggregate material between 2013 and 2014, published by the Mineral Producers Association (MPA). The only source of aggregate which showed a fall in demand between 2013 and 2014 was for land-won sand and gravel. This trend is a continuation in the underlying trend for substituting the supply of land-won sand and gravels with recycled aggregates over the last 35 years, as shown in Table 2 which sets out the changes in market share between land-won mineral and recycled aggregates as a proportion of the total market for aggregates.

**Table 1: GB Market Summary 2014<sup>2</sup>**

	<b>2013</b>	<b>2014</b>	<b>2013-14 growth</b>
Crushed Rock (mT)	82.4	93.6	13.6%
Sand and Gravel (mT)	51.9	52.1	0.39%
Land won	41.3	40.3	-2.4%
Marine	10.6	11.8	11.3%
Recycled CDE (mT)	55.7	60.2	8.1%
Total Aggregate (mT)	190.1	205.9	8.31%

<sup>1</sup> AMS2015 Tabel 3 12.487mT at 31.12.15 with the addition of 0.75mT from the Oxford Flood Alleviation scheme deliverable during the plan period as noted paragraph 4.32 OMWCS

<sup>2</sup> “Minerals Products Industry at a Glance 2015 Edition”, Table 3.1.c, Mineral Producers Association

**Table 2: Market Share of Total Aggregates by volume 1980 - 2014<sup>3</sup>**

	<b>1980</b>	<b>2014</b>
Crushed Rock	47%	45%
Sand and Gravel	44%	26%
Land won	38%	20%
Marine	6%	6%
Recycled CDE	9%	29%

- 2.7. Recycled aggregate is continuing to undergo significant advances in capability. New recycled aggregate wash plants systems are in operation that enable the production of higher quality substitute aggregate from construction, demolition and excavation (CDE) waste that can now supply the full range of sized and graded aggregates, as well as coarse and fine sand and ballast, equivalent to the products that would be offered by a local quarry. The quality of the products that they manufacture is to such a high level that they can also be used to manufacture concrete and concrete products. In addition the wash plants are increasingly able to process greater proportions of CDE waste. All of this means there is still considerable scope to increase levels and use of recycled aggregate as a direct substitute for primary land won materials.
- 2.8. Furthermore the wash plant used for CDE waste is very similar to that of a sand and gravel processing plant, but is not dependent on the location of mineral reserves, or the costs involved in extracting them, and does not affect or require large areas of land, and so therefore has more opportunity to be located close to the product markets, reducing transportation costs. Far from the production of recycled aggregate being prohibitively expensive, it is in fact a very cost effective as well as a more environmentally sustainable and resource efficient alternative to land won sources.
- 2.9. These fundamental changes in the sourcing and availability of materials in the aggregates industry highlights the urgent need for the Oxfordshire LAA to be updated to consider the 4.463mT of available recycled CDE implicitly forecast in the Waste Section of the Core Strategy, as set out in the table p13 of the OXAGE report, on the future provision of aggregate supply from land-won sources.

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<sup>3</sup> “Minerals Products Industry at a Glance 2015 Edition”, Table 3.1.d, MPAAssociation

### 3. Preliminary Assessment of Mineral Site Options

- 3.1. This document describes the preliminary assessment of sites nominated for mineral extraction in the OMWLP. The assessment has been undertaken at a strategic level to inform the potential deliverability of the OMWCS and identifies 23 possible sites containing some 50mT of S&G material.
- 3.2. Bachport wish to make the following observations on the preliminary assessment of sites, in particular in respect to the site listed as SG-17 “Land at Culham” (but which should be correctly called Land at Clifton Hampden as more than 90% of the identified land is in that parish). Since the site was first identified in the call for sites a new heritage asset has been identified and granted Scheduled Monument status<sup>4</sup>. This has significantly changed the deliverability of the site, in particular by reducing the area (and available resource) for consideration by nearly a half.
- 3.3. SG-17 is currently the subject of a planning application for a new 2.5mT sand and gravel quarry by Hills Quarry Products (April 2016), even though there is currently no requirement for a new quarry to meet ongoing demand due to the very large existing landbank of over 12mT, a landbank equivalent to more than 19 years supply based on the updated 10 year average sales of 0.63mT 2006-2014. Prior to the application a Scoping Opinion request was made in April 2014 for the site which identified a number of concerns with regard to traffic, flooding and landscape setting, and which could have informed the updated RAG assessment.
- 3.4. The planning application is unlikely to be determined before the Inspector’s examination of the Core Strategy in September and therefore it continues to remain relevant to address the preliminary RAG assessment of this site contained within this paper. The remainder of this response addresses some of the criteria used in the RAG assessment in more detail.

#### Traffic Impacts

- 3.5. This assesses the traffic impact by looking at whether a site can create a direct access on to the main lorry road network. However the traffic impact criteria also acknowledges the need to take into account the traffic impact on local communities (paragraph 2.10).
- 3.6. Although lorries from site SG-17 could directly access the A415, all lorries from this site would also be required to pass along this road and through either the heart of both Clifton Hampden and Burcot villages or through the town centre of Abingdon (a designated AQMA zone) before being able to disperse onto the wider lorry route network. In our view this traffic impact (dispersal of lorries onto the wider lorry

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<sup>4</sup> SM 1421606 Round Barrow Cemetery at Fullamoor Plantation, Dec 2014

network without impacting local communities) should and could be considered at this preliminary assessment stage to be consistent with the objectives of the OMWCS.

- 3.7. In the case of SG-17 we believe the traffic assessment should be given a rating of amber because of the traffic impact on local communities. Indeed unacceptable traffic impacts were noted by OCC officers as a reason for not taking this site forward in the withdrawn OMWCS (2012)<sup>5</sup>.

#### AONB

- 3.8. This criteria assesses the distance to a site from an AONB and has been arbitrarily defined as 1km.
- 3.9. SG-17 is approximately 1.5km from the boundary with the North Wessex Downs AONB and is intervisible with the AONB, particularly from Wittenham Clumps a well known elevated public viewpoint. Indeed, the North Wessex Downs AONB has submitted a response in regard to the planning application for SG-17 which states the proposed site area would have the potential to impact the AONB, in particular the views from Wittenham Clumps, as well as adversely affect both the Thames National Trail and River Thames waterway, which run adjacent to the proposed site boundary, and for which no weight has been identified in the assessments of sites. We would suggest the relevant criteria should be whether the site is visible from a public viewpoint within an AONB or from any other nationally important amenity, and whether it would therefore have an impact on users of that viewpoint, rather than relying on an arbitrarily defined distance.
- 3.10. Consequently, and particularly in light of the recent response from the North Wessex Downs AONB to the planning application regarding this site, we believe SG-17 should be given an amber weighting on this criterion in the assessment of sites.

#### Heritage Assets

- 3.11. No mention is made of SG-17 adjoining the conservation area of both Clifton Hampden and Long Wittenham villages. The site also adjoins Fullamoor Farmhouse a historic residential building of equivalent heritage status to a listed building, as acknowledged by the applicant in their recent planning application. This criteria should therefore be amended for SG-17 and designated amber to be consistent with the RAG grading of heritage assets for other sites in South Oxfordshire (e.g SG-13, SG-33).

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<sup>5</sup> Email from Lois Partidge, OCC to Suzi Coyne, Suze Coyne Planning, August 2011, attached as an Appendix

- 3.12. Since the list of sites was first identified in 2007 SG-17 has had a Scheduled Monument designated at Fullamoor Plantation, and which is acknowledged in paragraph 3e to impact half of the identified site. However paragraph 3e goes on to say “it may be possible to deliver some of the site avoiding the SM, depending on further investigation”. It is worth noting that both the County Archaeologist and Historic England in their responses to the consultation for the recent planning application, have suggested that the current application proposal for the site would have a high impact on the setting of the scheduled monument, and this effect would be neither temporary or minor<sup>6</sup>.
- 3.13. Notwithstanding these comments on the current planning application, a similar comment on site deliverability to that made for SG-17 in the RAG assessment could also be made in respect of Site SG-13, but has not been. SG-13 is comprised of 3 separate land parcels, the largest of these parcels being of a similar size to SG-17. This largest land parcel contains a small group of scheduled monuments that, in terms of scale and land area, are no greater a grouping than the single monument at SG-17, and which are no less separable from the overall land parcel than for the monument at SG-17. Therefore this land parcel at SG-13 and SG-17 should be accorded the same weight when considering deliverability of either site in view of the heritage assets.

### Flooding

- 3.14. The area of flood zone 3 in the amended area of SG-17 is assessed at 56% according to the planning application documents. According to the criteria in the assessment this would not affect the rating of this site as the criteria has been set at >80% flood zone 3.
- 3.15. However we believe focussing on the percentage of land in floodplain 3 is insufficient for this preliminary assessment. For example 90% flood zone 3 for a land parcel of 20 hectares has arguably less potential impact than the working of 50% of flood zone 3 on a land parcel of 100 hectares. Similarly the flood zone of a minor river may be less important than a major river, and for some sites the surrounding area may be more or less vulnerable to the impacts of river flooding and therefore be more or less vulnerable to mineral working in the floodplain. These factors are already known and should be considered.
- 3.16. A comparison of SG-03 and SG-17 serves as a good example to highlight the weakness of this criteria as currently applied. Both sites are located alongside the River Thames. 97% of SG-03 is in floodplain 3 but this represents an acreage of c. 6 hectares of floodplain. The nearby residential area of Benson has not been prone to river flooding. SG-17 in comparison has only 56% of the land area in flood zone 3, but this represents an area of 58 hectares of floodplain of the River

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<sup>6</sup> OCC Consultation Responses planning reference MW.0039/16, April 2016

Thames. Clifton Hampden village is immediately downstream of this area and has been vulnerable to several periods of flooding in the last ten years, leading to local road closures and with little freeboard from 'no flooding' to 'actual flooding' for a number of residential properties in the High Street. Yet SG-03 has been designated 'amber' and SG-17 'green' in the RAG preliminary assessment of sites.

#### Agricultural Land

- 3.17. All the land within site SG-17 is designated Grade 2 according to the regional agricultural land grade maps and which is determined as Best and Most Versatile (BMV) land. The recent planning application has suggested some of the land is not BMV but grade 3b and this has been noted in the RAG assessment, but insufficient evidence has been presented with the application to support this assertion, a matter which has been queried by both Bachport and Natural England in their application responses. Until any reliable evidence is forthcoming and accepted, all of the land area of site SG-17 should continue to be identified as BMV.
- 3.18. At present this criterion does not distinguish between sites which are almost entirely BMV and those with a mixture of BMV and other poorer land grades. The RAG assessment would be better served if an indication of the amount of BMV land affected within each site is recorded (in hectares), since this is the relevant concern for planning purposes. This is deliverable at this stage of the assessment.

#### Cumulative Development

- 3.19. Site SG-17 lies within 1km of the extant planning permission at Bridge Farm, Appleford. Accordingly this should be amended in the RAG assessment results and graded amber in accordance with the criteria.
- 3.20. Furthermore SG-17 is under investigation for a new road route to connect the Science Vale area between Didcot and the Culham Science Centre. This need has been documented for some time in both the emerging Vale of White Horse and South Oxfordshire District local plans and in the Local Transport Plan LTP4. Although the route planning is still at an early stage, there will be a requirement for safeguarded land within the remaining site area, and this should have been noted and considered in this updated preliminary assessment. This identified constraint should support an amber, or possibly even a red grading on this criterion for this site.



## Green Belt

- 3.21. The Green Belt has not been given any weight in the initial RAG assessment of sites. While mineral working is not considered inappropriate development in the Green Belt, any proposed site within the Green Belt would nevertheless have to demonstrate that the benefits of creating a site in the Green Belt would outweigh any harm to the Green Belt, would not conflict with the purpose of including that land in the Green Belt, and would continue to preserve the openness of the Green Belt in accordance with NPPF guidance. This requirement is no less important in planning terms than many of the other criteria used for this preliminary site assessment (e.g. whether a site is within 1km of an AONB or within 1km of an extant mineral permission), indeed it is as relevant a consideration, and therefore should form one of the criteria for preliminary site assessment. It is our view that as very few of the 23 possible sites lie within the Green Belt, any site lying wholly in the Oxford Green Belt should be awarded an amber rating.

## 4. Conclusion

- 4.1. The Oxfordshire Local Aggregate Interim Update provides no new evidence in support of the 2014 LAA figure for an annual requirement for the plan period of 1.015mT. Indeed the evidence continues to support a lower figure closer to that from the 2013 LAA of 0.81mT and which is confirmed by the most recent results of the Annual Monitoring Survey published 2nd June 2016.
- 4.2. The evidence for a lowering of the LAA figures is further supported by the continued move towards recycled aggregates over land-won supply. An increase of more than 4mT has been identified in the Waste Section of the OMWCS and which has been unjustifiably ignored in the LAA assessment for land-won provision.
- 4.3. The preliminary assessment of sites has not taken into account a number of factors that have emerged during recent years for SG-17, in particular the impact of the Scheduled Monument on the deliverability of the site and the requirement to safeguard part of the remaining land for a new road route. Furthermore, some of the other criteria used in the assessment are too arbitrarily defined, leading to a 'green' rating for factors that have been readily identified as areas of planning concern for this site.
- 4.4. If the RAG assessment were updated in light of these concerns, including the addition of Green Belt as a criterion, we believe there are as many if not more concerns than those identified for site SG-13 (rated red overall) and the overall rating for this site should be considered red rather than amber.

## APPENDICES

Best regards,  
Sue

**From:** Partridge, Lois - Environment & Economy - ESPPC [mailto:Lois.Partridge@Oxfordshire.gov.uk]  
**Sent:** 02 August 2011 09:24  
**To:** Sue Coyne  
**Cc:** Day, Peter - Environment & Economy - ESPPC  
**Subject:** RE: CAGE

Sue,

Thanks for your email, I'll try to go through each bullet point.

SG-17 Land at Culham has not been taken forward because of the issues with access from the site. If HGVs turn right out of the site and go through Clifton Hampden to reach the A4074, they would be contributing to congestion and there would be a significant impact on local amenity. If HGVs turned left, they would have to either go through Abingdon town centre or go over the bridge to Sutton Courtenay and go through Sutton Courtenay village, with a similar impact on local amenity. The preliminary site assessment does not highlight the more subjective criteria of impact on local communities particularly well, the only transport criterion being proximity to the main road network.

The archaeological report for SG-09, prepared by Hugh Coddington, is attached. It describes the presence and extent of the archaeological assets on the site and highlights the presence of assets which are of equivalent significance to scheduled sites.

I attach scanned nomination forms for SG-09, SG-13, SG-17, SG-41, SG-42, and SG-59, as requested.

We don't have a copy of the borehole investigations carried out by D.K Symes in 1992, but I have written to Martin Layer at Smiths to request a copy for our records and to forward to you.

As you are probably aware, a minerals sites document was published in 2007. Cholsey parish council submitted a response to the inclusion of two sites, SG-33 and SG-46. SG-46, which was land identified by the council as having potential resources but no nomination, has since been withdrawn from the potential list of sites available. Both of the parish council's responses were submitted by Gill Williams, on behalf of Ian Miles. The council was advised at that time that the proposed strategy was not sufficiently spatial and therefore, following the publication of the revised PPS 12 guidance in 2008, work started again on development of the options during 2008 and 2009.

Cholsey parish council was invited to attend both of the workshops which we held for parish councils to discuss our development of the mineral strategy options. The first invitation was issued in December 2009 to Mr Miles, the clerk to Cholsey PC; Mr Mark Gray attended the workshop at Benson in March 2010. This was a facilitated workshop at which officers gave a presentation on the initial set of draft options for minerals extraction. Delegates then had the opportunity to comment on these options; these comments were captured by the facilitators and a full report of the workshop was prepared. This is on our website:

[http://www.oxfordshire.gov.uk/eps/portal/publicsite/councilservices?WCM\\_GLOBAL\\_CONTEXT=http://eps.oxfordshire.gov.uk/eps/wcm/connect/0cc/InternetCouncil+Services/Environment+and+planning/Planning/Planning+Site+Consultation+Environment+and+Economy+Planning+Planning+Options+and+Options+Planning+Planning+Options+and+Options](http://www.oxfordshire.gov.uk/eps/portal/publicsite/councilservices?WCM_GLOBAL_CONTEXT=http://eps.oxfordshire.gov.uk/eps/wcm/connect/0cc/InternetCouncil+Services/Environment+and+planning/Planning/Planning+Site+Consultation+Environment+and+Economy+Planning+Planning+Options+and+Options+Planning+Planning+Options+and+Options)

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The workshop attended by Mr Gray at Benson was one of a series of three we held around the county; three further workshops were held in July 2010 when the options had been revised. Mr Gray attended the further workshop at Benson in July 2010 on behalf of Cholsey Parish Council. The format of the workshops was the same as in March, and again the report from the workshop and the presentation given is on the website. At both of these workshops, the Cholsey area was included in the possible options for future working.

I will be in touch shortly when I have heard back from Martin Layer, but in the meantime I hope this provides all the information you need.

Regards,

Lois

Lois Partridge  
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01865 815398

**From:** Sue Coyne [mailto:sue.coyne@ntworld.com]  
**Sent:** 01 August 2011 14:28  
**To:** Partridge, Lois - Environment & Economy - ESPPC  
**Subject:** CAGE

Dear Lois

We have been looking at the various proposed sites for further sand and gravel extraction in South Oxfordshire and have a couple of queries, which I hope you might be able to help with.

- SG-17 Land at Culham seems to score quite positively, but has not been taken forward. Are there any other issues limiting this site not referred to in the site assessment table?
- SG-09 Land N of Deynton St Leonard and SG-42 Nazeham Courtenay are coloured red on archaeology grounds in the site assessment table. It is clear from the table that part of this score for SG-42 is Nazeham Courtenay Park, however, please could you clarify what the level of archaeological interest is that otherwise affects these sites, and how much of each of the sites is affected by the constraint.

In addition I would be grateful if you could provide copies of the following information:

- The nomination forms for sites SG-09, SG-59, SG-13, SG-17, SG-41 and SG-42.
- Borehole investigation by D.K Symes ref 8892 March 1989, ARC Ref: 924 April 1992 - as referred to under the Geological Investigation section of the site nomination form for SG-33 dated January 2006.
- Details of the manner in which Cholsey Parish Council have been involved in the various stages of evolution of the minerals core strategy, i.e. when they have been invited to comment, on which document/proposal, whether they have been invited to any meetings or presentations etc.

Many thanks for your help.