

### Soundness of process:

We consider that the process of producing the policy and presenting it for consultation is as flawed as it has been convoluted. It has been as hard to find the relevant documents as it has been to keep up with the number of changes and the regular re-drafting of them.

The end result is documents which have grown steadily in length but not in clarity; many points are stated and restated repeatedly.

It is hard to imagine that a more complex and obscure set of documents (and links to them on the OCC website) would have been produced if someone set out deliberately to confuse the reader.

### Soundness of content: **Oxfordshire Local Aggregate Assessment (LAA) 2014 as referenced by policies M2 to M4 of the Core Strategy**

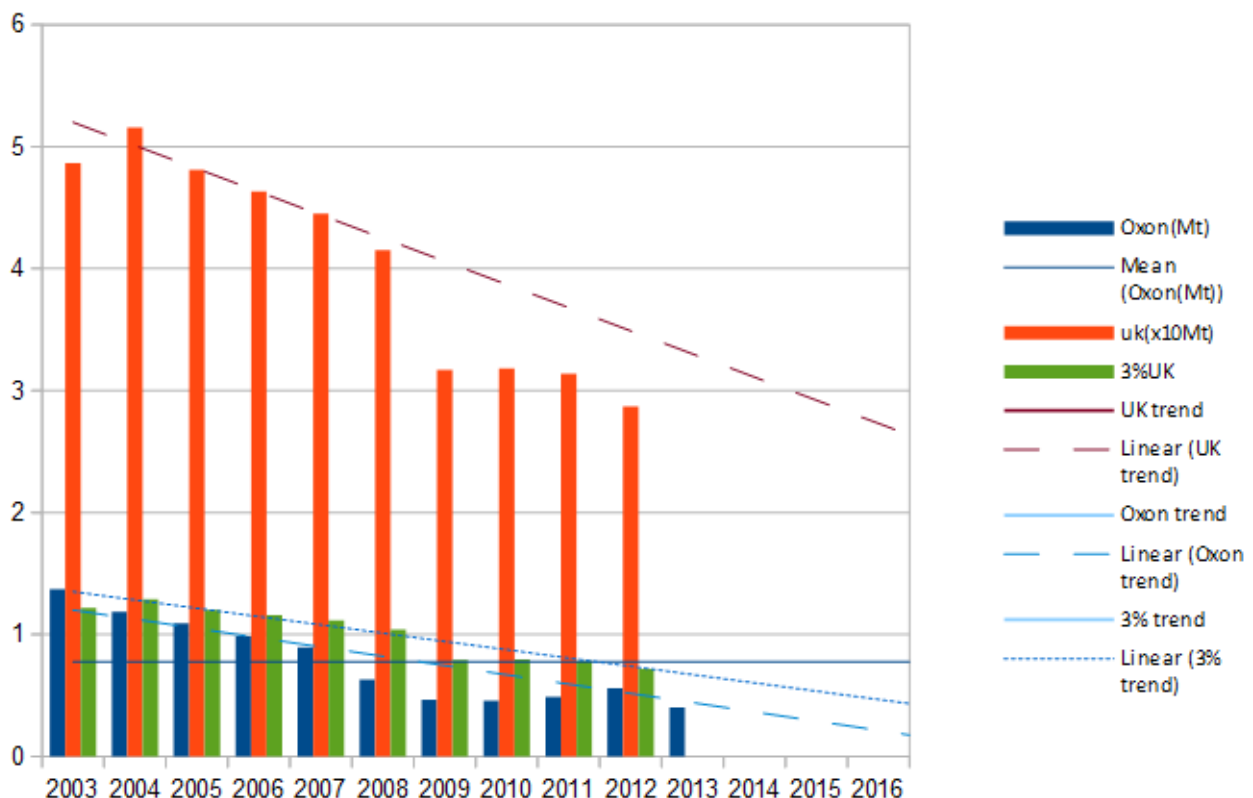
The quantities of minerals required over the period of the plan is determined in the Oxfordshire Local Aggregate Assessment (LAA). The number, often referred to as 'the LAA' is fundamental to the whole Minerals Strategy.

We consider the LAA document to have major flaws in its calculation of the requirements, particularly for sand and gravel. This is the largest quantity of all the mineral categories and, as the options for crushed rock and soft sand are far fewer, we have concentrated on this category.

All the figures for Sand and Gravel are based on an analysis of the historical production/sales and use of these aggregates over a ten year period but the methodology is flawed, as would be seen immediately if the data had been presented in chart rather than tabular form in the main report.

Instead, the charts are consigned to Appendix 2\* and, although the steady decline that is clear from them is referred to in the text (e.g. 3.8 to 3.12), the obvious conclusion, that sales and use of new (e.g. land-won) minerals has been and still is steadily declining, is never made!

The following chart uses the figures from Table 3.1 from the LAA (and Appendix 2). Linear trend lines, based on the pre-recession years 2003-7\*, are shown for UK (orange bars) and Oxfordshire (blue bars) together with a constant 3% of UK total which tracks the Oxfordshire figure quite well.



This decline is seen in both the UK and Oxfordshire figures; the UK rate follows a steady downward trend (purple dash) over the period 2003/4 to 2008 of about 1.82Mt per year, dropping dramatically as the recession took hold in 2009 and flat-lining until 2012 when it dropped again. This last drop from 2011 to 2012 appears to be at the same rate as before the recession but from a lower base, although it would be unwise to read too much into this limited amount of data.

Oxfordshire's use of new aggregate shows a similar trend (blue dash) with a steady decline of about 73kt/yr falling dramatically in 2008, flat-lining for two years then picking up slightly in 2011. In 2012 the figure rose back to the trend line of 2004 to 2007 and the drop in 2013 figures continued on this same trend. It is remarkable that this trend, if continued, would result in zero usage of virgin material by 2018! The dotted blue line shows the trend for 3% of UK total showing the same rate of decline as the actual value for Oxfordshire.

The method chosen for predicting the future demand is to take the average of the last ten years then extrapolate a horizontal line (solid blue – the real mean value before the final LAA was 'uplifted' to 1.015Mt) which one glance at the graph shows to be quite at odds with reality and explains why the actual figure for 2014 looks set to be half the level predicted by this method.

We could suggest reasons for the steady decline in the use of virgin aggregates, for example

- rapid increases in use of recycled materials for which data only goes back to 2008 and is admitted to be inaccurate. The rise in recycled material use is, after all, long established policy supported by financial incentive in the form of land-fill tax.
- changes in construction practices.
- the use of more brownfield sites where roads may already exist and there will be plenty of material on site to recycle.

However this is speculation and it is quite clear that proper facts are the requirement here.

We consider that the LAA is of such fundamental importance and the method used to predict future demand is so obviously flawed that the plan should be withdrawn and proper research done to establish realistic baseline and trend data, particularly an examination of the true impact of the use of recycled aggregates on demand for new land-won material.

As it is the plan is based on a false interpretation of the data and should be rejected at its public inspection as unsound.

The LAA demand is not just a detail which can be amended at a later date. If the demand is much lower than currently predicted many sites will not be needed at all during the period of this plan. In the past ideas such as fully-funded remediation agreements have been sidelined to incentivise operators to ensure that Oxfordshire's quota is met; that is clearly not the situation today with the demand for new minerals in decline.

\*LAA Appendix 2 offers trend lines but has chosen simply to use Excel's 'linear trend line' function over the whole data. Given the dramatic drop in production during the recession, a line which assumes a steady (that is 'linear') trend over both the pre and post recession years is simply wrong. Our chart shows a trend line that closely follows the data for the 'pre-recession years' and represents reality – although it did take a bit more effort to do in Excel.

## **Further comments on the Core Strategy Submission Document, Part I.**

### **Section 4.66 to 4.70 – policy M9 safeguarding of mineral assets.**

We fully understand the need to ensure that valuable minerals are not put out of reach by thoughtless developments.

However we consider policy M9 to be far too restrictive. The loss of a small area of mineral-bearing land should be permitted where this allows development, often of far greater economic and/or social value, to take place. This judgement should be made by OCC on a case by case basis and not be subject to a blanket 'No' to anything outside the three categories listed in the policy

### **Sections 4.72 to 4.84 – policy M10 relating to site re-use and remediation.**

We consider this policy and supporting paragraph says all the right things and generally we are very supportive of the good intentions outlined in 4.72 to 4.84.

However, the practice, as demonstrated at the Cassington quarry site, falls far short of the ideals outlined in this policy. Some may dismiss this old site as past history from which lessons have been learned and which will not be repeated but we can see no policy component which will ensure that future sites do not suffer exactly the same fate.

Cassington is closed to the public but a few people have gained access and it is clear that the steep sided, water filled, pits and derelict equipment littering the site will ensure that it remains out of bounds to local residents unless substantial sums are spent. The site is also a very poor habitat for wildlife as many of the environmental schemes such as planting reed beds have not been done correctly and have failed.

There is no fund or bond to pay for remediation and, after a number of changes of ownership, it is most unlikely that the current owner will carry out this work unless it involves the development of lakeside housing which, in the Oxford Green Belt, seems unlikely.

We therefore consider the policy M10 to be substantially flawed as it does not ensure that adequate funds are accrued during extraction to ensure proper remediation and reuse.

A properly funded and audited 'Remediation Fund' should be an absolute pre-requisite, required by policy M10, before granting approval to a site. The policy should also require annual audits of the remediation fund be carried out and sites closed unless the agreed level of funding is demonstrated at each annual audit.

### **Comment on site allocation of Map D12 in relation to 4.81**

We note that 4.81 identifies water-filled gravel workings as being ineffective at attenuating down-stream flooding. We note that the entire area identified for mineral working south of the A40 in Eynsham and Cassington Parishes is floodplain which plays a significant role in attenuating the floodwaters of the Evenlode before they enter the Thames. Loss of the attenuation in these fields will increase the risk of flooding in Oxford and all points downstream.

We strongly suggest that the benefits of the gravel that might be extracted here are outweighed by the likely costs of increased flooding. The land is Green Belt and therefore protected against development, therefore it can safely be removed from the allocated sites of this plan and the situation reviewed in 15 years time.

### **Comment on “Buffer Zones” between mineral workings and residential or educational buildings.**

Previous plans have made recommendations for the provision of buffer zones to protect residents and school-children from noise and dust of quarry workings. We could not find such a recommendation in this plan. It may be that we overlooked the item which we would like to see included for the protection of local people. It might usefully include recommendations for a separation zone between workings and business premises as many of the high value technology industries of Oxfordshire are adversely affected by dust and vibration.