

Part 1 – Respondent Details

1(a) Personal details	
Title	Mr
First Name	Michael
Last Name	Brown
Job Title (where relevant)	
Organisation (where relevant)	
1(b) Agent details <i>Only complete if an agent has been appointed</i>	
Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
1(c) Contact address details <i>If an agent has been appointed please give their contact details</i>	
Address Line 1	
Line 2	
Line 3	
Line 4	
Postcode	
Telephone No.	
Email address	

Are you writing as	<input checked="" type="checkbox"/> A resident <input type="checkbox"/> A local business <input type="checkbox"/> Minerals industry <input type="checkbox"/> Waste industry	<input type="checkbox"/> A parish council <input type="checkbox"/> A district council <input type="checkbox"/> A county council <input checked="" 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		Yes
Publication of the Inspector’s report and recommendations		Yes
Adoption of the Oxfordshire Minerals and Waste Core Strategy		Yes

Please sign and date the form:			
Signature:		Date:	

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

Various parts and policies

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 reasons set out below are in addition to those expressed in the Church Hanborough/Lower Evenlode Residents submission.

I wish to challenge the compliance and soundness of the OCC Part I Core Strategy on the following grounds:

1. Lack of information

(a) Paragraph 2.30 refers to a previous inspector having raised issues over the adequacy of the evidence base. The Core Strategy as now published fails to explain clearly in what way the inspector's concerns have been addressed.

(b) The Core Strategy fails to include information about the District Council's (in particular WODC) corresponding policies and how they impinge on the County proposals. In view of policy expressed later in the Core Strategy about re-balancing the sharp sand and gravel extraction between the north and south of the county, the views of WODC should be particularly pertinent.

2. Lack of proper identification of areas referred to

(a) Figure 9 Minerals Key Diagram shows Area 6 mostly to the south but also a 'finger' of land immediately to the north of the A40 road. It also shows the area covered by the Oxford Green Belt. So far as I can tell from the relatively small scale maps the said finger of land should show clearly that it is within the Green Belt. The way it is presented in Figure 9 indicates the contrary.

To try to identify the correct line of the western boundary of the Green Belt at this point I have referred both to the map on the LUC website in connection with their study commissioned by OCC and also to the interactive map on the CPRE website. Both of these indicate that the boundary of the Green Belt is well to the west of the river Evenlode at this point. Therefore the said finger of land in Area 6 is within the Green Belt. If I am correct, then Figure 9 is seriously misleading in this respect.

(b) As to the textual descriptions of areas, take for example paragraph 4.34. It refers to: "land to the east and north east of the river Evenlode within the Eynsham/Cassington/Yarnton part of the Thames, Lower Windrush and Lower Evenlode valleys (Standlake to Yarnton) strategic resource area". How, as a member of the public can I identify accurately

whether or not this description includes the SG-08 area also known as 'Land at Lower Road, Hanborough' on the map C-13 on the OCC website ? Surely there is a duty on OCC to identify all the areas it is referring to in such an important consultation document in such a way that members of the public can understand with confidence which of the areas might affect them.

3. Failure to address the effect on either the Green Belt and nearby land or the Church Hanborough Conservation area.

(a) Paragraph 4.24 explains that Areas of Outstanding Beauty and SACs "have been excluded but other designations and constraints have not been taken into account at this stage". However in the context of Waste at paragraph 5.34 the Core Strategy states that "Locations in the Oxford Green Belt should be avoided". Why is the importance of the Green Belt addressed in terms of Waste but not in terms of Mineral Extraction at this stage ?

(b) Church Hanborough is designated as a Conservation Area, with all the planning/development constraints that this imposes. The Core Strategy recognises the importance of Conservation Areas themselves but also the wider area in which they lie. Therefore it would make nonsense of Pevsner's enthusiastic views about the 900 year old church of St Peter & St Paul with its tall spire on the hill on which stands the village of Church Hanborough if it is to be blighted by mineral workings and all the attendant equipment and development. The reference to Conservation Areas in paragraph 4.46(j) requires proper attention at this stage not just a passing reference. Similarly, the passing reference to the 'character and setting of local settlements' in paragraph 4.46 (k)(viii).

4. Lack of balance between north and south Oxfordshire

At paragraph 4.27 it is confirmed that existing permissions can provide anticipated requirements of sharp sand and gravel until 2027, some 13 years from the 2014 Assessment. So the Core Strategy and subsequent allocations at the Part 2 stage should only focus on the 4 years 2027 to 2031 during which time some 4 million tons only will be required.

At paragraph 4.28 it is confirmed that the production (extraction) of sharp sand and gravel in Oxfordshire "has become increasingly concentrated in the northern part of the county, (Cherwell and West Oxfordshire Districts) particularly in West Oxfordshire, with a decline in the proportion coming from quarries in the southern part". Indeed over the last 10 years it says that "74% of production has been from Northern Oxfordshire". It then makes the point that "there are concerns about the rate and intensity of mineral working in the area and the consequent cumulative impact on local communities, generation of

traffic, including on the A40, and impacts on local rivers and groundwater flows.” SG-08 Land at Lower Road, Hanborough is close to Cassington, which is an affected village specifically identified elsewhere in 4.28.

By paragraph 4.30 the Core Strategy expresses the firm view that the balance of production capacity should be shifted from the West Oxfordshire District to South Oxfordshire. I would support this policy to achieve both a re-balance and overall fairness as well as reducing lorry movements across the county; specifically that “in view of the relatively high level of existing permitted reserves in the northern part of Oxfordshire (mainly West Oxfordshire) any requirement for additional sites for sharp sand and gravel should be primarily in the southern part of the county.” If this policy is followed then it should not be necessary to produce any of the extra 4 million tonnes assessed to be required by 2031 from the northern part of the county, and West Oxfordshire in particular – and certainly not from the SG-08 Land at Lower Road, Hanborough.

In paragraph 4.33 the Core Strategy goes further and says that “whilst any requirement for additional sites for sharp sand and gravel should be met primarily in the southern part of the county, in the event that further provision for working is also required from the northern part of the county in the plan period, this should be from within the Standlake to Yarnton area, which includes the existing working areas of the Lower Windrush valley and around Cassington .” I take it that this is not another vague description that could at some later date be said to extend to the SG-08 Land at Lower Road, Hanborough. This is another example that highlights the importance of clear identification of the areas of land being referred to.

In the light of the above it is inconsistent and misleading then at paragraph 4.45 Policy M3 to identify as the first strategic resource area for sharp sand and gravel as including the “ Lower Evenlode Valley” if by that it is intended to include SG-08 Land at Lower Road, Hanborough. Hence the need to identify much more clearly the extent of the areas being referred to. On the basis of redressing the balance between north and south, this Lower Evenlode Valley should not be included at all, let alone as the first of three separate areas of the county.

Additionally the balance needs to start to be addressed now, not “over the course of the plan period” as suggested at paragraph 4.46(b). With a current imbalance of 74% to 26%, this issue should be addressed immediately, for otherwise the balance that OCC says is important will realistically never be achieved.

5. Playing Field is not level

(a) Paragraph 7.11 indicates that possible new sites have already been put

forward (nominated) to OCC by mineral operators and landowners, and that a preliminary technical assessment of these sites has been undertaken showing that the minerals planning strategy is potentially capable of being delivered.

This sounds as if mineral operators and landowners are unfairly influencing the consultation process for their own benefit. Where is the 'technical assessment', why is it not available to the public at this stage, and which areas in the county does it relate to ? If, as appears to be the case, this 'technical assessment' has relevance to the Core Strategy then it should be available to everyone and the proposed strategy should address it properly so that all of those being consulted have an opportunity to consider it. The delphic language in one sentence in paragraph 7.11 at the end of the long Core Strategy document is inadequate. Arguably the OCC has failed in its duty to be transparent and provide a level playing field in such matters.

- (b) At paragraph 4.47 it is stated that prior to the adoption of Part 2 Site Allocations, permission will be granted for the work of aggregate minerals in order to maintain landbanks. The Core Strategy has previously established that permissions already granted will be sufficient to meet anticipated requirements of sharp sand and gravel until 2027. On this basis the overall county wide landbank therefore does not require any increase before Part 2 Site Allocations is adopted. If however the reference to landbanks in paragraph 4.47 is to individual mineral extraction companies' own landbanks, they should not be given priority in advance of the adoption of Part 2 Sites Allocation.

I would be grateful if the above issues could be addressed at this stage, and that I should be kept informed.

A large, empty rectangular box with a thin black border, occupying most of the page. It is intended for the user to provide representation or input.

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.

Remove all reference to the Lower Evenlode valley immediately north of the A40 as being suitable now or in the future for sharp sand and gravel production, and make the other changes I have addressed in 2(d) above.

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

