

Part 1 – Respondent Details

1(a) Personal details									
Title	Mr								
First Name	Steve								
Last Name	Cole								
Job Title (where relevant)	Environmental and Development Director								
Organisation (where relevant)	Raymond Brown Minerals & Recycling Ltd								
1(b) Agent details <i>Only complete if an agent has been appointed</i>									
Title	Mr								
First Name	Stephen								
Last Name	Bowley								
Job Title (where relevant)	Director								
Organisation (where relevant)	Stephen Bowley Planning Consultancy								
1(c) Contact address details <i>If an agent has been appointed please give their contact details</i>									
Address Line 1	Ferndale								
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Line 3	Thame								
Line 4	Oxfordshire								
Postcode	OX9 2LQ								
Telephone No.	01844 338636; Mob 07710 032722								
Email address	SBowleyPC@aol.com								
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 type="checkbox"/> <u>Minerals industry</u></td> <td><input type="checkbox"/> A county council</td> </tr> <tr> <td><input type="checkbox"/> <u>Waste industry</u></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 type="checkbox"/> <u>Minerals industry</u>	<input type="checkbox"/> A county council	<input type="checkbox"/> <u>Waste industry</u>	<input type="checkbox"/> Other (please specify)
<input type="checkbox"/> A resident	<input type="checkbox"/> A parish council								
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<input type="checkbox"/> <u>Minerals industry</u>	<input type="checkbox"/> A county council								
<input type="checkbox"/> <u>Waste industry</u>	<input type="checkbox"/> Other (please specify)								

Please tick the appropriate boxes if you wish to be notified of any of the following:	
That the Oxfordshire Minerals & Waste Core Strategy has been submitted for independent examination	Yes
Publication of the Inspector’s report and recommendations	Yes
Adoption of the Oxfordshire Minerals and Waste Core Strategy	Yes

Please sign and date the form:			
Signature:	Stephen Bowley	Date:	17/9/15

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) State which part of the Oxfordshire Minerals and Waste Local Plan Core Strategy you are making a representation about

Part or policy no. or paragraph

M1

2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy is: (tick as appropriate)

- (i) Legally compliant? Yes No
- (ii) Sound? Yes No

If you have answered **No** to question 2(b)(ii), please continue to question 2(c). In all other cases, please go to question 2(d).

2(c) Do you consider the Oxfordshire Minerals and Waste Core Strategy is unsound because it is not: (tick as appropriate)

- (i) Positively prepared No
- (ii) Justified No
- (iii) Effective No
- (iv) Consistent with national policy No

On the following pages, please set out why you think the Minerals and Waste Local Plan Core Strategy 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. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

2(d) Please give details of why you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy 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 is legally compliant and/or sound and wish to support this, please also use this box to set out your comments.

Raymond Brown Minerals & Recycling Ltd own and operate a waste management facility at Prospect Farm, Chilton about 5km to the south west of Didcot. The site contains a Materials Recycling Facility (MRF) and Aggregates Recycling Facility (ARF). The facility has the benefit of a temporary planning permission to operate until 31st December 2022. The company wishes to obtain permanent permission for the site. The temporary permission was linked to the associated landfilling of a disused railway cutting, which has now been completed and restored.

It is acknowledged that the Core Strategy is not site specific and will not allocate sites – these will be a matter for the subsequent Site Allocations Document. However the site has been nominated for inclusion in the Site Allocations Document as a permanent facility. The company therefore wishes to see policies in the Core Strategy that:

- (i) Provide a favourable policy framework for the future allocation of Prospect Farm, Chilton, as a permanent waste management site, and
- (ii) Provide a favourable policy framework for any future planning application for a permanent facility.

The site is located within the open countryside and within the North Wessex Downs AONB. The policies in the ‘Proposed Submission Document’ (the Draft Plan) aim to provide:

- Temporary facilities at active minerals and waste sites, and
- Permanent facilities on industrial land.

This is considered a far too restrictive approach to future provision. It is a top down approach that does not take into account the existing pattern of provision, or give sufficient weight to the qualities of temporary sites such as Chilton that could reasonably be granted permanent permission. This site has excellent access to the strategic road network, is remote from housing, and has limited visual impact.

We also have some reservations about the interpretation of the information on aggregate recycling in the Local Aggregates Assessment and Waste Needs Assessment. These are included with our response to Policy W3.

Representation are submitted to the following Sections of the Draft Plan.

Policy M1 Recycled and Secondary Aggregate
Policy W3 Provision for Waste Management Capacity
Policy W4 Locations for Facilities and Key Diagram
Policy W5 Siting of Waste Management Facilities
Policy C8 Landscape

Individual forms have been completed for each section. The full text of the representation is also submitted as a consolidated Statement in order that the overall objection and connections between the individual policy objections can be understood.

Policy M1 Recycled and Secondary Aggregate

We responded to the Consultation Draft Plan as follows:

Reliance on temporary recycling facilities at quarry and landfill sites results in loss of capacity as sites are completed. For some locations there will be a good case for retaining recycling facilities after the host quarry or landfill is completed, particularly where the site is remote from housing and has a good access. This is the case at Prospect Farm, Chilton. The retention of such facilities is preferable to possible new locations in or around the main urban areas which are likely to be subject to severe planning constraints including Green Belt and may not be commercially deliverable.

We are disappointed that Policy M1 has not been amended to take into account these views. On the contrary additional text has been added:

Proposals for temporary facilities shall provide for the satisfactory removal of the facility. At mineral working and landfill sites the facility shall be removed when or before the host activity ceases. Temporary facilities shall be restored in accordance with the requirements of Policy M10 for restoration of mineral workings.

There will be circumstances where the conversion of a temporary facility into a permanent facility is appropriate and this needs to be recognised in the Core Strategy.

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 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.

Policies dealing with aggregates recycling are included in both the minerals and waste sections of the Plan, which is confusing. We agree that the policy support for aggregates recycling should be in the Minerals Section under Policy M1, since such materials make an important contribution towards aggregates supply. It follows that the policy for locating sites would be also be better included in the Minerals Section where the similar characteristics of ARF's to minerals processing plants can be taken into account. The Draft Plan includes aggregates recycling facilities in the Waste Section where they are lumped together with all other types of waste facility which have different characteristics. This is not the correct approach since ARF's are different to other types of waste facility, requiring large open sites remote from housing.

The following changes are suggested to Policy M1:

After ...C1 – C11 insert:

The retention of temporary sites on a permanent basis will be considered on their merits.

Between 'shall' and 'provide' insert '*where appropriate*' so that it reads:

At mineral working and landfill sites the facility shall, where appropriate, provide for the satisfactory removal of the facility...

Continue on a separate sheet or expand the box if necessary.

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) State which part of the Oxfordshire Minerals and Waste Local Plan Core Strategy you are making a representation about

Part or policy no. or paragraph

W3

2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy is: (tick as appropriate)

- (i) Legally compliant? Yes No
- (ii) Sound? Yes No

If you have answered **No** to question 2(b)(ii), please continue to question 2(c). In all other cases, please go to question 2(d).

2(c) Do you consider the Oxfordshire Minerals and Waste Core Strategy is unsound because it is not: (tick as appropriate)

- (v) Positively prepared No
- (vi) Justified No
- (vii) Effective No
- (viii) Consistent with national policy No

On the following pages, please set out why you think the Minerals and Waste Local Plan Core Strategy 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. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

2(d) Please give details of why you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy 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 is legally compliant and/or sound and wish to support this, please also use this box to set out your comments.

Policy W3 Provision for Waste Management Capacity

This policy states where provision for all waste management capacity will be made and lists, in summary:

- Existing permanent sites
- Existing temporary sites
- Permitted sites not yet developed
- Sites to be allocated.

This list is too limited – effectively to existing and permitted sites, and future allocations. It needs to be extended to enable the conversion of temporary sites to permanent sites where appropriate, and should also cover unallocated sites – both until and after the Site Allocations Plan is adopted. Otherwise there is no strategic framework for new sites to be brought forward.

We have reviewed the information on recycled aggregates sites in the Local Aggregates Assessment 2014 (LAA Table 2.7) and would note that the majority of operational capacity is at temporary sites that will require replacement in due course if they are not to become permanent facilities. Several of the permanent sites are specialist facilities – for example for rail ballast, road planings and blockmaking, and are not conventional aggregates recycling sites. There are no other aggregates recycling sites apart from Prospect Farm, Chilton that we are aware of close to Didcot or in the A34 corridor south of Didcot that recycle construction and demolition waste.

The LAA also notes that the site capacity is likely to be greater than the actual level of production. Table 3.17 notes that the actual sales of secondary and recycled aggregates in 2013 were estimated to be 422,000 tonnes, or approximately one third of the total estimated capacity. Our understanding is that site capacities are taken from the Environmental Permit limits. However these are standard limits for a category of Permit and should not be used as a measure of the potential throughput of a site. Please note that the information on aggregates recycling sites in the LAA (Table 2.7) do not tally with the information in the Waste Needs Assessment (Tables 34) which appears to have transposed the capacity on permanent and non-permanent sites.

The future capacity of recycling/transfer facilities (for commercial/industrial and household wastes) such as the MRF at Chilton is considered in the Waste Needs Assessment at Para 6.11 – 6.14. It is evident that there will be an imminent shortage of such facilities as volumes increase and temporary facilities close (see table 45). Part

of this deficit could be met by converting Chilton into a permanent site – as proposed in the Site Nomination.

We consider that the policy framework is too restrictive to provide for the additional capacity that will be required over the plan period and needs to be made more flexible to provide a framework for additional capacity new sites and existing temporary sites to come forward.

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 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.

(i) Add ‘and any time extensions’ to bullet point to so it reads:

Time limited waste management facilities and any time extensions.

(ii) Add a fifth Bullet point:

- Unallocated sites

Part 2 – Representation

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

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2(a) State which part of the Oxfordshire Minerals and Waste Local Plan Core Strategy you are making a representation about

Part or policy no. or paragraph

W4

2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy is: (tick as appropriate)

- (i) Legally compliant? Yes No
- (ii) Sound? Yes No

If you have answered **No** to question 2(b)(ii), please continue to question 2(c). In all other cases, please go to question 2(d).

2(c) Do you consider the Oxfordshire Minerals and Waste Core Strategy is unsound because it is not: (tick as appropriate)

- (ix) Positively prepared No
- (x) Justified No
- (xi) Effective No
- (xii) Consistent with national policy No

On the following pages, please set out why you think the Minerals and Waste Local Plan Core Strategy 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. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

2(d) Please give details of why you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy 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 is legally compliant and/or sound and wish to support this, please also use this box to set out your comments.

Policy W4 Locations for Facilities and Key Diagram

This policy seeks to direct all principal waste facilities, whether strategic or not strategic, to sites close to the main towns. Elsewhere and in the rural areas facilities should be small scale. As noted in the introduction to these representations, this is a top down approach that does not take into account the existing pattern of provision, or give sufficient weight to the benefits of sites such as Prospect farm, Chilton that have excellent access to the strategic road network, are remote from housing, and have limited visual impact. In the case of aggregates recycling facilities, to the best of our knowledge these are rather randomly located around the County at minerals and waste sites where opportunities for recycling have been taken up. Proposals to locate close to the main towns have been refused – for example in the Oxford Green Belt.

To understand the reference to ‘small scale’ provision in rural areas it is necessary to cross refer to Table 8 where these are defined as less than 20,000 tonnes per annum throughput. Table 8 is described as a ‘Guide defining the scale of waste management facilities’ and categorised sites as Strategic (over 50,000 tpa), Non-Strategic (20-50,000tpa) and Small Scale (less than 20,000 tpa). We do not consider this is a helpful approach since the categories are arbitrary and take no account of the type of facility, its character or the land required. For example 20,000 tonnes is very small for a MRF or ARF which in effect are likely to be precluded from rural areas. The annual throughput of the company’s Chilton site is approximately 60,000 tonnes (35,000 MRF and 25,000 tpa ARF) with potential for 75,000 tonnes (40,000 MRF and 35,000 ARF). Under the terminology of Table 8 this is a ‘Strategic Site’ that should be located close to Bicester, Oxford, Abingdon or Didcot. The site is close to Didcot, and should be included in the Strategic Location Area shown on the Key Diagram if defined by proximity alone. However land within the AONB close to Didcot has been excluded.

The threshold of 20,000 tonnes for small scale sites is arbitrary and does not reflect the present operation at Chilton – for example compared to the major waste sites in Oxfordshire (Ardley EfW for example). By way of comparison the Hampshire Minerals and Waste Plan (Adopted October 2013) describes smaller scale facilities as having an approximate throughput of 50,000 tpa and sites of 2Ha or less. Larger scale facilities are those with a throughput in excess of 100,000 tpa (Paras 6.201/202). This is a more reasonable approach.

The Strategy needs to recognise the reality of the existing network of provision and how it evolved. There is a strong case for allowing waste management facilities in rural areas without any arbitrary limit on annual tonnage. A more subtle approach is needed that enables proposals to be considered on their merits taking into account the

character of the development in the context of the site and surroundings.

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 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.

- (i) Amend Policy W4(C) as follows:

Omit '*and particularly in more remote rural areas facilities should be small scale*' and replace by '*including the rural areas, facilities should be on a scale appropriate for their site and.*'

The Policy would then read:

Elsewhere in Oxfordshire, including the rural areas, facilities should be on a scale appropriate for their site, and in keeping with their surroundings

- (ii) Table 8 is described as a 'Guide to defining the scale of waste management facilities' and categorised sites as Strategic (over 50,000 tpa), Non-Strategic (20-50,000tpa) and Small Scale (less than 20,000 tpa). We do not consider this is a helpful approach and it should be deleted together with any associated

Part 2 – Representation

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

2(a) State which part of the Oxfordshire Minerals and Waste Local Plan Core Strategy you are making a representation about

Part or policy no. or paragraph

W5

2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy is: (tick as appropriate)

- (i) Legally compliant? Yes No
- (ii) Sound? Yes No

If you have answered **No** to question 2(b)(ii), please continue to question 2(c). In all other cases, please go to question 2(d).

2(c) Do you consider the Oxfordshire Minerals and Waste Core Strategy is **unsound because it is not**: (tick as appropriate)

- (xiii) Positively prepared No
- (xiv) Justified No
- (xv) Effective No
- (xvi) Consistent with national policy No

On the following pages, please set out why you think the Minerals and Waste Local Plan Core Strategy 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. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

2(d) Please give details of why you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy 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 is legally compliant and/or sound and wish to support this, please also use this box to set out your comments.

Policy W5 Siting of Waste Management Facilities

Policy 5 lists the general categories of sites that would be prioritised for all types of waste management facilities. These include active mineral working or landfill sites where proposals must ‘provided for the satisfactory removal of the facility and the restoration of the site at the end of its temporary period of operation.

This approach does not provide for any flexibility for the retention of temporary facilities on a permanent basis. As noted previously there will be existing waste management facilities sites such as at Prospect Farm, Chilton, where a permanent site would be entirely acceptable on its planning merits, and would continue the provision of a longstanding facility close to Didcot in accordance with Policy 4.

Chilton is an established site with good access and other infrastructure, with a longstanding workforce and established markets etc. The site has operated over many years without giving rise to any significant planning problems. Its retention would have no effect on restoration since the landfill element of the development has been completed. Planning policy should enable such developments subject to strict criteria being met. Retention of such sites is a sustainable approach to continuing provision and avoids the need to provide replacement facilities elsewhere.

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 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.

Add a paragraph to Policy W5 after the second paragraph as follows:

The retention of temporary sites on a permanent basis will be considered on their merits.

Please note that this is the same amendment proposed for Policy M1. A paragraph can also be included in the supporting text to explain the circumstances where a permanent facility might be appropriate. The following wording has been copied from the Adopted Hampshire Minerals and Waste Local Plan (Para 6.208) which states:

Some waste facilities, particularly those for recycling CDE waste that produce recycled and secondary aggregates reflect historic landfill locations or current/former quarries. In almost all cases, it is expected that former quarries and landfills will be restored but there may be exceptions where the benefits from continued development at some locations are considered to be more sustainable than re-locating the development elsewhere.

It is suggested that similar wording should usefully be included in the Oxfordshire Plan

Part 2 – Representation

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

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2(a) State which part of the Oxfordshire Minerals and Waste Local Plan Core Strategy you are making a representation about

Part or policy no. or paragraph

C8

2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy is: (tick as appropriate)

- (i) Legally compliant? Yes No
- (ii) Sound? Yes No

If you have answered **No** to question 2(b)(ii), please continue to question 2(c). In all other cases, please go to question 2(d).

2(c) Do you consider the Oxfordshire Minerals and Waste Core Strategy is **unsound because it is not**: (tick as appropriate)

- (xvii) Positively prepared No
- (xviii) Justified No
- (xix) Effective No
- (xx) Consistent with national policy No

On the following pages, please set out why you think the Minerals and Waste Local Plan Core Strategy 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. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

2(d) Please give details of why you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy 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 is legally compliant and/or sound and wish to support this, please also use this box to set out your comments.

Policy C8 Landscape

Our concern is the approach to waste management development in the North Wessex Downs AONB. The NPPF states that:

‘Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty...(Para 115)

Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- *The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- *The cost of, and scope for, developing elsewhere outside the designated area, or of meeting the need for it in some other way.*
- *Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

With regard to the AONB, Policy C8 is based on this approach, but omits key parts of the NPPF and adds more restrictive local considerations that unnecessary and unjustified. As a consequence the policy is much more restrictive than the NPPF:

1. Whilst there is reference to developments needing to be in the ‘public interest’, there is no reference to the three assessments listed in the NPPF (copied above) that should be considered. These are relevant to major waste developments in the AONB and should be reflected in the Plan.
2. Policy C8 states that development within the AONB shall normally only be small scale, to meet local needs and should be sensitively located and designed. However there is no reference to ‘small scale’ in the NPPF. In table 8 ‘small scale’ is defined as facilities with a throughput of under 20,000 tonnes.

Therefore the effect of Policy C8 in conjunction with Table 8 is to limit waste facilities to those less than 20,000tpa. This is inconsistent with the NPPF/NPPG. As noted in other submissions this figure is arbitrary and does not reflect the range of waste facilities and their requirements. We have submitted elsewhere that table 8 should be deleted from the Plan. This issue was raised at the previous consultation and it is disappointing no changes have been made.

Guidance on the definition of major development is given in the NPPG as follows:

‘Whether a proposed development in these designated area should be treated as a major development, to which paragraph 116 of the NPPF applies, will be a matter for the relevant decision taker, Taking into account the proposal in question and the local context.

Waste developments can be satisfactorily accommodated within the AONB and have been in Oxfordshire. For example a tyre recycling facility is sited within the former Worsham Quarry which is located in the Cotswolds AONB to the west of Witney. On its merits this was considered to be a good permanent use for the quarry when permission was granted in 2010. This site also has an excellent access, is remote from housing and well screened etc.

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 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.

The following amendments to Policy C8 are suggested:

- (i) After public interest add *and having regard to the considerations set out in Para 116 of the NPPF* to read:

Major developments within AONB's will not be permitted except where in can be demonstrated they are in the public interest and having regard to the considerations set out in Para 116 of the NPPF.

- (ii) Delete '*normally only be small scale to meet local needs and*' to read:

Developments within AONB's shall be sensitively located and designed.

2(f) Written representations or oral hearing

If your representation is seeking a change to the Oxfordshire Minerals and Waste Local Plan Core Strategy, do you consider it necessary to participate at the oral hearing part of the examination? *(tick box below as appropriate)*

No , I wish to communicate through written representations	
Yes , I wish to participate at the oral hearing part of the examination (go to 2(g))	YES

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated they wish to participate at the hearing part of the examination.

2(g) If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.
<p>The representations relate to a key company waste management facility. It is necessary for the representations to be considered at the Hearing in order that proposed changes can be fully explained and discussed with the Inspector, Planning Authority and any other interested parties</p>
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.