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Planning Regulation (Minerals & Waste)
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**Minerals and Waste Plan: Part 1 – Core Strategy
Proposed Submission Document, August 2015**

Thank you for your recent communication regarding the Oxfordshire Minerals and Waste Local Plan (Part 1 – Core Strategy) and we welcome the opportunity to comment on the proposed submission document.

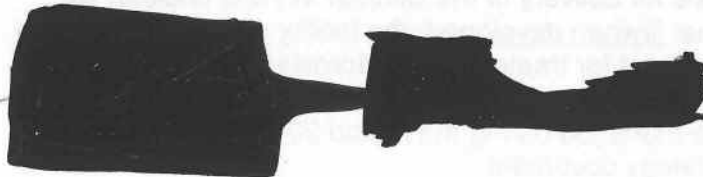
Please find the following representations submitted on behalf of Somerset County Council as the Waste Planning Authority for Somerset and we trust that you will find them informative and useful. In particular we comment on three of the waste policies proposed in the Core Strategy:

- Policy W3: provision for waste management capacity and facilities required;
- Policy W6: Landfill;
- Policy C5: Local environment, amenity and economy.

We note a potential relationship with Oxfordshire in terms of proposed / potential waste movements from Somerset to Ardley and we look forward to further dialogue with you in the spirit of the Duty to Co-operate.

Should you wish to further discuss any of these matters, please contact my colleague Louise Martin: Planning Policy Officer (Tel: 01823 359402).

Yours sincerely



Paul Hickson
Manager - Economy and Planning

Further information on the proposed WTS can be accessed through the Somerset Planning Portal. Please search for planning reference 15/00372/CPO via the following weblink: <http://webapp1.somerset.gov.uk/ePlanning/searchPageLoad.do>

Policy W6: Landfill

With regard to policy **W6: Landfill**, provision for inert waste disposal facilities is worded as “inert waste which cannot be recycled” and as such is interpreted by Somerset County Council as excluding inert waste that technically could be recycled.

As a previous comment in paragraph 5.63 identifies a likely shortfall of available inert waste to achieve satisfactory restoration of quarries is there a risk that the inclusion of the criterion “which cannot be recycled” might exclude potential sources of suitable inert waste material for inert landfill sites which facilitate restoration activities of previous extractive industry sites? For example sub-soil from excavation works technically can be recycled but has limited need to be although noting some such waste may require recycling treatment if contaminated. This however is not the case for “hard” demolition waste such as concrete which often requires a recycling treatment process such as crushing and screening to render it suitable for subsequent reuse.

Whilst acknowledging the need to have regard for the waste hierarchy, has consideration been given to making provision for the beneficial use of any suitable inert waste material at inert landfill facilities rather than require it to be waste that cannot be recycled? (*noting also that there are a range of interpretations across the waste management/planning sector of the beneficial use of waste being recovery or disposal*).

Policy C5: Local environment, amenity and economy

Paragraph 6.27 provides the supporting text for Common Core **Policy C5: local environment, amenity and economy** Whilst the preceding paragraphs 6.22 – 6.26 discuss the local environment and amenity aspects, there appears to be no discussion of economic aspects other than in the title and as such, it is unclear why economy is captured within this particular policy? Indeed as minerals and waste development constitute part of the local economy, is there perhaps potential for a degree of conflict?

Furthermore, within the Plan itself, the inclusion of economy within the policy text would appear to be in direct conflict with the statement in paragraph 6.26 which states “Policy 5 addresses general environmental and amenity considerations only.”

The principle of Sustainable Development is discussed in paragraphs 6.1 and 6.2. Common Core **Policy C1: Sustainable Development** captures the aim of presumption in favour sustainable development and therefore taking into consideration long-term social, economic and environmental impacts as described in the glossary section of the Core Strategy. As economic aspects are covered within Policy C1, is it appropriate / necessary to include local economy within the scope of Policy C5? If it is considered appropriate/necessary to include local economy within the scope of policy C5, the preceding paragraphs should provide some discussion of the justification.