

Planning

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Dear Oxfordshire Minerals and Waste Policy Team,

MWLP Sites Plan Interim Sustainability Appraisal (SA) of the Approach to Site Delivery and Site Assessment Methodology Update

South Oxfordshire (SODC) and Vale of White Horse (VWHDC) District Councils welcome the opportunity to comment on Oxfordshire County Council's updated Site Assessment Methodology and Interim Sustainability Appraisal (SA) of the Approach to Site Delivery.

Interim SA of the Approach to Site Delivery

Regarding the Interim SA of the Approach to Site Delivery, both councils consider that greater weight should have been given to climate change impacts in the assessment of Q20 'distribution of mineral extraction sites'. It is encouraging that one of the SA objectives is to 'reduce greenhouse gas emissions to reduce the cause of climate change' and is assessed in Table 4 which gives a score of 'uncertain'. However, there is no consideration of this objective in the discussion at paragraphs 4.20-4.22, or reasoning given behind the 'uncertain' score. We consider that the spatial distribution of mineral extraction sites is likely to have an impact on carbon emission levels and consequently climate change, and sufficient weight should be given to this in the SA. For example, options B and C propose the delivery of multiple mineral extraction sites, which could potentially lead to greater levels of vehicular movement on the road network due to the greater number of operational sites. This could consequently cause greater levels of carbon emissions to be produced than option A, where operations and travel would only be to and from a singular site. As a result, we consider that climate change impacts such as the example we have provided have not been fully considered in the assessment which ultimately recommends pursuing option C. Thus, we consider that the assessment is light on detail regarding the compliance of this key SA objective and recommend that it is reviewed to ensure this objective is met.

Regarding the previous proposal to potentially apply a contingency allowance, we agree with the decision stated in the Interim SA to not apply this. The inclusion of such a figure is not indicated by the PPG, and thus agree with the statement that it is 'beyond the scope of the Sites Plan'.

Site Assessment Methodology Update

South Oxfordshire District Council Response:

On review of the updated Site Assessment Methodology, South Oxfordshire District Council consider that our comments put forward in our previous consultation response dated 4 March 2020 have not been addressed. In that response, we stated that the secondary detailed assessment of sites included a 'policy on' assessment with regard to Oxfordshire Minerals and Waste Core Policy M3's requirement to balance sharp sand and gravel provision between 'northern' and 'southern' Oxfordshire. This led to some sites in 'northern' Oxfordshire being considered unsuitable for allocation that would otherwise be deemed more suitable than those pursued in 'southern' Oxfordshire in order to meet the demand to the end of the plan period. Furthermore, an 'additional sieve' has been introduced in the updated Site Assessment Methodology Stage 3b assessment process, one of which is 'rebalancing of the sources of supply of sand and gravel between the northern and southern halves of the County'. Paragraph 3.3 states that 'any sites that do not comply with these key policy considerations will be discounted from further consideration at this point and will not proceed further in the Stage 3b assessment process'. Therefore, our concerns about the 'policy on' approach has not been addressed, as this new 'additional sieve' consideration will ensure some suitable sites in 'northern' Oxfordshire are again screened out, even if they present greater and better opportunities for the extraction of sharp sand and gravel during the plan period. We reiterate our previous recommendation that there appears to be scope to instead rebalance the distribution of mineral provision through allocations in 'southern' Oxfordshire in the longer term, albeit these sites will not contribute their full potential for sharp sand and gravel extraction within the plan period.

In South Oxfordshire District Council's March 2020 consultation response, we stated that the assessment regarding Site SG42 – Land at Nuneham Courtenay was not in conformity with the Minerals and Waste Core Strategy policies and was inconsistent and flawed in some criteria, with heritage being missed entirely from the detailed assessment for the site. We understand that this consultation does not relate to the allocation of this site, however we consider that the updated Site Assessment Methodology could potentially lead to the same flawed conclusions being reached. This is because paragraph 1.37 states that 'it is not intended to fully repeat Stages 1a, 1b, 2 & 3a of the Site Assessment Methodology' as 'the site assessments previously undertaken are fit-for-purpose and therefore do not require a complete review'. Instead only a 'rapid analysis for the purposes of ensuring consistency with the newly nominated sites' is proposed of the Stage 3a initial screening assessments. We consider that a full review of the Stage 3a initial screening assessment is required in relation to this site because as stated in our previous consultation response, the approach taken was inconsistent with the approach taken for other sites which were rejected at the initial screening stage. The factors included in the assessment criteria were inconsistently weighted, especially regarding heritage, and thus the site should have been rejected at this stage¹. We therefore request that the initial assessment of this site is fully reassessed to ensure consistency with not only the newly nominated sites, but the previously nominated sites.

¹ For further detail on examples of inconsistency please refer to our March 2020 consultation response attached.

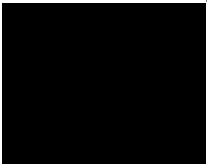
We welcome the decision to complete a full review of the Stage 3b assessments. SODC consider this review to be essential, as there were a number of fundamental flaws in the assessment process of Site SG42 previously. SODC again refer to our previous consultation response for details regarding these flaws, which set out our concerns with the assessment of the impacts on heritage, landscape and ecological assets in relation to this site. If the site is not screened out through the initial assessment as we advise (Stage 3a), we strongly encourage the concerns we set out in the previous response to be addressed through the new Stage 3b assessment.

Vale of White Horse Response:

Vale of White Horse District Council also welcome the decision to complete a full review of the Stage 3b assessments. We also acknowledge that this consultation does not relate to allocation of sites, but wish to reiterate our points made in our previous consultation response dated 4 March 2020² regarding three sites – Land at Chinham Farm, CR12/SS12, Hatford Quarry West Extension, CR22/SS18, and Shellingford Quarry, Shellingford/Stanford in the Vale. We also maintain our objection to the proposed allocation of Bradfield Grove Farm, which we consider unsuitable for development due to concerns relating to impacts on local landscape. We hope these comments are fully considered when progressing the plan, particularly during the site assessment stage.

We hope these comments are helpful - please keep us informed of any further consultation documents and do not hesitate to contact us if you wish to discuss any matters relevant to South Oxfordshire or Vale of White Horse District Councils.

Your sincerely,



Juliet Evans
Senior Planning Policy Officer

² We attach VWHDC response dated 4 March 2020 for your reference.