Oxfordshire Minerals and Waste Local Plan
Part 1 – Core Strategy

Submission Document

Topic Paper

Waste Site Safeguarding

April 2016
General Background to Topic Papers

The Minerals and Waste Local Plan: Part 1 – Core Strategy (the Core Strategy) was submitted to the Secretary of State on 30 December 2015 for examination by a government appointed Inspector. The Core Strategy is Part 1 of the new Oxfordshire Minerals and Waste Local Plan. It provides the planning strategies and policies for the development that will be needed for the supply of minerals and management of waste in Oxfordshire over the period to 2031. This new Plan will replace the existing Oxfordshire Minerals and Waste Local Plan which was adopted in 1996.

Further information on the Plan and the background to its preparation can be found in other documents published on the County Council website at: https://www.oxfordshire.gov.uk/cms/content/minerals-and-waste-core-strategy

A number of Topic Papers (previously termed Background Papers) were first published to support consultation on draft Minerals and Waste Planning Strategies in September 2011. Some of these were revised and further papers were prepared to support a Proposed Submission Draft Minerals and Waste Core Strategy in May 2012, which was then submitted for examination in October 2012 but was subsequently withdrawn, in July 2013. These papers include baseline data that has informed the development of policies and explanation of how relevant parts of the plan have been developed.

Some of the Topic Papers are now being further updated, and some new Topic Papers introduced, to assist in the examination of the Core Strategy. Their purpose remains the same – to provide background data and information to show how specific parts of the plan were developed up to publication of the Proposed Submission Document in August 2015. In some cases they also include relevant information that has become available since the Core Strategy was published.

This paper has been prepared to support the submission of the Core Strategy for examination.
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1 Introduction

1.1 This paper explains what is meant by ‘safeguarding’ in the context of waste planning. The issue is of relevance to those operating waste management facilities, potential future users of such sites and anyone who believes they are affected in some way by an existing waste management facility.

1.2 A draft of this Topic Paper was first produced in August 2013 as a discussion paper, setting out issues and options for developing a safeguarding policy in the Core Strategy. It provided a basis for selected consultation with the Oxfordshire District Councils and local waste operators.

1.3 A safeguarding policy was first introduced in the Waste Planning Strategy Consultation Draft (September 2011). Comments on the draft policy indicated that further work was required in the development of a policy and feedback from the District Councils and operators on the earlier draft of this Topic Paper informed changes to the safeguarding policy introduced in the Draft Minerals and Waste Local Plan: Core Strategy (February 2014). The various changes made in developing the policy now included in the submitted Core Strategy (2015) are explained in section 4 of this paper.

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1 The Draft of the Topic Paper was not published for wider comment, but is available on request.
2 What is Safeguarding?

2.1 Land can be safeguarded against future alternative forms of development through policy in a Local Plan. Safeguarding allows consideration to be given to the benefit of retaining land for a particular purpose when proposals for alternative development are made and ensures that this is weighed as a material consideration. It can play a key role in helping to deliver sustainable development.

2.2 Safeguarding is already used to protect facilities that have particular locational requirements and are not easily delivered or replaced. Minerals, for example, can only be worked from areas where they occur and the safeguarding of workable minerals resources has been an acknowledged and important part of minerals planning for some time². Safeguarding is also being used to control future uses within the corridor of the planned high speed rail link between London and the West Midlands³. Safeguarding can therefore apply to land used for a specific purpose, to land close to such land, or both.

2.3 The safeguarding of waste infrastructure is becoming increasingly used in the development planning process⁴ as local planning authorities seek to make provision for the diverse range of waste management facilities that are needed to help manage waste in accordance with the waste hierarchy⁵. Sites suitable for waste development are difficult to find, so it is important to ensure that sites already deemed fit for purpose are not readily lost. Also, that development does not take place on nearby land that might be incompatible with a waste use and, in the longer term, jeopardise its future continuation.

2.4 The safeguarding of sites for future waste management use⁶ would therefore aim to help secure the long-term use of sufficient land for Oxfordshire’s future waste needs. This meets a number of plan objectives, including that which aims for Oxfordshire to be net self-sufficient in meeting most of its waste needs (3.7i); providing for a broad distribution of facilities (3.7v); avoiding the unnecessary loss of green field land (3.7viii). To achieve this it is necessary to:

- Ensure that land already in waste management use is not used or developed for other purposes without good reason;
- Monitor land use activity in the vicinity of waste management facilities to guard against the establishment of non-conforming uses.

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² National Planning Policy Framework (see also section 3 of this paper)
³ www.hs2.org.uk
⁴ Examples include the adopted Hampshire Minerals and Waste Core Strategy and the adopted East Sussex Waste and Minerals Plan
⁵ http://ec.europa.eu/environment/waste/framework/
⁶ Planning Practice Guidance for Waste (ID 28-002-20141016) sets out matters that come within the scope of waste development
3 Existing Policy

National Policy

3.1 Guidance on the safeguarding of facilities for handling, processing and distributing secondary and recycled aggregate – often sourced from construction and demolition waste – is set out in the National Planning Policy Framework (NPPF).

“In preparing Local Plans, local planning authorities should:

Safeguard:

- Existing, planned and potential sites for concrete batching, the manufacture of coated materials, other concrete products and the handling, processing and distribution of substitute, recycled and secondary aggregate material.”

3.2 The National Planning Policy for Waste does not make specific reference to safeguarding. However, it is expected (para 3) that when preparing Waste Local Plans the extent to which the capacity of existing operational facilities would satisfy identified needs should be considered. Also that in the determination of planning applications for non-waste development the likely impact on existing or planned waste management facilities should be considered – with a view to ensuring that neither implementation of the waste hierarchy nor the efficient operation of the facility is prejudiced.

3.3 National Planning Practice Guidance for Waste advises that Local Plans should include clearly defined locations and/or areas of search for waste development, and that to meet European reporting requirements they should show existing and proposed waste management sites.

Regional Policy

3.4 The Regional Spatial Strategy for the South East was revoked by the Secretary of State in March 2013. Its provisions now have no statutory relevance, but issues relating to waste site safeguarding were addressed and tested at public examination. Several of its waste policies made reference to safeguarding (Appendix A).

Local Policy


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7 Para 143 and 146 of the National Planning Policy Framework (March 2012)
9 Such applications would normally be determined by the District Council as local planning authority
10 http://planningguidance.communities.gov.uk/blog/guidance/waste/ID 28-039-20141016
11 The South East Plan (May 2009)
Development of the Waste Site Safeguarding Policy

Waste Planning Consultation Draft (September 2011)

4.1 A policy for the future safeguarding of sites in use for waste management was first introduced in the Waste Planning Consultation Draft (September 2011). This recognised the difficulty of finding suitable sites due to the potential for conflict with a wide range of environmental factors and the high value of development land in Oxfordshire. The suggested approach was as follows:

**Policy W10: Safeguarding**

*Existing and proposed permanent waste management sites will be safeguarded for waste management use. Proposals for other development that would prevent or prejudice the use of a safeguarded site for waste management will not normally be permitted unless either provision for new waste management capacity is made at a suitable alternative location or it can be demonstrated that the site is no longer needed or suitable for waste management use.*

4.2 Three points were made in the responses to the consultation. All raised points of detail: there were no objections to the introduction of a safeguarding policy per se.

- Consideration should be given to safeguarding temporary waste sites;
- It is not clear when the policy may become relevant or to the types of facility that it may apply;
- The policy should allow for alternative uses to be pursued if an owner can demonstrate a waste use is no longer required.

Core Strategy Proposed Submission Document (May 2012)

4.3 Supporting text to policy W10 in the September 2011 Consultation Draft had explained that the sites to be safeguarded would be identified in a future Site Allocations Document and that temporary facilities would not be safeguarded unless they were assessed in that Document to be suitable for permanent (longer term) waste use. Otherwise the policy would apply to all types of facility. At this stage it was considered that no changes to the policy were necessary, and this approach was included in the proposed submission draft of the Minerals and Waste Core Strategy\(^{12}\).

4.4 Some responses to the proposed submission draft continued to argue for the safeguarding of temporary, as well as permanent, sites. This suggested that more consideration was required to policy content.

\(^{12}\) *Oxfordshire Minerals and Waste Core Strategy: Submission Document (Oct 2012)* but withdrawn in July 2013 prior to examination – see agenda item 8 of meeting of full meeting of Oxfordshire County Council 9 July 2013
4.5 In August 2013 the County Council produced a discussion paper to explore broader options for the development of a safeguarding policy. The options were set out in a Topic Paper – Waste Site Safeguarding (v.1 – Preliminary Draft) produced for discussion with the Oxfordshire District Councils and selected local operators (see para 1.2). To aid responses from the District Councils the Topic Paper was discussed at a meeting of the Oxfordshire Planning Policy Officers Group on 20 September 2013.

4.6 The Topic Paper addressed the following issues

- How should safeguarding be introduced?
- What type of facility should be safeguarded?
- What size of facility should be safeguarded?
- Should safeguarding apply to temporary (as well as permanent) facilities?
- Should safeguarding be time-limited?
- How should safeguarding be applied on a day to day basis?

4.7 The following options were considered and set out.

<table>
<thead>
<tr>
<th>Issue</th>
<th>Options</th>
</tr>
</thead>
</table>
| How to introduce safeguarding | 1. Confirm sites for safeguarding in the Core Strategy  
2. Provide criteria for safeguarding in the Core Strategy and identify sites in a later Site Allocations Document |
| Types of facility to be safeguarded | Eight categories of facility were identified, including two for landfill. Reasons were put forward for discounting landfills. No merit was seen in differentiating between the other categories. The County Council (as Waste Disposal Authority) would be consulting separately on proposals for HWRCs. |
| Size of facility to be safeguarded | Thresholds were put forward for classifying the types of facilities identified as either small, medium or large and advantages/disadvantages put forward for excluding small scale facilities from safeguarding. |
| Whether to include temporary as well as permanent facilities. | Advantages and disadvantages for including temporary facilities were explored, with the paper continuing to lean towards them not being included. |
| The time-scale to apply to safeguarded sites | 1. How to deal with any sites expiring within the plan period.  
2. How to deal with sites expiring beyond the plan period.  
3. Whether safeguarding of permanent sites should be 'in perpetuity' or for the plan period only? |
| How to operate (maintain) a safeguarding system | 1. Size of Consultation Zones to be applied.  
2. Definition of site boundaries.  
3. Circumstances in which sites are added to or withdrawn from the safeguarded list. |
4.8 The responses to the consultation are summarised in Appendix B. No objections were raised to the concept of safeguarding and there was a broadly favourable reaction to the approach set out. Several respondents felt that temporary, as well as permanent, facilities should be safeguarded but this view was not unanimous. There was also a suggestion that once safeguarded there should be a presumption that designation would roll forward into the next plan period.

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

4.9 Changes were made to the policy (now W11) as presented in the Core Strategy Consultation Draft. This provided as follows:

*Policy W11: Safeguarding waste management sites*

The following sites are safeguarded for future waste management use:
- Sites already in use for waste management purposes and with planning permission to operate throughout the plan period;
- Sites with planning permission to operate as a waste management facility throughout the plan period but not yet developed for that purpose.

Sites safeguarded for future waste management use will be specified and kept up to date in the Minerals and Waste Annual Monitoring Reports, and will also include:
- Sites with a lawful use for waste management purposes and that are not already identified;
- Sites where planning permission is granted for the operation of a waste management facility throughout the plan period.

Proposals for development that would prevent or prejudice the use of a site safeguarded for waste management will not normally be permitted unless:
- Provision for new waste management capacity is made at a suitable alternative location; or
- It can be demonstrated that the site is no longer needed or suitable for waste management use.

4.10 More detail was added to the policy to help address concerns about lack of clarity as to how it would operate. A blanket safeguarding would apply to existing sites on adoption of the Core Strategy and a commitment made to specify the sites in the Minerals and Waste Annual Monitoring Report. This report would also be used to keep the list up to date. Sites with a temporary planning permission expiring after the end of the plan period would be included in the list of sites that were automatically safeguarded, but supporting text continued to explain that the future of shorter term temporary sites would be reviewed in the future Site Allocations Plan. Facilities of all types and sizes would be safeguarded but with the approach to landfill being addressed through a separate policy (W7) specifically on landfill.
4.11 There were seven responses to the draft policy\(^{13}\), two of which raised the hope that this would not lead to an extension of the Sutton Courtenay landfill site beyond its planned closure in 2030. Two comments were by way of general support and the Anglian Water Company drew attention to its own policy on encroachment in the vicinity of its assets. The remaining two comments opposed the policy’s failure to apply safeguarding to all temporary facilities.


4.12 A report to a full meeting of the County Council in March 2015 advised on the changes that were considered necessary to the plan to take account of responses to the Consultation Draft. With regard to waste site safeguarding the report\(^{14}\) advised as follows:

*Policy W11 ‘Safeguarding waste management sites’ has been amended to follow a similar format to that used in the minerals safeguarding policies (M8 and M9); to clarify that sites to be safeguarded will be identified in Part 2 of the Plan – the Site Allocations Document but that pending adoption of that document sites to be safeguarded are listed in an appendix to the Core Strategy; and to avoid conflict between safeguarding of waste sites from other development and allocations for development in adopted local or neighbourhood plans.*

4.13 In the lead up to preparation of the report, further discussion was held with the District Councils through a meeting of the Oxfordshire Planning Policy Officers Group on 24 November 2014. The Group was provided with a re-draft of the waste site safeguarding policy and a list of sites to which safeguarding would apply and which may be included in the Core Strategy. The approach was generally supported and it was left to individual Districts to respond with any specific queries. Responses from Oxford City Council and South Oxfordshire District Council were received and these are summarised in Appendix B.

4.14 Policy W11 on waste site safeguarding now provides as follows:

*Policy W11: Safeguarding waste management sites*

The Minerals and Waste Local Plan: Part 2 – Site Allocations Document will identify sites that will be safeguarded for waste use for the duration of the plan period, comprising:

- Sites in waste use and with planning permission allowing the use to continue for the remainder of the plan period;
- Sites with planning permission for waste use but where the use or development permitted has not yet been undertaken;

\(^{13}\) [https://www.oxfordshire.gov.uk/cms/content/minerals-and-waste-core-strategy#submittedplan](https://www.oxfordshire.gov.uk/cms/content/minerals-and-waste-core-strategy#submittedplan)


Item 6/15 (Minerals and Waste Local Plan) of meeting of Oxfordshire County Council – Annex 3
- Vacant sites last used for waste purposes;
- Sites allocated for waste management development in the Site Allocations Document.

Pending the adoption of the Site Allocations Document existing and permitted waste management sites (as specified in Appendix 2) are safeguarded for future waste management use.

The list of sites safeguarded for future waste management use will be monitored and kept up to date in the Minerals and Waste Annual Monitoring Report.

Proposals for development that would prevent or prejudice the use of a site safeguarded for waste management will not be permitted unless:
- The development is in accordance with a site allocation for development in an adopted local plan or neighbourhood plan; or
- Equivalent waste management capacity can be appropriately and sustainably provided elsewhere; or
- It can be demonstrated that the site is no longer required for waste management.

4.15 As explained in the supporting text to the policy, all existing waste sites are now to be safeguarded – both permanent and temporary. This arrangement will apply pending the adoption of the Part 2 Site Allocations Document. This partly meets the objections made about the policy’s failure to address temporary sites. The sites that are being safeguarded are specified in Appendix 2 of the Core Strategy. Detailed of grid references are provided and site locations shown in figures 5 and 6 in the Core Strategy.

4.16 Site boundaries for these sites are shown in Waste Site Profiles that have been prepared to support the Waste Needs Assessment. Final boundaries for these sites will be confirmed in the Site Allocations Document. Pending the adoption of that document the County Council will liaise with the District Councils on the arrangements that need to be put in place to ensure that proposals for non-waste development take into account any waste issues raised by a safeguarded site.

4.16 The changes made to the policy are unlikely to meet some waste operators’ concerns about safeguarding temporary facilities for the duration of the relevant temporary planning permission. This is because the policy as drafted does not safeguard sites with a temporary permission expiring between 2019 and 2031. There are 10 sites that fall in this category – as listed in Appendix C. Of these, 2 have been nominated for a longer lifespan, although in practice, subject to discussion with the owner and/or operator of each site, they may close before the planned lifespan.

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15 [https://www.oxfordshire.gov.uk/cms/content/minerals-and-waste-core-strategy#submittedplan](https://www.oxfordshire.gov.uk/cms/content/minerals-and-waste-core-strategy#submittedplan)
Oxfordshire Minerals and Waste Local Plan Waste Needs Assessment (located in 'Other Evidence Base Documents'): para 5.4.
16 Submitted to the District Council in a planning application or put forward in emerging District Local Plans
17 The Part 2 Site Allocations Plan is expected to be adopted in 2019
the potential longer term use of all of these sites is likely to be looked at in the Part 2 Site Allocations Document.

4.17 The County Council believes that it is not logical to apply safeguarding to sites with an uncertain future, as the concept of safeguarding implies that there is a desire to retain a site in a certain use for as long as possible (at least until market conditions make this unnecessary – which seems unlikely in the foreseeable future). The County Council believes that safeguarding temporary sites in advance of a proper planning analysis of their suitability to function for a longer period than currently envisaged is akin to ‘putting the cart before the horse’. Such opportunity will arise in the preparation of the Part 2 Site Allocations Document and the preferred approach to temporary sites is to therefore safeguard them only until that plan confirms them as suitable for longer term waste use.

4.18 The alternative would be to safeguard all temporary sites for the duration of their permission, as suggested by some, and to advise that this in no way implies that the site is suitable for longer term use. It has been suggested that the NPPF’s call for “existing, planned and potential” sites to be safeguarded requires that temporary sites be safeguarded for their lifetime. The argument for doing this is certainly stronger for sites with a permission that expires toward the end of the plan period as there may be concern about allowing development to take place nearby that prejudices their ability to provide the capacity that the plan relies on. But the argument is less strong for facilities that are due to expire sooner. Again, these issues are best considered on a site by site basis in the Part 2 Site Allocations Document.

4.19 Concern has been raised that safeguarding sites for future waste use may be prejudicial to work by the District Councils in their search for land for other key uses – in particular housing and employment land. This has been addressed by an addition to that part of the policy that addresses the circumstances in which a site may be released from safeguarding. Where a site is included in a subsequently adopted District or Neighbourhood Plan for a non-waste development it should be released from safeguarding. Prior to the adoption of any other plan the County Council will have had the opportunity to address the waste related issues, if appropriate, through the Local Plan process, with the future use of the site being considered by an independent Planning Inspector.

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18 National Planning Policy Framework: paragraph 143 – albeit this applies only to secondary and recycled aggregate (Local Plan Category 6 waste sites)
5 Conclusions

5.1 The need for a safeguarding policy is supported by national planning policy which includes a requirement that Waste Plans demonstrate how adequate waste management capacity is to be provided. Much of Oxfordshire’s required capacity will be met by sites already in use for waste management purposes and safeguarding these sites against many other competing land uses is therefore important. Significantly, no objections have been raised to the principle of safeguarding but some concerns remain about the way this is to be introduced.

5.2 The County Council has sought comment from interested parties and has carefully considered comments made. Having discussed the operation of the safeguarding policy with the District Councils it is confident that the policy can be implemented successfully. Several changes have been made in response to comments made by operators (and others). These may not fully meet concerns expressed by two operators in response to the Draft Plan, but the County Council believes that the right balance has been struck in the way the policy deals with temporary facilities. In particular, the interests of operators of temporary facilities are not being prejudiced because the decision to not safeguard sites beyond 2019 in the Core Strategy does not pre-judge a decision on safeguarding that will be taken in the Part 2 Site Allocations Document.
Appendix A

Former South East Plan Waste Policies
Policies on waste safeguarding included in the former South East Plan (May 2009)

A1 Policy W6 set out targets for composting and recycling, and the supporting text addressed the issue of safeguarding such facilities:

“To ensure that sufficient facilities are developed, development plan documents will identify specific sites to allow for recycling, composting, reprocessing and transfer facilities, and safeguarded to protect them from other development since high land prices can hinder development of waste recycling facilities. Sites should generally be located in or near to urban areas, close to the main source of waste, although a range of facilities will also be needed to serve rural areas.”

A2 Policy W15 set out requirements for hazardous waste management:

“Waste development documents will……identify and safeguard sites for storage, treatment and remediation of contaminated soils and demolition waste.”

A3 Policy W16 identified a need for waste transfer and bulking facilities:

“Waste development documents should identify infrastructure facilities, including sites for waste transfer and bulking facilities, essential for the sustainable transport of waste materials. These sites and facilities should be safeguarded in local development documents……”

A4 Policy W17 addressed the locational requirements for (unspecified) waste management facilities:

“Waste development documents will, in identifying locations for waste management facilities, give priority to safeguarding and expanding suitable sites with an existing waste management use and good transport locations…”

In assessing the suitability of sites it was expected that consideration be given to accessibility to existing urban areas or major new or planned development, and to the compatibility of existing land uses, being:

- “Active mineral working sites;
- Previous or existing industrial land use;
- Contaminated or derelict land;
- Land adjoining sewage treatment works;
- Redundant farm buildings and their curtilages.”
Appendix B

Responses to Selected Stakeholder Engagement
### Waste Site Safeguarding
#### Responses to selected stakeholder engagement

**Topic Paper (v.1 – Preliminary Draft) August 2013**

<table>
<thead>
<tr>
<th>Respondent</th>
<th>Summary Comment</th>
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<tbody>
<tr>
<td>Vale of White Horse District Council</td>
<td>No objection to safeguarding existing waste sites. Would like to be consulted prior to further sites being added.</td>
</tr>
<tr>
<td>West Oxfordshire District Council</td>
<td>Discussion Paper ‘very clear and extremely well-written’. Can see no reason why safeguarded sites could not be brought through the Core Strategy, especially as the Stage 2 Site Allocations Plan is some way off. Suggest a buffer zone for consultation purposes of 50-100 metres. Landfills will continue to be important and should be protected. Apply safeguarding to temporary sites for the duration of the permission.</td>
</tr>
<tr>
<td>Stephen Bowley Planning</td>
<td>Sites subject to temporary permission should also be safeguarded as they may be suitable for longer term usage.</td>
</tr>
<tr>
<td>Carl Middleditch (agent)</td>
<td>Many small-scale skip hire businesses in north Oxfordshire have closed because there are too few transfer stations and high landfill charges. Safeguarded land at remaining transfer stations and also allow for their expansion.</td>
</tr>
<tr>
<td>Suzi Coyne Planning</td>
<td>The approach is too limited and not in accordance with NPPF which advocates safeguarding “existing, planned and potential” secondary and recycled aggregate facilities. Existing facilities includes sites the subject of temporary planning permission and these should also be safeguarded. OCC should not be concerned to avoid safeguarding temporary sites because they may become permanent: the objective is to safeguard sites whilst they have permission to operate.</td>
</tr>
<tr>
<td>Gill Pawson Planning</td>
<td>An ‘interesting and valid’ approach. Any new measure like this should be monitored once introduced to ensure it successfully meets its objectives.</td>
</tr>
<tr>
<td>Smiths of Bletchington</td>
<td>The Discussion Paper is 'logical and well argued'. Existing and planned sites should be safeguarded for the reasons given. Suggest broader consultation zone (500 metres). Landfills and temporary sites should not be safeguarded: it is reasonable that their futures be reviewed in Part 2 Allocation Plan before a safeguarding decision is made. Agree that small sites should be safeguarded as well as large ones. Would prefer to see safeguarding extending beyond the plan period (unless over-riding site specific reason to the contrary) as investment in sites may suffer toward the end of the period if this principle not applied.</td>
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### Oxfordshire Planning Policy Officers Group Meeting – 14 November 2014

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<td>Oxford City Council</td>
<td>Understand that the intention is to safeguard sites on an interim basis pending confirmation in the Site Allocations Plan, but the interim safeguarding of some of the sites identified could be prejudicial to much needed alternative uses (e.g., housing). Greater clarity is needed on the tests to be applied to releasing land from safeguarding.</td>
</tr>
<tr>
<td>South Oxfordshire District Council</td>
<td>Three sites highlighted where there could be potential land use conflict with development under consideration by the District Council in the emerging Local Plan. Subsequent meeting discussed these sites and an adjustment to the criteria to be applied before sites are safeguarded or released from safeguarding.</td>
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Appendix C

Sites not safeguarded beyond 2019
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<th>No.</th>
<th>Site</th>
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<tr>
<td>002</td>
<td>Prospect Farm, Chilton</td>
<td>Raymond Brown</td>
<td>VoWHDC</td>
<td>3 Recycling</td>
<td>2022</td>
<td>✓</td>
<td>35,000</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>6 Recycling</td>
<td>2022</td>
<td></td>
<td>35,000</td>
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<tr>
<td>003</td>
<td>Dix Pit, Stanton Harcourt</td>
<td>FCC</td>
<td>WODC</td>
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<td>Earthline</td>
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<td>6 Recycling</td>
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