

## Minerals and Waste Core Strategy Preferred Options Consultation Paper February 2007

### Form for making comments

Oxfordshire County Council is reviewing the planning policies covering mineral working and waste management in Oxfordshire. This will result in a new policy framework for the County – the Oxfordshire Minerals and Waste Development Framework. More information about this is available on our website ([www.oxfordshire.gov.uk](http://www.oxfordshire.gov.uk)).

The first policy document to be prepared is the Minerals and Waste Core Strategy. Last year we consulted on issues and options. We have now published the Core Strategy Preferred Options Consultation Paper, which you are invited to comment on. This consultation paper can be seen at council offices and libraries in Oxfordshire and on our website ([www.oxfordshire.gov.uk](http://www.oxfordshire.gov.uk)), or contact us on 01865 816025.

The consultation paper sets out strategic aims and objectives for minerals and waste planning in Oxfordshire and what at this stage we see as the preferred options for addressing key issues. We want to get a wide response to these options before we prepare a full Core Strategy with policies and proposals for submission to the Secretary of State and further consultation later this year.

#### How to Make Comments

Please use this representation form to make any comments on the Core Strategy Preferred Options. **Please use a separate form for each preferred option you are commenting on, using block capitals and black ink.**

This form is available to download as a Word file at:

<http://www.oxfordshire.gov.uk/links/public/mineralsandwastepolicy>. Please return electronic forms to: [minerals.wasteplan@oxfordshire.gov.uk](mailto:minerals.wasteplan@oxfordshire.gov.uk). For additional paper forms, please copy this form or contact us on 01865 816025.

Please send this form by post, fax or email to:

Core Strategy Preferred Options Consultation  
Minerals & Waste Policy (SPED)  
Environment & Economy  
Oxfordshire County Council  
Speedwell House, Speedwell Street  
Oxford OX1 1NE

Fax No: 01865 815787

Email: [minerals.wasteplan@oxfordshire.gov.uk](mailto:minerals.wasteplan@oxfordshire.gov.uk)

**Responses must be received by 4pm on 23 March 2007.**



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**Oxfordshire Minerals and Waste Development Framework**

**Minerals and Waste Core Strategy  
Preferred Options  
February 2007**

**Representation Form**

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State which option in the Core Strategy Preferred Options your representation relates to: <i>(please use a separate form for each option you comment on)</i>		
Option: 5b	Paragraph(s):	Other comment:

Indicate the type of representation you are making: <i>(please tick)</i>				
Objection:	<input checked="" type="checkbox"/>	Support:	<input type="checkbox"/>	Conditional Support:
Observation:	<input type="checkbox"/>	Other Comment:	<input type="checkbox"/>	<input type="checkbox"/>

**Details of your representation:** Give details of your objection / support / conditional support / observation / other comment, including any changes you think should be made to the preferred option and your reasons. Please support your comments with evidence where possible.

1. The proposed locating of facilities identified in Preferred Option 5b using the sequential approach of: - urban areas, close to urban areas; rural areas was not an option raised at Issues and Options stage and does not accord with PPS10 or the RSS.
2. PPS10 states (third bullet point paragraph 4) that the planned provision of new capacity and its spatial distribution should be based on clear policy objectives, robust analysis of available data and information, and an appraisal of options. This advice has not been followed. A new option has been introduced not formerly consulted on, not based on any clearly identified policy objectives, and not supported by any analysis of available data and information.
3. PPS10 at no point specifies that urban areas should be a priority for locating waste facilities. Instead it says that waste planning authorities should in identifying sites support the broad locations identified in the RSS (first bullet point paragraph 17) and consider a broad range of locations (second bullet point paragraph 20).
4. The relevant policy M2 of the RSS does not seek such a sequential approach either. It suggests that sites should primarily be on brownfield sites or within new employment developments, and that recycling operations need to be located within a viable catchment area close to the origins of the waste material and to the subsequent markets, which for construction and demolition materials generally means the main urban areas, but it does not say that sites should as a priority be in urban areas. Paragraph 11.27 of the supporting text clarifies that these facilities should be regarded as a waste management activity and that "Policy W17 (and its supporting text) of the Regional Waste Strategy will therefore be relevant...."
5. Policy W17 actually says that the priority should be given to safeguarding and expanding suitable sites with an existing waste management use and good transport connections. It further states that the suitability of existing sites and potential new sites should be assessed on the basis of (amongst other things) good accessibility from existing urban areas or major new or planned development. As with PPS10 there is clearly no requirement within the RSS for waste management facilities to be located within urban areas as a priority. Furthermore the supporting text to Policy W17 at paragraph 10.236 in fact recognises that the countryside is likely to represent the most appropriate location for certain activities. This would encompass activities such as aggregate recycling which requires a large area and to be some distance from sensitive receptors.
6. The best starting point for an analysis of the available data, which must support this identified preferred option (as required by PPS10), is to look at the current position. This reveals that there are no aggregate recycling facilities in urban areas. Apart from a few breakers' yards, council depots and civic amenity sites there are only two existing waste management facilities (transfer stations) in an urban area, and both are in Banbury. The Preferred Options document does not identify what mechanisms will be put in place to bring about a change to this position in the light of the prevailing climate for development.

7. Oxfordshire operates a policy of restraint on development, which means that undeveloped (or previously developed) land in urban areas is very much sought after for its development potential, or is safeguarded for much needed recreational purposes in already intensively developed areas. Land available for development, because it is sought after has a high land value, which puts it out of range for use as an aggregate recycling facility (which is not a form of development that generates the kinds of profits that can afford such land prices) and the land is therefore developed for other forms of more profitable (and also much needed) uses such as housing.
8. Aggregate recycling facilities cannot be located close to residential properties, commercial uses and other sensitive receptors because of such potential nuisance factors as noise and dust. Given the competing demands on land within urban areas in Oxfordshire as identified above, this means that aggregate/C&D waste recycling can only really be located outside of urban areas.
9. It is very important to note that aggregate recycling is predominantly carried out by groundworkers/plant hire companies/haulage companies, because they have access to and move the material and have the necessary equipment to process it. Some mineral operators are also now venturing into the business, because they are essentially also in the haulage business, but certainly as far as Oxfordshire is concerned the main aggregate recycling is carried out by two groundworkers/plant hire companies/haulage companies. It appears from paragraphs 9.8 and 9.19 of the Core Strategy Preferred Options document that it was the Minerals and Waste Stakeholder Forum who suggested this sequential approach to site selection, yet neither of these companies has been invited to take part in the Forum. Consequently the conclusions of the Forum on this aspect are not truly representative, because they were arrived at without seeking the views of those who are in the business, who have the experience in the process and are the ones who will be delivering the sites needed to meet the target.
10. Paragraph 9.21 appears to justify the sequential approach “in view of the likely difficulty in finding suitable sites for these facilities”. However, the actual effect of such a policy will mean that resources will have to be spent on each site selection and/or planning application in going through a theoretical exercise of demonstrating why an urban location is not available and/or suitable, when it is already clear from the evidence available that finding appropriate urban locations for aggregate recycling facilities would only be achievable in very exceptional (if even non-existent) circumstances.
11. In Preferred Option 11b, which deals with where waste management facilities (of all types) should be located, some account is taken of the possibility of the lack of available suitable land and the difficulty of finding sites, but this is not the case for Preferred Option 5b, yet the same difficulties apply. No doubt the differences in Option 11b to Option 5b arose as a result of the input from the waste management companies on the Forum (who are involved in landfill with recycling). The lack of such provision in Option 5b is a further indication that the interests of the organisations that carry out aggregate recycling are not properly represented on the Forum. As identified in the RSS (see paragraph 4 above) Option 5b deals with a waste management activity, and the proposed policies to deliver Option 5b should at the very least, be consistent with those for Option 11b.

12. The currently proposed sequential approach also does not recognise that the market for the recycled product may be a suitable locating factor, and locating in urban areas may not be appropriate, where a facility is needed to serve rural areas. It is an important element of the Government's required step-change in the way that waste is managed as set out in PPS10 to encourage communities to take more responsibility for their own waste.
13. Cost of transportation, both to the source of the waste and the market for the recycled material is an important factor in determining in particular whether aggregate recycling takes place. To enable recycled materials to displace primary aggregates the delivered cost (production plus transport) must be less than that for the quarried product. As production costs for recycled aggregates are generally of the same order as for primary stone, recycling is most viable where distances from point of waste arising to the recycling facility and from the recycling facility to the point of use is minimised.
14. It is suggested therefore that a more preferable identifying factor for the location of waste management facilities than the proposed sequential approach, would be closeness to source of the waste and/or market for the end product. Furthermore to be consistent with PPS10 and the RSS the policy to deliver where aggregate recycling facilities should be located, should acknowledge that a broad range of locations is likely to be necessary (which could include urban sites if possible).

(Continue on a separate sheet or expand box if necessary)

If you wish to be notified when the Minerals and Waste Core Strategy is submitted to the Secretary of State, please tick this box:

If you wish to be notified when the Minerals and Waste Core Strategy is adopted, please tick this box:

Signature:

Date:

Alternative Formats of this publication can be made available on request. These include other languages, large print, Braille, audio cassette, compute disk or e-mail

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**Environment and Economy**  
**Oxfordshire County Council**  
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**Oxfordshire Minerals and Waste Development Framework**

**Minerals and Waste Core Strategy  
Preferred Options  
February 2007**

**Representation Form**

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First Name	<input type="text" value="Chris"/>	<input type="text" value="Suzi"/>	
Last Name	<input type="text" value="Sheehan"/>	<input type="text" value="Coyne"/>	
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E-mail Address	<input type="text"/>	<input type="text" value="suzi.coyne@ntlworld.com"/>	

State which option in the Core Strategy Preferred Options your representation relates to: <i>(please use a separate form for each option you comment on)</i>		
Option: 11b	Paragraph(s):	Other comment:
<input type="text"/>	<input type="text"/>	<input type="text"/>

Indicate the type of representation you are making: <i>(please tick)</i>				
Objection:	<input checked="" type="checkbox"/>	Support:	<input type="checkbox"/>	Conditional Support:
Observation:	<input type="checkbox"/>	Other Comment:	<input type="checkbox"/>	<input type="checkbox"/>

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3. PPS10 at no point specifies that urban areas should be a priority for locating waste facilities. Instead it says that waste planning authorities should in identifying sites support the broad locations identified in the RSS (first bullet point paragraph 17) and consider a broad range of locations (second bullet point paragraph 20).
4. The relevant RSS policy for the location of waste management facilities is W17 which actually says that the priority should be given to safeguarding and expanding suitable sites with an existing waste management use and good transport connections. It further states that the suitability of existing sites and potential new sites should be assessed on the basis of (amongst other things) good accessibility from existing urban areas or major new or planned development. As with PPS10 there is clearly no requirement within the RSS for waste management facilities to be located within urban areas as a priority.
5. The best starting point for an analysis of the available data, which must support this identified preferred option (as required by PPS10), is to look at the current position. This reveals an extreme paucity of waste management facilities in urban areas. Apart from a few breakers' yards, council depots and civic amenity sites there are only two existing waste management facilities (transfer stations) in an urban area, and both are in Banbury. The Preferred Options document does not identify what mechanisms will be put in place to bring about a change to this position in the light of the prevailing climate for development.
6. Oxfordshire operates a policy of restraint on development, which means that undeveloped (or previously developed) land in urban areas is very much sought after for its development potential, or is safeguarded for much needed recreational purposes in already intensively developed areas. Land available for development, because it is sought after has a high land value, which puts it out of range for waste management uses (which are not developments that generate the kinds of profits that can afford such land prices) and the land is therefore developed for other forms of more profitable (and also much needed) uses such as housing.
7. In particular facilities for such types of waste management as skip waste recycling and general waste recovery cannot be located close to residential properties, commercial uses and other sensitive receptors because of such potential nuisance

factors as noise, dust and odour. Given the competing demands on land within urban areas in Oxfordshire as identified above, this means that these sorts of facilities can only really be located outside of urban areas.

8. The explanatory text to Option 11b acknowledges that it may be difficult to identify sufficient sites, and justifies the sequential approach on the basis that it will allow flexibility for site identification. However, the actual effect of such a policy will mean that resources will have to be spent on each site selection and/or planning application in going through a theoretical exercise of demonstrating why an urban location is not available and/or suitable, when it is already clear from the evidence available that finding appropriate urban locations for waste management facilities would only be achievable in very exceptional (if even non-existent) circumstances.
9. The currently proposed sequential approach also does not recognise that the market for the recycled product may be a suitable locating factor, and locating in urban areas may not be appropriate, where a facility is needed to serve rural areas. It is an important element of the Government's required step-change in the way that waste is managed as set out in PPS10 to encourage communities to take more responsibility for their own waste.
10. It is suggested therefore that a more preferable identifying factor for the location of waste management facilities than the proposed sequential approach, would be closeness to source of the waste and/or market for the end product. Furthermore to be consistent with PPS10 and the RSS the policy to deliver where waste management facilities should be located, should acknowledge that a broad range of locations is likely to be necessary (which could include urban sites if possible).

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