

Sent: 23 September 2015 13:43
To: Minerals and Waste Plan Consultation - E&E
Subject: Minerals & Waste Core Strategy Consultation
Importance: High

Dear Sir/Madam,

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

I am very disappointed that OCC failed to consult parish councils and the public generally when it suddenly increased the number of tons of gravel required in the plan (LAA), even though it found the resources and time to consult mineral producers towards the end of 2014.

Oxfordshire residents were deprived of an opportunity to question the flawed methods used and the inflated outcome reached by yet another set of consultants hired at great expense by OCC. I find it astonishing that OCC was happy with a much lower LAA in the summer of 2014 (Hives report), but then hired different consultants who, using spurious and circular arguments, produced a figure nearly 50% higher at the turn of the year. I believe government guidelines (NPPF) advise using, and most neighbouring counties use, a historical 10-year average of minerals sales when calculating the LAA. If OCC had used this methodology, it 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 abandoned the 10-year average methodology when it hired its own new set of consultants who produced a much higher LAA that is completely out of step with the 10-year average.

The OCC plan was not consulted on at appropriate stages, is contrary to government policy and is therefore not based on law. The circular argument in OCC's plan makes it non-compliant with government guidelines (NPPF). OCC cannot argue it 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. OCC is obliged to indicate potential sites and to set out formal evidence as to why each site has been chosen. Campaign groups have over the years provided OCC with a lot of input and advice, including from experts, which should have informed the council to get things right. It is therefore very odd, and rather suspicious, that OCC keeps coming back with flawed arguments and figures that would inevitably make the county a huge net exporter of gravel. Is this OCC's real aim? To get it wrong once, despite all the input from well-informed campaign groups and the public at large, could be described as a regrettable waste of public money on OCC's part. But to get it so wrong yet again this time around suggests that OCC has some ulterior motive and is not in the least bit bothered about wasting public money.

Yours faithfully,

Richard Bakesef