

OUTRAGE

Oxfordshire Upper Thames Residents Against Gravel Extraction

Response to Oxfordshire Minerals and Waste Core Strategy Consultation on Additional Documents: Oxfordshire Local Aggregate Assessment Interim Update 2015

Paras 5.8, 5.11 and 5.12 demonstrate that OCC has failed yet again to understand that by basing the LAA figure on a simple 10-year rolling average they will automatically arrive at a figure that reflects changes in market conditions. The fact that quarrying at certain sites has been suspended or deferred because of the recession means that the LAA figures that justified those permissions were too high, that is to say out of line with actual market conditions.

In para 5.8 OCC states that

An adjustment was considered appropriate mainly to compensate for a sharp reduction in sales which had occurred in Oxfordshire due to some quarries being temporarily closed during the recession with imports into the county being increased. It was considered that provision based on a straight 10 year average would be insufficient to meet the increase in demand that is expected to result from the growth planned in the county.

The minerals operators made a commercial decision during the recession to meet demand by importing from other counties. That was their prerogative. As demand picks up, they are in a position to increase production from their sites within the county, and the resulting sales will feed into subsequent 10 year averages. LAA figures based on those averages are likely to reflect actual market conditions better than figures which reflect pre-recession conditions which over time will recede into greater and greater irrelevance.

In paras 5.11 and 5.12 OCC appears to suggest that because the mineral operators have spare capacity the LAA figure should be left unchanged at an excessive and unrealistic level.

For communities that are affected by actual, suspended, planned or proposed quarry operations, this has serious consequences. To take the example of Stonehenge Farm in the Lower Windrush Valley: in 2010 permission was granted on the basis of the then-excessive LAA figure, which was almost immediately reduced to a level at which it would very probably not have been granted. Six years later one small hole has been dug in order to keep the permission alive. The existing facilities at Linch Hill where gravel from Stonehenge would be processed remain in a derelict, decaying and unsightly condition. Residents near the site are affected by the continuing uncertainty – for example there is a negative impact on property sales.

Figures based on the 10 year and 3 year averages are shown below. They imply that at

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present the existing landbank represents oversupply. But of course the particular virtue of the system of moving averages is that as and when market conditions change, an appropriate LAA figure will emerge that reflects those conditions.

	period	average	reserves	Landbank at end 2015
10 year average	2006-15	0.628	12.487	19.9
3 year average	2013-15	0.603	12.487	20.7

Our consultation response in September 2015 to OCC's draft Minerals Core Strategy draws attention to evidence (see table at 3.1) showing declining sales of sand and gravel against rising population and GDP figures across the period from 1990 to 2013 – the last date for which figures were then available. Table 3.2 in that response also shows an almost three-fold increase from 1985 to 2012 in the share of re-cycled material in the sales of aggregates. OCC's attempt to build in elements of the pre-recession minerals market risks losing sight of these trends. By contrast, the ten-year rolling average reflects them while at the same time accommodating any countervailing movements in the market from year to year. Furthermore, it is a simple, rational approach which has the merit of being easily understood. In a situation where there are competing interests – the industry on the one hand and local residents on the other – this is not a trivial consideration.