From: Robin Sladden
Sent: 23 September 2015 22:06
To: Minerals and Waste Plan Consultation - E&E
Subject: Comment on Proposed Strategy.

From
Robin and Sue Sladden

1. I have seen the Gardner Representation produced by Gardner Planning on behalf of OXAGE and fully support the points made.
   I am perturbed that OCC failed to consult parish councils and the public generally when it suddenly increased the LAA (the number of tons of gravel required in the plan) even though it found the resources and time to consult mineral producers towards the end of 2014. The public 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.
2. I have seen the Gardner Representation produced by Gardner Planning on behalf of OXAGE and fully support the points made.
   I am perturbed that OCC has produced a shoddy plan which is contrary to government policy and is therefore not based on law, and furthermore that this third-rate plan was not consulted on at appropriate stages.
3. I have seen the Gardner Representation produced by Gardner Planning on behalf of OXAGE and fully support the points made.
   I find it astonishing that OCC were happy with a much lower LAA this time last year (produced by experts hired by campaign groups), but then hired different consultants who, using spurious and circular arguments, produced a figure nearly 50% higher at the turn of the year. OCC then managed to consult mineral producers on the LAA but deliberately failed to consult the public at large.
4. I have seen the Gardner Representation produced by Gardner Planning on behalf of OXAGE and fully support the points made.
   There is a circular argument in OCC's plan which makes it non-compliant with government guidelines (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.
5. I have seen the Gardner Representation produced by Gardner Planning on behalf of OXAGE and fully support the points made.
   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. So it is odd, to say the least, and possibly suspicious, that OCC keep 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?
6. I have seen the Gardner Representation produced by Gardner Planning on behalf of OXAGE and fully support the points made.
   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. To get it so wrong yet again this time around suggests that OCC has some ulterior motive, such as making the county a net exporter of gravel, and is not in the least bothered about wasting public money.
7. I have seen the Gardner Representation produced by Gardner Planning on behalf of OXAGE and fully support the points made.

I see that government guidelines (the NPPF) advise using a historical 10-year average of minerals sales when calculating the LAA. 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 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 then 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.

Robin and Sue Sladden