

7B / Oxfordshire County Council (7344)**DRAFT SOUTH EAST PLAN – EXAMINATION IN PUBLIC
Sub-matter 7B - Minerals****Statement of Oxfordshire County Council****7B.1 Is the proposed apportionment of secondary and recycled materials fair and appropriate (Policy M2)?**

1. Oxfordshire County Council supports the principle of including a sub-regional apportionment of secondary and recycled aggregate provision in Policy M2, but objects to the proposed apportionment of 0.9 mtpa for Oxfordshire. We believe the apportionment methodology gives too little weight to arisings of construction and demolition waste and distribution of population, urban areas and future development and consequently results in an unjustifiably high apportionment for Oxfordshire. The apportionment is therefore neither fair nor appropriate. This is shown in the following analysis which, in particular, demonstrates that this level of supply of secondary and recycled aggregates is not achievable from the materials available within Oxfordshire and is therefore not realistic.
2. The apportionment figure of 0.9 mtpa for Oxfordshire is 12% of the regional target for 2016 of 7.7 mtpa. The report on Methodology for Apportionment of Recycled Aggregates in the South East Region, Land Use Consultants (LUC) November 2005, (Document Mr1) shows Oxfordshire accounting for only:
 - 7.6% of projected population in 2016 (Table 2.3);
 - 5.8% of C&D waste managed in 2005 (Table 2.4);
 - 7.9% of existing / planned C&D recycling capacity (Table 2.5).
3. The LUC report (Table 2.5) uses an existing / planned C&D recycling capacity estimate for 2016 for Oxfordshire of 0.35 mtpa. More recent survey work by the County Council shows this figure has changed little and now stands at 0.386 mtpa.
4. The Draft South East Plan adopts the assumption made in the report Update of the Model for Future Waste Management Capacity Needs in the South East, ERM September 2005, (Document Wr1) that the quantity of C&D waste managed in the region will remain level throughout the plan period. The total forecast C&D waste managed in Oxfordshire in 2016 is 0.755 mt (LUC report, Table 2.4 and paragraph 2.14 – Document Mr1). The proposed Oxfordshire apportionment of 0.9 mtpa exceeds this by 0.145 mt (19%).
5. The LUC report (paragraph 2.13) states the C&D waste management figures used are based on the regional estimate of C&D arisings from

the 2001 Symonds Survey (Survey of Arisings and Use of Construction and Demolition Waste in England and Wales in 2001, ODPM October 2002). That survey report shows (Table A9.1) that of a total of 13.444 mt of CDEW arising in the South East in 2001, 4898 mt (36%) was recycled as aggregate, and a further 0.445 mt (3%) was hard C&D waste that could potentially be recycled as aggregate. This gives a maximum of 39% of total arisings that could be recycled as aggregate. Applying this percentage to the Oxfordshire figure for total forecast C&D waste managed in 2016 (0.755 mt) gives a maximum of 0.294 mtpa that could be recycled as aggregate. This is only 33% of the proposed apportionment for Oxfordshire of 0.9 mtpa.

6. Using the equivalent figures from the 2003 Survey (Survey of Arisings and Use of Construction, Demolition and Excavation Waste in England in 2001, ODPM October 2004) (Table A8.1), gives the same result.
7. The Policy M2 target for increased use of secondary and recycled materials in the South East of at least 7.7 mtpa by 2016 includes secondary materials and road planings as well as C&D waste. The base figure of 6.6 mtpa in Policy M2 is made up of:
 - 4.9 mt C&D waste;
 - 0.6 mt secondary materials;
 - 1.1 mt road planings.(Letter from Lester Hicks, ODPM to National Coordinating Group, 28 January 2003.)
8. Even if all of the increase from 6.6 mtpa to 7.7 mtpa is made up by increases in secondary materials and/or road planings rather than C&D waste, secondary materials and road planings will only account for 2.8 mtpa (36% of the 2016 target). If it is assumed that 36% of total secondary and recycled aggregates supply in Oxfordshire in 2016 will comprise secondary materials and road planings, then based on the estimated maximum of 0.294 mtpa of C&D waste that could be recycled as aggregate in Oxfordshire (paragraph 5 above), the total supply of secondary and recycled aggregates in Oxfordshire at 2016 would be 0.459 mtpa. This is only 51% of the proposed apportionment for Oxfordshire of 0.9 mtpa.
9. This probably overestimates the supply of aggregates from C&D waste, but it also probably underestimates the supply of secondary aggregates since the Didcot A Power Station is a major supplier of ash used as secondary aggregate. The 2003 Aggregates Monitoring Survey recorded 0.201 mt of power station ash supplied for aggregate use in Oxfordshire in 2003, accounting for almost all secondary aggregates supply in the county. Other sources of secondary aggregates are limited in Oxfordshire; unlike some other south east counties, it does not have sources of materials like incinerator bottom ash and glass for aggregate use either existing or planned.

10. Over the period 2001 – 2005 Didcot A Power Station produced between 0.260 and 0.515 mtpa of ash, of which between 0.145 and 0.230 mtpa was sold for aggregate use; the remainder was disposed to local landfill. The ash reprocessing plant at Didcot A can produce 0.125 mtpa; other ash is sold in unprocessed form for bulk construction fill but demand for this is limited and variable. This position will not change unless there is significant investment in further ash reprocessing plant at the power station.
11. The proposed apportionment for Oxfordshire of 0.9 mtpa in 2016 could theoretically be achieved if:
- a) the amount of C&D waste recycled as aggregate is the maximum level of 0.294 mtpa (paragraph 5 above);
 - b) Didcot A Power Station operates at the maximum annual level of recent years and all the ash is used as aggregate (0.515 mtpa); and
 - c) the level of supply of road planings in Oxfordshire is assumed to be 0.14 mtpa. (This assumes that regional supply of road planings is 2.8 mtpa x 65% [from paragraphs 7 and 8 above], of which 7.6% is from Oxfordshire [proportion of projected south east population – paragraph 2 above]).
- This would give a total supply of secondary and recycled aggregates in Oxfordshire at 2016 of 0.949 mtpa. However, this is based on a set of assumptions that is very unlikely to be realised and is therefore not a realistic figure.
12. It is clear that a level of supply of secondary and recycled aggregates in Oxfordshire of 0.9 mtpa could not be achieved in 2016 solely from sources of material arising in the county. There is insufficient local material available to achieve this. This level of supply could only be achieved by local sources of material being supplemented by materials imported from other counties to processing plants in Oxfordshire. This would increase the distance that materials would have to be moved, almost certainly by road given the low value of secondary and recycled materials. This would be contrary to sustainability objectives for the region. In any case, in practice the low value of this material means it is unlikely that such inter-county movement of secondary and recycled aggregate materials would be economic on any significant scale. It is much more likely that the materials would be used locally, in their county of origin, and it is likely it would even be cheaper to dispose of materials locally to landfill or to exempt sites than to transport them to processing plants in Oxfordshire.
13. The County Council believes that to be fair and appropriate and also realistic the sub-regional apportionment of secondary and recycled aggregates supply should be largely based on the distribution of available materials and population in the south east. Applying the Oxfordshire proportions in paragraph 2 above would give an apportionment for Oxfordshire between 0.447 mtpa (5.8%) and 0.585 mtpa (7.6%). An apportionment based on availability of all sources of

secondary and recycled materials would give a higher figure for Oxfordshire because of the presence of Didcot A Power Station in the county. Based on the figures given above, an Oxfordshire apportionment of 0.664 mtpa (8.6%) (comprising 0.294 C&D waste; 0.14 road planings; 0.23 secondary aggregates) might be achievable as an absolute maximum. However, it is very questionable whether this level could be achieved in practice.

14. The County Council also believes that MPAs should be given the flexibility to consider their apportionments for primary aggregates and alternative aggregates together. A single apportionment for aggregates provision should be given for each MPA and it should then be for individual MPAs to determine the appropriate subdivision for their area between primary aggregates and secondary / recycled aggregates, through their minerals development frameworks. It would thus be possible to set off any increase in provision from secondary / recycled material sources with a corresponding decrease in primary aggregate provision. This would provide an incentive to increase local supply of secondary / recycled aggregates. It may not yet be practical to do this due to poor data on secondary / recycled aggregates at MPA level, but the South East Plan should signal a move towards such a system of planning for aggregates provision.