



APPENDIX B:

Oxfordshire Minerals and Waste Development Framework Minerals Sites Development Plan Document Issues and Options Consultation (April 2007)

Form for making comments

Oxfordshire County Council is reviewing the planning policies covering mineral working and waste management in Oxfordshire. This will result in a new policy framework for the County – the Oxfordshire Minerals and Waste Development Framework. More information about this is available on our website (<http://www.oxfordshire.gov.uk/links/public/mineralsandwastepolicy>).

The Minerals Sites Development Plan Document will identify sites that are suitable for mineral development. It will also include policies for making decisions on development proposals. We have published an Issues and Options paper, which you are invited to comment on. This consultation paper can be seen at council offices and libraries in Oxfordshire and on our website (as above), or contact us on 01865 816025.

The consultation paper includes an initial 'long list' of possible sites for minerals development. Before we go on to assess these site options, we want to make sure we have all the information we need about the sites and that we hear about any other possible sites that might be suitable for development.

How to make comments

Please use this form to make any comments on the Minerals Sites Consultation Paper. **Please use a separate form for each site or issue that you are commenting on, using block capitals and black ink.**

This form is available to download as a Word file at:

<http://www.oxfordshire.gov.uk/links/public/mineralsandwastepolicy>.

Please return electronic forms to: minerals.wasteplan@oxfordshire.gov.uk.

For additional paper forms, please copy this or contact us on 01865 816025.

Please send this form by post, fax or email to:

Minerals Sites (Issues and Options) Consultation
Minerals & Waste Policy (SPED)
Environment & Economy
Oxfordshire County Council
Speedwell House, Speedwell Street
Oxford OX1 1NE

Fax No: 01865 815787

Email: minerals.wasteplan@oxfordshire.gov.uk

Responses must be received by Friday 15th June 2007





**OXFORDSHIRE
COUNTY COUNCIL**
ENVIRONMENT & ECONOMY
www.oxfordshire.gov.uk

Oxfordshire Minerals and Waste Development Framework

**Minerals Sites Development Plan Document
Issues and Options Consultation
April 2007**

Comments Form

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State which site or issue in the Issues and Options paper your representation relates to: <i>(please use a separate form for each option you comment on)</i>	
Site Specific, include Site Code and/or name	Other Subject, e.g. Safeguarding, Fuller's Earth, Clay/Chalk or Coal/Oil/Gas/
Land between Grandpont and North/South Hinksey, Oxford. SG37	

Please note that at this first stage of consultation on minerals site options, we are looking for factual information about sites rather than opinions.

Details of your comments: Please state the source of evidence for information about sites, where relevant. Please support your comments on the questions posed or on other parts of the paper with evidence where possible.

Oxford City Council would like to make clear that given the following facts we **STRONGLY** object to this proposal. These views are to be endorsed by Oxford City Council's Executive Board on the 16th July 2007. We would like written confirmation that this is acceptable.

Land Between Grandpont & North/South Hinksey, Oxford

Type of material: Sand and gravel

Total Area in Hectares: 20

Estimated Total Yield: 1.5 Million tonnes

Other information: The nominator suggests that on-site processing of material would be preferable.

Questions

Question 3a What are the issues affecting the site?

1. **Hinksey ponds** – Site of Local Importance for Nature Conservation (SLINC) (Local Plan policy NE.19) and **Bullstake Stream/railway line wildlife corridor** (Local Plan policy NE.20) are located within the proposed extraction area as shown on the Oxford Local Plan Proposals Map. **Hinksey Stream SLINC** would also be affected by the extraction;
2. **Oxford Green Belt** (Local Plan policies NE.1 & NE.2);
3. **Flood plain** (Local Plan policies NE.7; NE.9; NE.10; & NE.12);
4. **View cones of Oxford & High Buildings Area** (Local Plan policies HE.9 & HE.10);
5. **Landscape Impact:** (Local Plan policies CP.7; CP.8; CP.9 & CP.11)
6. **Guided Bus/Local Rail Service** (Local Plan policy TR.8);
7. **Transport implications of providing new access point to the A34** (Local Plan policies TR.1 & TR.2);
8. **College sports grounds** (Local Plan policy SR.2);
9. **Impact on existing footpath from South Hinksey to Wytham St over the Devil's backbone** (Local Plan policy SR.9). **Proposed footpath links from the Devil's Backbone to Ferry Hinksey Road & a bridge over the railway line to provide a link between Grandpont Park & Hinksey Stream** (Local Plan policy SR.10 j & k);
10. **Impact of noise, dust, lighting on local residents** (Local Plan policies CP.19; CP.20 & CP.21);
11. **Impact on trees: a considerable number of trees could potentially be affected** (Local Plan policy NE.15);
12. **Oxford Flood relief scheme** – feasibility studies being undertaken by the Environment Agency (Local Plan policy NE.11).
13. **Archaeology** (Local Plan policy HE.2)

The site is also within the 2 kilometre consultation zone for mineral extraction requested by English Nature in 1998 for the Oxford Meadows Special Area of Conservation (SAC) and Iffley Meadows Site of Special Scientific Interest (SSSI). Natural England may

require an Appropriate Assessment if they consider that it would be likely to have a significant effect on the Oxford Meadows SAC.

3b What would be the impacts of mineral working at the site?

While the Oxford Local Plan 2001 – 2016 is not a Minerals and Waste Plan, the range of designations indicates the great sensitivity of this location. Key impacts include the following:

Landscape

PPG2 on Green Belts states that 'minerals can be worked only where they are found. Their extraction is a temporary activity. Mineral extraction need not be inappropriate development; it need not conflict with the purposes of including land in Green Belts, provided that high environmental standards are maintained and that the site is well restored.' While it is not disputed that Green Belts need not be unsuitable locations for mineral extraction, it is important to note that one of the specific purposes of the Oxford Green Belt is to 'preserve the setting and special character of Oxford and its landscape setting.' This is set out in Structure Plan policy G4; draft South East Plan policy CO3 and Local Plan policy NE.1.

The particular sensitivity of this part of the Oxford Green Belt is emphasised in 'A Character Assessment of Oxford in its Landscape Setting' (2002) carried out for the City Council and the Countryside Agency by Land Use Consultants. They included this area within Landscape Character Area 9E and their evaluation of its character and quality was as follows:

'This area has a strength of character by virtue of its good survival of floodplain features. It has an important role in the setting to the city of Oxford, providing the sense of a rural landscape in close proximity to the urban area. It is also critical in the iconography of Oxford – part of a much painted view from Boar's Hill and North Hinksey forming the rural setting to the historic core, and celebrated in the poetry of Matthew Arnold. Detracting features include the pylons and transmission lines, encroachment of built development, extension of sports facilities and intrusion of traffic noise, which has eroded the peaceful/rural character. Despite this, the area retains a strong visual and cultural unity and a high functional integrity that conveys a perception of exceptionally high landscape quality.'

Regarding its sensitivity to change, they commented that: 'Its distinctiveness, historic interest, high ecological value and open character make this area particularly sensitive to change. It also lies within the view cone of the key viewpoints identified at Raleigh Park and Boar's Hill to the west and this heightens its sensitivity to built elements.'

'A character assessment of Oxford in its Landscape Setting' assessed the zone of visual influence and key viewpoints. A number of key viewpoints were found on this side of the city, which are not shown on the Local Plan map, including Conduit House, Harcourt Hill; Hinksey Golf Course; and Chilswell valley. Some of these viewpoints are outstandingly good for views of the Oxford spires and mineral extraction would have a major potential impact upon the foreground, and would be likely to significantly detract from these views.

Many of the fields between North and South Hinksey are also very open with few trees. Most of the trees are located between Hinksey Stream and the railway line, and so

many of them would need to be removed for the proposed mineral extraction. This would remove the screening that they provide, making the ballast handling operation at Hinksey sidings much more visible and also potentially Osney Mead industrial estate. Loss of this vegetation and tree cover would massively affect the views from Hinksey Heights and potentially Boars Hill and would directly contravene the current Oxford Local Plan Policy HE.10 on View Cones of Oxford.

The landscape implications of a new access road to the A34 across low flood plain land would also be significant in this sensitive location. A commercially viable gravel extraction site in this area would necessitate road construction across the floodplain leading to the despoilation of the natural environment as the required access would need to be elevated above potential flood levels.

Transport

Road access to this site would need to come from the A34. This road already suffers from very considerable traffic congestion. According to an article in the Oxford Times on the 15th December 2006, the Highways Agency consider that 'the A34 is already operating above capacity' and it predicts 'that by 2026 the A34, between the M40 and Didcot, will become one of the most congested roads in the South East.' A large number of heavy lorries from a significant mineral extraction of 1.5 million tonnes of sand and gravel on to such a busy section of road would accentuate the problems and could potentially be dangerous.

When Grandpont Waters were putting forward their ideas for a rowing lake in this location, they were asked about the prospects of transporting the gravel away by rail. They stated that they had had some discussions with Network Rail, but they were not progressing very well. The costs of providing signalling and new lines were very high. If this is still the case this would mean that all transport had to be by road, and so there would be no scope for mitigation by this means.

Another potential impact is on the land reserved for the protected GTE corridor, part of which is within the nomination site. While the GTE scheme is not being pursued at present, the 'Oxford 2026 Core Strategy Preferred Options Document's' long term transport infrastructure 'preferred approach' 'supports an innovative approach to solving Oxford's transport problems' including to 'protect the existing rail corridor from development and investigate developing the Cowley branch line corridor for passenger transit.'

Biodiversity impacts

The proposed gravel extraction would involve the destruction of the Hinksey Ponds Site of Local Importance for Nature Conservation (SLINC) (Grid Ref: SP513044). 'A Nature Conservation Strategy for Oxford' (1995) states that 'There are also around 30 ponds in the city. A number are of interest for nature conservation. One of the best is Hinksey Pond (Grid Ref SP 513044), which is located immediately to the west of the Oxford to London railway. In this pond 100 species of macroinvertebrates have been recorded which was 25% greater than the number found in 150 other ponds surveyed by Pond Action in Oxfordshire. This richness is due to the large size of the pond, the presence of still and slow flowing water, a gravel bottom and a wide variety of aquatic plants, which provide a wide range of habitats for aquatic invertebrates. Two locally uncommon species were recorded namely the snail *Bithynia leachi*, and the water bug *Micronecta scholtzi*.'

The mineral extraction would also have a significant impact on Hinksey Stream SLINC, which flows into Hinksey pond. Concerning this site, 'A Nature Conservation Strategy for Oxford' states that: 'The only small stream in Oxford which has been studied in detail is Hinksey Stream which runs along the south-western boundary of the city. This stream has a rich fauna and flora which has survived because it has not suffered too severely from pollution, extensive dredging and culverting in the way that many other streams have. It supports a number of plants which are now uncommon in the Oxford area including fat duckweed and river water dropwort. A wide range of macroinvertebrates are also present with 103 different species being recorded. Macroinvertebrates consist of larger invertebrates such as dragonfly and mayfly nymphs, molluscs, crustaceans, water bugs and water beetles. Of particular note are the 23 species of snail, including the locally uncommon, *Bithynia leachi*. The stream is also important for birds with one survey revealing two breeding pairs of kingfisher, up to 12 pairs of reed warbler breeding in the reeds and the presence sometimes of four herons feeding simultaneously in the stream.'

The potential biodiversity impact could therefore be significant. As there have been no recent surveys it would be important to have a comprehensive survey of the terrestrial and aquatic wildlife in the nominated location for mineral extraction, plus a full assessment of the likely impact on the habitats and species found there. There also needs to be close liaison with Natural England in order to determine whether there would be a likely impact on the Oxford Meadows SAC or Iffley Meadows SSSI.

These biodiversity issues are given added weight by the requirement under the Natural Environment and Rural Communities Act 2006 that 'every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.' Under the Habitats Directive development can only be permitted after it has been ascertained that it will not adversely affect the integrity of a SAC. Unless it is possible to do this and the effect, or possible effect, cannot be removed by conditions, planning permission must not be granted unless there are no alternative solutions and there are imperative reasons of overriding public interest.

Recent Minerals Policy Statement 1: Planning and Minerals (paragraph 14) states 'do not normally grant planning permission for a proposed mineral development on land within or outside a *Site of Special Scientific Interest* (SSSI), if it is likely to have an adverse effect on a SSSI (either individually or in combination with other developments);' and with regard to other nature conservation areas such as the SLINCs, LPA's must 'consider carefully mineral proposals within or likely to affect *regional and local sites of biodiversity, geodiversity, landscape, historical and cultural heritage*;'.

Flooding

The site is within Flood Zone 3 (high probability), but PPS25 lists sand and gravel workings as water compatible development, which is suitable in this area. Potential adverse impacts could, however, arise from an access road across the flood plain to the A34. A Flood Risk Assessment would also be required and it will be necessary to ensure that the scheme is compatible with the Environment Agency's proposed Flood Relief scheme for Oxford. The scheme could also potentially reduce flooding on nearby meadows, potentially having a detrimental impact on their nature conservation interest.

College sports grounds and footpath links

Pembroke and Corpus Christi colleges' sports grounds would be lost by the proposed development. The footpath link between South Hinksey and Wytham Street would also be lost for the duration of the mineral extraction.

Noise and dust

Oxford City Council objects to this proposal on Environmental Health grounds, as there would be considerable potential for noise and dust nuisance from the quarrying in Hinksey because of the close proximity of residential properties.

Noise will be from the quarrying itself, stone crushing and sorting processes, lorry movements, vehicle reversing alarms, spoil movement, train movements, if this is the preferred option for transporting material. Dust will also be a problem from quarrying, spoil movements and lorry movements.

There is already a considerable history of noise and dust complaints, as well as disturbance from train movements and night-time loading at Hinksey Sidings. The proposed development is likely to intensify the problems that are currently experienced at Hinksey Sidings.

Archaeological implications

The pattern of local settlement, and therefore of archaeological deposits, for the proposal area can be inferred from the fact that its north edge lies within 200m of the centre of one of the archaeologically richest parts of the Oxford Flood plain. On the adjoining Osney Mead there is a stone-paved surface with the appearance of a 'ford' running down into the Bullstake stream which may indicate a crossing to the proposal site, which is topographically an island.

No crop-mark features are recorded from air photography, which would be surprising for a gravel area on this unusually rich flood plain, but in this case the absence does not necessarily imply no ancient settlement because the British Geological Survey Drift Map shows the area as alluvial deposits. Such alluvium could mean former river channels (hence no settlement), but in this case the proposal to extract gravel implies that the alluvium is not thick, so there could be settlement underneath it. Additionally recent information from Yarnton less than 10 km upstream is indicating prehistoric activity within the thickness of alluvial deposits.

If therefore the submission of this proposal implies that the thickness of alluvial covering has been checked and is not so thick as to be uneconomic to extract gravel, that information is important to the Council's assessment. In its absence it is not possible to assess the risk of significant archaeological deposits, and the Council can therefore reasonably object to the proposal on the grounds that it has not been provided with essential information.

Question 3c How could any negative impacts be mitigated?

Many of the impacts would be very difficult to mitigate. The biodiversity of well-established habitats with rich diversity cannot be easily recreated within a short period of time. Similarly landscape impacts from the view points on high land to the south west would be difficult to mitigate, especially given the loss of a large number of trees in the foreground. Without transport by rail the impact on traffic levels along the A34 would

also be difficult to mitigate.

Some impacts such as the loss of the playing fields might be more easily replaced.

3d What are the potential opportunities for restoration?

From the shape of the proposed mineral extraction site, it is assumed that the intended after use is a rowing lake. We object to this after-use at this location as it will have a significant impact on the site's character, landscape and bio-diversity as the gravel extraction itself. As the development and after-use would result in many of the impacts that the mineral workings would have becoming permanent e.g. transport on the A34; loss of the biodiversity rich ponds and character of Hinksey stream; impact on the views of Oxford's skyline from the west. A rowing lake would still require regular access by vehicles and there would be a need for a number of boathouses, pontoons and jetties, as witnessed on the Thames by the Abingdon Road, which will lead to semi-urbanisation of the area. Therefore, given the site's sensitive location restoration to a rowing lake is not considered appropriate.

We would also have to insist that any permission for mineral extraction would be required to make provision for the site restoration followed by a minimum of 5 years aftercare to ensure that the measures are successful. The only acceptable restored form is to bring the land back to its current status, but whatever is used to restore the levels will increase the traffic movements to the site, the best solution would be for each lorry taking gravel out would bring fill back, although in practical terms this is probably not realistic.

It is considered that the ecological, landscape and character value of this site is irreplaceable, and that traffic levels (if access is via road) will be significant and therefore this development cannot be adequately mitigated.

Considering the number of significant constraints on this site as indicated above, there is overwhelming doubt whether it can be demonstrated that the gain from this potential development, at only 1.5 million tonnes of gravel, is enough to cause lasting damage to this sensitive environment.

(Continue on a separate sheet or expand box if necessary)

If you wish to be notified when the Preferred Options consultation paper for the Minerals Sites Development Plan Document is published, please tick this box:	Yes pls
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Signature:

Date:

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