



GOVERNMENT OFFICE
FOR THE SOUTH EAST

**Partial Review of the
South East RSS
Review of Policy M3 –
Primary land-won aggregates
and sub-regional
apportionment**

Comments Form

Office Use Only

Respondent No:

Comment No:

Date Received:

Acknowledged:

If you wish to comment on the proposed changes to Policy M3 – Primary land-won aggregates and sub-regional apportionment, please:

- Complete all relevant details in Section A – this need only be done once irrespective of how many parts of the revision you wish to comment on.
- Complete a separate page 2 of the form for each part of the revision you wish to comment on. Ensure you insert your organisation name (or surname if responding as an individual) on each page 2 and complete Sections B, C & D. You may make copies of this form.
- Type or print clearly in black ink.
- Note that all comment forms will be made available for the public to read – they cannot be treated as confidential.
- E-mail or post (please do not send duplicates) the completed forms to be received by the Government Office before **5.00pm on Tuesday 1 June**.

Please send all responses to:

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Government Office for the South East
1st Floor, Bridge House
1 Walnut Tree Close
Guildford
GU1 4GA

E-Mail: rss@gose.gsi.gov.uk

Telephone: 01483 88 2532

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Section A

Comments submitted by:		Agent (if applicable):	
Organisation	Parishes Against Gravel Extraction (PAGE)	Organisation	
Surname	Douglas	Surname	
Title/first name	Mr Richard	Title/first name	
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Fax		Fax	

To ensure your comments are taken into account, this form must be completed and received by 5.00pm on Tuesday 1 June.

Signature: Submitted electronically via email Date: 26 May 2010

Would you like to be notified of the Government's publication of the final policy amendments?
(Copies will be available to purchase from the Stationery Office, and will be available to download free of charge from the Government Office website).

Yes

Comments from (organisation, or surname): Parishes Against Gravel Extraction

Section B

Support / oppose/ comment (please specify)	Oppose
Policy M3 or	Policy M3
Paragraph Number	

Section C

To help us process your response effectively, please summarise why you support or oppose the changes to the policy or paragraph:

Parishes Against Gravel Extraction is a community alliance of 8 Parish Councils in South Oxfordshire representing some 5500 residents. We oppose the Secretary of State's proposed changes to the sand and gravel figures in Policy M3, particularly the regional figure of 11.12 million tonnes per annum and the Oxfordshire apportionment figure of 2.10 million tonnes per annum. We oppose the top-down modelling approach to regional apportionment targets that appear to have little relationship with the reality of local markets in the last decade. As a consequence, rural communities such as ours (which are rich in arable land, heritage, landscape value and high quality of life) are put under increasing threat of destruction and disruption from unnecessary minerals extraction.

Section D1

If you wish to expand your response, please use the space below and attach additional sheets if necessary with your name on:

Please see attached sheet.

Section D2

If you are suggesting changes to the draft, please supply revised wording of the policy or supporting text as you wish to see them:

No comments

Please ensure that you have written your name at the top of the page and any additional pages. Completed forms should be received in the Government Office by 5.00pm on Tuesday 1 June. Late responses will not be accepted.

PAGE submission to South East Plan: The Secretary of State's proposed changes to policy M3 primary land-won aggregates and sub-regional apportionment, March 2010.

1 PAGE introduction

PAGE – Parishes Against Gravel Extraction – is an alliance of eight Parish Councils (Benson, Berinsfield, Berrick Salome, Dorchester on Thames, Drayton St Leonard, Newington, Stadhampton, Warborough) and represents some 5,500 residents in South Oxfordshire.

2 National forecasting system failure

In March 2009, SEERA proposed an apportionment of 9.01mtpa for Southern England. This was subsequently challenged by central government and increased to 11.12mtpa.

It is recognised that every official demand forecast at national level since 1991 has over-estimated aggregates demand for every single year. For example, forecasts based on 2003-2009 guidelines show steady year-on-year increase in primary aggregates consumption, but the actual data from 2001-2005 shows a year-on-year fall: 13% decline for England, and a 38% decline for the South East.

We recognise that modelling techniques have tried to accommodate this disparity, but the evidence remains clear that the national targets have not accurately forecasted the demands of the market.

3 Regional government forecasting – Government Office for the South East

GOSE have renegotiated minerals quotas on a number of occasions over the last 3 years. The apportionment to Oxfordshire of 1.82mtpa and the latest increase to 2.1mtpa are higher than any production figure since 1994. These figures are unreasonable at a time of economic austerity and a severe decline in the construction industry.

There has been acknowledgement at the EiP in 2009 that the Cambridge Econometrics data modelling is far from perfect, yet it is protected by commercial confidentiality clauses from any public or peer-reviewed scrutiny.

Furthermore, GOSE have burdened Oxfordshire with an ever-increasing share of the South East's sand and gravel production rising from an average of 14.5% over the last 12 years (or 13.7% over the last 5 years) to 18.9% in the Secretary of State's proposal of March 2010. This is equivalent to an additional 580ktpa, which means that other counties are to be granted reduced production targets, especially Surrey with a 52% decrease from 2.62mtpa to 1.27mtpa.

4 Oxfordshire

Oxfordshire's sand and gravel production has been reasonably constant from 1994 to 2001 at levels of 1.9-2.0mtpa. Since 2001, there has been a significant year-on-year reduction to a low of 0.78mtpa in 2008. It is widely anticipated that 2009 levels will be even lower. This decrease in production is most marked in sharp sand and gravel, where the 2008 production of 0.629mtpa is 39% of the 2001 figure.

Sand and gravel production in Oxfordshire has been below the proposed apportionment level since 1991. In 2008, this was only 37% of the proposed apportionment. There is no need for an increase in Oxfordshire's apportionment.

Regional government is now proposing to increase 2011-2026 land-won aggregate quotas to levels that were previously attained over ten years ago. This is in a market where the reality clearly shows that production levels are falling not increasing. This regional government view is completely illogical.

The only County to be given "red flag" warnings in the GOSE Sustainability report was Oxfordshire, in the areas of impact on air pollution and biodiversity. Despite these warnings, Oxfordshire continued to receive the bulk of the minerals quota for Southern England.

Comments from (organisation, or surname): Parishes Against Gravel Extraction

Furthermore, we do not believe that the Sustainability report is accurate in the assessment of proximity and transport objectives for Oxfordshire. The county is on the north-west periphery of the region. An increase in supply from Oxfordshire would be used to serve demand in other parts of the region, not Oxfordshire. The associated increase in lorry movements and the further distances travelled would have a major impact on climate change parameters. The increased costs of transport would also have a questionable effect on the economic viability of the aggregates.

5 The use of secondary and recycled aggregate materials

The Mineral Products Association (MPA) has demonstrated that the use of recycled and secondary materials in the UK aggregates market has increased rapidly, rising from 30mtpa in 1990 to over 70mtpa in 2007. Over that period the share of aggregates market supplied from recycled and secondary sources has risen from 10% to 25%. This is three times the European average.

Under Section 39 of the Planning and Compulsory Purchase Act 2009, there must be consideration "to ensure... the prudent, efficient and sustainable use of minerals and recycling materials, thereby minimizing the requirement for new primary extraction."

The South East policy is to increase the use of secondary and recycled aggregate to 34% of primary aggregate production by 2016.

However, at the EiP in 2009, there was acknowledgement from GOSE that the Cambridge Econometrics modelling technique fails to accurately account for the input of secondary and recycled aggregates into the supply chain.

We therefore question the validity of such a modelling technique in the dramatically changing marketplace for aggregates.

6 PAGE activity

PAGE represents the views of 8 Parish Councils and some 5,500 residents in rural South Oxfordshire.

The PAGE Campaign has received comprehensive media coverage in 2010 since we highlighted the Secretary of State's increased quota for Oxfordshire. This included the front page of The Oxford Times, the front page of The Oxford Journal, articles in the Oxford Mail, Wallingford Herald and Henley Standard, as well as radio and TV coverage by BBC Oxford.

This level of media attention indicates that minerals policy is of paramount interest to the Oxfordshire community and therefore requires the serious attention of the government in any future decision-making process.

The PAGE Campaign conducted eight public meetings in April and May. The feedback that we have received from local communities was clear and consistent:

- PAGE must totally reject the increased land-won aggregates targets imposed on Oxfordshire by regional government when other counties in South East England have had their targets reduced.
- PAGE must strive to protect the unique characteristics of our arable countryside, our unique heritage and the quality of life in our rural communities.

Since many of the sites in Oxfordshire offer wide bio-diversity, outstanding archaeology and a landscape of great natural beauty, then central, regional and local government all have a particular responsibility not to promote the careless destruction of our area, based on erroneous forecasts of aggregate requirements.

Richard Douglas,
Chairman, Parishes Against Gravel Extraction.
26 May 2010.