

Summary of responses to consultation on Atkins' report 'Local Assessment of Aggregates Supply Requirements'

1. Introduction

Oxfordshire County Council commissioned consultants to carry out a local assessment of aggregates supply requirements in October 2010. The consultants, Atkins, produced the final version of their report in January 2011, which the council published on the website, inviting feedback on the content and the methodology of the report. This report provides a summary of the responses received. It also identifies further work the Council intends to carry out in light of the responses received.

2. Responses

a) Mineral Products Association

The MPA is not convinced that the alternative methodologies proposed by Atkins provide a robust evidence base on which to diverge from using the apportionment in the proposed changes to Policy M3 of the Regional Spatial Strategy.

The MPA notes that Atkins proposed four methodologies and that they recommended that option 4, based on per capita consumption, was the most robust. The MPA believes that the Council's selection of a figure midway between the figures proposed in option 3 and option 4 is not a robust basis for proceeding.

The MPA notes that, although the Council has already adopted these figures, the data used in the Atkins report may need to be reviewed in light of the results of the AM 2009 survey, which will provide up to date information on imports and exports of aggregates. MPA notes that the data on cross boundary movements in the report, which assumes parity between imports and exports, are inadequate at present.

The MPA recommends that, if national forecasting and guidelines are abolished, all counties should use an average of 10 years past sales data, using 12 years but removing the highest and lowest values to reduce distortion). This would give a figure of 1.49 mtpa for sand and gravel, which is close to the figure of 1.58 mtpa previously agreed by the County Council.

b) Lafarge

Lafarge supports and endorses the Mineral Product's Association response.

c) Cemex

Cemex notes that the Council's adoption of a figure from the Atkins report is premature in light of the current discussions regarding the future of the national Managed Aggregates Supply System, the outcome of which has not yet been determined.

Cemex joins the MPA in noting that the Atkins report has not been able to use the AM 2009 data on inter-regional movements of primary aggregates and that the current data provides a 'distorted view' of movements. It also notes that the report does not adequately address cross boundary sales.

Cemex comments on the complex nature of the methodologies proposed by Atkins and notes that monitoring the correlation between housing or population statistics and aggregate use could be onerous.

Cemex notes that the county should not view recycled aggregates as a substitute for primary aggregates, but complementing the role of primary aggregates by their suitability for lower specification construction projects.

d) Stewart Mitchell (Grundon)

Mr Mitchell notes the prematurity of preparing this report before the results of the AM 2009 survey are known, and the resulting lack of up to date data on cross boundary movements.

The report takes into account a steady reduction in sales but Mr Mitchell notes that sales have been affected by the closure of three major production units and that the proposal to only make provision for a lower figure should not be justified on the basis of the temporary closure of some units.

He concludes by noting that in his view, none of the methodologies presented by Atkins are robust nor do they represent an exceptional circumstance to warrant a departure from the proposed changes to policy M3 of the South East Plan.

e) Stephen Bowley Planning Consultancy

Mr Bowley acknowledges the work done by the consultants but highlights the difficulties of providing a local assessment for one county which is part of a larger market area and where there are significant cross boundary movements of aggregates.

He notes that sales of hard rock and soft sand have held up well while sand and gravel has reduced over the past few years and that this should be reflected in future apportionments.

Mr Bowley believes that the statistics on recycled aggregates in the report are unreliable and that there is little scope to significantly increase production of recycled aggregates from the current production which is in the order of 300-400,000 tonnes per annum.

f) Arnold Grayson, CPRE

Mr Grayson is concerned that the report does not adequately set the historic context of aggregate supply and demand, and does not provide an explanation of the recent fall in consumption of aggregates per head. His response notes that this decline could partially be explained by decreasing intensity of aggregate use in construction projects.

g) Hills Quarry Products Ltd

Hills reiterates the point made by the MPA and by others that the evidence provided by Atkins is not sufficiently robust to warrant a departure from the proposed changes to Policy M3 of the South East Plan and that the lack of recent data on cross boundary movements, pending the publication of the results of the AM 2009 survey, means that the figures provided by Atkins are not sufficiently robust.

Hills recommends that OCC should check the aggregates use per head of population using the MPA's minerals consumption figures. In 2009, this figure was 3.3 tonnes per head; Oxfordshire's population is 635,000, which equates to an annual production of 2.1 million tonnes per annum as a suitable level of provision.

The report notes that the decline in sales of aggregates in Oxfordshire in recent years has been greater than the national decline in sales but that inadequate explanation for this disparity is given in the report. The report notes that reducing sales do not necessarily reflect reduced demand; operators may choose to import aggregates rather than to try to seek planning permission for new quarries in the county. Hills note that in their report, Atkins appears to link the reduction in sales with a perceived reduction in need for aggregates.

Hills notes the significant cross boundary movements of aggregates from other counties in the south east region but also from counties in the west midlands and the south west; these have not been adequately taken into account, although Hills acknowledges the general paucity of data on these movements.

Hills concludes by suggesting that if Oxfordshire does not plan for sufficient quarries to meet local need, aggregates will be imported into the county to meet that need and distances minerals need to be transported will therefore increase, which will go against a national objective of mineral planning in MPS 1, to reduce the carbon footprint of transportation of minerals. They question whether this approach is sound.

h) Parishes Against Gravel Extraction (PAGE)

PAGE broadly supports the adoption of an aggregate demand forecasting methodology related to population, although they believe that the figure of 1.23 mtpa sand and gravel is still too high in the context of current production levels. They note the decline in sand and gravel sales in Oxfordshire but ascribe this to a greater use of recycled aggregates, construction methods which use aggregates less intensively and to more efficient use of aggregates in the construction process.

PAGE encourages OCC to set challenging goals for recycling aggregates and is disappointed that Atkins has not encouraged this in their report. They note that the Atkins report does not take into account the ash which will be produced at the Ardley EfW plant, which will be a source of future production of secondary aggregates. (It is expected that this will produce approx 75,000 tonnes per annum).

PAGE notes the general lack of timely information available on production, consumption, imports, exports etc and urges the council to improve its data collection processes.

3. Further work

In light of the responses received, the Council intends to carry out the following further work:

- If the Managed Aggregates Supply system is abolished, the council will review the findings of the Atkins report in light of any replacement system which is put in place, such as the one proposed by the MPA that all counties should base their supply of aggregates on the mean of 10 of the past 12 years' sales, excluding the highest and lowest values.
- When the AM 2009 survey is published, the council will review the findings of the Atkins report, which recommends at present that there is parity of imports and exports. If necessary, net imports or exports will be taken into account into a revision of the figures for supply.
- The council will set a target figure for provision of secondary and recycled aggregates in accordance with the South East Plan target of 0.9 mtpa, which exceeds that recommended in the Atkins report.
- The Council will review its data collection processes and will liaise with the industry to review whether it is possible to receive accurate data on sales and movement of aggregates in a more timely fashion.

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