


Part 1 – Respondent Details

1(a) Personal details	
Title	Mr
First Name	Martin
Last Name	Layer
Job Title (where relevant)	Planning and Estates Manager
Organisation (where relevant)	Smiths and Sons (Bletchington) Ltd
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	Smith and Sons (Bletchington) Ltd
Line 2	Enslow
Line 3	Kidlington
Line 4	Oxfordshire
Postcode	OX5 3AY
Telephone No.	01869 331281
Email address	Martinl@smithsbletchington.co.uk
Are you writing as	<input type="checkbox"/> A resident <input type="checkbox"/> A local business <input checked="" type="checkbox"/> Minerals industry <input type="checkbox"/> Waste industry <input type="checkbox"/> A parish council <input type="checkbox"/> A district council <input type="checkbox"/> A county council <input type="checkbox"/> Other (please specify)

Smiths Bletchington 30.09.2015

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	Y
Publication of the Inspector's report and recommendations	Y
Adoption of the Oxfordshire Minerals and Waste Core Strategy	Y

Please sign and date the form:			
Signature:		Date:	30th 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 a, b and c; and Para 3.4 ii, iv, vii, ix, x
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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
- (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 broadly welcome the Vision and Objectives for minerals for Oxfordshire and in particular we express our support for:

- (a) the aim to provide for a steady and adequate supply of aggregates sufficient to meet the demands of the local economy and its neighbours through the plan period and the recognition given to the contribution that recycled aggregates can make in meeting this demand.
- (b) minimising the distance aggregates have to travel between quarry supply and the customer and
- (c) the recognition given of the contribution the mineral industry through its restoration work will continue to make to the quality of the County's natural environment.

We also support the objective to maintain a local supply of walling and building stone to maintain the distinctive character of Oxfordshire buildings and landscape. (3.4 iv) but are concerned about how this is to be limited to only "small scale" developments. This is addressed further in our representations on Policy M7 where we consider this is an issue of soundness (not 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.

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Part 2 – Representation

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

Part or policy no. or paragraph

Para 4.8 and Policy M1

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

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

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

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

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- (ii) Justified
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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 welcome and support the clear message that the supply of raw materials for recycling is limited by the levels of demolition and construction activity in the local economy and that although recycled and secondary aggregates have an important role in contributing to meeting the demand for aggregates in the county they cannot replace primary materials which in very many applications may be the only practical option. We believe this is a sensible approach recognising that recycled materials supplement but cannot replace primary aggregates.

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

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

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

Part or policy no. or paragraph

Policy M2 Provision for working aggregate minerals and Table 2.

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.

Policy M2: We strongly support the representations of our local trade body OMPG and broadly support Policy M2. We welcome the continuing identification and provision for separate sharp sand and gravel and soft sand landbanks. We welcome the approach adopted by the LAA which we believe is a flexible and practical means of addressing information relevant to the supply of aggregates in Oxfordshire.

However, the PPG states that an LAA is an annual assessment of the demand for and supply of aggregates in the mpa and although Policy M2 confirms the use of the “most recent” LAA to inform the Core Strategy there is no clear commitment that this will be produced and presented annually and be up to date. Although supporting text (paras 4.14, 4.18, 4.20) refers to annual reviews we believe that this should also be clearly stated in Policy M2 and that the most recent LAA is that based on the Aggregate Monitoring Survey data collected in the year of the review. This would avoid the prospect of delayed publication (for whatever reason) of an LAA and reliance upon out of date albeit “the most recent” LAA.

Table 2: Note 2 refer to a “proposed average working rate of 0.325 Mt per annum” for Gill Mill Quarry. The basis for this figure is questioned as this level of output was not proposed in the planning application which gave a range of 0.3-0.4 Mt per annum. At the higher level of output the permitted reserve at Gill Mill would be exhausted by the end of 2031 and sufficient provision would need to be made by the Plan to maintain the 7 year landbank through and beyond the end of the plan period. The Plan should be founded on factual evidence.

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.

Confirmation that the LAA will not only be reviewed but also published on an annual basis and that “the most recent” LAA will reflect the Aggregate Monitoring Survey data collected in the year of the review.

Table 2 should make clear provision for the level of reserves needed to maintain the landbank at the end of the plan period and to amend row G accordingly.

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

Policy M4 (clauses h, l and l)

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 NPPF states that consideration should be given to the ability to moderate any detrimental effect on the environment. Such mitigation is not provided for in Policy 4 clauses h and i and we believe this to be inconsistent with national policy.

Clause I refers to the cumulative impact of successive and/or simultaneous mineral workings. We believe that the meaning of “successive” in this context is unclear and is not in line with the NPPF. We believe that successive means “following on” which would allow for the continuation of mineral working in the principle locations over the plan period. This is in contrast to the cumulative effect of several active quarries in the same area at the same 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.

Clauses h and i should be consistent with national policy and include provision for adverse effects to be suitably mitigated. The wording used in clause K is supported.

Clause I should be consistent with national policy and the reference to successive should be deleted.

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

Policy M7 (Building Stone)

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
- (v) 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.

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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 believe that the use of the term “small scale” in the context of building stone quarries is subjective, insufficiently precise and gives a misleading impression of this type of operation. Although the output from a building and walling stone quarry may well be significantly lower than that associated with an aggregates quarry the use of the term is not helpful in determining whether or not a development is acceptable. This, as for all other developments, will depend on many factors and on the ability to mitigate impacts.

The reference to “small scale” is repeated in Policy C8 Landscape. Although here it is linked to meeting “local needs” and the opposite to “major” it remains imprecise. In our view its use is unhelpful in delivering the policy objectives and is not in line with the NPPF.

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 term “small scale’ should be deleted from Policy M7 and from 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

Policy W6

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.

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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 priority to be given to the use of non-recyclable inert wastes for quarry restoration is strongly supported. However the reference to its use in unrestored quarries requires clarification. An unrestored quarry is likely to be an old/former working that did not have a secured restoration scheme and the void may simply present a landfill opportunity diverting finite restoration materials from active workings with modern conditions and restoration schemes. If this is not the intention of the policy then a hierarchy of priorities should be provided with active quarries taking precedence. Alternatively the term “unrestored quarries” should be deleted.

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 “unrestored quarries” or provide clarification of the intention (to avoid landfill)

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

Policy C5

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)

- (vi) Positively prepared
- (vii) Justified
- (viii) Effective
- (ix) 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.

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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 strongly support the intention of this policy to determine buffer zones between mineral and waste developments and residential properties on a case by case basis. This avoids the unnecessary sterilisation of finite mineral reserves.

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

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.

Our participation may depend on whether or not issues of concern highlighted in our representation or in that of our local and national trade bodies OMPG and MPA are adequately covered by industry representatives. A coordinated approach with members of the OMPG/MPA to avoid duplication would be supported.

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.