

Part 1 – Respondent Details

1(a) Personal details									
Title	Mr								
First Name	Lewis								
Last Name	Brown								
Job Title (where relevant)	Strategic Land Negotiator								
Organisation (where relevant)	Croudace Strategic								
1(b) Agent details <i>Only complete if an agent has been appointed</i>									
Title	Mr								
First Name	Paul								
Last Name	Clarke								
Job Title (where relevant)	Associate Partner								
Organisation (where relevant)	Carter Jonas LLP								
1(c) Contact address details <i>If an agent has been appointed please give their contact details</i>									
Address Line 1	South Pavilion								
Line 2	Sansaw Business Park								
Line 3	Hadnall								
Line 4	Shrewsbury								
Postcode	SY4 4AS								
Telephone No.	01939 210172								
Email address	paul.clarke@carterjonas.co.uk								
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 checked="" 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 - Agent</td> </tr> </table>	<input type="checkbox"/> A resident	<input type="checkbox"/> A parish council	<input checked="" 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 - Agent
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<input type="checkbox"/> Waste industry	<input checked="" type="checkbox"/> Other - Agent								

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

Please sign and date the form:		
Signature: 	Date:	29 th Sept 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

Policy M3

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 M3 (para 4.45) identifies specific provision for principal location for aggregate working in the region. Within such policy provision, it is recognised that the 'Thames and Lower Thame Valleys Area from Oxford to Cholsey' features as a strategic resource area for winning/working sharp sand and gravel.

Notably, the physical extent of the 'Thames and Lower Thame Valleys Area from Oxford to Cholsey' is identified within the 'Minerals Key Diagram' (Figure 9, page 62). From review of the mapped extent of the resource area it can be observed that an allowance has been made to include for land previously nominated for inclusion within OCC's 'Mineral Sites Document' published in 2009.

It is appreciated that the Council have prepared the MWLP Core Strategy based upon an evidence base gathered over a period of years during previous rounds of consultation. However, consequential of the passage of time it is observed that facets of the evidence base gathered in terms of land available for mineral extraction are inevitably out of date.

Specifically, this is exemplified by land identified in the 2009 'Mineral Sites Document' as 'Land at Wallingford, Benson: Ref SG-47'.

In defining the 'Thames and Lower Thame Valleys Area from Oxford to Cholsey' it can be readily recognised that provision is made for the inclusion of the mapped extent of land/mineral within SG-47. It can also be assumed that the potential release of mineral from within the land referred to as nominated site SG-47 serves also to influence broader policy within the Core Strategy.

We are aware from correspondence sent to the Council on 7th July 2015 and 24th September 2015 (copies of such correspondence being enclosed for reference) that the landowner with the freehold interest in the property comprising SG-47 has firmly withdrawn their intent to make the land available to service the requirements of aggregate provision within emerging planning policy. Consequentially, the mapped extent of the 'Thames and Lower Thame Valleys Area from Oxford to Cholsey' featured within the Core Strategy needs to be adjusted accordingly so as to exclude the SG-47 land and represent a truly deliverable proposition.

Should the current extent of the 'Thames and Lower Thame Valleys Area from Oxford to Cholsey' resource area be maintained as per that area show on Figure 9, Policy M3 of the MWLP Core Strategy will be unsound in its content

and provision.

Specifically, it should be considered that Policy M3:

1. fails to demonstrate itself to be 'Effective' given that a key delivery partner is unwilling to be complicit in releasing land/mineral in pursuit of providing resources to serve the need for mineral during the forthcoming plan period;
2. fails to demonstrate itself to be 'consistent with national planning policy', given the intent to include the land and mineral within the area previously identified as SG-47 does not constitute a proposition capable of being construed as 'sustainable' or 'deliverable' in accordance with the overarching principles of NPPF.

Equally, serving to feature the SG-47 land within the 'Thames and Lower Thame Valleys Area from Oxford to Cholsey' resource area on an aspirational basis rather than a realistic basis serves only to create an overriding interest that may notionally serve to sterilise or injuriously impede development land otherwise suitable for serving other regional development needs. Again, this arrangement conflicts with plan making provision provided for by 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.

With reference to the 'Thames and Lower Thame Valleys Area from Oxford to Cholsey' resource area defined within the Core Strategy, an adjustment to the mapped area identified at Figure 9 should be made so as to exclude the extents of 'Land at Wallingford, Benson: Ref SG-47.

Alternate, replacement provision should be made elsewhere within the Core Strategy if necessary to compensate for this exclusion from the strategy document.

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

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.

<p>2(g) If you wish to participate at the hearing part of the examination, please outline why you consider this to be necessary.</p>
Empty space for the response
<p>Continue on a separate sheet or expand the box if necessary</p>

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.

Dan Anderson

From: Basu, Poulomee - Environment & Economy <Poulomee.Basu@Oxfordshire.gov.uk>
Sent: 28 July 2015 15:45
To: Dan Anderson
Cc: Day, Peter - Environment & Economy
Subject: RE: Oxfordshire County Council - Update of Site Nominations

Hi Dan

Hope you are doing well.

I am writing to confirm that we have withdrawn your nomination of the site SG-47 (Land at Wallingford/Benson) for the purposes of our MWLP. If you have any other questions, feel free to ask me.

Regards

Poulomee Basu
Planning Policy Officer
Oxfordshire County Council
01865 815494

From: Dan Anderson [mailto:Dan.Anderson@struttandparker.com]
Sent: 07 July 2015 16:32
To: Basu, Poulomee - Environment & Economy
Cc: Michael Anderson; Paul Fosh
Subject: FW: Oxfordshire County Council - Update of Site Nominations

Dear Poulomee,

Further to our telephone conversation of last week, I have today received confirmation from my clients that they wish to withdraw the site nomination in question **((SG-47) Land at Wallingford/Benson)** and no longer wish this site to be considered as part of the Oxfordshire Minerals and Waste Local Plan.

If you have any queries please do not hesitate to contact me.

Kind regards,

Dan Anderson

Daniel Anderson

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E-Mail: dan.anderson@struttandparker.com
Our Ref: G279.15.6

Minerals & Waste Core Strategy Consultation
Environment & Economy
Planning Regulation (Minerals & Waste)
Oxfordshire County Council
Speedwell House
Speedwell Street
Oxford OX1 1NE

24th September 2015

Dear Sir/Madam,

Trustees of J M Guthrie's 1965 Settlement
Oxfordshire County Council Minerals and Waste Local Plan Core Strategy

I write further to the recent publication of the Oxfordshire Minerals and Waste Local Plan: Part 1 – Core Strategy Proposed Submission Document, August 2015. I would be grateful if this letter could be registered as a formal representation as part of the ongoing consultation which ends on 30th September 2015.

Strutt and Parker LLP are managing agents for and on behalf of The Trustees of J M Guthrie's 1965 Settlement who own land and property at Wallingford, Oxfordshire. Land owned by my client, referred to as SG-47 (Land at Wallingford/Benson), was previously considered by Oxfordshire County Council as part of an earlier consultation process in 2008/9.

During the consultation process in May/June of this year, I formally notified Oxfordshire County Council that my client wished to withdraw the site nomination in question. It was confirmed to me in an email dated 28th July 2015 from the relevant planning policy officer that the site nomination for SG-47 (Land at Wallingford/Benson) had been withdrawn for the purposes of the Minerals and Waste Local Plan.

However, I note that in the Oxfordshire Minerals and Waste Local Plan: Part 1 – Core Strategy Proposed Submission Document, the site in question appears to have been included as part of one of the proposed Strategic Resource Areas as set out on the Minerals Key Diagram at Figure 9.

I therefore write to reiterate that my client, being the landowner with the freehold interest in the land in question, no longer supports this allocation and has withdrawn their intent to make the land available.

Should you have any queries at all regarding this representation please do not hesitate to contact me.

Yours faithfully,

Daniel Anderson
Assistant Land Agent

