

Local Assessment of Aggregates Supply Requirements for Oxfordshire Summary of comments on report by Atkins

Introduction

1. In October 2010 the County Council commissioned the consultants Atkins to carry out a local assessment of aggregates supply requirements for Oxfordshire. The consultants delivered the final version of their report on 1 February 2011. This report was published on the County Council website with an invitation for comments on the analysis and conclusions in the report to be made by 31 March. Eight responses have been received, which are summarised below. Proposals for addressing key points made in these comments are set out at the end of this annex.

Responses

Mineral Products Association (MPA)

2. The MPA is not convinced that the alternative methodologies proposed by Atkins provide a robust evidence base on which to diverge from using the apportionment in the proposed changes to Policy M3 of the South East Plan.
3. The MPA notes that Atkins proposed four methodologies and that they recommended that option 4, based on per capita consumption, was the most robust. The MPA believes that the County Council's selection of a figure midway between the figures proposed in option 2 and option 4 is not a robust basis for proceeding.
4. The MPA notes that, although the Council has already adopted these figures, the data used in the Atkins report may need to be reviewed in light of the results of the 2009 aggregates monitoring survey, which will provide up to date information on imports and exports of aggregates. The data on cross boundary movements in the report, which assumes parity between imports and exports, are inadequate at present.
5. The MPA recommends that, if national forecasting and guidelines are abolished, all counties should use an average of 10 years past sales data (taking 12 years but removing the highest and lowest values to reduce distortion). This would give a figure of 1.49 million tonnes per annum for sand and gravel, which is close to the figure of 1.58 million tonnes per annum previously agreed by the County Council.

Lafarge Aggregates Limited

6. Lafarge supports and endorses the Mineral Products Association response.

Cemex UK Materials Limited

7. Cemex considers that the County Council's adoption of a figure from the Atkins report is premature in the light of current discussions regarding the future of the national Managed Aggregates Supply System, the outcome of which has not yet been determined.
8. Cemex joins the MPA in noting that the Atkins report has not been able to use the 2009 annual monitoring survey data on inter-regional movements of primary aggregates and that the current data provides a 'distorted view' of movements. It also notes that the report does not adequately address cross boundary sales.
9. Cemex comments on the complex nature of the methodologies proposed by Atkins and notes that monitoring the correlation between housing or population statistics and aggregate use could be onerous.
10. Cemex considers that recycled aggregates should not be viewed as a substitute for primary aggregates, but as complementing the role of primary aggregates through their suitability for lower specification construction projects.

Hills Quarry Products Ltd

11. Hills reiterates the points made by the MPA that the evidence provided by Atkins is not sufficiently robust to warrant a departure from the proposed changes to Policy M3 of the South East Plan; and that the lack of recent data on cross boundary movements, pending the publication of the results of the 2009 aggregates monitoring survey, means that the figures provided by Atkins are not sufficiently robust.
12. Hills recommends that the County Council checks the aggregates use per head of population using the MPA's minerals consumption figures. In 2009, this figure was 3.3 tonnes per head; Oxfordshire's population is 635,000, which equates to an annual level of provision of 2.1 million tonnes per annum. Prior to the recession, the equivalent figure was 2.7 million tonnes per annum.
13. The report notes that the decline in sales of aggregates in Oxfordshire in recent years has been greater than the national decline in sales, but inadequate explanation for this disparity is given. The report notes that falling sales do not necessarily reflect reduced demand; operators may choose to import aggregates rather than to try to seek planning permission for new quarries in the county. But, in their report, Atkins appear to link the reduction in sales with a perceived reduction in need for aggregates.

14. Hills notes the significant cross boundary movements of aggregates from other counties in the South East, and also from counties in the West Midlands and the South West; these have not been adequately taken into account in the report, although Hills acknowledges the general paucity of data on these movements.
15. Hills suggests that if Oxfordshire does not plan for sufficient quarries to meet local need, aggregates will be imported into the county to meet that need and the distances minerals are transported will therefore increase. This would go against a national policy objective of mineral planning in MPS 1, to reduce the carbon footprint of transportation of minerals. Hills questions whether this approach is sound.

Grundon Waste Management

16. Grundon considers the preparation of the report to be premature before the results of the 2009 aggregates monitoring survey are known, resulting in a lack of up to date data on cross boundary movements.
17. The report takes into account a steady reduction in sales but Grundon notes that sales have been affected by the closure of three major production units. The proposal to use a lower figure for sand and gravel provision should not be justified on the basis of the temporary closure of some units.
18. Grundon considers that none of the methodologies presented by Atkins are robust nor do they represent an exceptional circumstance to warrant a departure from the proposed changes to policy M3 of the South East Plan.

Stephen Bowley Planning Consultancy

19. Mr Bowley acknowledges the work done by the consultants but highlights the difficulties of providing a local assessment for one county which is part of a larger market area and where there are significant cross boundary movements of aggregates.
20. Mr Bowley notes that sales of hard rock and soft sand have held up well while sand and gravel has reduced over the past few years and considers that this should be reflected in future levels of provision.
21. Mr Bowley believes that the statistics on recycled aggregates in the report are unreliable and that there is little scope to significantly increase production of recycled aggregates from the current level, which is in the order of 300–400,000 tonnes per annum.

Parishes Against Gravel Extraction (PAGE)

22. PAGE broadly supports the adoption of an aggregate demand forecasting methodology related to population, although they believe that the figure of 1.23 million tonnes per annum for sand and gravel is still too high in the context of current production levels. They note the decline in sand and gravel sales in Oxfordshire but ascribe this to a greater use of recycled aggregates, construction methods which use aggregates less intensively, and more efficient use of aggregates in the construction process.
23. PAGE encourages the County Council to set challenging goals for recycling aggregates and is disappointed that Atkins has not encouraged this in their report. They note that the Atkins' report does not take into account the ash which will be produced at the Ardley energy from waste incineration plant, which will be a source of future production of secondary aggregates. (It is expected that this will produce approximately 75,000 tonnes per annum).
24. PAGE notes the general lack of timely information available on production, consumption, imports, exports etc and urges the County Council to improve its data collection processes.

Mr Arnold Grayson (CPRE)

25. Mr Grayson is concerned that the report does not adequately set the historic context of aggregate supply and demand, and does not provide an explanation of the recent fall in consumption of aggregates per head. He notes that this decline could partially be explained by decreasing intensity of aggregate use in construction projects.

Proposed actions to address key points raised

26. In light of the comments received, the following actions are proposed:
 - i. In the event that the national Managed Aggregates Supply System is abolished, the County Council should review the findings of the Atkins report in the light of any new arrangements for aggregates planning put in place by the Government; at that time, consideration could be given to the MPA's proposal that all counties should base their supply of aggregates on the mean of 10 of the last 12 years' sales, excluding the highest and lowest values.
 - ii. When the full data from the 2009 aggregates monitoring survey is published by the Government, the County Council should review the findings of the Atkins report; in particular, the assumption of parity between imports and exports should be checked against the more recent data and, if necessary, amendments should be made to the figures for aggregates provision that result from the different assessment methodologies.

- iii. The County Council should aim to make provision to enable supply of secondary and recycled aggregates at least at the South East Plan Oxfordshire apportionment level of 0.9 million tonnes per annum, which exceeds the provision figures in the Atkins report; but it should be noted that actual production levels will depend on availability of suitable materials for secondary and recycled aggregates production, industry development of facilities in suitable locations, and construction industry demand for secondary and recycled aggregates.
- iv. The County Council should liaise with other mineral planning authorities and the minerals industry to consider whether and how aggregates data collection processes can be improved to provide more timely and accurate data in future years, particularly on sales and movements of aggregates.