

**OXFORDSHIRE MINERALS AND
WASTE LOCAL PLAN**

PART 2 – SITE ALLOCATIONS

ISSUES AND OPTIONS CONSULTATION

August 2018

RESPONSE FORM

Oxfordshire County Council is preparing the Oxfordshire Minerals and Waste Local Plan, comprising two parts: Part 1 – Core Strategy; and Part 2 – Site Allocations. Together these will guide all future Minerals and Waste Development within Oxfordshire. The Core Strategy was adopted by the County Council on 12th September 2017.

This consultation is the first key stage in the preparation of Part 2 of the Plan – Site Allocations. It is the first formal stage of consultation.

This form contains all the questions in the Minerals and Waste Local Plan: Part 2 - Site Allocations Issues and Options consultation document, which should be read alongside it. The consultation document, this form and other related documents are available at:

<https://www.oxfordshire.gov.uk/cms/content/new-minerals-and-waste-local-plan>

Please use this form to make your comments and send them to

mineralsandwasteplanconsultation@oxfordshire.gov.uk

Alternatively, please print this form and send your completed forms by post to:

Minerals & Waste Sites Plan Consultation
Development Management Team
Strategic Infrastructure and Planning
Oxfordshire County Council
County Hall, New Road, Oxford, OX1 1ND

Paper copies of this form, if required, are available from the Minerals and Waste Policy Team (contact details below). If you are unable to use this form, we will accept comments by email or post.

Comments must be received by 4.00pm on Wednesday 3rd October 2018.

Alternative formats of this publication can be made available on request. These include other languages, large print, Braille, audio cassette, compute disk or e-mail. Please contact the Minerals and Waste Policy Team:

Direct Line: 07392318899 or 07741607726

Email: mineralandwasteplanconsultation@oxfordshire.gov.uk

Part 1 – Respondent Details

1(a) Personal details									
Title	Mr								
First Name	David								
Last Name	Payne								
Job Title (where relevant)	Senior Planning Advisor								
Organisation (where relevant)	Mineral Products Association								
1(b) Agent details <i>Only complete if an agent has been appointed</i>									
Title									
First Name									
Last Name									
Job Title (where relevant)									
Organisation (where relevant)									
1(c) Contact address details <i>If an agent has been appointed, please give their contact details</i>									
Address Line 1	Gillingham House								
Line 2	38-44 Gillingham Street								
Line 3	London								
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Postcode	SW1V 1HU								
Telephone No.	07834 268407								
Email address	David.payne@mineralproducts.org								
Are you writing as	<table border="0"> <tr> <td><input type="checkbox"/> A resident</td> <td><input type="checkbox"/> A parish council</td> </tr> <tr> <td><input type="checkbox"/> A local business</td> <td><input type="checkbox"/> A district council</td> </tr> <tr> <td><input checked="" type="checkbox"/> Minerals industry x</td> <td><input type="checkbox"/> A county council</td> </tr> <tr> <td><input type="checkbox"/> Waste industry</td> <td><input type="checkbox"/> Other (please specify)</td> </tr> </table>	<input type="checkbox"/> A resident	<input type="checkbox"/> A parish council	<input type="checkbox"/> A local business	<input type="checkbox"/> A district council	<input checked="" type="checkbox"/> Minerals industry x	<input type="checkbox"/> A county council	<input type="checkbox"/> Waste industry	<input type="checkbox"/> Other (please specify)
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<input checked="" type="checkbox"/> Minerals industry x	<input type="checkbox"/> A county council								
<input type="checkbox"/> Waste industry	<input type="checkbox"/> Other (please specify)								

Please tick the appropriate boxes if you wish to be notified of any of the following and to show how you wish to be contacted:

(If you do not tick any of the boxes below, you will not be contacted again with regard to the preparation of the Minerals and Waste Local Plan)

	Contact by Email	Contact by Post
Publication of future consultations on the Minerals and Waste Local Plan – Part 2 Site Allocations Plan.	✓	
Submission of the Minerals and Waste Local Plan – Part 2 - Site Allocations Plan.	✓	
Examination of the Minerals and Waste Local Plan – Part 2 - Site Allocations Plan.	✓	
Adoption of the Minerals and Waste Local Plan – Part 2 - Site Allocations Plan.	✓	
Any other consultations on publications produced by Oxfordshire County Council Minerals and Waste Team	✓	

Data Protection and Freedom of Information

Oxfordshire County Council is a data controller for the purposes of the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council dated 27th April 2016). For more details on how the Council will handle your personal information, please use the link below to access our Privacy Notice. Hard copies of this can also be provided on request:

<https://www2.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/aboutyourcouncil/corporateovernance/GenericPrivacyNotice.pdf>

The information on this form is collected by Oxfordshire County Council as a data controller. The purposes for collecting this data are:

1. To assist in preparing the Oxfordshire Minerals and Waste Local Plan: Part 2 – Site Allocations. The preparation of this plan is required by the Planning and Compulsory Purchase Act 2004.
2. To contact you, if necessary, regarding the responses given in relation to this consultation.

The above purposes may require public disclosure of any data received by Oxfordshire County Council, in accordance with the Freedom of Information Act 2000 (as amended).

By responding to this consultation, you agree that Oxfordshire County Council can hold contact details and related responses. These details will only be used in relation to preparation of the Oxfordshire Minerals and Waste Local Plan: Part 2 – Site Allocations. You also accept that responses cannot be treated as confidential and that any comments made, including information provided in support of a site nomination, will be made publicly available for viewing in paper form and/or on the Council website in due course. Relevant information may be passed to external parties where required for the purposes of preparation of this plan only.

By responding to the invitation to nominate a site for possible inclusion in the Oxfordshire Minerals and Waste Local Plan: Part 2 – Site Allocations you understand and accept that this is without prejudice to the decisions that will be taken by the County Council on the site allocations and related policies to be included in the Plan.

The information collected will be held and retained by Oxfordshire County Council in paper and/or electronic form for the duration of the preparation of the Oxfordshire Minerals and Waste Local Plan: Part 2 – Site Allocations and for a period following adoption of the Plan in accordance with the Council's retention schedule. Consultation responses will be removed from the Council website when the Plan has been adopted.

You have the right to contact the Information Commissioners Office if you are unhappy with anything to do with our use of your personal information. If you have any concerns regarding the processing of your data, please contact Minerals.WastePlan@Oxfordshire.gov.uk

Please sign and date the form:

Please note that response forms that are not signed and dated will not be accepted (this can be typed in for electronic forms).

Signature:		Date:	25/10/18
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Questions on Site Options

Question 1 – selection of site options¹

Taking into account the need for certainty about delivery of sites in order that the Sites Plan will meet the test of soundness that it is “effective”:

A Should site allocations in the Sites Plan be drawn only from those sites that have been nominated by landowners or mineral/waste operators?

or

B Should other sites, in addition to those nominated, be considered for possible allocation in the Sites Plan and, if so, how should they be selected?

Your response:

Please give reasoning for your response

A. Limiting sites to those nominated would help ensure deliverability within the Plan period. Other policies provide for consideration of other sites that may come forward. Undertaking a separate site selection process would be unnecessary given the number and range of sites nominated, and would cause delay to the preparation and adoption of the Sites Plan.

¹ This question is particularly relevant to sites for recycled and secondary aggregate and waste management facilities, for which relatively few site nominations have been received.

Question 2 – issues relating to nominated sites	
In respect of each nominated site: <i>Please copy and complete a separate page for each site commented on</i>	
A	What would be the impacts of the proposed minerals or waste development at this site (including environmental, economic and social impacts, both negative and positive)?
B	How could any negative impacts be mitigated to make the development acceptable?
C	Are there any other planning issues that affect this site?
D	What are the potential opportunities for restoration of the site? How should the site be restored and what benefits could be gained through restoration? <i>(this question is for mineral working and landfill sites only)</i>
Site no. & name	
Your response: Please give reasoning for your comments	
No comment	

Question 3 – other potential sites

Are there any other sites that the County Council should consider and assess for possible allocation for minerals or waste development in the Sites Plan?

Please list any additional sites being nominated and for each site complete and attach a site nomination form – available on the Council's website:

Sites for Mineral Working:

<https://www2.oxfordshire.gov.uk/cms/content/minerals-sites>

Sites for Recycled & Secondary Aggregates and Waste Management Facilities:

<https://www2.oxfordshire.gov.uk/cms/content/waste-sites>

No comment

Questions on Other Issues about Allocation of Sites

Issue 1 – Level of provision and contingency for mineral working

Question 4 – level of mineral working site provision	
A	Should the Sites Plan make only the arithmetic minimum provision in site allocations that is required to meet the additional requirements for mineral working in Annex 1?
or	
B	Should provision in allocations also take into account the need to ensure there is sufficient production capacity available throughout the plan period to enable an adequate level of supply (recognising that reserves are not equally distributed between quarries and quarries have differing levels of output)?
Your response: Please give reasoning for your response	
<p>B YES. Capacity can be affected by a range of factors and constraints. Landbanks of reserves do not necessarily equate to capacity to supply, including to meet the rate set in the LAA, and there is no guarantee that all allocated sites will come forward when anticipated.</p> <p>In addition, making provision only for the ‘arithmetic minimum provision’ would not be consistent with national policy or guidance. The figure for provision (from the LAA) used to generate figures for planned provision should itself be regarded as a minimum and not a maximum (as implied in the question), as it is the basis for calculating landbanks (which themselves must be treated as the minimum level of reserves to be provided, as made clear in NPPF and PPG). As PPG also makes clear, there is no maximum landbank level, and so planning for an arithmetic minimum provision would not be appropriate or sensible – in terms of reserves or production capacity.</p>	

Question 5 – contingency provision for mineral working	
A	Should some contingency be added to the additional requirements for mineral working site provision to give flexibility in case sites cannot be brought forward or prove not able to deliver the expected yield?
and, if yes,	
B	What level of contingency provision would it be appropriate to add: 10%, 20%, 25%, other?
Your response: Please give reasoning for your response	
<p>A. YES - to reflect uncertainty, including the overall level of provision derived from the LAA as well as all sites not coming forward as anticipated, and reserves not being developable, and to provide sufficient flexibility to adapt to rapid change, including changes in market and demand.</p> <p>B. At least 25% would be appropriate, to take account of uncertainties, the time taken for sites to be developed and become productive, and the need to 'maintain' minimum landbanks – including at the end of the Plan period which at the prevailing LAA rate would require an additional 7.1mt of sand and gravel reserves.</p>	

Issue 2 – Provision for soft sand and crushed rock

Question 6 – allocation of sites for soft sand and crushed rock	
A	Should specific sites be allocated for soft sand and crushed rock?
or	
B	Should provision be made in some other way, such as by broader areas of search?
and, if yes to B	
C	Which areas should be included as areas of search?
Your response: Please give reasoning for your response	
<p>A. YES Allocation of sites nominated by operators and landowners provide certainty</p> <p>B. Areas of Search should reflect the Strategic Resource Areas</p>	

Issue 3 – Site size and extensions or new sites for mineral working

Question 7 – size of sites for mineral working	
A	Should a minimum site size (by mineral yield) be applied in the allocation of sites for mineral working?
and, if so	
B	What size threshold or thresholds should be used?
Your response: Please give reasoning for your response	
A. NO the viability of a site will depend on a range of factors and circumstances, and applying a threshold could place un-necessary restrictions on future developments.	

Question 8 – priority for extensions over new quarries
To what extent should the priority for extensions in Core Strategy policy M4 be applied in relation to other factors in the allocation of sites for: sharp sand and gravel; soft sand; and crushed rock?
Your response: Please give reasoning for your response
Extensions often offer benefits in terms of using existing infrastructure, continuity of provision, ongoing management of environmental and amenity impacts) and so could be prioritised for these reasons, although as PPG points out, the suitability of extensions or new sites should be considered on individual merits. New sites can release large new reserves and distribute the pattern of production.

Issue 4 – Restoration of mineral working sites

Question 9 – weight given to restoration objectives	
What weight should be given to the achievement of the restoration objectives of the Core Strategy relative to other factors in the allocation of sites for mineral working?	
Your response: Please give reasoning for your response	
<p>The CS policy provides for restoration to a wide range of after-uses. All mineral sites have potential for beneficial restoration and after-use, often to multiple uses. Therefore restoration objectives are wide and should be given equal weight to other factors in Policy M4.</p>	

Question 10 – specification of restoration requirements	
A	Should the Sites Plan specify how sites allocated for mineral working are to be restored?
and, if yes	
B	How detailed should the specified restoration requirements be?
Your response: Please give reasoning for your response	
<p>Broad opportunities, in terms of types of restoration and after use, could be identified for each allocated site, but the precise detail of such restoration should be at the application stage based on more detailed consideration of opportunities and constraints (as recognised in Policy M10 and supporting text).</p>	

Issue 5 – Sites already permitted for mineral working

Question 11 – allocation of sites already permitted for mineral working
Should areas of land that already have planning permission for mineral working be included as site allocations in the Sites Plan?
Your response: Please give reasoning for your response
NO. The Sites Plan should focus on identification of suitable new sites and reserves to be developed in future.

Issue 6 – Provision for recycled & secondary aggregates & waste management facilities

Question 12 – size of sites for recycled & secondary aggregates and waste management facilities	
A	Should there be a size threshold for sites for recycling / secondary aggregates and waste management facilities allocated in the Sites Plan?
and	
B	Should the Sites Plan only allocate sites for strategic and non-strategic facilities?
Your response: Please give reasoning for your response	
A. NO as viability of an operation will depend on a range of factors B. YES with CS policies M1, W4 and W5 provide for consideration of smaller-scale facilities.	

Question 13 – identification of other sites

Should the County Council seek to identify other sites for recycling / secondary aggregate and waste management facilities for assessment (in addition to those that have been nominated)?

Your response:

Please give reasoning for your response

No – likely that these may not be deliverable if not nominated, and CS policies would enable consideration should additional sites come forward ver time

Question 14 – allocation of industrial estates and employment areas

A **Should the Sites Plan allocate industrial estates and other broad areas of employment land where waste management facilities could potentially be located?**

and, if yes

B **Should this be as well as or instead of the allocation of specific sites?**

Your response:

Please give reasoning for your response

No comment

Issue 7 – Provision for inert waste deposit or disposal

Question 15 – sites for inert waste deposit or disposal	
A	Should the Sites Plan only allocate active or unrestored quarries as sites for deposit or disposal of inert waste?
or	
B	Should it also allocate other sites where deposit or disposal of inert waste on land would result in overall environmental benefit?
Your response: Please give reasoning for your response	
A – which would help make available, and encourage and enable use of such material in restoration of minerals sites	

Issue 8 – Mineral safeguarding

Question 16 – mineral safeguarding areas	
A	Should the mineral safeguarding areas be reviewed and, if appropriate, amended to include other areas of mineral resource?
and, if yes	
B	Which other areas of mineral resource should be included within mineral safeguarding areas?
Your response: Please give reasoning for your response	
A Yes if the evidence indicates current MSAs exclude areas of potentially workable minerals, particularly if such areas are likely to be potentially sterilised by development, including that allocated in emerging Local Plans B as above	

Question 17 – safeguarding mineral infrastructure

Which mineral infrastructure sites in Oxfordshire (in addition to the specified rail depot sites) should be defined in the Sites Plan to be safeguarded?

Your response:

Please give reasoning for your response

No comment

Issue 9 – Waste management site safeguarding

Question 18 – safeguarding waste management sites

A Are there any waste management sites in Appendix 2 of the Core Strategy that should not be safeguarded in the Sites Plan and, if so, why?

and

B Are there any waste management sites not included in Appendix 2 of the Core Strategy that should be safeguarded in the Sites Plan and, if so, why?

Your response:

Please give reasoning for your response

No comment

Issue 10 – Any other matters the plan should cover

Question 19 – any other matters the plan should cover

Is there anything else, not covered above in this consultation document, that the proposed Oxfordshire Minerals and Waste Site Allocations Plan should contain?

Your response:
Please give reasoning for your response

No comment