

## **MINERALS AND WASTE PLANS CONSULTATION SEPTEMBER 2015**

1. **Public Consultation.** Officers are aware that the OCC website and access to the Consultation documents was not available over the weekend 25-27 September a crucial weekend towards the end of the consultation. Consequently this response is not as comprehensive as the work done by the officers deserves. For that my apologies.
2. As an initial comment, however, the Strategy is sufficiently vague in its wording to mean all things to all people. The result is that it and does not do enough to provide protection for local communities against unnecessary development. Additionally there is no assessment of the cumulative impact of the provision of facilities on top of other development in areas most affected by the strategies.
3. **Mineral and Waste Strategies – Vision, Principles and Objectives.**
  - a. In both cases the Vision, Principles and Objectives should be strengthened to ensure that local communities are protected against unnecessary development and that no extra allowance is made for commercial benefit.
  - b. Of particular concern in the Waste Objectives at para 3.7 vii. In this much stronger reference should be made to reducing imports of waste from Berkshire and other authorities and to place pressure on them to deal with their own waste rather than exporting it to Oxfordshire. This needs also to be highlighted in the Vision Para 3.6. It is commendable that the strategy is endeavouring to ensure that Oxfordshire is self sufficient. That should equally be applied to other authorities which, despite the proximity principle, are making insufficient provision in their own areas and thereby adding to the burden of Oxfordshire communities, particularly around the Sutton Courtenay landfill site.
4. **Policy W5.** This policy should be amended to provide protection for local communities from having to carry an undue burden of the disposal of waste, including particularly from areas outside Oxfordshire. In support of this it should also stress that before site decisions are made, there should be a thorough assessment of the options to ensure the burden is shared equably.
5. **Para 5.5.** This paragraph presumes a continuation of landfill from the Berkshire authorities, which releases them from the need to provide their own facilities as required by the proximity principle. This means that communities in Oxfordshire

are carrying their burden, without accruing any benefit from the arrangements. This presumption should be reworded.

6. **Para 5.8.** This paragraph states that in accordance with Policy M10 landfill sites should be restored as soon as possible. It then goes however, to hedge the Council's bets by stating that "*proposals to extend the operation of landfill sites beyond a permitted closure date may be justified where this would make best use of the remaining resource.*" This statement elsewhere in the strategy that it should no longer apply. The above caveat should be removed. It should rather be replaced by wording such as "*To protect local communities, only in exceptional circumstances will any extension of landfill site end dates be permitted and then only after a compensatory levy for the local communities had been agreed with parish councils*".
7. **Para 5.64** mentions that the county might be seen as a suitable location for the disposal of inert waste from future large scale engineering project. This again should again include reference to compensation to local communities being agreed first.
8. **Para 5.65 Policy W6.** Delete the second sub para "Permission ....scheme" and insert:

*" Landfill sites will be restored at their at the end of their permitted end date. Only in exceptional circumstances will an extension be permitted where there is a proven overriding need and then only to meet Oxfordshire waste needs. In these circumstances the extension should be strictly time and quantity limited and only approved after agreement with local Parish Councils on a levy to benefit local communities."*