

## Part 1 – Respondent Details

<b>1(a) Personal details</b>		
<b>Title</b>	Mr	
<b>First Name</b>	Nick	
<b>Last Name</b>	Antram	
<b>Job Title (where relevant)</b>		
<b>Organisation (where relevant)</b>	CAGE	
<b>1(b) Agent details</b> <i>Only complete if an agent has been appointed</i>		
<b>Title</b>		
<b>First Name</b>		
<b>Last Name</b>		
<b>Job Title (where relevant)</b>		
<b>Organisation (where relevant)</b>		
<b>1(c) Contact address details</b> <i>If an agent has been appointed please give their contact details</i>		
<b>Address Line 1</b>		
<b>Line 2</b>		
<b>Line 3</b>		
<b>Line 4</b>		
<b>Postcode</b>		
<b>Telephone No.</b>		
<b>Email address</b>		
<b>Are you writing as</b>	<input type="checkbox"/> <b>A resident</b> <input type="checkbox"/> <b>A local business</b> <input type="checkbox"/> <b>Minerals industry</b> <input type="checkbox"/> <b>Waste industry</b>	<input type="checkbox"/> <b>A parish council</b> <input type="checkbox"/> <b>A district council</b> <input type="checkbox"/> <b>A county council</b> <input type="checkbox"/> <b>Other (please specify)</b>

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

<b>Please sign and date the form:</b>			
<b>Signature:</b>	N Antram	<b>Date:</b>	25 Sept 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

Minerals plan only
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### 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                       X
- (ii) Justified                                       X
- (iii) Effective                                       X
- (iv) Consistent with national policy       X

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.**

1. I have seen the Gardner Representation produced by Gardner Planning on behalf of OXAGE and fully support the points made.  
I am perturbed that OCC failed to consult parish councils and the public generally when it suddenly increased the LAA (the number of tons of gravel required in the plan) even though it found the resources and time to consult mineral producers towards the end of 2014. The public were deprived of an opportunity to question the flawed methods used and the inflated outcome reached by yet another set of consultants hired at great expense by OCC.
2. I have seen the Gardner Representation produced by Gardner Planning on behalf of OXAGE and fully support the points made.  
I am perturbed that OCC has produced a shoddy plan which is contrary to government policy and is therefore not based on law, and furthermore that this third-rate plan was not consulted on at appropriate stages.
3. I have seen the Gardner Representation produced by Gardner Planning on behalf of OXAGE and fully support the points made.  
I find it astonishing that OCC were happy with a much lower LAA this time last year (produced by experts hired by campaign groups), but then hired different consultants who, using spurious and circular arguments, produced a figure nearly 50% higher at the turn of the year. OCC then managed to consult mineral producers on the LAA but deliberately failed to consult the public at large.
4. I have seen the Gardner Representation produced by Gardner Planning on behalf of OXAGE and fully support the points made.  
There is a circular argument in OCC's plan which makes it non-compliant with government guidelines (the NPPF): OCC argue that they can leave site allocations until a later stage but at the same time indicate, without any formal supporting evidence, that the preferred area for allocations will be south Oxfordshire. In fact, they are obliged to indicate potential sites and to set out formal evidence as to why each site has been chosen.
5. I have seen the Gardner Representation produced by Gardner Planning

on behalf of OXAGE and fully support the points made.

Campaign groups have over the years provided OCC with a lot of input and advice, including from experts, which should have informed the council to get things right. So it is odd, to say the least, and possibly suspicious, that OCC keep coming back with flawed arguments and figures that would inevitably make the county a huge net exporter of gravel. Is this OCC's real aim?

6. I have seen the Gardner Representation produced by Gardner Planning on behalf of OXAGE and fully support the points made.

To get it wrong once despite all the input from well-informed campaign groups and the public at large could be described as a regrettable waste of public money on OCC's part. To get it so wrong yet again this time around suggests that OCC has some ulterior motive, such as making the county a net exporter of gravel, and is not in the least bothered about wasting public money.

7. I have seen the Gardner Representation produced by Gardner Planning on behalf of OXAGE and fully support the points made.

I see that 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

**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.**

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

**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	x
Yes, I wish to participate at the oral hearing part of the examination (go to 2(g))	

**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.

<p><b>2(g) If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.</b></p>
Empty space for user input
<p>Continue on a separate sheet or expand the box if necessary</p>

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.