Oxfordshire Minerals and Waste Local Plan: Core Strategy Consultation Draft February 2014

Response Form

Part 1 – Your Name and Contact Details

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Signature:		Date:	03/04/2014

Data protection: Please be aware that responses cannot be treated as confidential. All responses will be made available for public inspection and may be included in published reports. They will be handled in accordance with the Data Protection Act 1998 and kept for at least three years after the Minerals and Waste Local Plan: Core Strategy is adopted.

Part 2 – Your Views on the Draft Plan

2(a) Please state which section of the draft plan you are commenting on *(i.e policy, paragraph, figure or table number)*.
If you are commenting on a supporting document, please state which one.

Paragraph 3.7 c)

2(b) Please insert your comments on this section of the document. Please state any changes you think should be made and give your reasons.

The Waste Planning Vision states: “Waste management facilities will be distributed across the county, with larger scale and specialist facilities being located at or close to large towns, …”. The text should be amended to include reference also specifically to the city of Oxford.

The reasons for this are to avoid any ambiguity and/or inconsistency between the vision and the objectives of the plan. Oxford is technically not a town, but a city, and as drafted the vision is not clear that waste management facilities should be located at or close to this key location of development (see paragraph 2.4) and largest centre of waste arising (see paragraph 5.40). As such the vision could be construed as being inconsistent with Waste Planning Objective iv (at page 30), which seeks to provide for waste to be managed as close as possible to where it arises.

Continue on additional sheets if necessary. Please use a separate sheet for each section of the plan or supporting document you wish to comment on.

2(a) Please state which section of the draft plan you are commenting on *(i.e policy, paragraph, figure or table number)*.
If you are commenting on a supporting document, please state which one.

Paragraph 3.8 ix.

2(b) Please insert your comments on this section of the document. Please state any changes you think should be made and give your reasons.

This Waste Planning Objective, which seeks to avoid the permanent loss of green field land when making provision for sites for waste management facilities, is based on an unrealistic assumption and is inconsistent with overarching Government policy in Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10). It should be amended to say rather that priority should be given to the use of previously developed land, (and so also be more inline with the equivalent Waste Planning Objective (vi.) of the previous version of the plan).

PPS10 states that a broad range of locations should be considered for waste management facilities (paragraph 20). This does not exclude greenfield sites. Furthermore whilst PPS10 requires that priority should be given to the re-use of previously developed land (paragraph 21 (ii)), the companion guide to PPS10 explains (at paragraph 7.33) that this is to ensure that good use is made of suitable brownfield sites, and avoid turning unnecessarily to greenfield sites. Obviously it may be necessary to use a greenfield site where there are insufficient suitable brownfield sites to meet the need.

In addition the countryside is likely to represent the most appropriate location for certain activities, for example those, which require a large area and to be some distance from sensitive receptors, owing to the effects of potential disturbance or emissions from the activities.

The best starting point for an analysis of the soundness of a plan objective must be to look at actual practice and likely outcomes.

This reveals that of the existing waste management facilities that have been approved as a permanent permission in the last 20 years only about a third would have met the definition of previously developed land in the NPPF, which excludes land that is or has been occupied by agricultural or forestry buildings and land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration had been made through development control purposes. Therefore the significant majority of new waste management provision is in fact already being made on greenfield sites. Paragraph 2.45 of the plan confirms that it can be difficult to find suitable sites within or close to centres of population and many waste facilities are located in rural areas.

In addition, with the exception of 2 sites on former MOD land, all <u>new</u> sites nominated to be included in the Council's proposed site allocations document for waste recycling/recovery are on greenfield sites. This reflects the lack of available non greenfield sites for waste management purposes, due to the considerable constraints on development generally in the County and the preference for use of any available previously developed land for what are perceived to be more pressing other uses. Therefore the likely outcome is that this objective is not achievable.

2(a) Please state which section of the draft plan you are commenting on *(i.e policy, paragraph, figure or table number)*.
If you are commenting on a supporting document, please state which one.

Policy M1

2(b) Please insert your comments on this section of the document. Please state any changes you think should be made and give your reasons.

The policy does not set a target for the supply of recycled and secondary aggregates, and is therefore contrary to the National Planning Policy Framework (NPPF), which (fourth bullet point of paragraph 145) requires mineral planning authorities to take account of published National and Sub National Guidelines on future provision and use as a guideline when planning for the future demand for and supply of aggregates. The Government's Guidance on the Managed Aggregate Supply System published in October 2012 also confirms at paragraph 15 that the guidelines are a material consideration when determining the soundness of mineral plans.

The most recent Guidelines for 2005-2010 indicate that Oxfordshire should be providing for a supply of at least 926,000 tonnes of alternative aggregates per year (calculated on the basis of the equivalent percentage apportionment found to be appropriate for the county for this type of aggregate as examined though the former South East Plan process).

The supporting text to the policy (paragraph 4.6) states that the previous version of the plan included a policy target for recycled and secondary aggregate facility provision of 0.9 million tonnes per year; that the target was from the now revoked South East Plan; that it is now more appropriate for policy M1 not to set a specific target as this could be misconstrued as setting a maximum level to be achieved, rather to seek to maximise the contribution to aggregate supply from recycled and secondary aggregate sources; and that policy M1 is a positive policy to enable facilities to be provided in order to achieve this.

We would submit that this is an inaccurate representation of the previous position. The target was for supply, rather than facilities with that level of capacity, and it was clearly a minimum target.

In order to comply with Government Guidance and to provide some certainty about future provision of aggregates, policy M1 should now again provide a minimum target for the supply of recycled and secondary aggregate. This is important to demonstrate the assessment that has been made of the contribution that recycled and secondary aggregate can make to the overall supply of aggregates, having regard to the overall objective to minimise the amount of primary extraction, as required by the Government's Guidance on the Managed Aggregate Supply System (paragraph 11).

Also, if the aim is as stated, to maximise the contribution to aggregate supply from recycled and secondary aggregate sources, it is not sufficient to rely on the targets for construction, demolition and excavation (CDE) waste as suggested at

paragraph 4.7 of the supporting text to policy M1, because recycled aggregate is only one component of the materials that can be recovered from this waste stream, and it may not encompass secondary aggregate.

In addition there should be no confusion between provision of recycling capacity and supply, which are two different things. The difference between potential site capacity and actual recycling levels can vary significantly, depending on a number of factors. This is because it is unlikely that the facilities would for a variety of reasons be operating to full capacity at any given time. Direct experience in the industry, and research of the position with local sites, demonstrates that the difference between potential site capacity and actual recycling levels is about 30%.

Nevertheless and more importantly if the aim is to maximise the contribution to aggregate supply from alternative sources, then policy M1 needs to make specific provision for aggregate recycling systems that produce high quality recycled aggregate that is able to substitute properly for primary aggregate. The Government's Guidance on the Managed Aggregate Supply System confirms (paragraph 13) that it is necessary to ensure that the quality of the aggregate is appropriate, and that Mineral Planning Authorities should plan accordingly.

Conventional dry processing of CDE waste both at building and road development sites, and at fixed (transfer) locations using mobile mechanical screens and crushers can generally only produce recycled materials suitable for lower grade uses, and there is a common misconception that this is all that CDE waste can achieve, which we fear is being carried through to the plan.

By way of example, there was a comment on the previous plan that "secondary and recycled aggregates cannot be seen as a substitute to primary aggregates as only 25% of secondary aggregates are deemed appropriate as a substitute". The Council's response was to say they partly agreed that they largely have different end uses. In addition the background paper: Provision for Aggregates Supply made the statement at paragraph 7.8 that: "The aggregates industry consider that high rates of recovery of aggregate material from CDE wastes are already being achieved, so there may be limited scope for increased supply and use of recycled aggregates from this source."

It seems therefore that the Council is not anticipating any alternative or increased potential to re-use CDE waste. However, such an approach would be missing an important opportunity, as there is an as yet largely under-utilised potential to re-use CDE waste in higher value applications, and which can be achieved with new more sophisticated static processing plant systems, such as the Sheehans Aggregates Plant at Dix Pit.

The processing system is very similar to a mineral processing plant, but with added functions, and which puts the waste through a wash, screening and grading process. Due to the washing and grading process it is possible to manufacture recycled aggregate to a quality assured level that substitutes for and competes directly with land won minerals across the spectrum of building applications.

The Sheehans Aggregates Plant is supplying a range of products, including sized and graded aggregate, coarse and fine sand, and ballast, which is equivalent to that which would be offered by a local quarry. Recently, sand for the emergency

sand bags required for flood relief in the Thames Valley was sourced from the site, as a replacement facility for the local quarries that were flooded and not able to provide the material.

Recycled aggregate is not yet commonly accepted for use in the manufacture of concrete and concrete products, no doubt given its usual lower grade quality, as produced through conventional dry systems. However, extensive concrete trials have been conducted at the Sheehans Aggregates Plant site, including construction of holding bay walls, power floated floor and external paving, using 100% recycled aggregate. The trials have proven that the washed recycled aggregate, both fine and coarse, passes the test for structural concrete, achieving BS EN 1260 certification. A copy of the relevant grading results and a report of the assessment of the potential suitability of the recycled aggregate for use within concrete are attached. The concrete product has a 93% sustainable content by volume (the cement content making up the remainder).

A further significant benefit in terms of replacing higher specification aggregates is that the plant can produce Type 1 materials, which are not available locally as a land won mineral (as confirmed at paragraph 4.13 of the plan), and it therefore also helps reduce miles travelled in importing these minerals to the county from Somerset and Leicestershire.

Finally, as the system cleans the dirt and fines out through the washing process (and even creates a further useable form of material from it through a filter press), significantly higher proportions of CDE waste can be recovered, which would not otherwise be suitable for dry processing, (because it contains too much dirt and fines, which clog up the equipment). In fact since installing and operating the plant in 2012 it has become apparent that an even wider range of waste materials with much higher soil content can be processed than was previously thought possible. The plant can also be operated in all weathers, which is not the case with dry aggregate recycling, so this enables a steady throughput of material. The plant therefore not only maximises the contribution to aggregate supply from recycled and secondary aggregate sources, it also maximises the recovery of CDE waste.

Notably the Review and Update of the (May 2012) Waste Needs Assessment background document confirms at paragraph 7.2 of the Construction, Demolition and Excavation Waste Chapter that these types of systems, i.e. ones that clean up residues and generate product to be utilised as a suitable replacement for primary materials, should be the focus for further improvement in recovery of demolition waste. The document furthermore identifies in the following paragraph 7.3 that excavation waste is the most problematic stream to divert from landfill, because of clay type materials that are not amenable to recycling through currently adopted processing methods due to its cohesive properties, and that this material requires disposal to landfill if alternative routes are not available. New technology such as the Sheehans Aggregates Plant offers such an alternative route, and should be encouraged though planning policy by, as suggested at the end of paragraph 7.3 of the background document, ensuring the availability of new sites or expansion of existing capacity.

Such new facilities require significant commitment and investment to install, and it is not easy to find suitable sites, because the activity is regarded as uneighbourly – akin to a mineral processing plant - and therefore inappropriate in developed areas.

In these circumstances, given the opportunity that they represent to produce high quality aggregate recycling and to increase recovery of waste, there should be specific encouragement and guidance as to appropriate locations, which may need to entail some conditional relaxation of the presumption against development in the countryside, for this form of recycling.

These changes to the plan are necessary to fulfil the Minerals Planning Vision that there will be a sufficient supply of aggregate materials available to meet the development needs of the county from secondary and recycled aggregate materials (and other sources), and to achieve the first Minerals Planning Objective which is to encourage the maximum practical recovery of aggregate from secondary and recycled materials for use in place of primary aggregates. Specific provision for higher quality CDE recycling systems would also drive delivery of Waste Planning Objective iii, which is concerned with supporting initiatives of this kind.

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If you are commenting on a supporting document, please state which one.

Policy W4

2(b) Please insert your comments on this section of the document. Please state any changes you think should be made and give your reasons.

The policy does not give any indication of the amount of new waste management capacity that will be required to meet the targets identified in policy W3 and is therefore not consistent with Government policy in Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10).

PPS10 requires (paragraph 4) that there should be planned provision of new capacity based on robust analysis of available data and information. Without this information the plan is failing at its essential function, which is to plan for and provide some certainty about future provision. There is also therefore no baseline for monitoring the effectiveness of the plan's policies in delivering the required waste management infrastructure, and no strategic assessment for determining how much land should be identified in the subsequent site allocations development plan document.

Relying on the Annual Monitoring Report (AMR) to identify capacity requirements is not appropriate. The purpose of the AMR is to assess the performance of the plan policies and it cannot do this unless a baseline position has been set against which to monitor. Furthermore there is no opportunity to challenge the findings of the AMR or to have it examined publicly, so the capacity identified in it could be based on erroneous principles, which would go unchecked. The plan on the other hand must be based on a robust and credible evidence base that has been examined and found to be sound.

Just by way of example the most recent AMR from 2013 identifies in Table 4.8 two landfill sites: City Farm, Eynsham and Childrey Quarry, as being granted additional capacity. However, this is not the case. Both applications were for extensions of time to complete development already granted and no additional capacity was involved. Similar cases have occurred in previous years where permissions have been granted revising the terms or structure of existing waste management sites that have involved no additional throughput, but where the AMR has credited new capacity to the site.

In addition with regard to existing capacity the 2013 AMR simply repeats the tables from the Oxfordshire Waste Needs Assessment of May 2012, which are now out of date. The contents of this document, including some of the assumptions about existing capacity, were strongly challenged in responses to the previous version of the plan. As confirmed in the report (paragraph 19) to the Full Council meeting of 9 July 2013 the Council had been given specialist waste expert advice that there were some deficiencies in it that could affect the soundness of the Core Strategy. Whilst the Waste Needs Assessment has been partially reviewed and updated, this has focussed on an analysis of the quantities of waste to be managed and proposed recycling/ recovery targets. The review has not addressed existing

available capacity in any depth, which must be done to provide the plan with a credible and robust evidence base.

Furthermore, care should be taken to ensure that the new recycling capacity requirements that need to be identified provide for a capacity that is greater than the recycling target. This is because delivering the proposed levels of recycling would not be achieved by providing for new capacity equivalent to or close to the target requirement, because it is unlikely that the facilities would for a variety of reasons be operating to full capacity at any given time. Direct experience in the industry, and research of the position with local sites, demonstrates that the difference between potential site capacity and actual recycling levels is about 30%.

This contingency level is required for the proposed provision to be in accordance with the requirements of PPS10 (paragraph 16) that the core strategy of a waste planning authority should ensure sufficient opportunities for the provision of waste management facilities.

2(a) Please state which section of the draft plan you are commenting on *(i.e policy, paragraph, figure or table number)*.
If you are commenting on a supporting document, please state which one.

Policy W5

2(b) Please insert your comments on this section of the document. Please state any changes you think should be made and give your reasons.

The broad area which policy W5 identifies for the location of strategic facilities as shown in the key diagram (figure 16) does not accord with Government policy in Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10) and introduces internal inconsistences in the plan. It should be redrawn to provide greater flexibility in providing strategic waste facilities at sustainable locations.

The broad area is shown as an elongated shape centred on Oxford stretching north/south through the county to include Bicester in the north and Abingdon and Didcot in the south. With regard to the east/west axis the area is tightly drawn around the limits of Oxford City.

Paragraph 5.40 of the plan states that the opportunity should be taken to rectify the imbalance that Oxford is the largest centre of waste arising and has very few waste facilities, and that the broad area of search offers flexibility in meeting Oxford's needs in the event that suitable sites cannot be found in or around the City. The paragraph also indicates that strategic facilities would be those handling 50,000 tonnes of waste per annum.

Paragraph 5.48 of the plan confirms that there are no permanent CDE waste recycling facilities in or close to Oxford and that provision should be made for such facilities if suitable sites can be identified. Responses on previous versions of the plan have consistently stressed that it is unrealistic to promote sites for CDE waste recycling in Oxford, in light of the fact that it has repeatedly been demonstrated through site searches and work on site availability that no sites are likely to be forthcoming in Oxford.

In these circumstances the broad area should provide more flexibility for the location of new strategic CDE waste recycling facilities (i.e. those with a throughput of more than 50,000 tpa). As currently drafted, and because the City is simply not feasible, such sites would need to be at the northern/southern end of the area (i.e. Bicester and Didcot), and substantially distanced from the source of waste.

The area as drawn also does not include all of the Oxford area (Table 6) or the planned growth area, both as identified on figure 15, so as currently drafted policy W5 does not provide for waste facilities, intended to serve this key location for development and largest centre of waste arising, which is only expected to grow (paragraphs 2.4, 5.4 and 5.40 of the plan), to be located at the source of waste, still less close to it.

Policy W5 is therefore directly inconsistent with the guidance in PPS10, which states that a key objective is to deliver planning strategies that provide a framework

in which communities take more responsibility for their own waste, and with the following other aspects of the plan:

- The Waste Planning Vision, which states that waste management facilities will be located at or close to large towns, particularly the growth areas and close to main transport links, minimising the distance waste needs to be moved;
- Waste Planning Objective iv, which seeks to provide for waste to be managed as close as possible to where it arises; and
- Policy C10 which requires waste management and aggregate recycling facilities to be in locations that minimise the road distance from the main source of waste using roads suitable for lorries.

The need to be close to the source if waste is particularly important in relation to CDE waste recycling. The best means by which recycled material can displace use of primary sources is by ensuring that it is more cost effective. Since transportation of both sourcing the waste and delivering the recycled product is the largest element of the economics of the activity, a site placed too far from the market as well, which in this case would be Oxford, too, would simply not be viable.

Notably as currently drafted the broad area excludes existing operational strategic CDE waste recycling sites, for which Oxford is already their principal source of waste. These are:

- New Wintles Farm, Eynsham (to the west of Oxford); and
- The Sheehans Aggregate Plant, Dix Pit, to the south west of Oxford.

Furthermore there are currently no CDE waste recycling sites close to the eastern side of Oxford, and one in this area would also be well located to provide for Thame.

There is potential for sites closer to Oxford, both to the west and to the east, and the proposed strategic area should be revised to include a broadly concentric area around Oxford with a radius of about 15km from the centre. This would be consistent with the area of search used in the Council's site assessment report of August 2007, which was carried out to identify sites for development of strategic waste management facilities, and would provide the necessary flexibility to meet Oxford's needs in a sustainable manner. Facilities within this revised area would also meet the criteria as set out at paragraph 5.41 of the plan, i.e. still to be within the 5km distance of the built up area – or in this case the edge of the Oxford area and planned growth area as defined on figure 15, and with good access to the Oxfordshire lorry network, in particular the M40.

2(a) Please state which section of the draft plan you are commenting on *(i.e policy, paragraph, figure or table number)*.
If you are commenting on a supporting document, please state which one.

Policy W6

2(b) Please insert your comments on this section of the document. Please state any changes you think should be made and give your reasons.

The terms of this policy as currently drafted introduce internal inconsistences in the plan. It states that priority will be given to siting waste management facilities on land that involves (inter alia) existing agricultural buildings and their curtilages. The supporting text (paragraph 5.52) further states that land that is previously developed includes redundant farm buildings. This is not consistent with the definition of previously developed land given in the National Planning Policy Framework (NPPF), which specifically excludes land that is or has been occupied by agricultural or forestry buildings, and is therefore greenfield land. It follows then that there is an internal inconsistency in the policy with its requirement in the third paragraph that waste management facilities should not be permitted on greenfield land (unless there is an overriding need that cannot be met in any other way). As such the policy is also inconsistent with Waste Planning Objective iv, which seeks to avoid the permanent loss of green field land when making provision for sites for waste management facilities. Amendments should therefore be made to the policy to remove the third paragraph. The priority for previously developed would remain, and in this manner the policy would be made consistent with Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10), which does not exclude the use of greenfield sites. (See also the comments in relation to Waste Planning Objective iv).

Furthermore, for the reasons as set out in more detail in the comments on policy M1, policy W6 should be amended to give sufficient flexibility to allow for high quality aggregate recycling facilities, which require a site similar in nature and size to a mineral processing plant and its stocking area, and therefore have different characteristics to other types of waste facility. As it is impractical to site such facilities in developed areas, due to the lack of available space, proximity of sensitive receptors, and preference for use of any land that becomes available for alternative uses, locational criteria are necessary to provide for the siting of such facilities, which should include some flexibility in relation to the countryside.

These changes to the policy are necessary to fulfil the Minerals Planning Vision that there will be a sufficient supply of aggregate materials available to meet the development needs of the county from secondary and recycled aggregate materials (and other sources), and to achieve the first Minerals Planning Objective which is to encourage the maximum practical recovery of aggregate from secondary and recycled materials for use in place of primary aggregates. Specific provision for higher quality CDE recycling systems would also drive delivery of Waste Planning Objective iii, which is concerned with supporting initiatives of this kind.

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Policy W11

2(b) Please insert your comments on this section of the document. Please state any changes you think should be made and give your reasons.

The policy should also safeguard sites in use for waste management purposes, even if the planning permission does not endure for the entire plan period (i.e. to 2030).

The effect of this policy is that Sheehans Aggregates Plant at Dix Pit which is an extremely valuable facility, both for helping to maximise the contribution to aggregate supply from recycled and secondary aggregate sources, and to maximise the recovery of construction, demolition and excavation (CDE) waste, as set out in more detail under separate comments relating to policy M1, would not be safeguarded, despite the fact that it has a long term permission, which does not expire until the end of 2029 – just one year short of the plan period.

Para 2.44 of the plan states that sites already in longer term waste management use are valuable but can be vulnerable to pressures for other forms of development. This is essentially the reason that they need to be safeguarded, and the Sheehans Aggregates Plant would clearly fall within this category of site.

The National Planning Policy Framework (NPPF) states (paragraph 143) that existing, planned and potential sites for concrete manufacture and the handling, processing and distribution of substitute, recycled and secondary aggregate should be safeguarded in local plans. The phrase "existing, planned and potential" is wide. It does not limit the type of existing site to only one that has a permanent permission, or for the period of the plan. It even includes sites without planning permission, both ones where there is some certainty of the site coming forward (planned) and others where there is less certainty (potential).

The Sheehans Aggregates Plant is not only one of those sites that the NPPF says should be safeguarded for its capacity to produce recycled and secondary aggregate, it is also a site that has real potential to contribute to the manufacture of concrete and concrete products using the washed recycled aggregate – see comments relating to policy M1. It should therefore be safeguarded for its value both as a waste management site and in its capacity as a highly sustainable minerals site.

We would submit that the statement at paragraph 5.97 of the supporting text to policy W11, which says: “It would not be appropriate to safeguard temporary sites where the permission will expire before the end of the plan period, and a decision on the possible continuation of such use should only be taken after consideration of all the relevant planning considerations at the time.” is somewhat misplaced. Safeguarding is not at all relevant to the planning merits of a site, or to the issue of

whether a planning permission should be granted for continuation of a site. The same planning considerations must apply to any application for continuation of a temporary permission that expires after the end of the plan period, as would apply to a site where the permission expires before the end of the plan period. It cannot be the case, as seems to be implied that a temporary permission, which expires say in 2031, a year after the end of the plan period is effectively made permanent or given the advantage of more permanence through the fact that it has been safeguarded.

The purposes of safeguarding are to ensure that land already in waste management use is not used or developed for other purposes without good reason, and to monitor land use activity in the vicinity of waste management facilities to guard against the establishment of non-conforming uses with the objective of securing the long-term use of sufficient land for Oxfordshire's future waste needs.

These purposes apply equally to temporary uses. In the first instance it would not be appropriate for other land uses to replace a temporary waste management facility that might still have some years to run, as this would only add to the county's burden by needing then to find replacement capacity. Secondly, land use activity in the vicinity of temporary waste management facilities should equally be monitored to ensure that non-conforming interests are not permitted. This is necessary both to safeguard against harm to (new) neighbouring land uses from the potential effects of waste sites (even if temporarily), but also to safeguard against an additional issue arising in the planning balance that was not previously the case, and which could unfairly cause there to be a reason for not approving a continuation of the site, where the site may have otherwise been a suitable option.

There is a requirement in Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10) that in determining planning applications, all planning authorities should consider the likely impact of proposed, non-waste related, development on existing waste management facilities. There is no indication that “existing” does not include sites with a only temporary permission.

It is common practice to consider the approach taken by other authorities, and Buckinghamshire County Council clearly considered that there was a convincing case for safeguarding existing waste sites in their Minerals and Waste Core Strategy, without making any distinction between whether they are permanent or temporary sites (policy CS14). The inspector in approving the Core Strategy also considered that this approach was justified.

We would add that it is a not a case of suggesting that sites with temporary permission should be safeguarded indefinitely, or even for the life of the plan. If necessary the policy can say that they are safeguarded for the life of the permission. This enables the identified purposes of the policy to be equally applied to them (to comply with Government policy), and due consideration can then still be given to the planning issues that would normally be taken into account when extending or making permanent an activity on expiry of a temporary planning permission, without having unnecessarily added to them.

These changes are furthermore necessary to remove an existing inconsistency

between policy W11 and Minerals Planning Objective xi, which aims to safeguard important facilities for the production of secondary and recycled aggregate and the manufacture of concrete and concrete products.

Please return your completed form(s) by Monday 7th April 2014

by email to: **mineralsandwasteplanconsultation@oxfordshire.gov.uk**

or by post to: **Minerals and Waste Draft Plan Consultation**
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