

Oxfordshire Waste Core Strategy Consultation Draft  
Comments on behalf of Controlled Reclamation (Oxford) Ltd and John Sheehan (Oxford) Ltd

**Paragraph 4.7/Table 2**

1. There is no explanation made in paragraph 4.7 of the Oxfordshire Waste Core Strategy Consultation Draft (OWCS) for the statement that production of construction, demolition and excavation (C, D & E) waste is believed to have fallen sharply to about half normal levels. It is furthermore not the experience of those in the industry that levels have fallen so sharply. It appears that this statement is derived from the Waste Needs Assessment May 2011, which makes an assumption at paragraph 3.34, that because housing completions had dropped by 50% to 2010, the amount of CDE waste being managed has halved. This assumption takes no account of other significant elements of the building sector and major contributors to the generation of C, D and E waste, namely the commercial, public (hospitals, schools etc) and roads sectors, which have not declined at anything like the rate suggested. The assumption therefore at paragraph 4.7 and in the first column of Table 2 of the OWCS that the volume of C, D & E waste to be managed at 2010 is incorrect.

**Policy W4**

2. It is not at all clear how the additional capacity figures for C, D & E waste in Policy W4: Provision of additional waste management capacity have been arrived at. This must, however, be evident in the plan or in the evidence base for it to be considered sound. For example, for each milestone year, it should be clear how much capacity (on the basis of existing figures) would be available and how much additional capacity is required to make up the shortfall. Table 24 at page 65 of the Waste Needs Assessment May 2011 provides such a setting out of the capacity requirement, but this does not at all correlate to the figures given in Policy W4.
3. The OWCS identifies at paragraph 4.25 that the provision being planned for is the waste management targets of the predicted waste arising figure + 10%. The waste arising figure identified at policy W1 is 1.3 million tonnes per annum (mtpa), so for capacity purposes would be 1.43 mtpa. The C, D & E recycling target figures are identified at policy W3 as 50% by 2015, and 60% by 2020 until the end of the plan period. Therefore 715,000 tonnes of capacity is required by 2015, followed by 860,000 tonnes thereafter.
4. Policy W4 states that no new capacity is required until 2020, when 80,000 tpa is to be provided for, then 390,000 tpa by 2025 and 500,000 tpa at the end of the plan period.
5. The Waste Needs Assessment provides at Table 10/7 the individual recycling sites and a number of different total figures, none of which clarify how these assumptions are arrived at. A current total capacity of 1,095,000 tonnes per annum is given based on "Operational" (583,500 tpa), "Non-Operational" (30,000 tpa) and "Committed" (485,500 tpa) capacities. Although not stated it is apparent from our knowledge of the sector that "Committed" relates to facilities that have been granted planning permission, but which have not yet been implemented.

6. Sub-totals are given for the first two categories of sites which split the total capacity (of 613,500 tpa) into temporary, permanent and unauthorised sites. However, there is no indication as to at what point the current total capacity dwindles, because of temporary permissions. This and the fact that capacities for individual sites are not given in the table makes it impossible to ascertain whether the proposed additional provision is robust and would meet the required recycling targets.
7. It is unclear why individual site capacities are not given in the table. We know from past experience that the County Council claims that this approach is taken in the interests of commercial confidence. However, this is not a justified approach for a variety of reasons.
8. In the first instance for the vast majority of the sites, capacity figures were provided by operators to the County Council as part of a request for information to support the Minerals and Waste Development Framework process in late 2008/early 2009. The forms on which the information was provided made clear that the information would be made publicly available.
9. Secondly, certainly for the more recent permissions (i.e. "Committed" sites) planning applications require information on proposed throughput and capacity, and the documents are publicly available.
10. Thirdly, only last year (in September 2010) at the appeal against refusal of planning permission for the aggregate recycling facility at Dix Pit (committed facility no 236(iii) on the list), individual site capacities were agreed with the County Council and formed part of a Statement of Common Ground (Copy attached). There are 7 sites in the Table 10/7 of the Waste Needs Assessment not identified in the Statement of Common Ground table: Finmere 011(iv); Worsham 116(ii); Station Yard, Shrivenham 189; Dix Pit 236 (ii); Micks Skips 241; Hardwick 257; and Burford Quarry 260. The reason for this is that Burford has more recently acquired planning permission, Station Yard, Shrivenham and Finmere were not identified by either side as a potential site, and the others were agreed not to be relevant to the overall capacity, for reasons that will be addressed later in this submission.
11. Table 1 below provides the either publicly available or OCC agreed individual site capacities for the Operational/Non-Operational sites.

Table 1: C, D & E Waste Recycling Operational/Non-Operational Site Capacities

Facility No	Name	Recycling Capacity tpa	Life
001	Shipton Hill, Fulbrook	7,000	Permanent
002(iii)	Prospect Farm, Chilton	43,000	2022
004(ii)	Slape Hill Quarry, Glympton	55,000	2014
005(ii)	Playhatch Quarry	65,000	Permanent
008(ii)	New Wintles Farm, Eynsham	110,000	Permanent
009(iii)	Worton Farm, Cassington	48,000	Permanent
013(iii)	Ewelme No 2	20,000	2016
028 A(ii)	Gill Mill Quarry, Ducklington	27,000	2020

103	Lakeside Industrial Estate, Standlake (non-operational)	25,000	Permanent
118(ii)	Tubney Wood, Tubney	8,000	2011
121(i)	Old Brickworks Farm, Bletchingdon	40,000	2017
133(ii)	Milton Road, Bloxham	20,000	Permanent
142(ii)	Sandfields Farm, Over Norton	4,000	Permanent
145	Ferris Hill Farm, Hook Norton	4,000	Permanent
184	Rumbold's Pit, Ewelme	3,000	Permanent
189	Station Yard, Shrivenham (non-operational) <sup>1</sup>	5,000	Permanent
229(ii)	Shellingford Quarry <sup>2</sup>	15,000	2019
235	Peashell Farm	5,000	2010
236(ii)	Dix Pit, Stanton Harcourt	10,000	2012
241	Micks Skips, Lakeside, Standlake	2,000	Permanent
256	Hundridge Farm, Ipsden	5,000	Permanent
257	Hardwick <sup>3</sup>	15,000	Unauthorised
260	Burford Quarry <sup>4</sup>	3,000	2024
Total		539,000	

<sup>1</sup> There is no information available on this site, but in light of "Non-operational Sub-Total" of 30,000 tpa given in Table 10/7, 5,000 tpa has been assigned to this site. (Other non-operational site 103 has capacity of 25,000 tpa).

<sup>2</sup> Identified as unauthorised in Table 10/7 but permission for 15,000 tpa until 2019

<sup>3</sup> There is no information available on this site, but in light of "Unauthorised Sub-Total" of 15,000 tpa given in Table 10/7, all of this quantity has been assigned to this site.

<sup>4</sup> Very small scale quarry waste recycling with no imported waste. Estimated maximum annual capacity after first year of operation, derived from application documents.

12. The total capacity figure in Table 1 is some 74,500 tonnes lower than the capacity given in the Waste Needs Assessment. It is difficult to understand why that is the case. However, it is most likely mainly attributable to the fact that total throughput figures have been used for some sites, rather than actual recycling capacity. As the targets relate to the quantity of waste that is actually recycled (i.e. diverted from landfill) the latter is the relevant figure for the purposes of calculating required capacity.
13. There will always be an element of waste that cannot be recycled and so throughput will always be higher than recycling capacity. It was not clear from the OCC forms requesting information on sites in 2008/2009, which was the appropriate figure to put, so it may well be the case that for some sites throughput has been used in the Waste Needs Assessment rather than recycling capacity.
14. Alternatively, for some sites, which recycle a variety of different waste streams, wastes other than C, D & E may be included in the capacity figures. The difficulty of disaggregating only C, D & E wastes for some sites was a problem recognised in agreeing figures last year for the Statement of Common Ground table. Hence the footnotes to that table identifying the sites where wastes other than C&D are included in the figures. There may be other sites in Table 10/7 where the appropriate disaggregation has not occurred.
15. In addition there are a number of sites with a total of 40,000 tpa, which should not have been included in the Operational/Non-Operational sites figure. These are:
  - Dix Pit 236(ii) which is not a recycling, but a site restoration operation;

- Micks Skips 241 which only acts as a transfer station, and for this site to be in the capacity figures would amount to double counting as the waste is recovered/recycled at other facilities in the table;
- Peashell Farm 247, for which the permission expired at the end of last year;
- Hardwick which is an unauthorised site, and it is highly questionable that as such it should be included in the figures; and
- Tubney Wood is to be replaced by Upwood Park Quarry (a “Committed” facility and to include both would amount to double counting).

As such the total capacity of Operational/Non-Operational sites should be in the order of: 499,000 tpa.

16. It is entirely appropriate that the third category of “Committed” sites should be included for the purposes of determining overall capacity. Table 2 below provides the either publicly available or OCC agreed individual site capacities for these sites. Care has been taken to ensure that there is no double counting where new committed capacity is for replacement of an existing facility.

Table 2: C, D & E Waste Recycling Committed Site Capacities

Facility No	Name	Recycling Capacity tpa	Life
011(ii)	Finmere Quarry <sup>1</sup>	20,000	2020
0028	Gill Mill Quarry <sup>2</sup>	93,000	2020
114	Appleford Sidings	200,000	Permanent
116(ii)	Worsham Quarry <sup>3</sup>	0	2021
236(iii)	Dix Pit, Stanton Harcourt <sup>4</sup>	35,000	2029
247(i)	Upwood Park Quarry	8,000	2029
<b>Total</b>		<b>356,000</b>	

<sup>1</sup> There is no mention of the facility on the site information forms for Finmere Quarry and no record of this facility could be found on the Council’s website or in their office files. As Table 10/7 identifies it as a small scale facility the maximum quantity of 20,000 tpa for this scale is given.

<sup>2</sup> The site information forms make clear that the capacity of 120,000tpa (80% of 150,000 tpa throughput) for the new Gill Mill facility would include the existing capacity (of 27,000 tpa) at Gill Mill Quarry.

<sup>3</sup> The site information forms (for Gill Mill) make clear that the recycling activity could no longer be carried out at Worsham as of beginning of 2009 because of lack of operational space (due to the site having been infilled) and recycling facilities were transferred to Gill Mill.

<sup>4</sup> The new Dix Pit facility will replace the operator’s existing facility at Slape Hill and so net additional capacity is 35,000 tpa (new capacity of 90,000 tpa minus existing capacity of 55,000 tpa).

17. The total capacity figure in Table 2 is some 129,500 tonnes lower than the capacity given in the Waste Needs Assessment for “Committed” sites. This could quite easily be accounted for by an element of double counting, i.e. not taking into account that new facilities are planned to replace existing ones.

18. As a result, however, it means that actual potential total capacities and required shortfalls at the milestone years would be as shown in Table 3 below:

Table 3: C, D & E Waste Recycling Total Capacities Compared with Policy W3 Targets (tpa)

	2015	2020	2025	2030
Capacity	855,000	780,000	594,000	496,000
Target	715,000	860,000	860,000	860,000
Difference	+140,000	-80,000	-266,000	-364,000

19. Whilst some of the shortfalls work out lower than given in Policy W4, there is a further factor that should be a part of the calculation, which does not appear to have been taken into account. This is that the recycling targets would not be met by providing for sites with total capacities at a rate equivalent to the target requirement, because it is very unlikely that all of these facilities will for various reasons at any given time be operating at full capacity.
20. From work done for the appeal against refusal of planning permission for the aggregate recycling facility at Dix Pit (committed facility no 236(iii) in September 2010) it was apparent that the difference between total potential site capacity and actual recycling levels was about 30%. This evidence was unchallenged by the County Council at the Inquiry and accepted by the Planning Inspector.
21. The reasons for this quite significant difference between C, D & E potential and actual site capacities are essentially that the availability/supply of the material can fluctuate quite considerably, and only a few of the operators are actually in the business of managing the waste and with steady access to the source of the material. Many of the sites only rely on attracting the material in and do not have the necessary expertise to realise its full potential.
22. If the available capacity figures are reduced accordingly by 30% (to reflect actual levels of recycling), the position would be as set out in Table 4 below (rounded figures):

Table 4: C, D & E Waste Recycling Total Capacities Required to Achieve Policy W3 Targets (tpa)

	2015	2020	2025	2030
Capacity	600,000	550,000	420,000	350,000
Target	715,000	860,000	860,000	860,000
Requirement	115,000	310,000	440,000	510,000

23. Consideration of actual recycling levels is very important, also to meet the requirements of Policy M1 of the Oxfordshire Minerals Strategy Draft (OMS) which aims to make provision for facilities to enable the supply of at least 0.9 million tonnes a year of secondary and recycled aggregate. It quite properly does not provide for facilities with the potential capacity to recycle that amount, but which will actually achieve that level. This supply will almost entirely need to be met from C, D & E waste. Of the other materials identified at paragraph 4.3 of the OMCS road ballast and spent railway ballast are accounted for within the site capacities identified above, and ash from Didcot power station will no longer be produced after 2015.
24. In light of this position the minimum shortfall in C, D & E waste recycling capacity would be as set out in Table 5 below:

Table 5: C, D & E Waste Recycling Total Capacities Required to Achieve Recycled Aggregate Supply - OMCS Policy M1 (tpa)

	2015	2020	2025	2030
Capacity	600,000	550,000	420,000	350,000
Target	900,000	900,000	900,000	900,000
Requirement	300,000	350,000	480,000	550,000

**Policy W5 /Paragraphs 4.57 and 6.10**

25. The statement at paragraph 4.57 that “There is a need to explore whether there are potential opportunities in the Oxford area for new waste facilities.....” is inappropriate.
  
26. In the first instance the plan is supposed to provide some certainty about where waste development should take place. Given that the Strategy has been some seven years in preparation (since the advent of the Planning and Compulsory Purchase Act 2004), there has been ample time to explore the possibilities of the Oxford area to accommodate waste facilities.
  
27. Secondly two rounds of invitations for nominations of sites to be allocated in the plan over that period have not revealed any available sites in Oxford.
  
28. Thirdly searches of alternative sites put forward in support of applications for recycling facilities near to, but not within Oxford, have demonstrated that there is none. These site searches were accepted by the County Council within the last few years in granting permanent permission for the recycling sites at Worton Farm, Cassington (2009) and New Wintles Farm, Eynsham (2010), and also by the planning inspector earlier this year in allowing the appeal against refusal of planning permission for the aggregate recycling facility at Dix Pit (committed facility no 236(iii).
  
29. For these reasons the words “at or” should be removed from “close to” in the third bullet point of the second part of Policy W5. Paragraph 6.10 states that from preliminary work on site availability the strategy should be capable of being delivered, but there are no available sites in or “at” Oxford, and none likely to be, (as confirmed by attached email dated February 2010 from Oxford City Council on the subject of locating Aggregate recycling facilities in Oxford), so this element of the strategy is not capable of being delivered. PPS10 states in the third bullet point of paragraph 18 that unrealistic assumptions on the prospects for the development of waste management facilities, or of particular sites or areas, should be avoided.

**Policy W5 and Figure 7**

30. Policy W5 states that broad locations for strategic waste facilities are identified in the key diagram (figure 7), and that waste management facilities will be permitted at suitable sites within these broad locations. It is, however, not at all clear from Figure 7 what the broad locations comprise.
  
31. Black boxes are shown on the diagram, which the key identifies as “Proposed new facilities”, and these black boxes are shown next to various centres of population. However, the extent of

the broad locations is not clear. For example, there is a black box south of Abingdon, but is this also meant to encompass Wantage & Grove and Didcot (areas also referred to in Policy W5); a black box is shown north of Bicester, but would this also include the existing Ardley waste facilities; a black box is shown north of Witney, but could this include other areas around Witney and/or the close by Stanton Harcourt facilities?

32. As currently drafted Figure 7 is far too ambiguous and can be widely interpreted. What do the words of the policy of “within these broad locations” mean? A more accurate means of defining broad locations should be formulated, to give the certainty that the plan should provide.

#### **Policy W10**

33. In light of the urgent need to ensure that waste management needs are properly managed it is appropriate that waste management sites should be safeguarded from other forms of development. However, given the difficulty in finding suitable sites for waste facilities, as acknowledged at paragraph 4.87 of the OWS, consideration should also be given to safeguarding suitable temporary facilities. This would be in line with policy W17 of the South East Plan, which states that “Waste development plan documents will ..... give priority to safeguarding and expanding suitable sites with an existing waste management use....” The policy makes no distinction between sites with temporary and permanent permissions.

#### **Policy C7**

34. Policy C7 states that minerals and waste development will only be permitted where provision is made for convenient access to and along the primary road network. The primary road network is not defined. However, if it consists of only the Motorway and “Primary ‘A’ roads” as shown on Figure 8 then there will be severe difficulty in finding sites that can comply with the policy and indeed most existing waste sites would not comply, as they do not have direct access on to the primary road network.
35. As currently drafted there is an internal conflict between policies within the plan as many of the proposed locations for new waste management facilities envisaged within policy W5, for example at Wantage/Grove, Didcot, Carterton, Henley and Oxford could not have direct access to the primary road network and some are some distance away from it.
36. If direct access to the Motorway and “Primary ‘A’ roads” is not actually meant by the policy, then this needs to be clarified and/or the “primary road network” defined to ensure there is no ambiguity in the policy and internal conflict in the plan (which is one of the tests of soundness).

Suzi Coyne, SCP  
31 October 2011

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**Policy M1**

1. Paragraph 4.6 of the Oxfordshire Minerals Core Strategy Consultation Draft (OMCS) states that policy M1 provides for additional facilities to support a more ambitious level of secondary and recycled aggregate production, in line with the South East Plan target of 0.9 million tonnes per year.
2. No mention is made in the plan, however, of the current National and regional guidelines for aggregates provision in England, 2005-2020 published in June 2009. According to the government guidance on the abolishment of regional strategies, these guidelines are to be taken into account in making planning decisions and they identify a requirement for the provision of alternative materials of 130 million tonnes within the South East Region over the period 2005 to 2020, which equates to 8.125 million tonnes per annum (mtpa).
3. The guidelines indicate at paragraph 3 that the sub-regional apportionment of this figure is the responsibility of the regional assemblies, and in future responsible regional authorities, taking into account advice from the mineral planning authorities (MPAs) and the regional aggregates working party (RAWP). This task of sub-apportioning recycled and secondary aggregate provision for the South East was done as part of the preparation of the South East Plan, and it is evident from South East Plan policy M2 that Oxfordshire's share of the total quantity of secondary and recycled aggregate to be used in the South East amounts to 11.4% of the total to be achieved. Applying this same percentage to the 2005 to 2020 guidelines requirement for alternative materials of 8.125 mtpa, Oxfordshire's apportionment would therefore now amount to 926,000 tpa. In light of these new requirements policy M1 is not quite as ambitious as it should be.
4. In addition, as paragraphs 4.9 and 4.10 of the OMCS make clear the County Council is proposing to significantly reduce its primary aggregate apportionment from that required either by the current South East Plan policy M3 or that identified in the Government's proposed changes to Policy M3, which government guidance on the abolishment of regional strategies has said that Mineral Planning Authorities in the South East should be working to.
5. The County Council are effectively proposing to reduce their required apportionment to meet the needs of the South East aggregate provision by 40% (i.e. 0.84 million tonnes per annum). In light of this decision, one might have expected some form of compensation by increasing the recycled and secondary aggregate provision proposed for Oxfordshire, so that the burden of making up the overall regional shortfall does not fall so heavily on other neighbouring authorities. However, this is not the case. The County Council have decided to provide for only the absolute minimum requirement in terms of recycled aggregate provision.
6. In addition if as suggested at paragraph 4.1 of the OMCS the Council is serious about providing for an adequate and steady supply of minerals over the plan period by encouraging the use of



secondary and recycled aggregate as well as by identifying areas for mineral working, then policy M1 must be more specific in encouraging the right kind of aggregate recycling.

7. Significant quantities of inert waste are already recycled for low grade uses, for examples as low level fill. However, this is not the most sustainable use of these materials, and there is significant, as yet largely under-utilised, potential to re-use C&D waste in higher value applications. Conventional dry processing systems generally produce at best two types of product, which meet Government highways works specifications 6F1 (-40mm) and 6F2 (+40mm). These are suitable as general fill on larger applications or for a lower sub-base in road making, but are not suitable for concrete manufacture, or as a road base for laying tarmac on, or for more confined areas, such as bedding smaller drainage pipes. Sands are also not able to be processed effectively into a clean enough product and therefore are considered a waste product.
8. The WS Atkins report confirms at paragraph 3.53 that secondary and recycled aggregates do not currently substitute for primary aggregates in structural uses, only in lower specification construction uses like car parks, that they cannot replace sand and gravel, and therefore the possible contribution that alternative aggregates can make to total consumption needs to be treated with caution.
9. This makes the assumption that aggregate recycling should continue by relying on conventional dry processing systems. However, there is the alternative of new more sophisticated processing plant systems, which involve washing the waste. These plants can produce a range of high quality products that are able to substitute for and compete directly with all grades of local land won primary aggregates in a variety of building uses and applications.
10. Further key benefits of such systems are that they enable:
  - the recovery of sand from C, D & E wastes, which is not possible with conventional systems. 40% of the product from the proposed new wash facility at Dix Pit is anticipated to be recycled into two different grades of sand. If more of these wash facilities were available distributed across the County, the distances involved in transporting soft sand (only available at two locations in the County as a primary source) could be reduced.
  - the manufacture of high quality Type 1 aggregate, which is not available as a locally won material, and has to be imported by road and rail from Leicester and Frome, as acknowledged at paragraph 2.5 of the OMCS. This would be possible, because the plant would be processing waste from sites where Type 1 has been used in previous development of the site, or for example, where concrete has been removed from former structures – local aggregate and cement combined provide the strength required to meet the Type 1 specification.
  - the manufacture even of the residual silts and clay fines into useable products such as in brick manufacture, and as material for landfill engineering and cover.
11. The County Council should therefore be actively encouraging the installation of such systems through Policy M1. Not only would this enable recycled aggregate to substitute directly for virgin aggregates, with all the benefits that brings for the environment, but it would also

promote healthy competition and remove the current monopoly of the minerals industry, which is acting as an obstacle to the use of more high quality recycled aggregate.

**Figure 4**

12. There are a some inaccuracies on the diagram at Figure 4 on page 12 of the OMCS which shows active secondary and recycled aggregate facilities:

- Worton Farm and New Wintles Farm are identified as temporary facilities, but they both now have permanent permissions.
- The permission for Wicklesham has expired and it is not an operational site, so should not be shown.

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31 October 2011