

**Minerals and Waste Local Plan: Part 1 – Core Strategy, 2015
Consultation on Additional Documents April 2016**

Summary of Comments Received with County Council Responses July 2016

A. General Comments on the Additional Documents

Respondent Name & No.	Summary of Comments	County Council Response
Central Bedfordshire and Bedford Borough Council (006/ac/1)	No comment	Noted.
Anglian Water (015/ac/1)	Anglian Water Services Limited is the sewerage undertaker for the parishes of Ardley, Cottisford, Finmere, Fringford, Fritwell, Godington, Hardwick with Tusmore, Hethe, Mixbury, Newton Purcell with Shelswell, Somerton, Stoke Lyne and Stratton Audley within the Cherwell District Council only. The views of Thames Water should also be sought.	Noted.
OXAGE (017/ac/1)	<p>Withdraw the objection on non-compliance with the Duty to Cooperate.</p> <p>Objection remains that there was no consultation on the Local Aggregate Assessment (2014), which is contrary to the Statement of Community Involvement and fails legal compliance. The plan also fails the tests of soundness for the reasons outlined in the original GPL representation.</p> <p>Object to a plan without sites, which is at odds with Government policy.</p>	<p>Noted</p> <p>See responses to comments 017/ac on documents B, C, D, K & L.</p>

PAGE (072/ac/1)	Support OXAGE representation (017/ac). The submission of further documents does not alter the fact that the Core Strategy is not legally compliant and unsound	See responses to comments 017/ac on documents B, C, D, K & L; and response to comments 072/ac on document C.
Clifton Hampden Parish Council (084/ac/1)	Support Bachport representation (159/ac).	See responses to comments 017/ac on documents B, C, D, K & L; and response to comments 159/ac on documents C & D.
Appleford Parish Council (085/ac/1)	Support Bachport representation (159/ac).	See responses to comments 017/ac on documents B, C, D, K & L; and response to comments 159/ac on documents C & D.
Wokingham Borough Council (090/ac/1)	No comment.	Noted.
Mayor of London (091/ac/1)	No further comment.	Noted.
Highways England (097/ac/1)	No further comment.	Noted
CAGE (099/ac/1)	Support OXAGE representation (017/ac). The plan is not legally compliant as the SCI was not followed, and is unsound as set out in original OXAGE representation. The Core Strategy is based on an annual production figure which is too high; the 10 year sales average continues to drop. The LAA takes no account of the proposed increase in recycled aggregate. Permitted reserves have increased, reinforcing the point that no new sites are required.	See responses to comments 017/ac on documents B, C, D, K & L; and response to comments 099/ac on documents C & D.
Wallingford Town Council (111/ac/1)	Support OXAGE representation (017/ac). The plan is not legally compliant as the SCI was not followed, and is unsound as set out in original OXAGE representation. The Core Strategy is based on an annual production figure which is too high; the 10 year sales average continues to drop.	See responses to comments 017/ac on documents B, C, D, K & L; and response to comments 111/ac on documents C & D.

	The LAA takes no account of the proposed increase in recycled aggregate. Permitted reserves have increased, reinforcing the point that no new sites are required.	
Natural England (126/ac/1)	No further comment.	Noted.
Cllr C Mathew (130/ac/1)	Support OUTRAGE response (127/ac). Oppose completely groundless level of the LAA. Have severe doubts as to soundness of the plan. Intend to speak at examination hearings to ensure concerns are heard.	Noted. See response to comments 127/ac on document C. Noted.
Surrey County Council (142/ac/1)	No comment.	Noted.
Chilterns Conservation Board (146/ac/1)	It is difficult to comment properly without seeing a complete schedule of proposed modifications.	Noted.
D.K. Symes (158/ac/1)	Attached comments on SS-01, SG-09 and SG-59.	See response to comments 158/ac on document D.
Bachport (159/ac/1)	Bachport represents the interests of Clifton Hampden and Burcot Parish Council, Long Wittenham Parish Council, Appleford Parish Council and Culham Parish Council. Bachport is a participant member of OXAGE and their additional comments are fully supported. However, Bachport would like to make additional comments.	Noted. See responses to comments 017/ac on documents B, C, D, K & L; and response to comments 159/ac on documents C & D.
Culham Parish Council (160/ac/1)	Support Bachport representation.	See responses to comments 017/ac on documents B, C, D, K & L; and response to comments 159/ac on documents C & D.
Long Wittenham Parish Council (161/ac/1)	Support Bachport representation.	See responses to comments 017/ac on documents B, C, D, K & L; and response to comments 159/ac on documents C & D.

B. Development of the Minerals Spatial Strategy (Topic Paper), April 2016

Respondent Name & No.	Summary of Comments	County Council Response
OXAGE (017/ac/2)	The topic paper is long and does not justify the new Plan.	The paper explains the evolution of the Core Strategy, drawing on work undertaken from 2006.
	The topic paper gives no explanation of why the new approach to calculation of future annual mineral supply in the NPPF is not being followed.	The requirements of the NPPF for the preparation of the Local Aggregate Assessment have been followed.
	The paper does not explain why the Core Strategy is not site specific contrary to Government Policy.	The justification for preparing the Plan in two parts is at paragraphs 1.5 and 1.6 of the submitted Core Strategy, which also states that legislation and national policy allows for such an approach.
West Oxfordshire District Council (098/ac/1)	The Council notes that the removal of a target for secondary and recycled aggregates was removed as a result of the revocation of the South East Plan and reiterates its concerns about the lack of a specific target for policy M1. The County Council has provided no strong justification for the approach taken.	The Council believes policy M1 to be soundly based but recognizes there would be some benefits in the inclusion of a minimum provision figure; the Council will therefore consider proposing a change to insert an appropriate figure.
	Regarding Policy M3, identifying new areas of working in southern Oxfordshire will be vital in achieving the objective of changing the balance of production capacity. It will also be important that the site allocations plan deliver enough specific sites in the southern part of the county to achieve this shift.	Noted. The plan seeks to do this through the application of Core Strategy Policy M4 b) and the preparation of the subsequent Site Allocations Document.
Smith and Sons Bletchington Ltd. (132/ac/1)	No specific comments – a useful summary.	Noted.

Sheehan Haulage and Plant Hire Ltd. (113/ac/1)	The topic paper does not explain how the current approach to provision for secondary and recycled aggregates has been arrived at or what processes have been involved in arriving at the spatial strategy.	The paper explains the evolution of the Core Strategy, drawing on work undertaken from 2006.
	There has been no objective assessment of potential site options for secondary and recycled aggregates, no evaluation of reasonable alternatives and no collaborative approach involving the business community, developers, landowners and other interested parties to inform the strategy. As a result it is not viable or deliverable and is too restrictive.	Site options for recycled and secondary aggregate supply will be identified and assessed in the preparation of the Site Allocations Document. Preparation of the Core Strategy has involved engagement with the minerals and waste industry (see examination document 3.1). Policy M1 is a positive and flexible policy to enable the supply of recycled and secondary aggregates to be maximised.
M&M Skip Hire Ltd. (114/ac/1)	See comments 113/ac/1	See response to comments 113/ac/1.
David Einig Contracting Ltd. (115/ac/1)	See comments 113/ac/1	See response to comments 113/ac/1.
McKenna Environmental Ltd. (116/ac/1)	See comments 113/ac/1	See response to comments 113/ac/1.

C. Oxfordshire Local Aggregate Assessment: Interim Update 2015, November 2015

Respondent Name & No.	Summary of Comments	County Council Response
Earthline Ltd. (012/ac/1)	<p>Comments relate to crushed rock. The draft LAA reveals a production figure in 2014 of 1.06m tonnes (more than double that of 2013). Concern that this is being considered a spike, when company experience is that demand is continuing due to large housing projects, not only in Oxfordshire, but in neighbouring counties with no limestone deposits – rail heads cannot keep up with demand.</p> <p>The AM2015 survey shows that sales were 0.93mt in 2015 – this is consistent with the company’s current position and likely to continue. Therefore the provision in the LAA of 0.58 mtpa is clearly too low and needs to be reviewed.</p>	<p>There has clearly been a change in demand for locally produced crushed rock in the most recent years. This could indicate a need to review the provision figure but there should be further monitoring as it could be a spike. If the recent higher levels of sales continue, the Council will consider the need to increase the level of provision in a future review of the LAA.</p>
Raymond Brown Minerals and Recycling Ltd. (014/ac/1)	<p>We note that this does not include aggregate recycling.</p>	<p>Aggregate recycling figures for 2014 were not available when the LAA Interim Update 2015 was prepared. Data on sales of recycled aggregate for 2014 and 2015 will be published when it is available and will be taken into account in the next LAA.</p>
OXAGE (017/ac/3)	<p>There was no consultation on the LAA 2014 which is contrary to the Statement of Community Involvement.</p>	<p>The LAA is not part of the Plan but is one of the evidence base documents that support it. The 2006 SCI was the operative SCI when the LAA 2014 was prepared. The 2006 SCI sets out at paragraph 4.4 how the Council will involve people in the Minerals and Waste Development Framework. This refers to consulting and involving individuals and organisations in</p>

		<p>relation to the production of minerals and waste development documents. The table following 4.10 lists evidence gathering as one of the stages, for which involvement is stated to be technical consultation with statutory bodies and consultation with key stakeholders. The Council does not consider that the 2006 SCI required it to involve or consult a wider range of persons or organisations, such as local residents or environmental groups and parish councils in the preparation of individual evidence base documents, such as the LAA.</p>
	<p>The LAA November 2015 is now available for comment, but the view remains that it is flawed by failing to follow government policy, and massively over-provides for sharp sand and gravel.</p> <p>The LAA 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 0.628mtpa) just 57% of the LAA figure (1.015mtpa) on which the CS is based.</p> <p>Current policy in the NPPF includes the calculation of a future annual mineral supply figure to be based on a rolling average of 10 years sales data and other relevant local information. The assumptions for increasing the LAA2014 provision figure from the 10-year average are misguided and not evidence-based.</p>	<p>The LAA has been prepared in accordance with the NPPF, National Planning Practice Guidance and the POS/MPA guidance note; it is based on both the rolling average of 10 years sales data and other relevant local information.</p> <p>The continued fall in the 10 year sales average was expected when the LAA 2014 was prepared; in the light of the other information available this fall does not justify changing the LAA provision figure for sharp sand and gravel, which continues to be the most appropriate figure to use.</p>

	<p>The content of the LAA November 2015 and Annual Monitoring Survey 2015 (AM2015) demonstrate that the new 10-year average is even lower than before. Figures in AMS2015 show that permitted reserves have risen and when coupled with the future need for sharp sand and gravel (based on the new figure of 0.628mtpa) reinforces the point that no new sites are required. There should be no Part 2 Plan, the CS should be complete and can now be clear about the lack of need for new sites within the plan period.</p>	<p>Whilst the level of permitted reserves of sharp sand and gravel has increased substantially, there is still a gap in the provision required over the plan period, based on the LAA figure, and consequently a need for new sites to be allocated in a Site Allocations Document.</p>
	<p>There is no evidence that imports increased during the recession.</p>	<p>There is no published data to confirm that imports increased during the recession but the Council believes that the 2014 data on movements of aggregates (when published) will show a sharp decline in imports of sharp sand and gravel, whilst consumption of material produced in Oxfordshire increased.</p>
	<p>The LAA November 2015 shows the ratio of Oxfordshire to England sales of sharp sand and gravel fell in post-recession 2013.</p>	<p>Within the data series for sharp sand and gravel sales to 2015, the figure for 2013 is abnormally low. The reason for this is not yet clear and conclusions should not be drawn from the figure for this single year.</p>
	<p>There is no evidence for the assertion relating to when the 10 year rolling sales average will bottom out.</p>	<p>If sharp sand and gravel sales continue at the 2015 level, the 10 year sales average will reach its lowest level in 2017 (2008-2017) and will then start to increase. If sales continue to increase in 2016 and after, the 10 year average could begin to increase sooner.</p>

	The LAA takes no account of the proposed increase in recycled Construction, Demolition and Excavation Waste which (as proposed elsewhere in the Core Strategy – policy W2) will yield an extra 4.463mt in the period up to 2031, an average of some 0.3 mtpa of raw material. This is a considerable amount which goes some way to making up any predicted shortfall in land-won supply.	These comments make the mistake of equating CDE waste with recycled aggregate, ignoring that much of CDE waste is material such as soil, timber, metals, plastics etc, which cannot be recycled as construction aggregate. See also response to comments 159/ac/2 (Batchport) below.
PAGE (072/ac/2)	Support the latest representations submitted by OXAGE (017/ac). The November LAA and AMS2015 show that the annual provision for sand and gravel is too high as there is a continuing decline in the 10 year sales average. The current LAA figure of 1.015mtpa is 62% higher than the 10 year sales average figure of 0.628mtpa. OCC's continuing decision not to follow their SCI has led to the blighting of the countryside.	See responses to comments 017/ac/3 (OXAGE) above.
Grundon (082/ac/1)	Supply for aggregates has increased across England following the recession. Oxfordshire is also showing an increase – higher than elsewhere, pointing to a unique local situation. Sand and gravel sales have increased by 92% in the last two years, and similar levels for crushed rock. Demand is likely to increase further, and given that existing sand and gravel production units are at capacity this will restrict supply and flexibility. The LAA sand and gravel figure of 1.015 seems realistic and total capacity needs to be more than this to allow flexibility.	The Council agrees that having capacity available to enable production at the levels required to meet demand is important, in addition to setting a provision level that is adequate to meet forecast demand. The Council will therefore consider proposing a change to Policy M2 to include reference to enabling sufficient capacity to supply, in addition to maintaining landbanks.
West Oxfordshire District Council (098/ac/2)	It is noted that a full update of the LAA has not yet been possible and that, despite indications that the 2014 LAA provision level for sand and gravel is too high, no adjustment has been made and further monitoring will be carried out. The District Council has no specific objection to this but a new 2015 requirement level should be determined as soon as possible.	Noted.
	Whilst benchmarking Policy M2 against the latest LAA is not	The Council believes policy M2 to be

	unreasonable, further clarity is needed as to how that will operate in practice and what status will be afforded to a document (the LAA) that is not formally tested through the development plan process.	soundly based but recognizes there would be benefits in the inclusion of provision level figure in the policy as, whilst this would reduce flexibility to respond to changes in the LAA, it would increase clarity as to the amount of provision being made in the plan and would simplify implementation of the policy; the Council will therefore consider proposing a change to insert the provision level figures from the current LAA in policy M2.
CAGE (099/ac/2)	Continue to support the case made by OXAGE. The LAA 2015 update and the AMS2015 confirm that the provision rate of 1.015 mtpa for sand and gravel is too high. It also takes no account of any contribution from recycled aggregates. The increase in permitted reserves reinforces the point that no new sites are required.	See responses to comments 017/ac/3 (OXAGE) above.
Wallingford Town Council (111/ac/2)	Continue to support the case made by OXAGE. The LAA 2015 update and the AMS2015 confirm that the provision rate of 1.015 mtpa for sand and gravel is too high. It also takes no account of any contribution from recycled aggregates. The increase in permitted reserves reinforces the point that no new sites are required.	See responses to comments 017/ac/3 (OXAGE) above.
OUTRAGE (127/ac/1)	The provision for sand and gravel in the 2014 LAA is far too high. A rolling 10 year average will adjust to market conditions and no adjustment is necessary as it has led to overprovision. This has led to uncertainty in communities where operations have been suspended due to oversupply.	See responses to comments 017/ac/3 (OXAGE) above.
Smith and Sons Bletchington Ltd. (132/ac/2)	Crushed rock – sales increased by 111% in 2013-2014, due to the Bicester-Oxford railway works. This has been completed but there are other major railway works planned and this will	There has clearly been a change in demand for locally produced crushed rock in the most recent years. This

	<p>increase demand for sales of crushed rock and demand is now at pre-recession levels. Therefore the LAA provision figure for crushed rock (0.584tpa) is too low to be properly representative for landbank calculations.</p>	<p>could indicate a need to review the provision figure but there should be further monitoring as it could be a spike. If the recent higher levels of sales continue, the Council will consider the need to increase the level of provision in a future review of the LAA.</p>
	<p>It is considered that sharp sand and gravel will also experience an increase in demand. With limited production capacity in the county, it will be difficult to supply this from local sources. Therefore sales from local sources will not reflect real demand and regular, prompt updates to the LAA will be essential.</p>	<p>Noted. See also response to comments 082/ac/1 (Grundon) above.</p>
Bachport (159/ac/2)	<p>Fully endorses the comments of OXAGE (017/ac/3) on the LAA 2015 Interim Update. There is no further evidence to support the LAA 2014 provision figure of 1.015 mtpa, in fact the evidence shows that this figure is too high and is now 54% above the 10 year average. There is also no provision for the use of alternative and recycled materials for aggregate. When using a lower provision figure, there are sufficient reserves to last until the end of the plan period.</p>	<p>See responses to comments 017/ac/3 (OXAGE) above.</p>
	<p>GB statistics published by the Mineral Products Association show an underlying national decline in land-won sand & gravel production, offset by, and at least partially caused by the progressive growth in recycled and secondary aggregates.</p>	<p>Other data published by the MPA show that the contribution from recycled and secondary sources peaked at about 30% in 2013 and, although the tonnages of production may increase at times, there is unlikely to be scope for significant further growth in this sector in terms of its percentage contribution to the overall mix. Any future growth in overall demand will</p>

		therefore require an increase in production from primary aggregate sources.
--	--	---

D. Preliminary Assessment of Mineral Site Options, April 2016

Respondent Name & No.	Summary of Comments	County Council Response
Earthline Ltd. (012/ac/2)	<p>Site SS-03 (CR-11) Hatford South Extension: The proximity of SSSIs has not been an issue with previous extensions and so question the assessment.</p> <p>Site SS-08(CR16) Shellingford Western extension: The proximity of SSSIs has not been an issue with previous extensions and so question the assessment. A planning application is being prepared for this site. SSSI IRZ advice is inconsistent with previous pre-app advice and so the assessment is flawed.</p>	<p>The purpose of the preliminary site assessment is to assess the likely deliverability of the nominated sites to indicate whether the strategy for mineral working in the Core Strategy is deliverable. It is not an assessment of suitability for allocation in the Site Allocations Document.</p> <p>These comments raise detailed matters that will be considered when the sites are assessed in the preparation of the Site Allocations Document but they do not affect the preliminary site assessments.</p>
	<p>Site SS15 (CR11) Hatford North extension: This mineral would be processed at the existing quarry and exported via the existing access onto the B4508. Sandy Lane would not be used as an access and this should be made clear.</p>	<p>This is recognised in the notes column of the assessment matrix and consequently the site is scored amber – may be acceptable.</p>
	<p>The sites nominated at Shipton-on-Cherwell have not been assessed. It is understood that these will be assessed. The site has also been subject to pre-application consultation and assessment should be consistent with this.</p>	<p>The preliminary site assessment only includes sites that lie within one of the strategic resource areas identified in policy M3. These sites are not within such an area and were therefore not included.</p>
OXAGE (017/ac/4)	<p>The value of this assessment is doubted because the Inspector has been clear that specific sites will not be put forward as part of this plan; they are for a later plan.</p>	<p>The purpose of the preliminary site assessment is to assess the likely deliverability of the nominated sites to indicate whether the strategy for</p>

	No selection of sites should or could be made in the Core Strategy; there is not enough information.	mineral working in the Core Strategy is deliverable. It is not an assessment of suitability for allocation in the Site Allocations Document.
	There is no evidential justification for favouring a new sand and gravel site to the south of Oxford rather than to the West.	This is a comment on the Core Strategy rather than the preliminary site assessment; this issue is responded to elsewhere; the sites are divided between southern and western Oxfordshire to reflect Policy M4 b).
	No new site is required and if demand and production emerges to justify another site or sites it will not be until the final years of the plan period, and is the proper and usual function of a review of the plan; it cannot plan ahead for 16 or 17 years on the flawed numbers in the LAA.	This is a comment on the Core Strategy rather than the preliminary site assessment; this issue is responded to elsewhere.
Cherwell District Council (033/ac/1)	There is a discrepancy regarding the site SS-06. It is assessed as being 'red' in the table in Appendix 2 and 'amber' in the text section 3.2.	There is an error in the table; this site should be assessed as 'amber'; a correction is required.
West Oxfordshire District Council (098/ac/3)	When further work is undertaken on the site allocations document, it will be essential that sites taken forward are consistent with the stated objective of achieving a more even distribution of sand and gravel working across the county.	Noted. The methodology that is drawn up to assess sites for the Site Allocations Document will need to be consistent with the criteria in Core Strategy Policy M4, including M4 b).
CAGE (099/ac/3)	Not all the criteria have a red weighting (unsuitable for mineral extraction) e.g. agricultural land quality. This creates an inherent bias in favour of development.	Some of the criteria, whilst being constraints on mineral working, are such that they cannot be used to definitely rule out the possibility of mineral working, e.g. high grade agricultural land can be restored. In such case it is right that red scorings are not used in a preliminary site assessment, the purpose of which is to

		indicate deliverability of the strategy.
	The traffic criterion takes no account of the suitability of the road network, only the accessibility of it; this needs addressing.	This is a matter for consideration when sites are assessed in detail in the preparation of the Site Allocations Document; or at the planning application stage when information on traffic movements is available. These comments raise detailed matters but they do not affect the preliminary site assessment.
	The red weighting for proximity to residential areas is fatuous as no economically viable mineral working would be located entirely within 100m of a residential area. Also, no weighting has been given for proximity to industrial or commercial areas, sensitive downwind receptors or protected airfields.	The preliminary site assessment has necessarily had to take a simple approach to enable all sites to be assessed on an equal basis using readily available information. The scoring system used for proximity to residential areas is considered realistic and it is not considered practical to include the other factors proposed. Other landuses are generally less sensitive to mineral working but impacts on these will need to be assessed when the Site Allocations Document is prepared, as will potential impacts on other sensitive receptors and airfields, as covered by Policy C5.
	<u>SG-33</u> The site assessment should be revised to Red because: presence of protected species and close proximity to a Conservation Target Area, coupled with location over a main aquifer; grade 2 and 3a agricultural land classification; location within the bird strike exclusion area for RAF Benson; traffic impact on the road network; and sensitive receptors within 1km	These are important factors that should be taken into consideration if and when the site is assessed in detail in the preparation of the Site Allocations Document and/or at planning application stage, when more

	of the site.	information about the development and its potential impacts is available. None of these factors justify ruling the site out as 'unlikely to be acceptable for minerals development' in the preliminary site assessment, the purpose of which is only to indicate deliverability of the minerals strategy.
	<u>SG-60</u> The site assessment should be revised to Red because: location within or adjoining a Conservation Target Area and presence of protected species, coupled with location over a main aquifer; residential properties within 300m of processing plant; location within the bird strike exclusion area for RAF Benson; traffic impact on the road network; and sensitive receptors within 1km of the site.	These are important factors that should be taken into consideration if and when the site is assessed in detail in the preparation of the Site Allocations Document and/or at planning application stage, when more information about the development and its potential impacts is available. None of these factors justify ruling the site out as 'unlikely to be acceptable for minerals development' in the preliminary site assessment, the purpose of which is only to indicate deliverability of the minerals strategy.
Wallingford Town Council (111/ac/3)	Not all the criteria have a red weighting (unsuitable for mineral extraction) e.g. agricultural land quality. This creates an inherent bias in favour of development.	Some of the criteria, whilst being constraints on mineral working, are such that they cannot be used to definitely rule out the possibility of mineral working, e.g. high grade agricultural land can be restored. In such case it is right that red scorings are not used in a preliminary site assessment, the purpose of which is to indicate deliverability of the strategy.

	<p>The traffic criterion takes no account of the suitability of the road network, only the accessibility of it; this needs addressing.</p>	<p>This is a matter for consideration when sites are assessed in detail in the preparation of the Site Allocations Document; or at the planning application stage when information on traffic movements is available. These comments raise detailed matters but they do not affect the preliminary site assessment.</p>
	<p>The red weighting for proximity to residential areas is fatuous as no economically viable mineral working would be located entirely within 100m of a residential area. Also, no weighting has been given for proximity to industrial or commercial areas, sensitive downwind receptors or protected airfields.</p>	<p>The preliminary site assessment has necessarily had to take a simple approach to enable all sites to be assessed on an equal basis using readily available information. The scoring system used for proximity to residential areas is considered realistic and it is not considered practical to include the other factors proposed. Other landuses are generally less sensitive to mineral working but impacts on these will need to be assessed when the Site Allocations Document is prepared, as will potential impacts on other sensitive receptors and airfields, as covered by Policy C5.</p>
	<p><u>SG-33</u> The site assessment should be revised to Red because: presence of protected species and close proximity to a Conservation Target Area, coupled with location over a main aquifer; grade 2 and 3a agricultural land classification; location within the bird strike exclusion area for RAF Benson; traffic impact on the road network; and sensitive receptors within 1km of the site.</p>	<p>These are important factors that should be taken into consideration if and when the site is assessed in detail in the preparation of the Site Allocations Document and/or at planning application stage, when more information about the development and</p>

		<p>its potential impacts is available. None of these factors justify ruling the site out as 'unlikely to be acceptable for minerals development' in the preliminary site assessment, the purpose of which is only to indicate deliverability of the minerals strategy.</p>
	<p><u>SG-60</u> The site assessment should be revised to Red because: location within or adjoining a Conservation Target Area and presence of protected species, coupled with location over a main aquifer; residential properties within 300m of processing plant; location within the bird strike exclusion area for RAF Benson; traffic impact on the road network; and sensitive receptors within 1km of the site.</p>	<p>These are important factors that should be taken into consideration if and when the site is assessed in detail in the preparation of the Site Allocations Document and/or at planning application stage, when more information about the development and its potential impacts is available. None of these factors justify ruling the site out as 'unlikely to be acceptable for minerals development' in the preliminary site assessment, the purpose of which is only to indicate deliverability of the minerals strategy.</p>
<p>Historic England (120/ac/1)</p>	<p>Non-designated assets of local importance should also be taken into account (as with locally designated areas of nature conservation interest). This would include the assets in the Lower Windrush Valley and any parks and gardens on local or county lists. The Oxfordshire Aggregates and Archaeology Assessment should form an important part of the evidence base. The weighting assigned to heritage assets is crude and does not accurately reflect the NPPF understanding of 'setting'. Greater consideration should be given to the impact of mineral and waste workings on the setting of heritage assets, and further investigation undertaken of sites with a 'Green'</p>	<p>The purpose of the preliminary site assessment is to assess the likely deliverability of the nominated sites to indicate whether the strategy for mineral working in the Core Strategy is deliverable. It is not an assessment of suitability for allocation in the Site Allocations Document. These comments raise important matters that will be considered when the methodology is drawn up to assess</p>

	<p>assessment. It should not be the case that a site with a Green assessment should be seen as acceptable for mineral workings at this stage.</p>	<p>sites for the Site Allocations Document. The assessment of site options for the Site Allocations Document will be a more detailed assessment, using more information.</p>
	<p><u>SG-09</u> Impact on the setting of the SM and Nuneham Courtenay Conservation area and Park and garden should be taken into account. The area of the SM should be excluded from mineral extraction.</p> <p><u>SG-11</u> Likely to be within setting of Sonning Eye conservation area which should be taken into account when determining the suitability of the site for mineral extraction.</p> <p><u>SG-13</u> Agree with Red assessment.</p> <p><u>SG-17</u> Presence of SM and particular waterlogged features mean the site is unlikely to be deliverable as the likely impact of mineral working on the SM would appear likely to be unacceptable.</p> <p><u>SG-19</u> Site may be within setting of Sutton Courtenay Conservation Area, which should be taken into account when determining the suitability of the site for mineral extraction.</p> <p><u>SG-41</u> Site may be within setting of Nuneham Courtenay Conservation Area and Grade 1 registered park and garden at Nuneham Courtenay which should be taken into account when determining the suitability of the site for mineral extraction.</p> <p><u>SG-42</u> The site may include part of the Nuneham Courtenay Conservation Area, which should be excluded from mineral</p>	<p>These comments will be looked at in detail and if there are errors the assessments will be corrected. Otherwise the detailed comments are noted and will, as appropriate, be taken into consideration when the more detailed assessment of sites for the Site Allocations Document is carried out.</p> <p>The comments that for SG-17 the likely impact of mineral working on the SM would appear likely to be unacceptable and that SG-30 should be assessed as red and not amber are noted. However, if these two sites were reassessed as red, rather than amber, this would not affect the overall conclusion of the preliminary assessment of mineral site options that sufficient mineral resources are potentially deliverable to meet the planned requirement.</p>

	<p>extraction. The site will also be within setting of Nuneham Courtenay Conservation Area and Grade 1 registered park and garden at Nuneham Courtenay which should be taken into account when determining the suitability of the site for mineral extraction.</p> <p><u>SG-59</u> The site may be within the setting of listed buildings Camoys Court or Chiselhampton bridge which should be taken into account when determining the suitability of the site for mineral extraction.</p> <p><u>SG-60</u> Potential impact on listed buildings should be taken into account when determining the suitability of the site for mineral extraction.</p> <p><u>SG-62</u> The area may be adjacent to scheduled monument, which should be taken into account when determining the suitability of the site for mineral extraction, particularly as the archaeological interest may extend beyond the scheduled area.</p> <p><u>SG-08</u> The part of the Church Hanborough Conservation area should be excluded from mineral extraction, and the potential impact on the setting of the area needs to be considered when determining the suitability of the site for mineral extraction.</p> <p><u>SG-18</u> This site lies within a rich archaeological landscape and significant archaeological remains may be masked by alluvium. However, the site is well away from the 'core' interest area and the Amber assessment is justified.</p>	
--	---	--

	<p><u>SG20a&b</u> These sites are within the setting of the Eynsham Conservation Area, which needs to be considered when determining the suitability of the site for mineral extraction.</p> <p><u>SG-23</u> The site appears to be within the setting of the Stanton Harcourt and Sutton Courtenay Conservation Areas. This needs to be considered when determining the suitability of these sites for mineral extraction.</p> <p><u>SG-27</u> Adjoins two listed buildings, impacts on the setting of which needs to be considered when determining the suitability of the site for mineral extraction. In addition it is close to the core of a rich archaeological landscape, and the South Eastern strip should be considered as an exclusion zone.</p> <p><u>SG-28</u> The site lies within an area that has been extensively quarried but is also of significant archaeological interest, and close to the 'core area'. Significant remains may be present underneath alluvium, and working should not be pursued here if further investigation shows if any are present. Subject to that, the amber assessment is appropriate.</p> <p><u>SG-29</u> The site adjoins the setting of the Stanton Harcourt and Sutton Courtenay Conservation Areas. This needs to be considered when determining the suitability of these sites for mineral extraction.</p> <p><u>SG-30</u> There is significant archaeological interest within and near this site, consequently it should be assessed as Red.</p> <p><u>SG-31</u> The site is within the setting of the Stanton Harcourt and Sutton Courtenay Conservation Areas. This needs to be</p>	
--	--	--

	<p>considered when determining the suitability of these sites for mineral extraction.</p> <p><u>SS-01</u> This site is possibly within the setting of the Fyfield and Netherton Conservation Areas. Potential impacts on these should be considered when determining the suitability of the site for mineral extraction.</p> <p><u>SS-04</u> There is a listed building and registered park and garden just to the north of the site. Potential impacts on these should be considered when determining the suitability of the site for mineral extraction.</p> <p><u>SS-07</u> The site appears to be within the setting of the Shellingford Conservation Area. The potential impact on this should be considered when determining the suitability of the site for mineral extraction.</p> <p><u>SS-12 (CR-12)</u> The site is potentially within the setting of a scheduled monument. The potential impact on this should be considered when determining the suitability of the site for mineral extraction.</p> <p><u>CR-10</u> A listed building is to the north of the quarry. The potential impact on this should be considered when determining the suitability of the site for mineral extraction.</p> <p><u>CR-12 (SS-12)</u> The site lies opposite the Faringdon Conservation Area. The potential impact on this should be considered when determining the suitability of the site for mineral extraction.</p>	
--	--	--

Smith and Sons Bletchington Ltd. (132/ac/3)	No comments – a useful summary. Table 1 has a rate of 3.25tpa for Gill Mill – this may be too low to reflect current demand.	Noted. The production rate for Gill Mill Quarry will be checked and, if appropriate, corrected.
Environment Agency (133/ac/2)	<p>Support the use of the Habitats Regulations Screening Report to determine effects on Special Areas of Conservation and the recognition that significant effects from mineral workings include both dust and water quality and quantity impacts.</p> <p>Welcome further detailed investigation being needed for sites within an IRZ of a SSSI.</p> <p>Recommend that further clarity is given to the role of the sequential flood risk test in steering development to areas of least flood risk. Support methodology and criteria used in RAG analysis and that further detailed assessment should be undertaken in the Part 2 Plan. For clarity, recommend that specific reference is made to the requirement for flood risk sequential test in the next stage of the assessment process.</p> <p>Noted that cumulative impacts are only assessed in relation to communities. Recommend that cumulative impacts on the environment are also assessed, particularly cumulative impacts on groundwater resources and aquifers.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted. This will be taken into consideration in site assessment work for the Site Allocations Document; and this will be clarified in any further update of the preliminary site assessment paper.</p> <p>The purpose of the preliminary site assessment is to provide an indication of the deliverability of the Core Strategy. This recommendation will be considered when the methodology for a more detailed site assessment for the Site Allocations Document is drawn up.</p>
Chilterns Conservation Board (146/ac/2)	Using a 1km buffer to interpret the setting of the AONB is overly simplistic and may lead to effects on the setting being underestimated. Further investigation is needed for these sites to determine their effects on the setting of AONBs.	The purpose of the preliminary site assessment is to provide an indication of the deliverability of the Core Strategy; it is not an assessment of suitability for allocation in the Site

		<p>Allocations Document. The preliminary site assessment has necessarily had to take a simple approach to enable all sites to be assessed on an equal basis using readily available information. Consideration will be given to how a more detailed assessment of effects on the settings of AONBs can be included when the methodology to assess sites for the Site Allocations Document is drawn up.</p>
<p>D.K. Symes (158/ac/2)</p>	<p>SS-01: the site has a proven reserve of soft sand. There are several topics where an amber assessment is given: <u>SSSI:</u> The site is separated from Frilford Heath by 300-400m and the A420, which indicates there will be no impact from noise, dust or air pollution. There may be a very limited need to dewater, however if restricting development to 'dry' working only would address any perceived impacts, this would be acceptable. <u>LWS:</u> The proposed extraction is 50-100m away with an ecological improvement zone to ensure protection of the LWS. <u>Agricultural Land:</u> Restoration to agriculture is proposed to ensure this resource is not lost. <u>Properties:</u> There will be a buffer zone of 100m to properties. With regards to Tubney – this is separated by the A420 providing a noise 'corridor'. <u>Existing Quarry</u> (cumulative impacts). Mineral workings have now ceased at Tubney Wood Quarry, and therefore this should be reassessed as green. <u>Summary:</u> The location, together with mitigation should mean the site can be used for mineral working. The land is available for mineral</p>	<p>These detailed comments are noted and will, as appropriate, be taken into consideration when the more detailed assessment of sites for the Site Allocations Document is carried out. It is accepted that Tubney Wood Quarry has now ceased operation, apart from some final restoration work. Nevertheless, these comments do not affect the overall assessment of this site as amber.</p>

	<p>extraction and can be delivered in the plan period.</p>	
	<p>SG-09: the site has a proven reserve of soft sand. The RAG assessments are commented on: <u>SSSI:</u> Little Wittenham is over 3km distant and hydrologically separate therefore the site should be reassessed as green. <u>Archaeology:</u> The cursus can be fully protected should the site be developed. <u>Agricultural Land:</u> restoration to agriculture should conserve this resource. <u>Residential Properties:</u> The proposed limit of working does not adjoin residential properties and therefore this criterion should be reassessed as Green. <u>Summary:</u> By restricting the extent of mineral development, this will address any adverse impacts. The site remains available for mineral development and can be delivered within the plan period.</p>	<p>These detailed comments are noted and will, as appropriate, be taken into consideration when the more detailed assessment of sites for the Site Allocations Document is carried out. The assessment recognises that the cursus covers a relatively small area of the site and does not rule out the possibility of mineral working within the rest of the site. These comments do not affect the overall assessment of this site as amber.</p>
	<p>SG-59: the site has a proven reserve of soft sand. The RAG assessments are commented on: <u>SSSI:</u> Little Wittenham is over 3km distant and hydrologically separate therefore the site should be reassessed as green. <u>Listed Building:</u> There will be no direct impacts on Chiselhampton Bridge as a temporary separate crossing is proposed. Effects on the setting will be mitigated. <u>Groundwater:</u> The site is not on a principal aquifer according to the EA website and the assessment is incorrect. The assessment should be adjusted to Green. <u>Agricultural Land:</u> restoration to agriculture should conserve this resource . <u>Residential Properties:</u> Buffer zones will protect the amenity of nearby properties. <u>Availability:</u> The site remains available for mineral development and can be delivered within the plan period.</p>	<p>These detailed comments are noted and will, as appropriate, be taken into consideration when the more detailed assessment of sites for the Site Allocations Document is carried out. These comments do not affect the overall assessment of this site as amber.</p>

<p>Bachport (159/ac/3)</p>	<p>Specific comments on SG-17 are made. The site should be named 'Land at Clifton Hampden' to reflect the fact that more than 90% is located in that parish. <u>Traffic Impacts:</u> Although lorries could directly access the A415, they would have to pass through villages or the centre of Abingdon in order to access the wider lorry network. Weighting should be changed to Amber. <u>AONB:</u> The 1km distance from the AONB has been arbitrarily defined. The site is inter-visible from the North Wessex Downs AONB at a distance of 1.5km. The site will also impact upon the view from Thames Path National trail and The River Thames, neither of which have been assessed. Criteria should be changed to whether a site is visible from a public viewpoint within an AONB, or any other nationally important viewpoint, rather than an arbitrary distance. The site should be re-assessed as Amber. <u>Heritage Assets:</u> No mention is made of the adjoining conservation area of both Clifton Hampden and Long Wittenham Villages. The site also adjoins Fullamoor Farmhouse. The assessment should therefore be Amber. The SM is a significant constraint, as it is for SG-13. Therefore SG-13 should be accorded the same weight when considering deliverability in view of heritage assets. <u>Flooding:</u> This criterion is weak as the actual amount of land in the floodplain has not been assessed and is relevant, as is whether the floodplain is associated with a major or minor river. <u>Agricultural Land:</u> Until any reliable evidence is forthcoming, the whole site should be classed as BMV land. The RAG assessment should take into account whether the site is predominantly/entirely BMV land or whether it is a mixture of BMV and poorer grades. <u>Cumulative Development:</u> The site lies within 1km of the extant</p>	<p>The purpose of the preliminary site assessment is to provide an indication of the deliverability of the Core Strategy; it is not an assessment of suitability for allocation in the Site Allocations Document. The preliminary site assessment has necessarily had to take a simple approach to enable all sites to be assessed on an equal basis using readily available information.</p> <p>These detailed comments are noted and will, as appropriate, be taken into consideration when the methodology for a more detailed assessment of sites for the Site Allocations Document is drawn up and that assessment is carried out.</p> <p>The nominated site boundary does not adjoin either the Clifton Hampden or Long Wittenham Conservation Area.</p> <p>The assessment relating to heritage assets will be checked. The comments made by Historic England (120/ac/1) on this site are that the likely impact of mineral working on the SM would appear likely to be unacceptable. However, if this site was reassessed as red, rather than amber, this would not affect the overall conclusion of the</p>
----------------------------	--	---

	<p>planning permission at Bridge Far, therefore the RAG assessment should be amended in accordance with the criteria. There will be a need for safeguarded land in the site to accommodate a new road route to connect Science Vale and Dicot and Culham Science Centre (as identified in LTP4). This should be noted and considered in the assessment.</p> <p><u>Green Belt:</u> No consideration has been made of the Green Belt. Although minerals development is not inappropriate in the Green Belt, any site will still have to demonstrate that the benefits in creating a site will outweigh the harm to the Green Belt, and would continue to serve the openness. This should be included as a consideration and form a criteria in the assessment. Any site lying wholly within the Green Belt should be given an Amber rating.</p> <p>The overall rating should be Red instead of Amber.</p>	<p>preliminary assessment of mineral site options that sufficient mineral resources are potentially deliverable to meet the planned requirement.</p> <p>The site is within 1km of the existing Bridge Farm mineral working site and the cumulative impact assessment score should therefore be amber.</p> <p>Green Belt is not an appropriate criteria for assessment of mineral working sites as the NPPF states that mineral extraction is not inappropriate development in Green Belt.</p>
--	---	---

E. Non Aggregate Minerals (Topic Paper), April 2016

Respondent Name & No.	Summary of Comments	County Council Response
Smith and Sons Bletchington Ltd. (132/ac/4)	The continued recognition of building stone and its importance to the conservation and maintenance of the built environment in Oxfordshire is welcome.	Noted.

F. Restoration of Mineral Workings (Topic Paper), April 2016

Respondent Name & No.	Summary of Comments	County Council Response
<p>Smith and Sons Bletchington Ltd. (132/ac/5)</p>	<p>This comprehensive paper provides a useful summary of the issues to do with restoration.</p> <p>RGN13 of the Environment Agency (EA) is referenced, however this document has been withdrawn and a revised draft has been issued for EA officers and applicants. Reference to the Methley decision and revised guidance is helpful as an aid to quarry restoration so long as there is a legal obligation. However, a judgement from the Court of Justice of the European Union is awaited regarding a case in Italy that may reverse this position, and class the backfilling of a quarry as disposal of waste. The decision is expected in Autumn 2016.</p> <p>Strongly support the position that where the use of inert waste is needed to restore a quarry this is seen as water compatible development. Mineral restoration and working should not be decoupled. Welcome reference to the importance of inert waste in securing mineral restoration and support changes to policy M10 if revised wording was helpful in securing a recovery permit from the EA.</p> <p>Regarding funding for long-term post aftercare management – the requirements are clear for mineral operators. Therefore paragraph 6.2 should be simplified.</p>	<p>Noted.</p> <p>Noted but, although RGN13 is being reviewed by the EA, the April 2014 version of this guidance has not been withdrawn.</p> <p>Noted</p> <p>The suggested changes to the paper are noted but they would not affect the Core Strategy.</p>
<p>Environment Agency (133/ac/2)</p>	<p>Support this paper as it addresses a number of key issues. Welcome the recognition that all restoration schemes have the potential to enhance biodiversity.</p> <p>Support the inclusion of paragraph 3.36-3.38.</p>	<p>Noted.</p>

	<p>Welcome the simplification in section 5 and distinction of the role of planning and permitting in relation to the use of inert waste to restore mineral workings.</p> <p>Welcome the identification of sand and gravel working as water compatible development and support approach in 5.13.</p> <p>Welcome that consideration should always be given to restoration at lower levels.</p> <p>Support paragraphs 5.18 – 5.20.</p> <p>Support a minor change to Policy M10 to include consideration of impact of imported fill on flood risk and water quality, as suggested in paragraph 5.22.</p>	<p>The Council will consider proposing a change to policy M10 and the supporting text of the Core Strategy as suggested.</p>
<p>Ms. A. Hoare (156L/ac/1)</p>	<p>Support relevance of NPPF with regard to restoration of mineral workings, recognition of UK Biodiversity Action Plan and inclusion of Oxfordshire Conservation Target Areas, and recognition of need to conserve geodiversity.</p> <p>However, there is limited recognition of local plan policies on valued landscapes, limited understanding and significance attached to earth science (geology) features, limited understanding of the link between biodiversity and geodiversity, and lack of statutory citations. This has led to outdated understanding of earth science issues which impacts upon policy provision.</p> <p>Account should be taken of the Common Standards Monitoring Guidance for Earth Science Sites and Guidelines for selection of Earth Science SSSIs (Joint Nature Conservation Committee).</p> <p>The update of this paper lacks clarity and meaning of intention compared to 2012 paper.</p>	<p>These comments are noted. Many of them raise site specific matters that will be more appropriate to the Site Allocations Document and in the consideration of planning applications rather than to the policies in the Core Strategy.</p>

	<p>Use of inert material in restoration may still alter soil chemistry and structure and needs to be re-examined and revised to determine it does not conflict with restoration aims.</p> <p>It is not clear how land owner co-operation will be secured to meet restoration aims, and whether planning obligations will be used to require best practice.</p> <p>Mineral planning objective ix should also take into account earth science conservation as well as nature conservation.</p> <p>Policy M10 should also include a statement on geodiversity.</p> <p>It is not clear how financial mechanisms to secure restoration would be used, or how 'necessary' would be determined.</p> <p>Objective x should be clarified by adding a reference to BAP approach to conservation.</p> <p>Objective ix is unclear and contradictory.</p> <p>Policies C7 and C11 are welcomed.</p> <p>The section on history of policy development is long and confusing.</p>	<p>Earth science is covered by 'natural environment' in Minerals Planning Objective ix.</p> <p>Geodiversity is included in Policy M10 in the submitted Core Strategy.</p> <p>This is addressed in paragraph 4.83 of the Core Strategy but detailed implementation is a matter for the planning application process.</p> <p>This is more appropriately covered in the supporting text to Policy M10 on restoration rather than in an objective.</p> <p>This should be objective viii. No change is considered to be necessary.</p> <p>Noted.</p> <p>Comment noted.</p>
--	--	---

	<p>Policies M7, M8 and M10 are unclear and inadequate and should be re-worded.</p> <p>Policy C7 should be re-worded to be clearer and more specific.</p>	<p>These comments relate to different versions of the restoration policy at various stages in the evolution of the Core Strategy. It is only Policy M10 in the submitted Core Strategy that should now be commented on. It is not clear what changes are sought to this policy, although a small change to this policy was sought in the respondent's representation on the published plan.</p> <p>The suggested rewording appears to relate to the 2014 draft plan version of Policy C7 on biodiversity and geodiversity rather than the policy in the submitted Core Strategy, although a small change to this policy was sought in the respondent's representation on the published plan.</p>
--	--	--

G. Development of the Waste Spatial Strategy (Topic Paper), April 2016

Respondent Name & No.	Summary of Comments	County Council Response
Smith and Sons Bletchington Ltd. (132/ac/6)	Welcome continued recognition of the importance of inert waste in restoring mineral workings. It is also welcome that where the use of inert waste to restore a quarry is seen as waste disposal, there will still be provision for inert landfill of this purpose. It is important to ensure consistency between this and the restoration topic paper.	Noted.
Magnox Ltd. (140/ac/1)	The section on National Policy does not refer to the NDA national strategies for radioactive waste management. This is considered fundamental given the presence of a former nuclear research facility subject to decommissioning at Harwell. The latest versions of the strategies were only published following the submission of the Core Strategy, but the topic paper should be updated to reflect the current position and a paragraph should be added to section 2 to clarify the role of the NDA Strategy III and the NDA Higher Activity Waste Strategy in the waste planning arena [wording suggested] .	The Council recognises that these are important national policy documents. Reference to these strategies therefore should be included in any update of this topic paper. The Council will consider proposing changes to Policy W9 and the supporting text of the Core Strategy to include appropriate reference to national strategy for radioactive waste management along the lines put forward in the respondent's representation on the published Core Strategy.
Sheehan Haulage and Plant Hire Ltd. (113/ac/2)	There has been no evolution of the topic paper over the course of the plan to record and keep track of how the waste spatial strategy has developed. Several important aspects of government policy and guidance have been omitted and some have been misinterpreted. Consequently it is not surprising that the spatial strategy is inadequate, as the policy background has been misunderstood.	These comments are noted and will be taken into consideration in any update of this topic paper.

	<p>The analysis of facilities does not justify that rural facilities should be small-scale, less than 20,000 tpa. Appendix 11 is flawed, as it includes sites which are in the green belt, which has been specifically excluded from the strategic areas. Also, the spatial strategy covers only the principal waste streams and so facilities for other types of waste and scrap yards should be excluded from the analysis. Re-analysis shows that the size of facilities is not a function of whether they are rural or not and there should not be a policy cap in this way on the size of sites. Very large facilities will need to be located in rural areas because suitable land with an appropriate distance from sensitive receptors is not available in urban areas in Oxfordshire.</p>	<p>The Council believes that a strategy that generally restricts waste development in rural locations to small scale facilities is justified. However, this needs to be seen in the context of the locations for strategic and non-strategic locations (Core Strategy policy W4 and Figure 12) which include rural areas around the towns and also the statements in Core Strategy paragraphs 5.33 and 5.34 about the suitability of locations further from towns which have good access (see also response to comments 113/ac/2 on Policy W4 below).</p>
	<p>The population figures show that the strategy would not assist the re-balancing of the distribution of waste management facilities or meet the unmet needs of Oxford or minimise the distances that waste needs to be moved within the county.</p>	<p>The Council believes that a strategy that generally seeks to concentrate larger waste facilities in proximity to larger centres of population, rather than allowing facilities to be located anywhere, is justified.</p>
	<p>The application of Policy W4 is ambiguous and therefore is not in line with NPPF paragraph 17. The explanatory text to Policy W4 should be altered to be consistent with the policy, as put forward in the representations on the published Core strategy; or Policy W4 should be amended to be less restrictive. The prospect of delivering sites in the area identified to meet Oxford's waste management needs is remote and therefore the strategy is not viable and needs to be changed.</p>	<p>The Council recognises that policy W4 appears to be more restrictive than is indicated as the intention in the supporting text, in particular the statements in paragraphs 5.33 and 5.34 of the Core Strategy that 'locations further from these towns may also be suitable where there is good access to the Oxfordshire lorry route network (policy C10)'. The Council will consider proposing changes to Policy</p>

		W4 and, if necessary, to the supporting text to make the flexibility intended in policy W4 clearer and ensure consistency between this policy and the supporting text.
	There has been no consideration of alternative options, such as drawing the radius wider around Oxford to encompass land beyond the Green Belt.	Where reasonable alternatives have been identified these have been considered and assessed – see also responses to comments 113/ac/6 on the Sustainability Appraisal Report Addendum below. The Council recognises that options for waste management facilities to serve Oxford are limited by the lack of available sites within Oxford and the Green Belt around Oxford and therefore that a strategic area with a 10km radius from the centre of Oxford may not provide sufficient flexibility. The statements in Core Strategy paragraphs 5.33 and 5.34 about the suitability of locations further from towns which have good access do provide additional flexibility (see also response to comments 113/ac/2 on Policy W4 below) but the Council will also consider proposing changes to the supporting text to Policy W4 and Figure 12 to increase the strategic area around Oxford.
	There is no mention of compliance with the duty to co-operate with the District Councils in terms of the viability of the spatial	The Council's engagement with the District Councils is addressed in the

	<p>strategy for meeting Oxford's waste management needs.</p>	<p>Councils Statement on Compliance with the Duty to Cooperate, December 2015. None of the District Councils have raised this as an issue.</p>
	<p>The presumption against the use of greenfield land in Policy W5 conflicts with national policy. This policy imposes a ban on use of greenfield land contrary to what is said in the topic paper (paragraph 3.87). The internal conflict within Policy W5 introduces uncertainty about what is required by the policy and it is not consistent with national policy.</p>	<p>The Council recognises that development of green field land for waste management facilities can sometimes be necessary and there is no intention that Policy W5 should act to prevent this. The NPPW gives priority to land that is either not green field or has already been allocated for development and Policy W5 reflects this. The Council will consider proposing a change to Policy W5 to make it clearer that development of green field land may be permitted where suitable sites at the priority land uses types listed are not available.</p>
	<p>Contrary to paragraph 3.77 of the topic paper, there has been no change in national policy on Green Belt between PPS10 and the NPPW. Locations within the Green Belt should not have been automatically ruled out.</p>	<p>The Council considers that there was a change in how Green Belt policy should be applied to waste management development between PPS10 and the NPPW. The NPPW states that waste planning authorities should first look for suitable sites and areas outside the Green Belt for waste management facilities (that would be inappropriate development in the Green Belt) and the strategy for the location of waste management facilities in the Core Strategy reflects this. The</p>

		Council will consider proposing a changes to the supporting text to Policy W4 (paragraphs 5.33 and 5.34) to make it clearer that whilst sites should first be looked for outside the Green Belt there may be circumstances where the locational needs of the development justify siting within the Green Belt and that the strategy in policy W4 allows for this; the need for a consequent change to Figure 12 will also be considered.
M&M Skip Hire Ltd. (114/ac/2)	See 113/ac/2	See response to comments 113/ac/2 above.
David Einig Contracting Ltd. (115/ac/2)	See 113/ac/2	See response to comments 113/ac/2 above.
McKenna Environmental Ltd. (116/ac/2)	See 113/ac/2	See response to comments 113/ac/2 above.

H. Supplement to the Waste Needs Assessment, April 2016

Respondent Name & No.	Summary of Comments	County Council Response
Raymond Brown Minerals and Recycling Ltd. (014/ac/2)	It is difficult to follow the analysis of CDE waste, but clearly there is a dearth of reliable information that makes forecasting difficult. There will clearly be a need for long term capacity for CDE waste management capacity in Oxfordshire, especially as high levels of construction are due to continue.	Noted.
Sheehan Haulage and Plant Hire Ltd. (113/ac/3)	<p><u>Chapter 1: Introduction</u></p> <p>The purpose and status of the 2016 supplement is not clear, the document is long and confusing. It was prepared after the 2015 Part 1 Submission plan and does not explain nor justify it. It employs new methodologies, which reach different conclusions and if the conclusions are to be used, then proper plan making process has not been followed as the preparation of the plan has not been evidence led.</p>	As stated in the document, the purpose of the April 2016 Supplement is to review the Waste Needs Assessment August 2015 to ensure it is up to date and using the best available information. Waste needs are not static and it is therefore right that the basis for policy is regularly reviewed and updated, even if this is after a plan has been published and submitted. If significantly different conclusions are reached from those in the plan, then these should be taken into consideration before the plan is adopted. The County Council will look in detail at the comments made in this response before reaching a final view on any changes that it considers should be made to the Core Strategy.
	<p><u>Chapter 2: Waste Policy</u></p> <p>Many aspects of government policy and guidance have been misinterpreted.</p>	The Council will look at these comments in more detail.

	<p><u>Chapter 3: Waste to be Managed</u></p> <p>The discounting of contribution of ash from Didcot power station is not justified as it had already been taken into account in BPPs earlier figure and is not used further anyway as an 'as managed' figure is estimated. There is no explanation of the benefits or reasons for using an 'as managed' baseline rather than arisings. A figure somewhere in the region of BPPs 2011 estimate (710,000) should be used, and not the new figure in the 2016 supplement (533,462). The growth rates applied are not appropriate as the potential for growth has not been analysed properly. There is no basis for the chosen comparisons between other local authorities' waste targets. No greater reliance can be placed on an 'as managed' baseline than a 'point of production' baseline. The new method used to estimate CDE baseline was one used by Defra but then withdrawn as it was complex, not very repeatable and only applicable at national level. The CDE baseline figures have not been used to estimate forecasts and therefore capacity. Therefore the supplement does not fulfil its brief.</p>	<p>The Council will look in detail at the comments made in this response before reaching a final position but is of the view that changes should be made to the plan to reflect the revised conclusions reached in the April 2016 Supplement. In particular, the Council is of the view that it is now more appropriate to use an 'as-managed' rather than 'point of production' approach in assessing waste management needs. The main changes involved are:</p> <ul style="list-style-type: none"> • revised 'as-managed' C&I waste baseline figure of 533,462 tonnes in 2014; • consequent revised forecasts of waste to be managed to 2031; • revised 'as-managed' CDE waste baseline figure of 1.03 mt in 2014; • amended forecasts for CDE waste with increased recycling rates in 2025 and 2026; • changing landfill/restoration to 'permanent deposit of waste' (to cover recovery to land and landfill). <p>The Council will therefore consider proposing appropriate changes to the Waste Planning Strategy section of the Core Strategy as indicated.</p>
--	--	---

	<p><u>Chapter 4: Cross Boundary Movement of Waste</u> The statement that Oxfordshire has made significant strides in providing additional capacity and making an increasing contribution to the management of out of plan area waste is not justified and could be accounted for through improvements to data collection. Import figures are subject to great fluctuation and do not specify if they are for landfill so does not justify that more recycling capacity has been established.</p>	<p>The County Council will look in detail at the comments made in this response before reaching a final view on any changes that it considers should be made to the Core Strategy.</p>
	<p><u>Chapter 5: Waste Management Capacity</u> WDI data records material received at site (site input limit), and this will of course be higher than that recycled (recycling rate). Maximum capacity does not equal actual capacity, and it is this that requires improving. The examples given are not representative of the wider picture. An adjustment to theoretical site capacities must be made to allow for the difference between actual and potential recycling performance.</p>	<p>The County Council will look in detail at the comments made in this response before reaching a final view on any changes that it considers should be made to the Core Strategy.</p>
M&M Skip Hire Ltd. (114/ac/3)	See 113/ac/3	See response to comments 113/ac/3 above.
David Einig Contracting Ltd. (115/ac/3)	See 113/ac/3	See response to comments 113/ac/3 above.
McKenna Environmental Ltd. (116/ac/3)	See 113/ac/3	See response to comments 113/ac/3 above.

I. Preliminary Assessment of Waste Site Options

Respondent Name & No.	Summary of Comments	County Council Response
Raymond Brown Minerals and Recycling Ltd. (014/ac/3)	<p>Categories 3 & 6: Site 002 – Prospect Farm, Chilton</p> <p>Question whether the correct site has been assessed. Under category 3 the site is not in the setting of the AONB, but within the boundary of the AONB. It is not in the risk zone of several SSSIs, and SSSIs have never been an issue in the past. Wittenham clumps is 10km from the site and not likely to be relevant. The site is remote with no housing or other sensitive development nearby. Under category 6 – the site does not have poor access, it has good access directly onto the A34. Request that the assessment is adjusted as they currently prejudice the site from becoming permanent.</p>	<p>The assessments will be re-checked. The site is within the AONB, not within the setting.</p> <p>The purpose of the preliminary site assessment is to assess the likely deliverability of the nominated sites to indicate whether the strategy for waste management in the Core Strategy is deliverable. It is not an assessment of suitability for allocation in the Site Allocations Document.</p> <p>Detailed matters will be considered when the sites are assessed in the preparation of the Site Allocations Document but these do not affect the preliminary site assessments.</p>
Sheehan Haulage and Plant Hire Ltd. (113/ac/4)	<p>The intention of this paper has changed from being one which shows that the waste planning strategy is potentially capable of being delivered (Core Strategy 7.31) to one that will show whether the nominations will enable the waste strategy to be delivered. Producing a topic paper after the plan has been submitted demonstrates that the strategy has not been prepared to meet objectively assessed development requirements.</p>	<p>Noted. This paper has been produced to show whether the waste strategy is deliverable. The assessment would be the same whether published before or after publication and submission of the Core Strategy.</p>
	<p>The assessment proves that the spatial strategy cannot be delivered, and highlights that in relation to policy W4 the plan does not provide a practical framework within which planning decisions can be made, as required in the NPPF (para 17).</p>	<p>See response to comments 113/ac/2 above in relation to the paper on Development of the Waste Spatial Strategy.</p>

	<p>The spatial strategy should be modified so that it is deliverable, or Policy W4 should be reworded to include more flexibility in locating sites. Following the interpretation of policy W4, there is severely less capacity than the preliminary assessment shows, and not enough to satisfy even the Councils assessed need, let alone the increased capacity that is actually required.</p>	
	<p>Ruling out greenfield sites demonstrates that the Council does intend to rule out the use of greenfield land, even though there is no national policy presumption against it.</p>	<p>The purpose of the preliminary site assessment is to assess the likely deliverability of the nominated sites to indicate whether the strategy for waste management in the Core Strategy is deliverable. It is not an assessment of suitability for allocation in the Site Allocations Document. The preliminary site assessment necessarily has to adopt a simple scoring system which cannot always reflect the subtleties of how policies might be applied in practice.</p>
	<p>Detailed comments are made on a large number of sites, in many cases suggesting errors in the assessment scores. Several sites have been said to be nominated for small scale facilities, however they are actually for additional capacity to an existing site and therefore these sites should be assessed as large scale sites. Several sites have been nominated for permanent use, and therefore should be assessed as Red on greenfield land, as restoration would not be secured.</p>	<p>These comments will be looked at in detail and if there are errors the assessments will be corrected.</p>
	<p>There is no justification for the statement that at least some of the sites nominated for inert waste recycling would be suitable and could become available for provision of non-hazardous waste recycling facilities as the two have completely differing</p>	<p>The County Council believes this to be a reasonable assertion and that the difference between site requirements for inert waste recycling and non-</p>

	requirements and have been nominated for their intended use for this reason.	hazardous waste recycling is being exaggerated, albeit that inert waste recycling is generally an open air activity whereas non-hazardous waste recycling is carried out in a building and consequently there will be some sites that are not suitable for both.
M&M Skip Hire Ltd. (114/ac/4)	See 113/ac/4	See response to comments 113/ac/4 above.
David Einig Contracting Ltd. (115/ac/4)	See 113/ac/4	See response to comments 113/ac/4 above.
McKenna Environmental Ltd. (116/ac/4)	See 113/ac/4	See response to comments 113/ac/4 above.
Historic England (120/ac/2)	Non-designated assets of local importance should also be taken into account (as with locally designated areas of nature conservation interest). This would include the assets in the lower Windrush Valley and any parks and gardens on local or county lists. The Oxfordshire Aggregates and Archaeology Assessment should form an important part of the evidence base. The weighting assigned to heritage assets is crude and does not accurately reflect the NPPF understanding of 'setting'. Greater consideration should be given to the impact of mineral and waste workings on the setting of heritage assets, and further investigation undertaken of sites with a 'Green' assessment. It should not be the case that a site with a Green assessment should be seen as acceptable for waste development at this stage.	The purpose of the preliminary site assessment is to assess the likely deliverability of the nominated sites to indicate whether the strategy for mineral working in the Core Strategy is deliverable. It is not an assessment of suitability for allocation in the Site Allocations Document. These comments raise important matters that will be considered when the methodology is drawn up to assess sites for the Site Allocations Document. The assessment of site options for the Site Allocations Document will be a more detailed assessment, using more information.
	<u>236</u> Further development on this site could be within the setting of a Scheduled Monument. The potential impacts on this should be taken into account when determining the suitability	These comments will be looked at in detail and if there are errors the assessments will be corrected.

	<p>of the site for waste development.</p> <p><u>217</u> the site is possibly within the setting of a registered park and garden. The potential impacts on this should be taken into account when determining the suitability of the site for waste development.</p> <p><u>249A&B</u> These sites are within the setting of a listed building. The potential impacts on this should be taken into account when determining the suitability of the site for waste development.</p> <p><u>001</u> the site is within the setting of a number of listed buildings. The potential impacts on these should be taken into account when determining the suitability of the site for waste development.</p> <p><u>020B</u> Further development on this site would be within a listed building and the potential impact on this should be taken into account when determining the suitability of the site for waste development.</p> <p><u>265</u> The site is within the setting of listed buildings. The potential impact on these should be taken into account when determining the suitability of the site for waste development.</p> <p><u>279</u> the site is potentially within the setting of listed buildings. The potential impacts on these should be taken into account when determining the suitability of the site for waste development.</p> <p><u>232</u> The site is within the setting of the Oxford Canal</p>	<p>Otherwise the detailed comments are noted and will, as appropriate, be taken into consideration when the more detailed assessment of sites for the Site Allocations Document is carried out.</p>
--	--	---

	Conservation Area. The potential impact on these should be taken into account when determining the suitability of the site for waste development.	
Environment Agency (133/ac/3)	<p>Support the approach to identify sites according to Flood Zone, and welcome the precautionary approach to flood zone 3 and recognition that certain activities will be subject to the exception test.</p> <p>Acknowledge the lack of detail regarding the intrinsic impact of waste sites on groundwater quality in groundwater protection zones. It would be useful to indicate that further detailed assessment will be required to determine the particular suitability of a particular site for a certain type of waste.</p> <p>Welcome the proportionate approach to above ground waste sites and confirmation that further investigation will be undertaken.</p>	<p>Noted.</p> <p>Noted. This will be taken into consideration when the more detailed assessment of sites for the Site Allocations Document is carried out.</p> <p>Noted.</p>
Chilterns Conservation Board (146/ac/3)	Using a 1km buffer to interpret the setting of the AONB is overly simplistic and may lead to effects on the setting being underestimated. Further investigation is needed for these sites to determine their effects on the setting of AONBs.	The purpose of the preliminary site assessment is to provide an indication of the deliverability of the Core Strategy; it is not an assessment of suitability for allocation in the Site Allocations Document. The preliminary site assessment has necessarily had to take a simple approach to enable all sites to be assessed on an equal basis using readily available information. Consideration will be given to how a more detailed assessment of effects on the settings of AONBs can be included when the methodology to assess sites for the Site Allocations Document is

		drawn up.
	One of the waste sites (005 – Playhatch Quarry) is incorrectly recorded as within 2km of the North Wessex Downs – this should be the Chilterns AONB.	This error will be corrected.

J. Waste Site Safeguarding (Topic Paper), April 2016

Respondent Name & No.	Summary of Comments	County Council Response
Anglian Water (015/ac/2)	<p>Support the principle of safeguarding existing waste management sites. However no further evidence is included in the Topic Paper to explain the rationale for including the threshold of 250m from a waste management site for consultation in paragraph 5.103 of the Core Strategy. The proposed distance is insufficient to safeguard existing sewage treatment works. We remain of the view that paragraph 5.103 and Appendix 2 of the Core Strategy should be amended as set in our previous comments (i.e. to change the consultation distance to 400m for sewage treatment works in paragraph 5.103 and to include 6 additional sewage treatment works sites in Appendix 2).</p>	<p>The Council recognises that there is justification for the changes that are sought and understands that a consultation distance of 400m for sewage treatment works is now being adopted in other parts of Anglian Water's area of operation. The Council will therefore consider proposing changes to paragraph 5.103 and Appendix 2 along the lines requested.</p>
Sheehan Haulage and Plant Hire Ltd. (113/ac/5)	<p>Temporary waste sites with permissions ending before the end of the plan period were safeguarded in previous versions of the plan. There has been no explanation of why this has been removed (seemingly contrary to what was approved by council) and Policy W11 should be reworded to reinstate this. The Council's reasoning that safeguarding temporary sites with permissions ending before the end of the plan period would be safeguarding sites with an uncertain future has not been applied as non-operational sites are proposed to be safeguarded. Safeguarding some temporary sites and not others is preferential treatment, and temporary sites with permissions ending just before the plan period could provide valuable contributions to waste management capacity.</p>	<p>Under Policy W11, existing temporary sites will be safeguarded pending adoption of the Site Allocations Document, and are included in Appendix 2. The Council recognises that waste management sites with temporary permissions make a significant contribution towards meeting capacity requirements and therefore that there is justification for safeguarding temporary sites on a longer term basis, through identification in the Site Allocations Document. This could either be for the duration of the permission or, if the site is considered appropriate, for the</p>

		<p>remainder of the plan period (as referred to in paragraph 5.101 of the Core strategy). The Council will therefore consider proposing a change to Policy W11 to include sites with permissions that expire before the end of the plan period as sites to be identified for safeguarding in the Site Allocations Document.</p>
--	--	---

K. Core Strategy Sustainability Appraisal Report Addendum, April 2016

Respondent Name & No.	Summary of Comments	County Council Response
OXAGE (017/ac/5)	The SA does not evaluate the need to produce a single plan with sites against a two-stage process and any associated advantages/disadvantages of each approach.	The role of SA is to consider the sustainability effects of a Plan and its reasonable alternatives during the various stages in the plan making process. There is no requirement to undertake SA on different approaches that the plan making process could take.
	The SA does not react to the changes introduced by the NPPF in 2012 for calculating the annual requirement rate by evaluating the alternatives of using a 10-year rolling average as opposed to the approach currently used.	In accordance with the NPPF the Council have based their LAA on a rolling average of 10 years sales data and other relevant local information. It is considered that there are no reasonable alternatives to this approach.
	The SA effectively concludes that an environmental balance needs to be struck to reduce long-term pressures on West Oxfordshire. This appears to be a subjective or anecdotal conclusion rather than based on objective evidence and analysis.	The SA identified that rebalancing the geographical split in extraction, so that there will be increased working in South Oxfordshire close to areas of housing and economic growth, will have sustainability benefits as it will reduce the distances needed to transport aggregates. Any resulting reduction of working in West Oxfordshire would reduce the cumulative impacts in that part of the County. Such conclusions are not anecdotal.

Sheehan Haulage and Plant Hire Ltd. (113/ac/6)	The SA Report Addendum is not a new exercise providing a more detailed appraisal of the alternatives (and is therefore not the type of addendum endorsed by the 'Cogent case').	The SA Report Addendum was prepared in order to improve the clarity of the information provided in the previous rounds of reporting and to aim to avoid the need for a 'paper chase'.
	The assessment of alternatives for policies has not been undertaken since 2012. As this is the preparation of a new local plan the alternatives should have been identified and assessed and therefore the plan is not legally compliant.	Whilst in procedural terms the Plan is a 'new plan', in practice it is an evolution of the previously withdrawn Core Strategy and therefore the work undertaken in developing that Core Strategy, including the consideration of options in the SA process, remains relevant and valid.
	The SA does not consider the consequences of changing from a single plan approach with no site allocations to a two part plan.	This is a procedural issue. There is no requirement to undertake SA on the plan making process.
	Assessing strategies in isolation does not satisfy the SA requirements that meaningful comparisons of reasonable alternatives are made, to ensure that the preferred approach is the most appropriate.	Options have been considered at several stages during the plan making process and have been assessed to the same level of detail at each stage. The draft 2014 Plan and the 2015 Publication Plan (that has now been submitted) took forward the preferred approach from the withdrawn 2012 Core Strategy. The approach has been updated but not to a degree where new alternatives were considered.
	Reasonable alternatives need to be considered for all policies.	The SEA Regulations and Guidance do not require alternatives to be considered for all policies. For some policies in the Plan 'reasonable alternatives' were not

		identified and therefore options were not considered.
	In Appendix 2 the SA commentary for the 2014 Consultation draft in the sheet for Sharp Sand and Gravel refers to “the site allocations stage” yet at that point in time there was not to be a site allocations plan.	This was an error. It should have referred to the “planning application stage”.
	<p>Table 2 does not provide the reasons why alternatives were rejected.</p> <p>Table 2 does not provide specific details for the actual policy options, but just says that ‘options were considered’.</p> <p>Appendix 3 does not give clear reasons for rejecting alternatives (where they are considered) and provides no conclusions on the overall sustainability of the different options.</p>	<p>Table 2 was developed to provide a summary of how the policies were developed.</p> <p>As specified in Section 4.2 of the SA Report Addendum the details of the options considered are provided in Appendices 1-3, including reasons for selecting or rejecting options.</p> <p>Section 5 and Appendix C of the SA Report (August 2015) provide further information on the consideration of options during the plan making process and provide signposting to the previous SA Reports that include details of assessments of all alternatives considered.</p>
	The Sustainability Appraisal Addendum does not provide any additional evidence to prove that the requirements of the SA process have been met.	The SA Report Addendum was prepared under the assumption that whilst in procedural terms the Plan is a ‘new plan’, in practice it is an evolution of the previously withdrawn Core Strategy. It was therefore not considered necessary to provide additional evidence beyond that included in the SA Report (August 2015), further clarified in the SA Report

		Addendum.
M&M Skip Hire Ltd. (114/ac/5)	See comments 113/ac/6	See response to comments 113/ac/6
David Einig Contracting Ltd. (115/ac/5)	See comments 113/ac/6	See response to comments 113/ac/6
McKenna Environmental Ltd. (116/ac/5)	See comments 113/ac/6	See response to comments 113/ac/6

L. Core Strategy Legal Compliance Self-Assessment Checklist, April 2016

Respondent Name & No.	Summary of Comments	County Council Response
OXAGE (017/ac/6)	The LAA 2014 was not subject to public consultation despite a commitment to do so in the extant Statement of Community Involvement. The legal compliance checklist still does not address this. Therefore the Plan is not legally compliant.	The LAA is not part of the Plan but is one of the evidence base documents that support it. The 2006 SCI was the operative SCI when the LAA 2014 was prepared. The 2006 SCI sets out at paragraph 4.4 how the Council will involve people in the Minerals and Waste Development Framework. This refers to consulting and involving individuals and organisations in relation to the production of minerals and waste development documents. The table following 4.10 lists evidence gathering as one of the stages, for which involvement is stated to be technical consultation with statutory bodies and consultation with key stakeholders. The Council does not consider that the 2006 SCI required it to involve or consult a wider range of persons or organisations, such as local residents or environmental groups and parish councils in the preparation of individual evidence base documents, such as the LAA.