

## Part 1 – Respondent Details

<b>1(a) Personal details</b>									
<b>Title</b>	Dr.								
<b>First Name</b>	Jolyon								
<b>Last Name</b>	Cox								
<b>Job Title (where relevant)</b>	Hon. Secretary								
<b>Organisation (where relevant)</b>	The Eynsham Society								
<b>1(b) Agent details</b> <i>Only complete if an agent has been appointed</i>									
<b>Title</b>									
<b>First Name</b>									
<b>Last Name</b>									
<b>Job Title (where relevant)</b>									
<b>Organisation (where relevant)</b>									
<b>1(c) Contact address details</b> <i>If an agent has been appointed please give their contact details</i>									
<b>Address Line 1</b>	108 Spareacre Lane								
<b>Line 2</b>	Eynsham								
<b>Line 3</b>	Witney								
<b>Line 4</b>	Oxon								
<b>Postcode</b>	OX29 4NP								
<b>Telephone No.</b>	07950 066566								
<b>Email address</b>	secretary@eynshamsociety.org.uk								
<b>Are you writing as</b>	<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 type="checkbox"/> Minerals industry</td> <td><input type="checkbox"/> A county council</td> </tr> <tr> <td><input type="checkbox"/> Waste industry</td> <td><input checked="" type="checkbox"/> Other (please specify) Village amenity society</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 type="checkbox"/> Minerals industry	<input type="checkbox"/> A county council	<input type="checkbox"/> Waste industry	<input checked="" type="checkbox"/> Other (please specify) Village amenity society
<input type="checkbox"/> A resident	<input type="checkbox"/> A parish council								
<input type="checkbox"/> A local business	<input type="checkbox"/> A district council								
<input type="checkbox"/> Minerals industry	<input type="checkbox"/> A county council								
<input type="checkbox"/> Waste industry	<input checked="" type="checkbox"/> Other (please specify) Village amenity society								

<b>Please tick the appropriate boxes if you wish to be notified of any of the following:</b>	
Publication of the Inspector's report and recommendations	✓
Adoption of the Oxfordshire Minerals and Waste Core Strategy	✓

Please tick this box if you no longer wish to be notified of any updates regarding the Oxfordshire Minerals and Waste Core Strategy:

<b>Please sign and date the form:</b>			
<b>Signature:</b>	(signed) Jolyon Cox	<b>Date:</b>	19 <sup>th</sup> March 2017

## 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 Proposed Main Modification you are making a representation about

Proposed Main Modification No.  
(and part or policy no. or  
paragraph if relevant)

Entire Plan

### 2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications 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 incorporating the Proposed Main Modifications 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 incorporating the Proposed Main Modifications 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.

**2(d) Please give details of why you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications 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 incorporating the Proposed Main Modifications is legally compliant and/or sound and wish to support this, please also use this box to set out your comments.**

(a) the Council should not have ignored government guidelines for the production of integrated, single-stage plans unless there were strong reasons to the contrary (which there were not)

(b) the whole document should have been sent out for a second round of public consultation as a result of the huge (40%) increase in proposed levels of extraction subsequent to the original consultation exercise

(c) the new figures for rates of extraction (notably the figure of 1.015 MTpa for sharp sand and gravel) lack any proper evidence base - and indeed run counter to strong evidence that demand for land-won primary sand and gravel is declining as a result of increased recycling, increased marine extraction, changes in construction methods, and the pressure for more brownfield developments where a considerable amount of the aggregate needed is already available on site. Our view is that the inspector, in his interim report, was wrong to overrule these very powerful objections.

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 incorporating the Proposed Main Modifications 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.**

(a) Adhere to government guidelines for the production of integrated, single-stage plans.

(b) Send the whole document out for a second round of public consultation on the huge increase in proposed levels of extraction compared with the plan which went to consultation

(c) Either provide evidence of need for the increase, or revert to the original figures.

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.

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paragraph if relevant)

M2 – total extraction targets

### 2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications 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 incorporating the Proposed Main Modifications 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 incorporating the Proposed Main Modifications 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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The extraction targets for sharp sand and gravel are set excessively and unreasonably high with no real supporting evidence.

Continue on a separate sheet or expand the box if necessary

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Reduce the allocation or provide evidence of need.

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

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M3: Standlake to Yarnton as a "Principal Location".
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- (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 incorporating the Proposed Main Modifications 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 incorporating the Proposed Main Modifications 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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Embedded in the plan is an acknowledgement that excessive environmental impact, including local climate change, should be avoided. Arguably, the impact of existing workings in this area, together with workings for which permission has already been granted (e.g. at Gill Mill - 5 million tons) is so great that further extraction permissions in this region would cause irrevocable harm.

Continue on a separate sheet or expand the box if necessary

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Embargo further allocation of sites in West Oxfordshire until a fair balance has been achieved between extraction north and south of the Thames.

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

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M4: Sites, including Eynsham /  
Cassington / Yarnton:

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- (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 incorporating the Proposed Main Modifications is unsound because it is not: (tick as appropriate)

- (i) Positively prepared
- (ii) Justified
- (iii) Effective
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The proposals conflict with other County Council policies for residential development and high technology industry in the area; excessive traffic on already near-gridlocked roads; noise, dust, disturbance, loss of amenity, danger to the public, etc. In particular:

Traffic on the A40 is already considerably over capacity and will be even more so if current WODC proposals for housing development in the area go through. The A40 should not be used for any additional minerals traffic until this is resolved.

Routes through villages (e.g. the B4044) should be out of bounds to minerals traffic. When drivers currently ignore such restrictions, the minerals operators pretend to have no control over this because the drivers are independent subcontractors.

There are no effective policies to mitigate the effects of dust and vibration by providing buffer zones round residential properties, schools and sensitive high-technology industrial facilities.

Continue on a separate sheet or expand the box if necessary

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Include realistic buffer zones to prevent nuisance to residential dwellings, schools and dust-sensitive high-technology industrial sites.

Defer allocation of any new sites in this area until adequate road or rail transport infrastructure is in place.

Make minerals operators legally liable for cases where their self-employed subcontractors ignore approved routes (e.g. A40/A34) and instead use other routes (e.g. B4044), prosecute such infractions, and withhold further grants of planning permission until the situation is remedied.

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

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paragraph if relevant)

M10: Restoration and after-use.

### 2(b) Do you consider the Oxfordshire Minerals and Waste Local Plan Core Strategy incorporating the Proposed Main Modifications 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 incorporating the Proposed Main Modifications is unsound because it is not: (tick as appropriate)

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The plan pays lip service to restoration, after-care and after-use, and states that planning permission will not be granted unless the proposals include, "where necessary, the means of securing them in the longer term" (main document, p.,71). However, no mechanisms are provided to ensure that promises which are made are actually kept.

Permissions granted in the 1980s apparently included no requirements for restoration and after-use, though that is not the impression which was given during consultations at the time – maps showed facilities such as of sailing, windsurfing, fishing, birdwatching, picnicking, walking and cycling, but it now appears that these were merely "aspirational".

The Cassington and Yarnton workings are a good example of what actually happens in practice - the site is mainly an industrial wasteland, with many unacceptable risks, including unsafe banks and un-reclaimed silt lagoons, the latter fenced off with barbed wire and hazard warning signs. There is no indication that anything will be done about this.

We have no confidence that the Plan as currently formulated will ameliorate this situation or prevent recurrence elsewhere. Communities which have been blighted for years by opencast mining have been badly let down and this must not happen again.

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 incorporating the Proposed Main Modifications 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.**

Mechanisms are required to:

Require operators to deposit funds in escrow (before mining starts) for restoration, public access and after-use as provided for in any grant of planning permission for extraction.

Ensure that restoration is undertaken by independent, properly skilled teams, and not by unskilled, unqualified staff drafted in by the mining companies.

Institute organisational and management structures to ensure the longer-term sustainability and financial viability of after-use activities.

Actively engage local communities in each of the above stages.

Require operators to meet all outstanding after-use commitments before grant of any further permission for extraction.

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.

### Part 3 – Equalities information about you (The Equality Act 2010)

To monitor the effectiveness of this consultation and help us complete our equalities impact assessment we would like to record certain personal details about the people who respond. This information will be separated from both the respondent details and the representations; it will be treated in the strictest confidence; and it will only be used for statistical purposes.

Information recorded on this form may be used in computerised records. Under the terms of the Data Protection Act 1998 this information will be treated in a secure and confidential manner.

You **do not** have to give us this information if you do not wish to do so. You do not have to answer all of the questions.

<b>Age</b>	<input type="checkbox"/> Under 17 <input type="checkbox"/> 17-24 <input type="checkbox"/> 25-34	<input type="checkbox"/> 35-44 <input type="checkbox"/> 45-54 <input type="checkbox"/> 55-64	<input type="checkbox"/> 65-74 <input type="checkbox"/> 75-84 <input type="checkbox"/> Over 85	<input type="checkbox"/> I do not wish to disclose this
<b>Gender</b>	Male <input type="checkbox"/>	Female <input type="checkbox"/>	I do not wish to disclose this <input type="checkbox"/>	
<b>Ethnic origin</b>	White <input type="checkbox"/>	Mixed ethnicity <input type="checkbox"/>	Other ethnic group <input type="checkbox"/>	I do not wish to disclose this <input type="checkbox"/>