

From: Henry Pavlovich
Sent: 26 September 2015 19:28
To: Minerals and Waste Plan Consultation - E&E
Subject: Representation on the OCC draft Minerals & Waste Plan

My name is Henry Pavlovich and my address is

Using the pro forma template to make a representation on OCC's current draft Minerals & Waste plan is too complicated for someone wishing to make general arguments of a legal nature against that plan, so I am writing an email to this effect and providing my name and address in order to make 3 points as my representation. I contend that this is perfectly in compliance with my legal rights to make a representation in this way and want you to include this among others for consideration.

1. OCC cites an environmental argument for excusing west Oxfordshire from having any fresh SS&G pits, but no such argument is mentioned when south Oxfordshire is then mentioned. Since representations are supposed to be confined to legal soundness, this then prevents people from commenting on the environmental aspects of exploiting SS&G in south Oxfordshire. This is therefore unfair and the process is thereby legally unsound.
2. Local people were not given an opportunity to comment on and challenge the flawed methodology used by OCC to arrive at the currently proposed inflated LAA figures for sharp sand and gravel. The methodology does not comply with government guidelines, which recommend using a 10-year rolling average of sales. This methodology is used by most English counties, and certainly most of Oxfordshire's neighbours.
3. 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.

Henry Pavlovich