

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								
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	Grundon								
Line 2	Grange Lane								
Line 3	Beenham								
Line 4									
Postcode	RG7 5PY								
Telephone No.	01189 714040								
Email address	Stewart.mitchell@grundon.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 checked="" type="checkbox"/> A local business</td> <td><input type="checkbox"/> A district council</td> </tr> <tr> <td><input type="checkbox"/> Minerals industry</td> <td><input type="checkbox"/> A county council</td> </tr> <tr> <td><input type="checkbox"/> Waste industry</td> <td><input type="checkbox"/> Other (please specify)</td> </tr> </table>	<input type="checkbox"/> A resident	<input type="checkbox"/> A parish council	<input checked="" type="checkbox"/> A local business	<input type="checkbox"/> A district council	<input type="checkbox"/> Minerals industry	<input type="checkbox"/> A county council	<input type="checkbox"/> Waste industry	<input type="checkbox"/> Other (please specify)
<input type="checkbox"/> A resident	<input type="checkbox"/> A parish council								
<input checked="" type="checkbox"/> A local business	<input type="checkbox"/> A district council								
<input type="checkbox"/> Minerals industry	<input type="checkbox"/> A county council								
<input type="checkbox"/> Waste industry	<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	
Publication of the Inspector’s report and recommendations	
Adoption of the Oxfordshire Minerals and Waste Core Strategy	

Please sign and date the form:			
Signature:		Date:	28 th 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

Minerals Vision and Objectives Waste Vision and Objectives

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
- (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.

We support the Vision and Objectives, particularly the provision for a steady and adequate supply of minerals over the Plan period, and the clear recognition that Oxfordshire will make an appropriate contribution to meeting the wider needs for aggregates beyond the County boundary which recognises the wider role of the County, its more abundant resources and dwindling supply elsewhere due to resource constraints.

We support the aim of moving waste up the hierarchy through increased reuse and recycling and the aim of self-sufficiency. We are pleased that the CS recognises that some waste streams are often treated at the sub-national or national level due to their specialist nature and lower volume that requires bespoke facilities. The broad distribution of waste facilities is supported as there is under provision in areas that needs addressing. The re-use of previously developed land is laudable but in reality unlikely due to owners seeking more lucrative uses such as housing and the absence of new allocations for industrial uses is exacerbating the issue. We believe that locational flexibility is required to retain and expand the number of waste 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 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 aim to maintain landbanks of reserves over the Plan period is supported. There is a second strand to provision and there needs to be a commitment to provide sufficient productive capacity to meet the LAA annual provision. Given that the LAA figure is an average the capacity needs to be slightly above that figure. Over concentrating on the landbank may not lead to a steady and adequate supply. Current productive capacity i.e. the amount of aggregate that physically can be put through quarry gates, is below the annual average level of supply that is provided for in the latest LAA and Policy.

Minerals Objective (ii) could helpfully therefore refer to making provision for a steady and adequate supply ... "through ensuring sufficient reserves and productive capacity are permitted". This will ensure that the CS is effective and remains sound.

Waste Objective (x) seeks the restoration of temporary waste facilities where it is no longer required or acceptable. We presume that this means that recycling facilities could be permanently retained if there is an ongoing need and that they cause no adverse impact.

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

M2 Provision for Working Aggregate Minerals

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
- (vi) Justified
- (vii) Effective
- (viii) 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.

While we support the level of provision reflecting the LAA (which properly takes account of local information affecting the long term average of aggregates sales in Oxfordshire and so is above the 10-year average) the policy focuses on maintenance of landbanks of reserves and does not provide for the maintenance of productive capacity in order to achieve an steady and adequate supply of aggregates. Current capacity to supply is around 800,000 tonnes and is below the annual LAA provision as set out in para 4.14. The theoretical calculation based solely on landbank would indicate the 14Mt reserves are sufficient for 14 years. However given actual capacity the LAA provision is incapable of being meet. The application of policy based solely on landbank leads to a cap on supply. While provision for adequate landbanks of reserves is required by national policy and is supported, on its own this won't necessarily deliver a steady and adequate supply if the amount of material that actually can be provided to the market is limited.

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 policy should refer to enabling a 'steady and adequate' supply.

The policy should refer to enabling 'sufficient capacity to supply' as well as landbanks of reserves.

These amendments are required to be effective in delivering a steady and adequate supply and to meet the requirements of the current and future LAAs.

The *maintenance* of landbanks throughout the Plan period means that at the end of the Plan period there will need to be reserves equivalent to the supply of at least 7 years of sand and gravel and 10 years of rock. Based on the figures in the LAA and paragraph 4.14 this means that additional reserves of sharp sand and gravel and soft sand need to be provided for, above those indicated in paras 4.19, 7.5 and Table 2 - the total requirement in Row B will need to increase by 7.1mt of sharp sand and gravel and 1.3mt of soft sand. Adequate sites will then need to be allocated in the Site Allocations Document to provide for this amount of aggregates.

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

4.27 to 4.33 M5 Working of aggregate minerals
--

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
- (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 purpose of the CS is to provide a broad locational strategy and we believe that it does so in seeking to provide a variety of potential locations that align with areas of demand and we support this aim. Whilst it may be desirable to have a sites DPD running alongside this it is not a requirement nor is it always possible. Providing that sites can be permitted in the interim and not judged premature we believe that the CS could achieve its aims.

Paragraph 4.27 states that the current permissions could provide the current LAA figure to 2027. Whilst in theory this is correct, based on the reserves divided by the LAA figure, the reality is that there is insufficient productive capacity to meet the LAA figure. Without the ability to increase capacity the policy become a cap. The policy needs to seek to not only maintain a landbank but also to ensure that there is sufficient productive capacity. This would ensure that the current and future LAA annual production figures are capable of being achieved and maintained.

4.31 details that Sutton Courtney has only a few years of reserves remaining, however most of these lie underneath the processing plant, a similar situation to Cassington, and are therefore not readily available nor is it certain when and at what quantity they will become available. The lack of further resources at these sites is one reason for their mothballing. The site at Caversham is only just recommencing production after a gap of many years due to the length of time and difficulties in securing this extension. Operators are finding that it often takes 4-5 years from the commencement of the planning process until the first mineral becomes available. The CS needs to recognise this and be flexible in its approach.

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.

Policy M5 allows for the granting of mineral sites in the interim period prior to the adoption of the Sites DPD. However it should be amended at paragraph 4 to not only maintain a landbank but also to provide sufficient productive capacity to meet the LAA annual figure. This amendment is required to be effective in delivering a supply in accordance with the current LAA and is linked back to Policy M2.

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

M4 Sites for working aggregate minerals

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
- (vi) Justified
- (vii) Effective
- (viii) 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.

Given that current productive capacity/capacity to supply is insufficient to deliver the annual average amounts of land won supply (reflecting the LAA) there will be a need to maintain productive capacity in the West of the County while increasing productive capacity in the South which will still achieve the change in 'balance' between supply from these areas as proposed in para 4.30 and the policy (b). this is required to make the Plan effective.

Clause (h) - the 'avoidance' of locations within or significantly affecting AONBs appears to be too absolute and does not reflect the NPPF which requires that consideration be given to the need for development and the impact of refusing it on the local economy, the cost of and scope for developing elsewhere, and the potential to moderate detrimental effects are taken into account (para 116). Specific to minerals, para 144 requires that provision for maintenance of landbanks is made outside of AONBs 'as far as is practical.' Other clauses eg (k) provide flexibility and include provision for adverse effects to be suitably mitigated.

Clause (l) erroneously refers to 'successive' mineral development as contributing to cumulative effects. The NPPF (para 143) refers to taking into account 'the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality'. Our interpretation is that it applies to the cumulative effects of a number of sites operating at the same time within a locality, not to operation of different sites over time.

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.

Acknowledge in supporting text (para 4.30) that a change in the balance of production capacity between the West and the South of the County can be achieved through increasing production capacity in the South without reducing the production capacity in the West. An overall increase in production capacity is required to ensure that a steady and adequate supply is maintained and that the levels of production set out in the Plan (para 4.14) and the LAA are achieved, and to ensure the Plan is effective.

Clause (h) should be caveated to provide necessary flexibility and include reference to avoidance of these locations 'where practical' and where significant effects occur that these can be 'moderated', to make consistent with national policy.

Clause (l) – delete reference to 'successive' mineral development, to make consistent with national policy

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

M5 Working of aggregate minerals

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

(x) Justified

(xi) Effective

(xii) 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 policy, like others, focuses solely on the maintenance of landbanks. As highlighted previously, production capacity is limited, and to deliver a steady and adequate supply in line with the CS and LAA the policy needs amending.

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 policy at its 4th paragraph should refer to not only maintaining a landbank but also to providing sufficient productive capacity in accordance with the latest LAA. This would ensure that a steady and adequate supply is maintained and that the policy is effective in delivering the required amount.

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

Para 4.64 M8 Safeguarding mineral resources
--

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

(xiv) Justified

(xv) Effective

(xvi) 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.

While we understand the inclusion of the clause exempting sites allocated in adopted development plans it is important that this only applies to sites where the need for safeguarding of mineral resource has been properly taken into account when the development plan in question was being prepared and examined. We are aware that in the past (particularly pre-NPPF) local planning authorities may not have been fully aware of the importance of mineral safeguarding when preparing plans and site allocations. In such circumstances, prior extraction should still be considered when development proceeds.

The same concern applies to policy M9.

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.

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

Table 3, 4 and 5

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
- (xviii) Justified
- (xix) Effective
- (xx) 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.

Table 3 at LLW should also refer to ILW and be correctly reference to Table 15.

Table 4 at CDE has two figures for arisings. It would be useful if there was an explanation as to why.

Table 5 CDE figures are based on the lower Table 4 figures, rather than the higher number. Does this lead to a risk of underprovision.

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.

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 Provision for waste management capacity and facilities required
--

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)

(xxi) Positively prepared

(xxii) Justified

(xxiii) Effective

(xxiv) 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.

A large number of sites are likely to be required to meet the requirements set out in Table 7. Minerals sites may provide suitable locations for waste management facilities, particularly CDE waste recycling but also other types of waste and treatment, particularly where there are good transport links and existing infrastructure, and where development may be well contained and screened. Policy W3 does not identify minerals sites as potentially suitable locations, whereas Policy W5 does include 'active' mineral workings as priority sites for accommodation of waste 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 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.

Include 'mineral workings' in the list of types of locations where waste facilities may be accommodated, to make it effective and consistent with W5, and justified. The reference to 'active' sites in Policy W5 is interpreted as including sites that have not yet been restored, but this should also be clarified. If the policies were to refer to 'mineral sites' in general it would also provide the flexibility for suitable minerals sites, either 'active' or non active, to be considered.

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

Table 10 distribution of waste sites W5 Siting of waste management facilities
--

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)

- (xxv) Positively prepared
- (xxvi) Justified
- (xxvii) Effective
- (xxviii) 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.

Table 10 details the population each district and compares this to waste management capacity. The South area has an obvious shortfall which is probably mainly due to landscape designation and a lack of available sites. There are a number of temporary sites located at landfills which at the end of their life would be removed. This would greatly increase the capacity imbalance putting unnecessary pressure on other areas and increasing waste miles. These sites have operated for a considerable period of time without harm arising from their location or operation.

Policy W5 limits consideration for accommodating waste facilities to active mineral and landfill sites. However, this would exclude potential sites that would be suitable for accommodating waste facilities, particularly given existing transport connections, infrastructure and mitigation, and does not provide flexibility to be effective. Provision could be made to retain facilities on a permanent basis providing that there is no adverse impact arising from their operation.

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.

Amend the second paragraph of W5 to allow for the retention of recycling facilities beyond their host period providing there is no adverse impact from their operation.

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

W11 Safeguarding

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
- (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 policy only seeks to safeguard sites if they have a permission beyond 2031. This means that important facilities that have a shorter duration would not be protected by policy and could be compromised by encroaching developed. In contrast to this pending the adoption of the Sites DPD all sites would be safeguarded.

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 first bullet of W11 should be amended to refer to 'sites in waste use with planning permission' and to delete the remainder of that part.

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	
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.*

2(g) If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.

Grundon is the largest private waste company in the County and runs a number of collection and recycling sites. It is also a sand and gravel producer in the County. It has a detailed knowledge of waste and minerals issues and we hope can usefully inform the debate.

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.