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28 September 2015

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

Dear Sir/Madam

I am writing to you as Chairman of PAGE (Parishes Against Gravel Extraction) which represents eight parish councils in South Oxfordshire with a population of around 5,500 people. We are also a member of the county-wide alliance known as OXAGE (Oxfordshire Against Gravel Extraction).

We have been fully involved in the development of the Representation to Proposed Submission Core Strategy Part 1 dated 21 September 2015 submitted on behalf of OXAGE by Gardner Planning Ltd and wholeheartedly support everything contained in this submission.

We consider that the Oxfordshire Minerals and Waste Local Plan Core Strategy is **not legally compliant** and is **unsound**.

We have been actively involved in the various phases of the development of the core strategy over the last five years, which included the OCC Cabinet deciding in November 2013 to reject the earlier Atkins methodology in favour of the 10 year sales average to calculate the Local Aggregate Assessment (LAA). However we feel very strongly that OCC's decision in summer 2014 not to engage with the local groups in the reversal of their earlier decision and the development of the LUC and Cuesta LAA methodology to be a total betrayal of their local communities, as well as being in complete contradiction of their Statement of Community Involvement.

The result of this closed process is a completely flawed LAA methodology developed by LUC and Cuesta resulting in a LAA of 1.015 mtpa which is 42% higher than the 10 year sales average of 0.715 mtpa. Amongst many failures by OCC in this process, they have not given any consideration to the trend of the last 3 years where the average is 0.483mtpa – the LAA of 1.015mtpa is 210% higher and 0.715 mtpa is 148% higher. The overall consumption trend for sharp sand and gravel is demonstrably down.

We do not intend to repeat all the arguments in the Gardner Planning submission; however we wish to participate at the oral hearings, especially as we were deliberately excluded by OCC from the discussion on the change in LAA methodology from the 10 year sales average to the flawed LUC and Cuesta methodology.

Yours sincerely,

J J Taylor

Chairman of PAGE