

AGGROW

Anti Gravel Group of Residents in Oxfordshire West

September 20th 2015.

Representation to OCC Proposed Submission Document Part 1 - Core Strategy Oxfordshire Minerals and Waste Local Plan

This Representation is on behalf of the residents in the following towns and parishes of West Oxfordshire – **Alvescot, Bampton, Black Bourton, Brize Norton, Broadwell, Carterton, Clanfield, Grafton/Radcot, Kelmscott, Kencot, Langford**. The title of this group is AGGROW (Anti Gravel Group of Residents of Oxfordshire West). In the 2011 census the group numbered 21,706 people, we estimate the figure is now 22,500.

We are keen to see an agreed sand and gravel plan adopted by Oxfordshire County Council but have grave concerns on a number of points:-

1. The Plan does not comply with the Oxfordshire Statement of Community Involvement.
2. The Plan is not consistent with National Policy and Advice.
3. The Plan's proposed excavation figure is not based on 'robust and credible' research.

1. It does not comply with the Oxfordshire Statement of Community Involvement.

This states "We will go beyond just meeting the requirements of the Regulations. We will seek to involve all individuals, groups, organisations and bodies that we think have an interest in the minerals and waste development documents being prepared or who have expressed an interest in being involved or consulted ... key target groups to be involved and consulted include local action groups ... minerals companies."

This was not done. The summary of action was:-

June 2013: Consultants Atkins supplied OCC with a report suggesting increased sand and gravel excavation (1.204 mtpa). (*Atkins LAA OCC, Final Draft, p.39, June 2013*)

Sept. 2013: OCC consulted with 8 environmental groups, including AGGROW, who explained the flaws in the Atkins report and advised the Government's recommended 10-year sales average.

Nov. 2013: OCC Cabinet accepted the advice of their Cabinet Advisory Group and their Officers and unanimously approved the 10-year sales average of 0.812 mtpa. (*OCC Minerals and Waste Local Plan Core Strategy, Consultation Draft, Feb. 2014, p.36*)

Spring 2014: Full consultation yielded 644 separate comments. There were **NO** adverse comments on the use of the 10-year average.

Aug. 2014: OCC appointed another consultant – LUC and Cuesta Consulting (LUC).

The latest published data (2004-2013) showed the 10-year sales average had reduced to 0.715 mtpa. Yet LUC's subsequent report recommended an annual excavation figure of 1.015 mtpa. This is 42% higher than the 10-year sales average policy indicated by the Government. But this is the figure proposed in the OCC Minerals and Waste Local Plan Core Strategy, August 2015. The first the public knew of this was one week prior to the Cabinet meeting on November 25, 2014. At that meeting one Councillor spoke in favour of the proposal, the eventual voting was 5 in favour and 3 abstentions.

March 2015: OCC called a full Council meeting to discuss using the 10-year average or the 42% higher LUC figure. 56 Councillors attended. There was a narrow majority of 3 for the higher figure with 7 abstentions..

In contrast to the Public Consultation on the June 2013 Atkins report, there was none on the LUC report. Yet the change to the calculation methodology fundamentally changed the nature of the Plan and the excavation figure was now 42% higher than the 10-year average. The Public were not consulted. This is totally unacceptable.

However, Officers have consulted the South East of England Aggregate Working Party which comprises other Mineral Planning Authorities and mineral operators, and the Oxfordshire Minerals Producers Group. These bodies would naturally support the higher figures.

This lack of Public Consultation is completely contrary to the "Statement of Community Involvement".

2. The Plan is not consistent with National Policy and Advice.

The National Policy recommends the use of an average of a 10-year figure that is to be visited annually and, if necessary, adjusted. Whilst allowance is rightly made for special circumstances, the policy also recommends that note should be taken of the trend shown by the last 3-year sales figures.

The National Policy is sensible and flexible. To come forward with a plan for a LAA figure that is 42% higher is astonishing. The following points support using the National Policy:

- Sand and gravel are finite materials and great care should be taken to minimise their use.
- Secondary or recycled material is much preferable to land excavation but the encouragement in this Plan to excavate gravel reduces the incentive to use secondary or recycled material.
- Approving a vastly increased LAA figure (+42%) will reduce the use of alternative products such as marine gravel, china clay waste, ash, crushed rock.
- For instance, only half the area licensed for marine sand and gravel is currently being worked.
- Increased excavation hastens the desecration of the countryside. The days are long gone when empty quarries could be filled with waste or soil and the land recovered. Nor is there a requirement for more fisheries or marinas. Used quarries are now 'blights' on the countryside.
- Every quarry destroys land capable of food production. With a rapidly growing population that has become an important matter.

- The long-term solution must surely be the development and introduction of a new product. To allow excessive excavation of a low priced product reduces the incentive to carry out the necessary research.
- This Plan has not looked at the last 3 years at all. The actual excavation figures show sales of sharp sand and gravel at their lowest levels ever!
- In the South East all the other LAAs are based on a 10-year average except where there is an already adopted Plan with a different figure and one instance where they are using the 3-year average. (*Cabinet 26.11.13. Report by Deputy Director for Environment and Economy, para 17*)

For these reasons we believe this Plan with its massively increased excavation figure is against National Policy.

3. The Plan's proposed excavation figure is not based on robust and credible research.

The Plan is 'unsound' for the following reasons:-

- It has not taken note of the considerable growth of recycled aggregate. This has grown from 20 million tonnes, 9% of the market in 1980 to 60 million tonnes, 40.6% of the market in 2012. (*British Marine Aggregate Producers Association*)
- It is claimed the temporary market reduction, due to the country's economic problems, justified a higher LAA. However, when the Government produced the guide lines it was well aware of economic surges and declines. The 10-year average smooths the figures satisfactorily. There is no justification therefore in increasing the total excavated.
- There is reference to 'the supply of primary aggregates in Oxfordshire has fallen far below the apportionments given in the former South East Plan' as a justification for increasing the LAA. This is nonsense as the figures were forced on Oxfordshire, were far too high and were never reached.
- It is claimed the country's economic growth will lead to a higher need. This point is adequately covered by the required annual review and the reference to the consideration of the 3-year trend.
- Population and housing growth. It is claimed this is justification for exceeding the National guide lines. This is based on the SHMA figures. However, these figures are beset with, as the Plan says, 'considerable uncertainty in Oxfordshire about deliverability'. This is hardly 'robust' or 'reliable'.
- Major infrastructure projects. Here the Plan acknowledges 'it is difficult to quantify'. Hardly a robust or reliable reason to increase a 10-year average by 42%.
- The Plan does not recognise that there have been many 'booms and busts' since 1980 for instance and taking that year as 100 and comparing it to 2013 the following figures emerge:-
 - Real GDP +108%
 - Construction output +38%
 - Population +14%
 - Land sand and gravel - 44%
 (*Based on data published by British Marine Aggregate Producers Association*)

Not 'robust and credible' evidence to reject the 10-year average in favour of a 42% increase.

- It is good to see the usage of land won sharp sand and gravel declining for the reasons given earlier. It is also pleasing to see the increasing use of other materials, particularly wood and glass. This reinforces the claim that sensible planning should be the 10-year average.

We are strongly in favour of the National policy of 10-year average. The present Plan is unsound and not robust or credible on this point.

Other than these 3 points, we support the Plan.

We wish to be notified of subsequent stages.

Yours faithfully,

John Bowler,
Chairman, AGGROW.