

This representation comes from Charles Mathew, Oxfordshire County Councillor for the division of Eynsham (West Oxfordshire) and Chairman of Stanton Harcourt Parish Council.

I have represented the division, which comprises the greater part of the Lower Windrush Valley, for some eight years and lived within this area for more than thirty two. The Lower Windrush Valley, approximately bounded by the A40, the Thames and the A415 Witney Abingdon road, has been very extensively excavated for gravel since World War Two . Your correspondent, however, believes his County Council role primarily encompasses a responsibility for policies which are measured by their applicability to the whole of Oxfordshire, as in this case and not only for his division to the exclusion of all other areas.

I would point out that previous representations have been made by me to earlier consultations on this and earlier drafts and it is with disappointment that I record that these representations remain mainly relevant; believing that these will be available to you, I am therefore concentrating on the a priori concerns, which make this draft policy document unsound, while listing further less dominant issues, which need attention.

My brief comments on the Waste section encompass my concerns that the content of this draft policy ignores the 2016/7 draft Budget proposals, which may recommend the closing of the majority of the Waste recycling sites in Oxfordshire.

Returning to the Minerals category-

#### LAA- Sharp Sand and Gravel

The last recorded annual excavation figure for the county of Oxfordshire is 401,000 in calendar 2013 to be compared with a declining ten year average of 702,000 tonnes and a proposed future figure of 1,015,000 tonnes (all per annum) . The document wrongly quotes the ten year average as 812,000 tonnes- this figure is the ten years average to 2012. It will be recognised that the ten year average depicts an additional increase of c.75 per cent constant throughout the period under review and of the proposed annual excavation figure is some 153 per cent similarly to the last known actual. While the need for virgin gravel is not disputed, the basis on which the latest Consultants (LUC and Cuesta Consulting) conjured up this figure is unsatisfactory. Indeed the meeting arranged to discuss their report broke up in some array and the members of the all party OCC Cabinet Advisory Group were unanimous in condemning their rationale and conclusions.

for either the capacity of secondary gravel or the annual actual are sparse and for that reason cannot be enumerated to specific effect within Oxfordshire statistics but they are significant.

All this adds up to a conclusion that a LAA of 1,015,000 tpa is exorbitant; why does this matter?

The basis of the decline in use of virgin gravel is clear for most to see but is not accepted within the Draft report. Secondary gravel has become a serious source of material for some seventy per cent of the uses of gravel; marine dredging has produced a far larger volume of gravel in the last few years; the usage of gravel has declined significantly in the building of new structures. This all supports the lesser

need for gravel that is highlighted in the gradual decline of the annual excavation figures in the last ten years. Figures for both the capacity of the secondary gravel and the annual production are tenuous and for that reason cannot be enumerated with accuracy within Oxfordshire statistics but they are significant.

The inevitable conclusion, when coupled with the hyperthetical basis of the current LAA, suggests that a LAA of 1,015,000 is exorbitant. One might ask the significance of this in the Core strategy. Firstly there is a requirement in NPPF that seven years' 'Landbank' is held with Planning Permission, to ensure continuity. Clearly seven times 401,000 tonnes per year is significantly removed from seven times 1,015,000 tonnes- by some 4,298,000 tonnes. The table on page 42 would, if calculated at the ten year average figure of 702,000 tonnes produce an excess, on the basis of no more permissions granted before 2031, of some 2,553,000 or over three and a half years supply- ie it represents 10.56 years in total. In addition the more excess that is given Planning permission has the effect of reducing the merit of secondary gravel and give the Operating Companies far too much influence over the industry. The present proposals would lead to wasteful excavation of virgin land to the detriment of the countryside and local residents.

### Division of sites to reflect need

West Oxfordshire has been responsible for an average of 74.6 per cent of the gravel excavated in Oxfordshire over the last ten years; in view of the dominant need for gravel in the South of the County, it is vital that sites are dug close to need and thereby negating the necessity to travel HGVs on the A40 and A34, which are currently under severe stress already. This gives strong support to the clause 4.30, even if no proof has been given to back up the statement that gravel is 'more extensive' in West Oxfordshire. The emergent draft policy has already been ignored by the granting of Planning Permission for 5,000,000 tonnes at Gill Mill, Ducklington in January this year- a figure apparently considerably in excess of capacity (1,500,000 tonnes is stated to be undug by 2031) , which has in any effect ensured that West Oxfordshire by current reckoning will continue to carry more than eighty per cent of Oxfordshire excavation to at least 2031- depending of course on the LAA figures.

### Process

The latest Oxfordshire County Council Draft Core Strategy 2031 agreed by Oxfordshire County Council by a majority of three on 24<sup>th</sup> March 2015; the relevant LAA in that document was 1,015,000 tonnes pa but the public consultation conducted in the previous autumn was the ten year rolling average. The change in the LAA amount between the two (some 44.5 per cent) merited a fresh consultation in my opinion. This has not taken place, ie the commentary on the later public consultation refers to the earlier figures.

There are documents still missing from the current Draft which have never been supplied and pertain to provide the background evidence to the Report.

The draft Report as it stands is loquacious, long winded, very unuser-friendly and in places contradictory, in my opinion.

### Some other issues

The lack of enforcement on Planning conditions leads to an unsatisfactory state of control during activity and lack of imagination in formulating 'restoration'. A visit to Linch Hill, near Stanton Harcourt or Cassington Quarry will enforce the need to tighten up these concerns.

The need to balance the needs of local communities and the Operating Companies is paramount; currently there is no 'compensation' to local residents for compensation for loss of amenity and HGV traffic increases.

Reports accompanying Planning permissions should be the responsibility of and responsible to the Planning Authority, although paid by the Applicant- to ensure soundness of process.

All sites should have financial bonding, thereby guaranteeing completion of the conditions attached to any Planning Permission.problems.

There are in my view many fundamental concerns with the Oxfordshire County Council Draft Core Strategy 2031 as it stands, of which the foremost is the level presently outlined for the LAA. The prime purpose of the County in raising a Core Strategy Plan is to dictate the methodology and terms under which mineral operators are permitted to excavate; this protects the Council's duty to regulate the excavation of minerals in everybody's interest.

The question of worse flooding being caused by the excavation of minerals is of major concern and needs to be the basis of a much more serious examination before Planning Permission is granted. I quote the example of the Lower Windrush Valley; extensive excavations have caused the flow at times of heavy downpour to be speeded up due to no sponge effect to dribble through and the excavation of the large gravel concreted boulders, a vestige of the Last Ice Age. The result is prolonged flooding in situ and too much water reaching Oxford too quickly.

No gravel sites should be excavated wet as it obscures the Palaeolithic remains, which would be visible with dry excavation. The principle should be included in the Core Strategy. In my view, such remains should be considered part of our Natural Heritage.

I would want to participate in the oral hearing of the Examination please

Yours sincerely

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