



**STEPHEN BOWLEY
PLANNING CONSULTANCY**

Stephen Bowley BA MRTPI
Ferndale
Albury View
Tiddington
THAME OX9 2LQ
Tel/Fax 01844 338 636
Mobile 07710 032722
Email: SBowleyPC@aol.com

Mr Peter Day
Minerals and Waste Planning
Oxfordshire County Council

20 March 2017

Dear Peter and Team,

Oxfordshire Minerals and Waste Local Plan Core Strategy Proposed Main Modifications*

Thank you for the opportunity to make comments on the Proposed Main Modifications. The comments below are made on behalf of Raymond Brown Minerals and Recycling Ltd. My comments in respect of the Main Modifications are listed below:

- MM8: Policy M1, the additions indicating that production and supply of recycled and secondary aggregate will be encouraged so as to enable the maximum delivery of recycled and secondary aggregate within Oxfordshire is supported.
- MM40: Explanatory text here makes it clear there is no requirement for need to be demonstrated against a specific capacity requirement, and further, that there is no ceiling set on the capacity that may be provided. This text provides a more positive context for consideration of waste recycling proposals which is helpful and is supported.
- It is disappointing that there are no modifications to Table 8 of the plan – which defines the size of small scale (up to 20,000tpa), strategic (over 50,000tpa) and non-strategic facilities (20-50,000tpa). It would have been helpful if the maximum throughputs could have been increased somewhat to provide a little more flexibility.
- MM46: Policy W3. The addition of a line indicating that where recycling forms part of a mineral site it will *normally* be time limited to the mineral working but adding '*except where a new planning permission is granted for retention of a facility, temporary facility sites shall be restored at the end of their permitted period.*' Is helpful in indicating that there will be circumstances where conversion of a temporary site into a permanent site

will be appropriate. This amendment is supported. The continued tight definition of the size of facilities including small scale facilities at maximum 20,000tpa is not supported for the reason provided in reference to Table 8 above.

- MM47 and MM48 and MM51: The text describing the purpose/criteria behind strategic, non- strategic and small scale facilities as then reflected in modified Policy W4 below is supported in so far as it explains that non-strategic waste management facilities should normally be located within 5 kilometres of a larger town and that good access to the lorry route network is advantageous. It is disappointing however that the threshold for small scale sites is set so low (20,000 tpa).
- MM52: Policy 5 describes preferred siting of WM facilities and has a useful proposed addition: 'Waste management facilities may be sited on other green field locations where this can be shown to be the most suitable and sustainable option.' This is supported.
- MM68 Landscape Policy: This policy has been modified to expressly refer to the NPPF test for allowing major development in the Countryside and this change is therefore supported.

Thank you for the opportunity to comment on these Modifications.

Yours sincerely

A black rectangular redaction box covering the signature of Rob Dance.

Rob Dance
Telephone: 01993 815955
Mobile: 07749 367939