

Draft Oxfordshire Waste Planning Strategy  
 Consultation (September 2011)

Waste Needs Assessment  
 Full Responses

ID	Comment
WN01	<p>Lois - I promised Trevor I would point out the mistakes in the Waste Needs Assessment. I don't have his email so can you pl fwd.</p> <p>Table 10/3 - Site 116 Worsham Quarry is now a permanent tyre recycling facility and not a landfill.</p> <p>Table 10/4 Site 162 Tyre Yard (Downs Rd) has closed - moved to Worsham.</p> <p>Table 10/7 Site 229 Shellingford is not unauthorised but has permission until 2029.</p>
WN02	<p>This brings me to a point which illustrates the most unsatisfactory nature of this draft, again concerning Sutton Courtenay Landfill site.</p> <p>The Waste development Framework document referred to at the top of this e-mail has in Appendix 11 page 129 a reference to 'Site 10 Sutton Courtenay Landfill site'. It is difficult to understand why the paragraph under 'details of Nomination column' contains the following item, for site 10 and I quote.. ' Continued operation of the open composting facility and land fill (to 2030); development of integrated Waste management facility with <b>EfW</b> plant , MRF, IVC, and <b>MBT</b> plant (MSW and C&amp;I waste). Why has this been written as such and not subject to correction.? As stated at the top of this e-mail, the planning committee turned down both incinerator and MBT, the incinerator over two years ago, and the MBT in September this year. Clearly the planning committee does not consider Sutton Courtenay an appropriate place for an 'Integrated Waste management facility, on the scale that this draft appears to, incorrectly, envisage. The local population of the area around Abingdon, Didcot, and the Vale of White Horse clearly do not want or <b>need</b> a huge 'integrated' facility if, as it appears <i>despite</i> Policies W1and</p>

	<p>W2, it will be used to process other people's imported waste, and so the views of the planning committee are supported by the majority of Vale of White Horse residents.</p> <p>There is nothing in the document that justifies Oxfordshire having any need, or will obtain any benefit from importing waste.</p> <p>Why are these erroneous references to Incinerator and MBT plants still in the document ? Is this part of a waste development policy to try to overturn the planning committee's decision and allow an MBT or incinerator to be built at Sutton Courtenay after all? Sutton Courtenay is a site that is destined to be returned to green field status in years to come, so that huge permanent buildings and structures are not correct for this site.</p>
<p>WN03 TWA</p>	<p><b><u>Draft Waste Needs Assessment</u></b></p> <p>We support the detail of the Needs Assessment in relation to sewage sludge and the sites listed (Oxford, Witney, Bicester, Banbury, Didcot and Wantage/Grove).</p> <p>For accuracy purposes we would suggest a couple of specific changes to paragraph 3.46. They are as follows:</p> <p><i>'The majority of treated sludge in the Thames Water region (62%) is presently spread on agricultural land, most of the remainder (36%) is sent to one of two thermal destruction plants in London (Beckton or Crossness).'</i></p> <p>There is reference within the draft Waste Needs Assessment to sludge being categorised as a hazardous waste, for example in table 28 of the document. Sewage sludge is not it is classified in the EWC (European Waste Codes) as hazardous waste. The EWC for sewage sludge is 19 08 05 (sludges from treatment of urban wastewater) and it is non-hazardous. Therefore we would like sewage sludge to be categorised separately.</p> <p>I trust our comments will be considered, and we look forward to working with Oxfordshire County in delivering a robust and viable Waste Core Strategy.</p>
<p>WN04</p>	<p>To pick up on a couple of other points, in the appendix of waste sites listed in the appendices of May's Framework document, I very much resent seeing the Sutton Courtenay site listed as 'continued operation of open composting facility and landfill (to</p>

	<p>2030); development of Integrated Waste Management facility with EfW plant, MRF, HWRC, IVC and MBT Plant (MSW and C&amp;I waste).' This is largely untrue and needs to be corrected forthwith. Anyone would think the entry had been put in by WRG rather than a professional and independent member of OCC's waste management staff. This is just sloppy and please see the entry is changed to reflect the accurate position as soon as possible.</p>
WN05	<ol style="list-style-type: none"> <li>1. The officers are to be commended in their first attempt in addressing the Minerals and Waste Strategies, though unsurprisingly I suggest that considerable amendment and further public consultation will be required before it is submitted to the Secretary of State. It is crucial that we get this right and I hope the following helps in that.</li> <li>2. At the basis of the above contention is the lack of correlation between the strategies and especially between the Waste Needs Assessment and the Waste Planning Strategy. It is a pity that the Needs Assessment was not put out for public consultation before the draft waste core strategy was developed, as the figures used are very confusing and highly questionable, as is evidenced by the caveats put on almost all of them.</li> <li>3. The result is an underestimation of recycling totals and a consequent overestimation of the capacity gaps and the need for additional plant. Moreover there is no means of checking what current capacity, so as to be able to measure any shortfall accurately, even if the waste estimates were correct. As written, therefore, the Needs Assessment simply lacks credibility as a baseline for the strategy and the assumptions drawn from it therefore cannot be validated. Consequently there is no accurate basis for Policy W1 or W4 as drafted.</li> <li>4. Additionally where the Waste Planning Strategy borders on producing an outline plan, such as its recommendations on the areas where plant will be required under Policy W5:       <ol style="list-style-type: none"> <li>a. The logic falls down not just because of the incorrect baseline figures in the Needs Assessment, but because there is no audit trail between the Assessment and some of the figures used in the strategy. For example:           <ul style="list-style-type: none"> <li>• The Needs Assessment tables do not include permitted but unbuilt plants, but apparently the Waste Planning Strategy does.</li> <li>• There is no way of cross-checking the figures and indeed the current capacity to validate the estimated</li> </ul> </li> </ol> </li> </ol>

	<p>capacity gap.</p> <ul style="list-style-type: none"> <li>• There is particular doubt about the estimated C&amp;I capacity gap, as the level of recycling and the capacity available at Ardley are again underestimated, the capacity at Finmere is not included and there appears to be insufficient allowance for the reduction of waste levels on the closure of Didcot A.</li> </ul> <p>b. Additionally the Waste Planning Strategy fails to spell out the advantages and disadvantages of the limited options it puts forward and uses unspecified “initial assessments” in paragraphs 4.41 and 4.46 to recommend policy. The result is that Policy W5 gives the unfortunate impression that the authors are prejudging the issue.</p> <p>c. I suggest that the Needs Assessment is rewritten with an improved Executive Summary and put out to public consultation, so an agreed baseline is produced for the subsequent redrafting of the Waste Planning Strategy and a further public consultation on that and the policies it recommends. This should include the current and proposed capacities by site and cross referencing by source to the policies, starting with Policy W1.</p>
<p>WN06 SC PC</p>	<p>It is stated that the draft waste plan is underpinned by the assessment of additional waste facilities needed. Yet a number of discrepancies in the needs assessment lead to false assumptions in the draft strategy. A considerable number of inaccurate statements create anomalies and inconsistencies in the documents. e.g. in table 28 in the needs assessment there is reference to fly ash being created by an energy from waste plan treating all of Oxfordshire’s residual waste plus the fly ash generated at Ardley EfW plant.</p> <p>The reverse is also true in that table 13/1 does not include permitted plant which has yet to be constructed. However there are extant consents which are still to be implemented and which would contribute to minimise the alleged shortfall in capacity. The figures should be amended to include the additional capacity of these already permitted developments.</p> <p>In annex 11 in the waste needs assessment Sutton Courtenay has a description of continued operation of open composting facility and landfill, development of integrated waste management facility with EfW plant, MRF, HWRC, IVC and MBT plant. There is no planning consent for EfW or MBT plants and given the fact that planning consent was refused on the Sutton Courtenay site, they will not exist in the future. The correct description for the Sutton Courtenay site is shown at table 8.1 which</p>

	<p>states that it is only temporary. Sutton Courtenay is zoned for agriculture and is not a waste park.</p> <p>It is extremely confusing and difficult to understand how the statistics have been generated and the origins of them. How can accurate forecasts as to need be made when, for example, there are statements made such as “there is considerable uncertainty around the amount of C &amp; I waste in Oxfordshire” (para 3.19) or “It is difficult to assess the extent to which waste arisings are currently affected by the economic downturn” (para 3.27) or “the capacity gap shown in table 21 is largely a theoretical one” (para 6.8). There is no indication of which models have been used to calculate the figures. They appear to be random figures plucked from the air.</p> <p>Point 4.4 “waste <u>could</u> increase”, point 4.5. “other waste is <u>expected</u> to increase”, point 4.6. “for municipal waste it is <u>assumed</u>,” point 4.26 “<u>estimated</u> additional provision needs to be made”. The draft appears to be based on guesswork rather than on proper analysis.</p>
<p>WN07 ConRec</p>	<p>The figures in Appendix 10 for CDE Recycling Capacity do not correlate with information agreed with Oxfordshire County Council in a Statement of Common Ground dated 21 September 2010 to assist the public inquiry held to consider Controlled Reclamation (Oxford) Ltd’s appeal (APP/U3000/A/10/2125146/NWF) against the County Council’s refusal to grant planning permission for a CDE Recycling Facility etc at the Dix Pit Complex, Stanton Harcourt (full copy supplied with representations).</p>
<p>WN08</p>	<p>Starting outwards from the Sutton Courtenay site itself, there seems to be (in <i>Appendix 11</i>) a supposition that this site hosts a whole raft of integrated waste management processes. That may very well have been the local authorities’ intention back in May 2011 (in cahoots with WRG or otherwise), but since that assumption was built into the paperwork six months ago we have had the 12 September meeting at which WRG’s wings were firmly if temporarily clipped by the councillors. WRG’s current proposal, obviously itself drafted well before 12 September on the surprisingly sensible basis that its predecessor would be rejected, does not <i>prima facie</i> include all these myriad other processes. One might wonder whether these present plans ~ very noticeably more modest in physical scale ~ are in fact a ‘foot-in-the-door’ to maintain ‘temporary’ facility on this patch of land which has, as I understand, been worked on an almost ridiculously extended sequence of ‘temporary’ bases since about three-quarters of a century ago. Perhaps someone is banking on such a ‘temporary’ presence being maintained now with a couple of sardonically green domes, and gradually being added-to piecemeal until the site becomes a far-from-temporary hive of manifold waste-related activities.</p>

	<p>Somewhere along that putative timeline, a boundary of semantics and plain common-sense would have been crossed, whereby a ‘temporary’ facility on a modest scale and for just one or maybe two purposes became something too big for anyone with a shred of credibility (official, technical or lay) to pretend to be temporary or dismantle-able.</p> <p>At any rate, any onward strategy posited upon there being a multiple operation at Sutton Courtenay is seriously compromised because no such multiple facility yet exists there; any forward planning based on such wishful thinking would be inherently flawed. If this were a mere theoretical exercise, all well and good; but we are talking here about vast quantities of waste, substantial ranges of processes and a potentially large, inconvenient and unsightly agglomeration of bulk industrial units amid open farmland within a few minutes’ walk (if permitted) of our national river . As a local resident, taxpayer and one who cherishes the scenery of the Thames Valley, I really don’t think financial and material commitments should be piled atop one another when the actual state of play is so far from what the Strategy document seems to presuppose.</p> <p>For instance, Table 13/1 does not accord with the full range or potential of facilities for which planning has already been granted; why not? Yet a note on Table 28 attempts to deal with quantities of fly-ash from some unspecified plant, the likes of which have yet to be permitted for construction.</p>
<p>WN09 J Sheehan</p>	<p>The figures in Appendix 10 for CDE Recycling Capacity do not correlate with information agreed with Oxfordshire County Council in a Statement of Common Ground dated 21 September 2010 to assist the public inquiry held to consider Controlled Reclamation (Oxford) Ltd’s appeal (APP/U3000/A/10/2125146/NWF) against the County Council’s refusal to grant planning permission for a CDE Recycling Facility etc at the Dix Pit Complex, Stanton Harcourt (full copy supplied with representations).</p>
<p>WN10 Lafarge</p>	<p><b>Draft Waste Needs Assessment</b></p> <p>On behalf of Lafarge Aggregates, we also wish to comment on the Draft Waste Needs Assessment (May 2011), which informs the Draft Waste Strategy. This examines existing facilities, future waste arisings and waste capacity requirements.</p> <p>With reference to paragraphs 6.27 and Table 26 of the document, County-wide figures are provided in reviewing whether a capacity gap exists for inert landfill. Paragraph 6.29 subsequently states that there is sufficient voidspace until 2020, but also</p>

	<p>states that a significant proportion of this capacity is provided at a single facility to the north of Oxford.</p> <p>It is our contention that the aforementioned statements within the Draft Waste Needs Assessment fail to recognise the practical reality of inert waste arisings and disposal. Inert waste is a low value material that cannot be hauled long distances and provision therefore needs to be made locally across the County. The approach of looking at the need and availability of facilities on a County-wide basis is unrealistic and it is considered that the reliance on one site with significant capacity is neither sufficient nor sustainable in this instance. We therefore submit that capacity for inert landfill needs to be assessed locally and provision made accordingly.</p>
WN11	<p>I am writing to make a few comments on the draft waste strategy and its support documents, which I read over the weekend. My main comments are given below:</p> <ul style="list-style-type: none"> <li>• I find the data presented very poorly. There is no clear listing of present or planned (via recent planning permissions) waste capacities by types of waste capacity forecast for the county (i.e. composting, recycling, pure landfill etc) through to 2030.</li> <li>• Once this data is properly collated and presented, it would also be useful to know where these present and planned capacities by type are located in the county respective to the areas where most waste originates to see that strategy complies broadly with the proximity principle.</li> <li>• I fail to understand why, when total combined volumes of waste either generated within or imported into the county are forecast to decline (by 38% between 2010 and 2030), why future waste provision requirements are forecast to increase. Again, breakdown by type of waste capacity for both internally and externally generated waste over the period would be helpful.</li> <li>• Reading between the lines for future C%I waste volumes, it appears there are several caveats in the text of the main draft and the supporting documents that undermines confidence in these estimates....'considerable uncertainty'...'difficult to assess' come to mind. The capacity gap is referred to as a 'largely theoretical one' and that there may actually be 'a healthy surplus of capacity'. It appears that there may well not be a capacity shortfall at all therefore, while the draft</li> </ul>

strategy very strangely concludes there will be a shortfall. These statements are irreconcilable.

- The draft strategy assumes that current levels of recycling for C&I waste are ‘appropriate’, but what are these? The document does not clarify this. If it’s anything less than DEFRA’s estimate of 50% of C&I waste being recycled nationally, we need to know this and why this lower level is deemed ‘appropriate. Please clarify!
- On a similar line, why are recycling rates of 62% of household waste deemed acceptable by the year 2020, when some areas of the county are achieving close to 70% recycling rates. This is not explained.
- With the above levels of confusion and lack of clarity, it is hard to follow the majority of conclusions in the draft. They largely appear without any clear basis of argument at all.
- With little basis in fact, the proposal for a large plant for recovery of resources from residual C&I waste in the Abingdon/Didcot/Wantage and Grove area seems very premature indeed. Why, when this waste may never materialize, as the background comments suggest? Are the officers listening a little too closely to WRG own proposals for expansion, as suggested by the largely false description given of the status of the Sutton Courtenay site in the May Framework document. If the rest of data supplied in the draft is as wayward of reality as this single instance of sloppiness. God help us!
- On the proximity principle I fail to understand why no plans (should more waste materialize) are seriously recommended for Oxford, when it is clearly admitted that ‘Oxford is the largest source of waste in the county, yet there are few waste facilities located here’.

To conclude, because the basic data is presented so poorly, I fail to see any linkage between the data and the conclusions. This is a very sloppy piece of work which doesn’t hang together to an outside reader and I very much hope its shortcomings will be addressed seriously. Can do better.