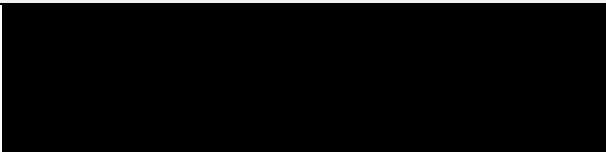


Part 1 – Respondent Details

1(a) Personal details									
Title	Mr								
First Name	David								
Last Name	Payne								
Job Title (where relevant)	Senior Planning Advisor								
Organisation (where relevant)	Mineral Products Association								
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	Gillingham House								
Line 2	38-44 Gillingham Street								
Line 3	London								
Line 4									
Postcode	SW1V 1HU								
Telephone No.	07834268407								
Email address	David.payne@mineralproducts.org								
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 checked="" 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 type="checkbox"/> A local business	<input type="checkbox"/> A district council	<input checked="" 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 type="checkbox"/> A local business	<input type="checkbox"/> A district council								
<input checked="" 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:	30 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

Para 3.3 Vision (a) Para 3.4 Objectives (ii) and (iii)

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.

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.

While the provision to maintain landbanks of reserves over the Plan period is supported, the need to maintain and increase the *capacity to provide* aggregates to the market in order to maintain a steady and adequate supply is neglected. Information from our members indicates that current productive capacity ie 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 Policy

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 is addressed further in our representations on specific policies where we consider this to be an issue of soundness (not Effective).

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 only focuses on maintenance of landbanks of reserves and does not, in our view, adequately provide for an increase, and thereafter maintenance, of *productive capacity* in order to achieve an steady and adequate supply of aggregates. Our members advise us that current capacity to supply is around 800,000 tonnes and so is below the annual average level of provision necessary to maintain a steady and adequate supply as set out in para 4.19. 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, for example by physical constraints or restrictions imposed by planning conditions.

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.

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

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)

- (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.

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 (j) – 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)

(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.

The policy, like others, focuses solely on the maintenance of landbanks. As highlighted previously, an increase in and maintenance of production capacity is also required to deliver a steady and adequate supply in line with the Plan and 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 policy should make it clear that prior to adoption of the Site Allocations Document permission will be granted for the working of aggregate minerals where this is necessary required in order to maintain '*productive capacity to meet the annual supply requirements in the LAA*' in addition to 'maintain landbanks'. This is needed to make the policy effective as inadequate capacity will mean that the annual provision will not be met even if landbanks are maintained.

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

M7 Non aggregate mineral working C8 Landscape
--

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.

Policy M7 requires quarries for Building Stone having to be 'small scale'. This is not defined or justified. If the aim of the policy is to reduce environmental (principally landscape) and amenity impacts of extraction, and also processing and/or transport, then this should be clarified. The impacts of stone quarries, and the significance and acceptability of these impacts, as for other types of mineral or any other development, will depend on the location, design, operation and management of the quarry, including mitigation. The NPPF (para 144) provides specific advice on building stone quarries, stressing the small-scale nature and impact of such operations, and the need for a flexible approach to their working. The reference to 'small scale' in Policy C8 appears to refer to development that is not 'major' and which is required to meet local needs. There is no need to make additional reference to undefined 'small-scale' quarries.

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.

'Small scale' should be deleted from Policies M7 and C8. Policy M7 could instead refer to the requirement that other policies of the Plan are met (including a modified Policy C8).

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)

(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.

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.

Explain in the text that the exemption in the policy only applies where local plan allocations have been made having considered the potential sterilisation of mineral resources.

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 4.83 Policy M10 Restoration of mineral workings

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.

The reference to securing restoration, aftercare and after use in the 'longer term' is a little vague. Paragraph 4.83 refers to the standard application in Oxfordshire of 20 years for long term management in addition to the 5 year aftercare.

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.

Replace reference to 'longer term' with 5 years aftercare plus 20 years longer term management period, to provide clarity and be effective.

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)

(xxix) Positively prepared

(xxx) Justified

(xxxi) Effective

(xxxii) 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

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)

- (xxxiii) Positively prepared
- (xxxiv) Justified
- (xxxv) Effective
- (xxxvi) 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.

Policy W5 limits consideration for accommodating waste facilities to 'active' mineral sites. We interpret 'active' as including sites at which restoration has not yet been completed. However, this would exclude restored former sites which could potentially be suitable for accommodating waste facilities, particularly given transport connections and infrastructure, and does not provide flexibility to be effective.

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.

Refer to 'mineral workings' in general and delete 'active, or include an additional bullet point referring to 'former mineral working'.

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

C10 Para 6.56

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)

- (xxxvii) Positively prepared
- (xxxviii) Justified
- (xxxix) Effective
- (xl) 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 reference in Policy C10 to development leading to a 'need improvement to the transport network' and 'developers will be expected to provide such improvement or make an appropriate financial contribution' is vague in terms of how such needs might be demonstrated and how financial contributions may be calculated. Minerals operators already make substantial contributions towards transport including through taxation and expenditure related to specific legal agreements and should not be expected to pay additional commuted funds for maintenance of highways, where the marginal effect of quarry-related traffic is not proven.

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.

Delete reference to '*commuted funds*' in the paragraph 6.56 and the paragraph referring to '*Where development leads to the need for improvement to the transport networkappropriate financial contribution*' from Policy C10 which is open-ended, unreasonable, unjustified and impractical.

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

