

Part 1 – Respondent Details

1(a) Personal details									
Title	Mr								
First Name	David								
Last Name	Payne								
Job Title (where relevant)	Senior Planning Advisor								
Organisation (where relevant)	Mineral Products Association (representation also on behalf of the Oxfordshire Minerals Producers' Group)								
1(b) Agent details <i>Only complete if an agent has been appointed</i>									
Title									
First Name									
Last Name									
Job Title (where relevant)									
Organisation (where relevant)									
1(c) Contact address details <i>If an agent has been appointed please give their contact details</i>									
Address Line 1	Gillingham House								
Line 2	38-44 Gillingham Street								
Line 3	London								
Line 4									
Postcode	SW1V 1HU								
Telephone No.	07834 268407								
Email address	David.payne@mineralproducts.org								
Are you writing as	<table border="0"> <tr> <td><input type="checkbox"/> A resident</td> <td><input type="checkbox"/> A parish council</td> </tr> <tr> <td><input type="checkbox"/> A local business</td> <td><input type="checkbox"/> A district council</td> </tr> <tr> <td><input checked="" type="checkbox"/> Minerals industry</td> <td><input type="checkbox"/> A county council</td> </tr> <tr> <td><input type="checkbox"/> Waste industry</td> <td><input type="checkbox"/> Other (please specify)</td> </tr> </table>	<input type="checkbox"/> A resident	<input type="checkbox"/> A parish council	<input type="checkbox"/> A local business	<input type="checkbox"/> A district council	<input checked="" type="checkbox"/> Minerals industry	<input type="checkbox"/> A county council	<input type="checkbox"/> Waste industry	<input type="checkbox"/> Other (please specify)
<input type="checkbox"/> A resident	<input type="checkbox"/> A parish council								
<input type="checkbox"/> A local business	<input type="checkbox"/> A district council								
<input checked="" type="checkbox"/> Minerals industry	<input type="checkbox"/> A county council								
<input type="checkbox"/> Waste industry	<input type="checkbox"/> Other (please specify)								

Please tick the appropriate boxes if you wish to be notified of any of the following:	
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:

Please sign and date the form:			
Signature:		Date:	17/03/17

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)

MM5

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.

The MM reflects the debate at the Examination, and the important qualification that recycled aggregate cannot replace primary materials in a range of applications, particularly in structural load bearing concrete. This is important to recognise as it would be wrong to assume that provision for primary aggregates should be reduced on the assumption that recycled and secondary materials can increasingly replace these materials. In addition, while the Plan can provide for capacity for recycled aggregate production, the supply of CDE material and output of recycling facilities cannot be guaranteed and so any increased reliance on this source of supply and its use has inherent risks.

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.

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 2 – Representation

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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)

MM11, MM12, MM14

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? | <input type="checkbox"/> | Yes ✓ | <input type="checkbox"/> | No |
| (ii) | Sound? | <input type="checkbox"/> | Yes ✓ | <input type="checkbox"/> | 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 | <input type="checkbox"/> |
| (ii) | Justified | <input type="checkbox"/> |
| (iii) | Effective | <input type="checkbox"/> |
| (iv) | Consistent with national policy | <input type="checkbox"/> |

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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We support the inclusion of the amounts of provision to be made, referring to the 2014 LAA. As discussed at the Examination, the use of these figures is justified given the distortion to sales in Oxfordshire that suppressed the 10 year average of sales figures, and the growing sales over recent years and likely continued increase in demand expected in the immediate future and over the Plan period.

The reference in MM12 and MM14 to maintaining sufficient 'productive capacity' is supported, as it is important that the ability to provide sufficient material to the market ('get it through the gate') is maintained as well as landbanks of reserves.

In order to 'maintain' sufficient minimum landbanks throughout the Plan period, there will of course be a need for reserves of 1.32mt of soft sand, 7.1mt of sharp sand and gravel, and 5.8mt of rock at the end of the Plan period, which will be in addition to the 'total provision requirement' set out in Policy M2 (MM14).

Continue on a separate sheet or expand the box if necessary

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Please be as precise as possible.

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

Part 2 – Representation

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)

MM16, MM20

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? | <input type="checkbox"/> | Yes ✓ | <input type="checkbox"/> | No |
| (ii) | Sound? | <input type="checkbox"/> | Yes ✓ | <input type="checkbox"/> | 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 | <input type="checkbox"/> |
| (ii) | Justified | <input type="checkbox"/> |
| (iii) | Effective | <input type="checkbox"/> |
| (iv) | Consistent with national policy | <input type="checkbox"/> |

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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We support the spatial strategy and the proposed split in provision between northern Oxfordshire and southern Oxfordshire. The proposal that this 'should lead to an approximately equal split of production capacity for sharp sand and gravel' is supported, although whether the balance in reserves translates into the anticipated balance of productive capacity will depend on adequate sites coming forward and permissions enabling delivery.

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Part 2 – Representation

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)

MM24

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
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We support the deletion of reference to 'small scale' and inclusion of reference to the impact of development on the environment and amenity and its mitigation, which reflects national policy.

Continue on a separate sheet or expand the box if necessary

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Please be as precise as possible.

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Part 2 – Representation

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)

MM25, MM27

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
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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.

We support the delineation of MSAs in the CS as safeguarding is a strategic and long term policy that is not dependent or particularly linked to preparation of a Site Allocations plan. This is consistent with national policy.

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.

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Part 2 – Representation

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)

MM76 (MM20)

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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While we still have concerns over the Plan's identification of 'Strategic Resource Areas' rather than reflecting the terminology and requirement by the NPPF to identify 'areas of search and/or preferred areas' (para 145), we welcome the inclusion in the definition provided in MM76 of assurance that permission may be granted in the SRA but outside an allocated site.

We understand that a Site Allocations plan will be prepared, and that the County has sufficient evidence to be able to allocate sufficient sites to meet the provision set out in the CS.

However, we do believe that in practice the 'SRAs' will be the same as Areas of Search, particularly in the interim period while the Site Allocations document is prepared and adopted, and that this is supported by the definition and caveat that permission, notwithstanding the assertion that they are different. The SRAs appear to reflect the definition provided in PPG as referenced in MM76. Identification of an AoS does not necessarily mean permission will be granted for aggregates extraction, but as these are the areas where knowledge of the mineral resource is reasonably well known and where applications would be likely to come forward, they are areas where permission *may* be granted, particularly if there is a shortfall.

While we acknowledge that the County has undertaken a great deal of work in identifying potential sites for allocation, the timetable for adoption of the Site Allocations plan looks optimistic, and is unlikely before 2020 at the earliest. As the market and industry confidence improves, a clear framework is required in which applications will be positively considered, and we believe that identification of Areas of Search (based on the SRAs) would help to provide for this.

Policy M3 (MM20) would also need to refer to Areas of Search instead of SRAs.

Continue on a separate sheet or expand the box if necessary

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