

From: Carl Mannering
Sent: 25 September 2015 20:23
To: Minerals and Waste Plan Consultation - E&E
Subject: OXFORDSHIRE MINERALS AND WASTE LOCAL PLAN - representation agaist

Dear sir / madam

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

<http://test.cagegravel.org.uk/wp-content/uploads/2012/04/OXAGE-reps-to-OCC-MWLP-Pt-1-21.9.15.pdf>

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.

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

The plan appears to aim to make Oxfordshire a net exporter of gravel at the expense of its communities. It is contrary to government policy and is therefore not based on law, and furthermore the plan was not consulted on at appropriate stages.

Sincerely

Carl Mannering