

From: alison elliott  
Sent: 28 September 2015 13:28  
To: Minerals and Waste Plan Consultation - E&E  
Subject: OXFORDSHIRE MINERALS AND WASTE LOCAL PLAN

I have seen the Gardner Representation produced by Gardner Planning on behalf of OXAGE and fully support the points made.

I believe that the current OCC plan is contrary to government policy and is therefore not soundly based in law. The government guidelines (the NPPF) advise using a historical 10-year average of minerals sales when calculating the LAA (the number of tons of gravel required). Most neighbouring counties use this or very similar methodology. The original LAA proposed by campaign groups from across the county (the Hives report) which used the 10-year average as its basis, was accepted and agreed by OCC in the summer of 2014. This would have meant that there would be no need for new gravel extraction sites in the county for many years. I find it objectionable that OCC appear to have abandoned the 10-year average methodology and that a further set of consultants subsequently instructed by the OCC produced an LAA figure nearly 50% higher at the turn of the year. The arguments and figures now adopted by OCC would result in the county being a considerable net exporter of gravel, and that is neither a valid aim of nor reasonable position for a county council.

I am perturbed that OCC failed to consult parish councils and the public generally at appropriate stages when it increased the LAA in the plan and that, as a consequence, the public were deprived of an opportunity to question the methods used and the inflated outcome reached by the additional consultants hired at considerable expense by OCC. I am also concerned that OCC spent resources and time instead consulting mineral producers towards the end of 2014.

In addition, there is a circular argument in OCC's plan which further renders it non-compliant with the NPPF: OCC argue that they can leave site allocations until a later stage but at the same time indicate, without any formal supporting evidence, that the preferred area for allocations will be south Oxfordshire. In fact, they are obliged to indicate potential sites and to set out formal evidence as to why each site has been chosen.

Alison Elliott