## Part 1 - Respondent Details

1(a) Personal details						
Title	Mr					
First Name	Stewart					
Last Name	Mitchell					
Job Title (where relevant)	Estates manager					
Organisation (where relevant)	Grundon Waste Management					
1(b) Agent details Only complete if an agent has been appointed						
Title						
First Name						
Last Name						
Job Title (where relevant)						
Organisation (where relevant)						
1(c) Contact address details  If an agent has been appointed please give their contact details						
Address Line 1	Grange Lane					
Line 2	Beenham					
Line 3						
Line 4						
Postcode	RG7 5PY					
Telephone No.	01189714040					
Email address	Stewart.mitchell@grundon.com					
Are you writing as	☐ A resident	☐ A parish council				
	A local business	☐ A district council				
	Minerals industry	☐ A county council				
	■ Waste industry	Other (please specify)				

OMWLP Core Strategy Proposed Main Modifications February 2017 Representation Form

Please tick the appropriate boxes if you wish to be notified of any of the following:						
Publication of	ons	Yes				
Adoption of th	trategy	Yes				
Please tick this box if you no longer wish to be notified of any updates regarding the Oxfordshire Minerals and Waste Core Strategy:						
Please sign and date the form:						
Signature:	S Mitchell	Date:	13/03/17			

## Part 2 - Representation

Please complete this part (Part 2) of the form separately for each separate representation you wish to make.

You can find an explanation of the terms used below in the accompanying guidance on making representations.

2(a)	2(a) State which Proposed Main Modification you are making a representation about					
Proposed Main Modification No. (and part or policy no. or paragraph if relevant)		See below	V			
2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications is: (tick as appropriate)						
(i)	Legall	y compliant?	Yes		No	
(ii)	Sound	1? ■	Yes		No	
-		e answered <b>No</b> to queses, please go to question	. , . ,	please co	ntinue to question 2(c). Ir	ı all
2(c)	inco	ou consider the Oxforporating the Propose (tick as appropriate)			Waste Core Strategy s is unsound because it	is
	(i) (ii) (iii) (iv)	Positively prepared Justified Effective Consistent with nation	al policy			

On the following pages, please set out why you think the Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications is legally non-compliant and/or unsound and any changes you are suggesting should be made to it that would make it legally compliant or sound.

**Please note** your representation should include as succinctly as possible all the information and evidence necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on your representation at this stage.

2(d) Please give details of why you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications is not legally compliant or is unsound. Please be as precise as possible.

If you agree that the Oxfordshire Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications is legally compliant and/or sound and wish to support this, please also use this box to set out your comments.

**MM1:** The modification reflects the NPPF supply preference and is welcomed.

**MM2**: The introduction of a detailed Policies map is supported to aid the spatial strategy and mineral safeguarding.

**MM3:** The clarification on CDE capacity and Figure X is a useful addition to enable a better understanding of the issues around capacity and the life of temporary sites.

**MM5:** The recognition of limitations to quantity and quality of recycled aggregate is welcomed and reflects the factual situation.

**MM6:** The commitment to replace CDE capacity lost during the plan period is supported in order to help maintain productive capacity to facilitate potential supply of recycled aggregate.

**MM8:** The amendment to Policy M1 is supported and reflects the necessary amendments to achieve the ongoing supply of recycled aggregate.

**MM11:** The provision for sand and gravel reflects the LAA and the Inspector's Interim Report and is supported. The updated provision is a factual amount that reflects available consented mineral during the CS period.

**MM12:** In order to maintain supply at the LAA rate there needs to be sufficient consented mineral and productive capacity. The amendment that reflects the need to maintain productive capacity is supported.

**MM14**: The inclusion of figures into Policy M2 that reflect the LAA is supported as is the reference to maintaining sufficient capacity to supply at these rates. This accords with the NPPF requirement to maintain a steady and adequate supply.

**MM15:** The amplification of the reasoning for the broad north/south split is welcomed and supported to aid the spatial strategy.

**MM16**: The amendment reflects the available consented mineral and its location in relation to the north/south demand split and their respective mineral resource areas. It is therefore largely a factual matter to support the spatial strategy. This approach is supported.

**MM19**: The clarification regarding the NPPF position on mineral working not being inappropriate in Green Belt is supported.

**MM20**: Policy M3 correctly reflects the CS spatial strategy and that future supply needs to be consented to maintain capacity in the north and to replace that being lost in the south based on available consented mineral. This approach is supported.

**MM21**: Clause (g) should be caveated with 'as far as is practical' to reflect NPPF and also be consistent with references in other policies eg M7 (MM24). Clause (k) delete reference to 'successive' as cumulative is a number of sites operating simultaneously.

**MM22**: The amendments allow flexibility and importantly remove uncertainty especially prior to the adoption of Part 2 to enable the proper consideration of planning applications and to maintain supply. The amendment is supported.

**MM25**: The clarification that the mineral resource areas on the Policies Map are Mineral Safeguarding Areas is supported.

**MM27**: The inclusion of MSAs in Policy M8 is supported. It would be useful if District Councils were also required to consult on developments adjacent to the MSAs as such developments could impact on the resources in the MSA.

MM32, 35, 38, 41, 44 & 46: New paragraph 5.5a states that the C&I figure is a managed one. This is some 60-70% of the previous arisings figure and should be regarded as a minimum in Tables 3 & 4 and Policy W1. It would be useful if Policy W1 included this caveat so that it is an "at least" figure and that it is also included at Tables 4, 5 & 7. Unless this is done the Tables could be interpreted as a maximum target and put a ceiling on capacity. The wording of amended Policy W3 contains such wording and it would be helpful if the supporting information reflected this.

**MM33**: New paragraph 5.5b states that some 20% of the CDE figure is non-hazardous waste. Some clarity on how this has been incorporated into Tables 5 & 7 would be useful.

**MM46:** Policy W3 seeks to allocate provision and sites for non-hazardous waste recycling. However it only seeks to allocate strategic and non-strategic sites. The Policy could be widened to enable the allocation of smaller scale facilities.

Continue on a separate sheet or expand the box if necessary

2(e) Please set out the changes(s) you consider necessary to make the Oxfordshire Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications legally compliant or sound, having regard to the reason you have identified at 2(c) above where this relates to soundness. You should say why this change will make the Core Strategy legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

Please be as precise as possible.		
See above comments for:  • MM21  • MM27  • MM32, 35, 38, 41, 44 & 46  • MM33  • MM46		
Continue on a separate sheet or expand the box if necessary.		

Please complete Part 2 of the form separately for each separate representation you wish to make, and submit all the Parts 2s with one copy of Part 1 and Part 3.