

Part 1 – Respondent Details


1(a) Personal details	
Title	Mr
First Name	Vincent
Last Name	Goodstadt
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	██

<p>Are you writing as</p>	<p><input type="checkbox"/> A resident</p>	
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Please tick the appropriate boxes if you wish to be notified of any of the following:

<p>That the Oxfordshire Minerals & Waste Core Strategy has been submitted for independent examination</p>	<p><input checked="" type="checkbox"/></p>
<p>Publication of the Inspector's report and recommendations</p>	<p><input checked="" type="checkbox"/></p>
<p>Adoption of the Oxfordshire Minerals and Waste Core Strategy</p>	<p><input checked="" type="checkbox"/></p>

Please sign and date the form:

<p>Signature:</p>		<p>Date:</p>	<p>29th September 2015</p>
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Representation 1- Consultation Process

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

The Consultation Process

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

- (i) Legally compliant? No
- (ii) Sound? 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 No
- (iii) Effective
- (iv) Consistent with national policy No (because of other matters)

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.

Issue 1: The inadequate evidence base of the Draft Plan: The failure to provide the listed reports (upon which the draft core strategy is based) is not only undesirable but fundamentally undermined the consultation process at a critical stage.

I consider that the consultation process was fundamentally flawed since the draft document states in para 1.4 , that “documents that make up the evidence base for the plan, are available on the Council’s website”.

These documents were not however available , as stated in the text copied from the OCC website March 2014

“Oxfordshire Local Aggregate Assessment 2013 – to be added soon
Topic Papers – updates of background papers published in 2012 to be added soon”

These missing papers were central to the assessment of the draft core strategy and the test of its soundness. Up to date assessment local aggregates and of the various topic papers are essential to the process and its credibility. Without them the technical basis of the draft core strategy could not be properly assessed.

This was a matter of great concern and raised at the time with the Council. Not only was the process misleading and flawed, and challengeable in its own right but also, I believe, it was also contrary to the NPPF requirement for an evidence-based planning process and meaningful consultation (para 155) and the requirements of Regulation 35 – these require evidence to be presented before not after the consultation process for a minimum of six weeks.

In its response (page 3 Annex 2 of the Consultation Report) OCC state “ It was not possible to provide topic papers at the time of the consultation but this did not prevent people commenting on the draft plan. Evidence base documents will be available at subsequent stages in the plan preparation process.”. This however is considered sufficient to overcome the basic flaw in its initial consultation process which affected the responses that were possible and fettered OCC considerations of the outcome of the consultation process.

It was and still is material to some of the more specific concerns that are raised elsewhere in this response.

**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.**

At the time I therefore recommended that in order to avoid challenges to the Council's processes, that the OCC undertake consultation on these reports as and when the evidence is available for public scrutiny. It is understood that this has in effect been accepted by OCC officers. Mr Day stated in response to my concerns that "*The Local Aggregate Assessment and updated Topic Papers will be published as soon as we are able to finalise them and we will be happy to receive comments on them and any further comments on the draft plan that relate to them.*"

In view of the other issues involved (see the other representations that I make) unless the Plan can be significantly altered through the examination process to meet the issues raised, I cannot see any option but to send the plan back for proper consultation on an up to date evidence base, especially as it has changed since the 2014 consultation, namely , in the geographical balance of supply and demand within the County.

Representation 2 – Vision Statement

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

The Minerals Planning Vision paragraph 3.3

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

- (i) Legally compliant?
- (ii) Sound? 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 No
- (iii) Effective No
- (iv) Consistent with national policy No (because of other matters)

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.

Issue 2: The inadequacy of the Minerals Planning Vision :The Vision set out in the report lacks clarity and local distinctiveness

As currently expressed the Vision in the plan is a meaningless restatement of general objectives that could apply to any County in England. This failure in having a clear Vision cascades throughout the document, resulting in the general weakness of the approach in the proposed policies. Namely, the policies as drafted in effect leave any decision on future working to be decided on an ad hoc basis as and when a planning application is submitted. This view is substantiated by the recent decision on the Gill Mill application.

Of particular concern is the lack of any spatial dimension in the Vision, when a core issue for the plan is to have a balanced spatial distribution of aggregate workings to achieve a more sustainable pattern of development. The County Council has stated that it wants to achieve this by reducing the scale and proportion of mineral workings in the west of the county and reduce the pressure on the road network and communities in the north and west. This should therefore be reflected in the Vision.

OCC response to this concern is to state "The County Council considers the minerals vision to be appropriate and does not agree that it leads to a weak policy approach. The spatial strategy for minerals is set out through the minerals policies, in particular policies M2 – M4, which have been amended from the consultation draft. The Minerals and Waste Local Plan is now being prepared in two parts: part 2 will allocate specific sites for development within the broad locations identified in this part 1 Core Strategy." (page 12 of the Annex 2) . This however is a self-fulfilling justification since it is based on the assumption that Policies M2-4 are sound when they are not and do not have any real spatiality since the broad locations identified are really o more than a map of the main workable mineral deposits (with some limited policy constraints which apply already)

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 Vision should be corrected to include a clear Spatial priority to reduce the pressure of mineral working in west Oxfordshire and to reduce the traffic loading on the A40 and the local environment which is understood to be the aim of the OCC (refer paragraphs 4.28 et al) and accepted generally.

Representation 3 – Lack of Identified Preferred Areas

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

General Issue and Policy M2 & M3

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

- (i) Legally compliant?
- (ii) Sound? 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 No
- (ii) Justified No
- (iii) Effective No
- (iv) Consistent with national policy No (because of other matters)

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.

Issue 3: The lack of spatial priorities in the Minerals Planning Strategy : the failure to identify 'Preferred Areas' and reliance of excessively extensive Search Area and now strategic resource areas

The draft core strategy relied solely on the identification of 'Search Areas'

The government guidance states that priority should be given to specific sites and preferred areas over search areas - designating Preferred Areas, which are areas of known resources where planning permission might reasonably be anticipated.

As it is the core strategy will, if it is not altered, create an unnecessary level of uncertainty since it gives equal status to around 40 locations which it identifies within a Search Area designation. These locations have a minimum capacity of over 60 million tonnes, when the draft core strategy states that even over the 18 year period of the plan only 8 million tonnes will be required. The lack of direction in the draft plan and the scale of choices left to the market place in effect means that development will not be plan-led but determined by ad hoc planning applications.

OCC response (page 26 Annex 2) to these concerns is that "*The format of the Minerals and Waste Local Plan and the minerals spatial strategy has been changed. The plan is now being prepared in two parts: this Core Strategy is part 1 and will identify broad locations for development; and it will be followed by part 2, which will allocate specific sites. Policy M3 has been amended to replace the previous areas of search within which planning permission for mineral working would be granted by strategic resource areas within which specific sites for mineral working will be identified in part 2 of the plan, using the criteria in amended policy M4.*" This response does not address the issue. Site allocations were always to be done as a second stage, so nothing has changed in that respect. Whilst the change from search areas to the strategic resources areas merely reinforces the issue since the areas which have in effect been given an 'amber' light are now apparently even more extensive. They are still in effect broad search areas under a different name.

As part of the action required to ensure that the plan is robust, the current assumptions about the overall level of demand for minerals in the county and its distribution needs to be re-evaluated since there has been too much change and therefore uncertainty about the basis of the figures used and therefore there will be continued debate about how they should be rolled forward as required by the NPPF.

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.

Given the priority that needs to be attached to balancing the distribution of mineral resources and the stated shortfall identified in the plan then, on the basis of the information on the website, the Search Areas/strategic resource areas outside west Oxfordshire that score well in the assessment and have been identified by the industry (and therefore must be considered viable) should be identified as 'Preferred Areas' to reflect the spatial priorities in the plan

The overall demand assumptions in the plan need to be updated , tested and confirmed

Representation 4 – Policy M2

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 and M4 related paragraphs

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

(i) Legally compliant?

(ii) Sound? 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 No

(iii) Effective No

(iv) Consistent with national policy No (because of other matters)

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.

Issue 4 : The Policy M2: The provision for working aggregate minerals in Policy M2 is too ambiguous and weak to provide effective control of the scale of future mineral consents

The draft plan as currently constructed talks about a 7 year minimum provision (which is adequately met already) and an 18-year horizon (for which it says there is a related shortfall of c. 8m tonnes). It is not clear however how these should be used in the application of Policy M2. As currently written the policy will be used to require a 7 year supply at any period of time but also allow applications to be brought forward to meet the 18 year horizon shortfall with an additional unspecified level of additional flexibility over and above this.

It also adds uncertainty by talking about a yearly review of the figures that should be used. The concern is that as constructed the policy will not exercise any effective control on the scale of new planning applications.

The Policy says that a broad balance will be sought between the levels of production in different parts of the County. It however does not define what is meant by a 'broad balance', how it will be measured nor how it will be 'sought'. As currently constructed this objective of achieving a better balance is no more than a vague aspiration and non-deliverable which makes the Policy unsound.

The core strategy policies should set out the anticipated scale of future development over the plan period and indicate how and where this will be met. The annual update of figures provide a basis for monitoring the relevance of these updates but should not be used (as currently written the Policy) as a basis for deferring decisions about future development. Development should be based on a plan-led approach and not left to future development management decisions.

OCC response to these concerns (page 54 in Annex 2) is that "Policy M2 has been amended and the County Council considers that it appropriately sets out how the level of provision to be made through the plan is to be established and is in line with national policy and guidance. As part of the change that has been made to the locational strategy approach the section of the policy on the balance between west and southern Oxfordshire has been moved to policy M4." This response does not address the issues raised, it is merely an assertion and not a demonstration that the concerns raised will not arise. The change to Policy 4 merely transfers the weak approach that is being adopted to the control of mineral working from one policy to another. the provision in Policy M4 still gives no clear guidance as to what is the current balance in the distribution of mineral workings that should be planned for. this will be fought on a site by site basis as applications come forward.

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 core strategy policies M2 and/or M4 should set out the anticipated scale of future development over the plan period and indicate how and where this will be met.

Representation 5 – Policy M3 (Balance of Development)

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 M3 and related paragraphs

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

(i) Legally compliant?

(ii) Sound? 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 No

(iii) Effective No

(iv) Consistent with national policy No (because of other matters)

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.

Issue 5: Locations identified in Policy M3 for working aggregate minerals in West Oxfordshire are not justified

The text of the report talks about the need for a balance in the geographical distribution of planning consents and that Policy M3 has this as a key part of any assessment. However there is no indication of what is meant by this. It is clear from the recent Gill Mill decision that any application falling within one of the areas identified in Policy M3 will be seen as supportive of the plan. OCC intends to apply Policy M3 will not be result in a better geographic balance of development. In the light of the Gill Mill decision, there is no need for the identification of the Thames, Lower Windrush and Lower Evenlode Valleys area from Standlake to Yarnton area in Policy M3 will merely lead to a continuation of the imbalance that the plan purported seeks to remedy

In contrast in view of the available potential supply in the county there should be a strong constraint on any new consent in the west until new consents are brought forward elsewhere. Any further consent in the west will only create imbalance which the county states that it wants to prevent. The need for a better balance has also been reinforced by the latest housing demand assessments which highlight the increased relative scale of development that will be in the south of the County

The plan therefore should have an explicit calculation of the distribution (existing, needed and potential) in terms of the areas referred to in policy, so there is no ambiguity. In addition because of the overall policy objectives is to achieve a better balance, the search areas outside west Oxfordshire should be re-designated as the preferred areas for mineral working in locations that score well in the planning assessment and have been identified by the industry (and therefore must be considered viable).

The OCC response to these concerns is that "*The County Council considers that the Thames, Lower Windrush and Lower Evenlode Valleys area is the most appropriate in west Oxfordshire to be identified in policy M3 as a strategic resource area for sharp sand and gravel within which sites for mineral working should be considered for allocation in part 2 of the plan.*" This however does not address the issue that particularly in view of the Gill Mill decision, any additional provision in West Oxfordshire will reinforce the imbalance that the plan purportedly seeks to redress. It is illogical to include this area therefore even if it is the most suitable in West Oxfordshire); to delete this area from Policy M3 would not preclude individual applications being made and assessed, but they should not start with a presumption in favour of being granted subject to site specific issues being addressed which the current policy construction creates.

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 plan should have an explicit calculation of the distribution (existing, needed and potential) in terms of the areas referred to in policy, so there is no ambiguity. In addition, the *Thames, Lower Windrush and Lower Evenlode Valleys area from Standlake to Yarnton* should be dropped from Policy M3 and the search areas outside west Oxfordshire should be re-designated as the preferred areas for potential areas of mineral working in locations that score well in the planning assessment and have been identified by the industry.

Representation 6 – Policy M3 (Eynsham / Cassington/ Yarnton)

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 M3 & M4 and related paragraphs

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

(i) Legally compliant? No

(ii) Sound? 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 | <input type="checkbox"/> No |
| (ii) Justified | <input type="checkbox"/> No |
| (iii) Effective | <input type="checkbox"/> No |
| (iv) Consistent with national policy | <input type="checkbox"/> No (because of other matters) |

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.

Issue 6 : Policy M3: Eynsham/Cassington/Yarnton (including Lower Evenlode Valley) Search Area

There is a specific issue related to the search area in the Eynsham/Cassington/Yarnton area in that any update of the information base would recognise that it is now near to residential areas (now the Swinford Green has been development), in contrast to what was stated in the earlier studies by the County

Weight should be given to its greenbelt status, which has not been given in the technical analysis that has been issued to date

The report that was produced on the SAC raises concern about the potential impact on the SAC and did not rule out the risk to the SAC from mineral working in its catchment. A precautionary approach should have been adopted which excluded locations within its catchment from the list of search areas.

In addition to these reasons the capacity in the other search locations identified in the plan is more than adequate to provide a range of choice in meeting the expected demand of 8m tonnes.

Therefore the Eynsham/Cassington/Yarnton area should be dropped as a search area in Policy M3,

The OCC response to these concerns is that *"The County Council considers that ...It would not be reasonable to exclude this area on grounds of proximity of housing at this strategic stage of the plan. This is a factor which will be considered at the subsequent site allocation stage, in part 2 of the plan, in accordance with revised policy M4 and policy C5. Mineral extraction is not inappropriate development in the Green Belt. Potential impact on the SAC is addresses in the separate Habitats Regulations Assessment Screening Report. The County Council considers it necessary to provide for continued working of sharp sand and gravel in west Oxfordshire, notwithstanding the existing workings and permitted reserves in this part of the county and other areas identified in policy M3 "* This response however fails to recognise that:

- (i) Proximity to housing was actually one of its own criteria in the assessment process it used in preparing the plan;
- (ii) whilst the NPPF does not preclude mineral workings in the greenbelt it still requires the evaluation of the impact of policies in the local plan in greenbelt which has not been done in this plan; and
- (iii) The issues related to the SAC that are raised in the background report are matters to be resolved in the local plan and not merely left to the planning application stage; and

(iv) there are more than sufficient reserves in planning consent already identified in this part of Oxfordshire to meet the needs for minerals in the area. Any additional consents would undermine the stated goal of rebalancing the provision in the county.

OCC have also stated (page 113 Annex 2) that “The Gill Mill permission has been included in a revised Table 2. The plan seeks to achieve a change in the balance of production capacity between west and southern Oxfordshire through the allocation of sites for mineral working in accordance with revised policy M4. Whilst there is a high level of existing permitted reserves in west Oxfordshire, there may be a requirement for additional provision to be made for the later part of the plan period. Policies M2, M3 and M4 have been revised and inter-relate to provide a strong framework for the provision of aggregate mineral working, within which policy M2 covers need for permissions.” The OCC clearly accept the fact that there is now following Gill Mill decision an undesirable imbalance in provision between the west and the rest of the county. Itb proposed policy framework does not provide the clear spatial framework in terms of locations and scale. It is reactive in nature and gives an amber light (at the very least to proposals for new mineral working in a part of the county which it has stated does not need additional mineral workings.

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 Eynsham/Cassington/Yarnton area should be dropped as a search area in Policy M3,

Representation 6 – Inter-relationship of Policies

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, M3 & M4 and the related paragraphs, and plan generally

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

- (i) Legally compliant? No
- (ii) Sound? 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 No
- (ii) Justified No
- (iii) Effective No
- (iv) Consistent with national policy No (because of other matters)

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.

Issue 6 : Implications of Gill Mill decision

The recent decision by the Council to approve the Gill Mill application raises serious concerns about the way the OCC intends to interpret the policies in the draft Core Strategy if they are adopted.

This shows in effect that the Council

- (1) Do not intend to set any constraint in the scale of mineral extraction in the County. It is clear that the OCC do not consider that the granting of the consent at Gill Mill in any way limits what could be brought forward elsewhere; and
- (2) OCC is treating the areas in Policy M3 as in effect preferred mineral extraction areas, where there is a presumption in favour of their development and not areas to be called upon if the supply of minerals falls below the minimum levels identified in Policy M2 (which is the intended particular purpose of Search Areas)

The plan therefore needs to be modified to reflect the implications of the Gill Mill by placing greater weight upon limiting any further mineral working in the west of the county:

It is therefore recommended that the wording of all the core policies (M2, 3 and 4) to should be tightened to make them more strongly inter-related and state that consent will only be granted to ensure the required levels of demand to be met and thereby avoid longer term and speculative land banking.

A meeting was requested to allow a fuller discussion with officers on the potential revised wording of policies, and the other issues raised. No response was received to this offer.

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.

It is recommended that the wording of policies M2, 3 and 4 to should be tightened to make them more strongly inter-related and state that consent will only be granted to ensure the required levels of demand to be met and thereby avoid longer term and speculative land banking.

Representation 7 – Key Diagram

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

Key Diagram

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

- (i) Legally compliant? No
- (ii) Sound? 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 | <input type="checkbox"/> No |
| (ii) Justified | <input type="checkbox"/> |
| (iii) Effective | <input type="checkbox"/> No |
| (iv) Consistent with national policy | <input type="checkbox"/> No |

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.

It is considered that the mineral strategy should be supported by a key diagram which indicates the broad locations for strategic development. The current plan merely shows areas of mineral deposits and other survey information e.g. growth areas

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 key diagram should show spatial planning priorities set out in policy and text and not be a survey map

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))	Yes

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.

I consider the issues raised in my representations are so fundamental that they need to be examined in a way that allows the evidence base of the council to be put in the public domain and tested publically in a way that was not possible through the consultation process.