

Part 1 – Respondent Details

1(a) Personal details		
Title	Prof.	
First Name	Richard	
Last Name	Harding	
Job Title (where relevant)	Chairman, Wallingford District	
Organisation (where relevant)	CPRE	
1(b) Agent details <i>Only complete if an agent has been appointed</i>		
Title		
First Name		
Last Name		
Job Title (where relevant)		
Organisation (where relevant)		
1(c) Contact address details <i>If an agent has been appointed please give their contact details</i>		
Address Line 1		
Line 2		
Line 3		
Line 4		
Postcode		
Telephone No.		
Email address		
Are you writing as	<input type="checkbox"/> A resident <input type="checkbox"/> A local business <input type="checkbox"/> Minerals industry <input type="checkbox"/> Waste industry	<input type="checkbox"/> A parish council <input type="checkbox"/> A district council <input type="checkbox"/> A county council <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	X
Publication of the Inspector’s report and recommendations	X
Adoption of the Oxfordshire Minerals and Waste Core Strategy	X

Please sign and date the form:			
Signature:	R J Harding	Date:	24 September 2015

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

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

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

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 X
- (ii) Justified
- (iii) Effective
- (iv) Consistent with national policy

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.

The strategy is not legally compliant because Government policy has not been followed and the Local Aggregate Assessment (the number of tons of gravel required) has not been properly assessed. It argues that if OCC had carried out the LAA properly, then currently permitted sites already in existence would have sufficient reserves to meet Oxfordshire's needs for the next 10 years, i.e. there would be no need for new sand and gravel pits anywhere in Oxfordshire.

In addition the local councils and public have not been fully consulted on the LAA.

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 government guidelines (the NPPF) advise using a historical 10-year average of minerals sales when calculating the LAA. Most neighbouring counties use this or very similar methodology. The original LAA proposed by campaign groups from across the county (the Hives report, which used the 10-year average as its basis) was accepted by OCC in the summer of 2014. This would have meant that there would be no need for new gravel extraction sites in the county for many years. I find it objectionable that OCC then abandoned the 10-year average methodology when it hired its own new set of consultants who produced a much higher LAA that is completely out of step with the 10-year average.

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

