

My name is Allan Murdoch and I represent the Communities of Barford, Sherbourne and Wasperton.

Our concern is that WCC have not complied with all the Rules and Regulations when putting together the Minerals Plan despite assertions to the contrary.

This conclusion follows a detailed review of the Plan by our professional advisors, namely:

- **Richard Kimblin** QC, planning barrister at No 5 Chambers in Birmingham
- **Wardle Armstrong**, Multidisciplinary Engineering, Environmental and Mining Consultants.
- **Jane Mulcahey** of JAM Consultants, experts on Sustainability Assessment

There are 3 key areas which give us the greatest concern which I would like to share with you:

The first is sustainability. The choice of sites is so very important to the communities affected and if done properly should not give them cause to dispute the choice. That is not the case here due to a number of failings.

Let me mention some of these as an example;

The reasons for the selection and rejection of sites has not been outlined within the SUSTAINABILITY ASSESSMENT report contrary to the Regulations and Guidance. It should provide conclusions on the overall sustainability of the different alternatives. Any assumptions used in assessing the

significance of effects of the Local Plan should be documented in accordance with the NPPG.

The key findings of the consultations and how they have been taken into consideration, particularly the Statutory Consultees, have not been included within the SUSTAINABILITY ASSESSMENT report. This omission means the SUSTAINABILITY ASSESSMENT has failed to comply with both the Regulations (Environmental Assessment of Plans and Programmes Regulations 2004) and the NPPG.

The viability and deliverability of the proposals have not been assessed contrary to the NPPF.

The selection of the sites is not linked to any evidence base.

The failure in the SUSTAINABILITY ASSESSMENT process alone means that the Plan can not be found sound.

2. There has been no Landscape assessment which is crucial to a decision of this magnitude.

3. There has been no Heritage assessment with a site containing so many heritage assets.

Many of these points have already been made in response to the consultation procedure but unfortunately they have been brushed aside as having little or no relevance. We hope that this body will take note of what we are saying. You must realise that non compliance of Regulations allows us to challenge the validity of any decision and we propose to do this if we are put in a position of having to fight a decision.

THANK YOU FOR YOUR ATTENTION