Submission ID: S70A0AEA5

Smith & Sons (Bletchington) Limited (Smiths) are an established mineral extraction company operating five quarries in Oxfordshire. Smiths have been extracting limestone in the Ardley area for a number of years and currently extract limestone from Dewars Farm Quarry which is located to the east of the proposed development and to the north of the proposed Middleton Stoney By-pass.

Smiths wish to object to the proposed development due to sterilisation of future reserves that the Company is wishing to extract. The latest version of the NPPF published in August 2026 gives great weight to safeguarding mineral resources and states in Chapter 11- facilitating the sustainable use of minerals

"The objective of the policies in this chapter is to ensure there is sufficient supply of minerals which are essential to provide the infrastructure, buildings, green energy and goods that the country needs...Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long term conservation."

Policy M6: Safeguarding Mineral Resources and Infrastructure Through decision making goes on to state

"1. Proposals for non-mineral development should not:

a. constrain potential future use for mineral working in a Mineral Safeguarding Area

3. The prior extraction of minerals, where practicable and environmentally feasible, should be supported where it would prevent the sterilisation of mineral deposits as a consequence of other forms of development proposals or allocations"

The Oxfordshire Minerals and Waste Core Strategy under Policy M3 has designated the area north west of Bicester (where the proposed development is located) as a Strategic Resource Area and goes onto to say that mineral deposits are finite resources and can only be worked where they exist in the ground. It is Government policy that important mineral resources should be safeguarded for the long term. Mineral Planning Authority's are required to define Mineral Safeguarding Areas in mineral plans so that resources are not sterilised by non-mineral development, although there is no presumption that the resources will be worked.

Policy M8 Safeguarding Mineral Resources states

"Mineral resources in the Mineral Safeguarded Areas shown on the policies map are safeguarded for possible future use. Development that would prevent or otherwise hinder the possible future working of the mineral will not be permitted unless it can be shown that:

- the site has been allocated for development in an adopted local plan or neighbourhood plan;
- the need for the development outweighs the economic and sustainability considerations relating to the mineral resource
- the mineral will be extracted prior to the development taking place...

The Applicant has submitted a Minerals Resource document (Appendix 11.3) which states that the size of the proposed development represents only a small percentage (1.2%) of the overall available mineral in Oxfordshire (by area). I would argue the MSA covers entire areas and does not take into account settlements, individual dwellings, listed buildings, SSSI's and other designations where mineral extraction is unlikely to be approved. If these areas were removed from the MSA then the actual amount of land that would be suitable for mineral extraction within the MSA would be relatively small and therefore the size of the proposed development represents a significant area that would permanently sterilise important limestone resources. Indeed Smiths has recently engaged consultants to look for a replacement site for Dewars Farm Quarry once it is exhausted and they have highlighted a site to the west of Dewars which contains approximately 10 million tonnes which could be operated as an extension to Dewars by linking the extension with the current plant site and associated infrastructure by a conveyor. However this extension is partially sterilised by the proposed SRFI, and it would be uneconomic to progress without the whole deposit.

Of more concern to Smiths is the proposed Middleton Stoney by-pass which lies to the immediate south of the current quarry which has been earmarked by Smiths for a southerly extension. Smiths drilled the site in 2017 and is in advanced position of draft legal documents to enter into a lease for this area which would then enable us to progress a planning application for this southerly extension. The proposed extension is for approximately 2.2 million tonnes and if the Middleton Stoney by-pass were to proceed then this would reduce the tonnage available to approximately 1 million tonnes which would not be economic for Smiths to proceed with. Smiths promoted this site to Oxfordshire County Council in their last call for sites in April 2023 to be included as an allocated site in the Minerals and Waste Local Plan. Unfortunately progress on this plan has stalled and we are expecting another call for sites shortly and this would be a site that we would be promoting.

The Applicant is aware of our proposals for this area of land as it has approached the landowner regarding compulsory purchase of the land, but has not made any approaches to Smiths regarding prior extraction of this area. Given the relatively small tonnage involved we believe that should the scheme progress then this area could be prior extracted in accordance with national and local policy.

Summarising we wish to object to the proposed development on the basis that the development is in contravention of national and local policy for Mineral Safeguarded Areas and do not believe that a development should proceed in a MSA that would sterilise proven reserves with a willing operator and effectively sterilise a further 200ha of the MSA.