#### **ANNEX 2b**

# Oxfordshire Minerals and Waste Local Plan: Part 1 – Core Strategy Consideration of alternatives for the Oxfordshire Waste Strategy

30<sup>th</sup> November 2016

## **Introduction**

This document provides information on the alternatives that are being considered during the post-Examination process to undertake the further SEA/SA required and finalise the Main Modifications that Oxfordshire County Council will be proposing to publish for consultation.

Table 1 provides information on the alternatives that have been considered for each of the policies that make up the Waste Strategy element of the Core Strategy, identifying those which will be taken forward for assessment in the ongoing SEA/SA process. That process will also be undertaking assessments for the Main Modifications for which alternatives are not being considered at this stage in the development of the Plan.

**Table 1: Waste Strategy Alternatives** 

Waste Strategy Policy	Reasonable alternatives to be assessed	Alternatives that are not considered to be reasonable
Policy W1: Oxfordshire waste to be managed	The Inspector has concluded that the figures shown for MSW and C&I waste in the table within policy W1 on page 17 of Document M9/1 should be included in the revision to policy W1, and that no figures should be shown in the revision of policy W1 for the CDE waste stream.  There are therefore no reasonable alternatives to consider at this stage in the development of the Plan.	Alternative relating to self-sufficiency versus the Plan's current approach for net self-sufficiency.  Self-sufficiency is not considered to be a reasonable alternative given lack of Waste Planning Authority control over cross-boundary movement (out of and in to the County) of most waste; and because it is implicitly inconsistent with the National Planning Policy for Waste (paragraph 3).

Waste Strategy Policy	Reasonable alternativ	es to b	e asses	sed		Alternatives that are not considered to be reasonable
Policy W2: Oxfordshire waste management targets	A. For C&I waste, an was put forward via re rate of increase in r Consideration should targets are achievable of increase put for consultants BPP Cor (Document 6.4c) shou alternatives to be asset 1. Submitted Plan targ	presentecycling be given and who was and who ward as alting lid be used ar	tations g targe en to v nether t by g in F used ins e as fol	relating tes poswhethe he slow the Cebruary tead. The lows:	to the t-2021. r these ver rate ouncil's v 2014	None
	Year	2016	2021	2026	2031	
	C&I dry recycling target	55%	60%	65%	65%	
	2. BPP report (Feb 201	4) targe	ets for (	C&I recy	cling	
	Year	2016	2021	2026	2031	
	C&I recycling target	55%	60%	60%	65%	
	amended the targets version of the Core Str The Inspector notes in that there was agreen waste recycling in pol for 2026 and 2031 to 6	ategy. his Intenent the icy W2	erim Re lat the should	port (pa target t	ara. 61) for CDE creased	
	For purposes of compassessed as a rease approach in the Salternatives to be asse	onable ubmitt	altern ed Pla	ative ın. Th	to the	
	1. Submitted Plan targ	ets for	CDE red	ycling		
	Year	2016	2021	2026	2031	
	CDE recycling target	55%	60%	60%	60%	
	2. Suggested modificat	ion tar	gets for	CDE re	cycling	
	Year	2016	2021	2026	2031	
	CDE recycling target	55%	60%	65%	70%	

Waste Strategy Policy	Reasonable alternatives to be assessed	Alternatives that are not considered to be reasonable
Policy W3: Provision for waste management capacity	For the waste facility types 'Composting / food waste treatment' and 'Non-hazardous waste recycling' (for MSW and C&I wastes), and 'inert waste recycling' (for CDE waste), the following alternatives will be considered during the development of the Main Modifications:	None
	<ol> <li>An approach to use any additional capacity requirement as a cap for the amount of provision to be made (as inferred by the wording of policy W3 in the Submitted Plan).</li> </ol>	
	2. An approach to use any additional capacity requirement as a minimum amount of provision to be made which can be exceeded if suitable sites are available, with no cap on provision and no requirement for need to be demonstrated.	
	For 'Composting / food waste treatment' and 'Non-hazardous waste recycling', the additional capacity requirement can be calculated by applying the recycling targets in policy W2 to the figures that the Inspector has concluded should be shown in policy W1 for MSW and C&I wastes, taking into account the capacity available at existing facilities. Whilst the Inspector has concluded that no figures for CDE waste should be shown in policy W1, it would be possible to calculate the additional capacity requirement for inert waste recycling based on best available forecasts of Oxfordshire's CDE waste and the targets in policy W2, taking into account the capacity available at existing facilities.	
	An alternative approach to provision for CDE waste recycling was put forward at the Hearing (Documents H10 & H17aa), involving a positive policy approach to maximise delivery of recycled material and diversion of waste from landfill, with no requirement to demonstrate need. This was an alternative to what was seen as the approach in the submitted plan of using the additional capacity requirement as a cap for the amount of provision to be made. This alternative is contained within alternative 2 above, which seeks to maximise suitable opportunities for recycling and sets no cap on provision and no requirement for need to be demonstrated.	

## Waste Strategy Policy

## Reasonable alternatives to be assessed

# Alternatives that are not considered to be reasonable

Policy W4: Locations for facilities to manage the principal waste streams Through representations and discussions at the Examination Hearing a range of alternatives have been suggested for inclusion in policy W4. These relate to the size of the zones around Oxford and other towns, the inclusion of Banbury as a potential location for strategic waste management facilities, the inclusion of the smaller towns (e.g. Carterton) as potential locations for non-strategic waste management facilities and the potential location of any size of facility at any of the specified locations.

In addition, suggested modifications included in Document M9/1, amend policy W4 to include provisions relating to proximity to lorry routes that are covered in the supporting text to policy W4. Similarly, issues relating to constraints on locations placed by AONBs and SACs that are included in the supporting text to policy W4 could be included in modifications to policy W4, with cross references to policies C8, C7 and C12 (proposed new policy on Green Belt in Document M9/1b).

Consequently four potential alternatives to the locational strategy provided in policy W4 have been developed for assessment. The five alternatives to be assessed are detailed in Appendix A to this document.

In response to representations, suggested modifications included in Document M9/1 amended the supporting test to policy W4 (paragraphs 5.33 and 5.34) to take out references to locations in Green Belt being avoided and instead to state that locations in Green Belt will be considered against policy W5 in line with the NPPF. Document M9/1b suggested a modification to include a new policy (C12) on Green Belt (to replace the reference to Green Belt in policy W5). In the light of this, and reflecting that policy W4 does not refer to locations in Green Belt, the Waste Key Diagram should be amended to show the Green Belt as a transparent layer over the waste areas and not as a solid 'exclusionary' layer.

Alternatives to the categorization of size of facilities should be assessed (including that small-scale should be under 50,000tpa and strategic should be more than 100,000tpa; and that strategic should be more than 75,000tpa for inert waste recycling facilities).

The consideration of different tonnage figures for the different scales of facility is not in itself considered to be a policy choice (the policy choice comes in deciding where different sized facilities should be located) and therefore is not considered to be a reasonable alternative for the Core Strategy.

Alternative to include larger scale facilities in AONB in locational strategy.

In the light of policy on AONB in the NPPF, as reflected in policy C8 of the Core Strategy, this is not considered to be a reasonable alternative to include in Policy W4. Policy W4 does not exclude the possibility of larger facilities being located in AONB as it includes the word 'normally' to allow for exceptions where these are appropriate having due regard to national policy and other relevant policies of the plan.

Alternative to include large scale facilities in rural areas in the locational strategy.

The inclusion of large scale facilities in rural areas as a generality is not considered to be a reasonable alternative to include in policy W4. Clauses a) and b) of policy W4 include the word 'normally', which allows the possibility of strategic and nonstrategic facilities being located other than in or close to the specified towns. This means that policy W4 does not exclude the possibility of large facilities being located in rural areas. In addition, suggested modifications included in Document M9/1, amend policy W4 to include provisions relating to proximity to lorry routes that are currently

Reasonable alternatives to be assessed	Alternatives that are not considered to be reasonable
	covered in the supporting text to policy W4, which could potentially allow a large facility to be located in a rural area where it would have good access to the lorry route network. This suggested modification is included in alternatives 2 to 5 for policy W4 that are to be assessed (see Appendix A). In more remote rural areas, facilities larger than small-scale would be unacceptable. Therefore an alternative to include large scale facilities in rural areas in the locational strategy is not considered to be a reasonable alternative.
The proposed Main Modifications for this policy will be assessed along with the other Main Modifications. The element of the policy that relates to Green Belt is now proposed to be included in a new Core Policy (C12). That new policy will also be assessed with the other Main Modifications.  There no new alternatives to be considered.	Alternative to remove presumption against greenfield development  Document M9/1 included a modification to amend policy W5 to allow for greenfield locations in line with national policy and guidance.  It is the Council's intention to include this in the Main Modifications and so it will be assessed along with the other Main Modifications. No need to consider as an alternative.
	Alternative approaches to temporary recycling facilities at the cessation of the host activity. Approach to remove unless a separate application for retention is successful (approach in submitted Core Strategy) versus approach with presumption for retention unless there is an overriding case for removal.  These are alternative policy wordings
	rather than distinct policy approaches and therefore this is not considered to be a reasonable alternative.
	Alternative to include restored mineral sites as priority in locational strategy.
	Restored mineral sites are greenfield locations, the inclusion of which as priority locations would be contrary to national policy and guidance. Therefore this is not considered to be a reasonable alternative.
	The proposed Main Modifications for this policy will be assessed along with the other Main Modifications. The element of the policy that relates to Green Belt is now proposed to be included in a new Core Policy (C12). That new policy will also be assessed with the other Main Modifications.

Waste Strategy Policy	Reasonable alternatives to be assessed	Alternatives that are not considered to be reasonable
Policy W6: Landfill	No alternatives to be considered.	Sutton Courtenay landfill should not be extended
		Not a reasonable alternative for the Waste Strategy as it is a site specific issue.
Policy W7: Management and disposal of hazardous waste	No alternatives to be considered.	None
Policy W8: Management of agricultural waste	No alternatives to be considered.	None
Policy W9: Management and disposal of radioactive waste	Policy amendment detailed in Document M9/1b will be assessed with other Main Modifications. This amendment takes into account the Statement of Common Ground between OCC and Magnox - allowing for treatment and disposal of radioactive waste across the NDA estate.	None
	No alternatives to be considered.	
Policy W10: Management and disposal of waste water/sewage	No alternatives to be considered.	None
Policy W11: Safeguarding waste management sites	An alternative policy approach was put forward via representations and was discussed at the Examination Hearing. This relates to the inclusion of temporary waste management sites, with permissions that expire before the end of the plan period, within the sites that should be safeguarded for waste use. A suggested modification to Policy W11 included in Document M9/1b would allow for the safeguarding of such temporary sites for the duration of their planning permission.	Alternative to safeguard existing facilities on industrial estates.  No need to consider as an alternative. If they are existing permitted facilities on industrial estates then they will be safeguarded under the current policy.  Alternative to safeguard existing waste sites already in use – except Sutton Courtenay.
	For purposes of completeness this change will be assessed as a reasonable alternative to the requirements in the Submitted Plan. The alternatives to be assessed are therefore as follows:  1. The Submitted Plan approach to not allow for temporary waste management sites to be safeguarded where the planning permission expires before the end of the plan period.	Not a reasonable alternative as this is a site specific issue that would be considered in the Part 2 plan. In addition landfills are not a category of site that would be covered under policy W11 (see paragraph 5.100 and Appendix 2 of the submitted Core Strategy).
	The suggested modification approach to safeguard all permitted waste management sites for the duration of their planning	

# CA11

Waste Strategy Policy	Reasonable alternatives to be assessed	Alternatives that are not considered to be reasonable
	permission, whether or not the permission allows the use to continue to the end of the plan period.	

#### Appendix A - Alternatives for Policy W4

In determining the most appropriate locational strategy for waste, five alternatives have been identified for assessment. Details of these are provided below, along with information on how the supporting text and Waste Key Diagram would be updated to support any changes to the policy. Underlined and strikethrough text have been used to show changes to the Submission Plan policy.

NB: the amended text incorporated in the potential policy alternatives is indicative wording to show how the spatial strategy alternatives could be incorporated in a modified policy W4 that might be included in proposed Main Modifications – it should not be seen as the final proposed wording.

#### **ALTERNATIVE 1**

Policy as included in the Submission Core Strategy.

#### Policy W4: Locations for facilities to manage the principal waste streams

Facilities (other than landfill) to manage the principal waste streams should be located as follows:

- a) Strategic waste management facilities should normally be located in or close to Bicester, Oxford, Abingdon and Didcot, as indicated on the Key Waste Diagram.
- b) Non-strategic waste management facilities should normally be located in or close to Bicester, Oxford, Abingdon and Didcot and the other large towns (Banbury, Witney and Wantage & Grove), as indicated on the Key Waste Diagram.
- c) Elsewhere in Oxfordshire, and particularly in more remote rural areas, facilities should only be small scale, in keeping with their surroundings.

Specific sites for waste management facilities (other than landfill) to meet the requirements set out in Policy W3 will be allocated in accordance with this locational strategy in the Minerals and Waste Local Plan: Part 2- Site Allocations Document. The suitability of any new sites for allocation in the Site Allocations Document will be assessed against the criteria in policies W5 and C1 - C12.

Assume no change to the supporting text or to the Key Diagram, except and to cross refer to proposed new policy C12 on Green Belt.

NB: Reference to the core policies at the end of policy W4 has been changed from 'C1 - C11' (as in the Submitted Plan) to 'C1 - C12' to reflect the Council's intention to propose a modification to include a new policy (C12) on Green Belt (to replace the reference to Green Belt in policy W5), as suggested in Document M9/1b.

#### **ALTERNATIVE 2**

This alternative does not add any new 'overall Plan' requirements, but brings into policy elements that were previously covered in supporting text. This alternative builds on the suggested modification in Document M9/1.

#### Policy W4: Locations for facilities to manage the principal waste streams

Facilities (other than landfill) to manage the principal waste streams should be located as follows:

- a) Strategic waste management facilities should normally be located in or close to Bicester, Oxford, Abingdon and Didcot, as indicated on the Key Waste Diagram. <u>Locations further from these towns may be</u> appropriate where there is access to the Oxfordshire lorry route network in accordance with Policy C10.
- b) Non-strategic waste management facilities should normally be located in or close to Bicester, Oxford, Abingdon and Didcot and the other large towns (Banbury, Witney and Wantage & Grove), as indicated on the Key Waste Diagram. <u>Locations further from these towns may be appropriate where there is access to the Oxfordshire lorry route network in accordance with Policy C10.</u>
- c) Elsewhere in Oxfordshire, and particularly in more remote rural areas, facilities should only be small scale, in keeping with their surroundings.

The locations for strategic and/or non-strategic waste facilities around Oxford, Abingdon, Didcot and Wantage and Grove exclude the Oxford Meadows, Cothill Fen, Little Wittenham and Hackpen Hill Special Areas of Conservation and a 200 metre dust impact buffer zone adjacent to these SACs.

As indicated on the Waste Key Diagram, strategic and non-strategic waste management facilities (that comprise major development) should not be located within Areas of Outstanding Natural Beauty except where it can be demonstrated that the 'major development test' in the NPPF (paragraph 116), and as reflected in policy C8, is met.

Specific sites for waste management facilities (other than landfill) to meet the requirements set out in Policy W3 will be allocated in accordance with this locational strategy in the Minerals and Waste Local Plan: Part 2 – Site Allocations Document. The suitability of any new sites for allocation in the Site Allocations Document will be assessed against the criteria in requirements of policies W5 and C1 – C11 C12.

#### Supporting text update

Change the supporting text, in particular paragraphs 5.33 and 5.34, to reflect the fact that lorry route, AONB and SAC related requirements are now included in policy text and to cross refer to proposed new policy C12 on Green Belt.

#### **ALTERNATIVE 3**

This alternative builds on Alternative 2 by 'reclassifying' Banbury and expanding the zone around Oxford from 10km to 15km.

#### Policy W4: Locations for facilities to manage the principal waste streams

Facilities (other than landfill) to manage the principal waste streams should be located as follows:

- a) Strategic waste management facilities should normally be located in or close to <u>Banbury</u>, Bicester, Oxford, Abingdon and Didcot, as indicated on the Key Waste Diagram. <u>Locations further from these towns may be appropriate where there is access to the Oxfordshire lorry route network in accordance with Policy C10</u>.
- b) Non-strategic waste management facilities should normally be located in or close to <u>Banbury</u>, <u>Bicester</u>, Oxford, Abingdon and Didcot, and the other large towns (<del>Banbury</del>, Witney and Wantage & Grove), as indicated on the Key Waste Diagram. <u>Locations further from these towns may be appropriate where there is access to the Oxfordshire lorry route network in accordance with Policy C10.</u>
- c) Elsewhere in Oxfordshire, and particularly in more remote rural areas, facilities should only be small scale, in keeping with their surroundings.

The locations for strategic and/or non-strategic waste facilities around Oxford, Abingdon, Didcot and Wantage and Grove exclude the Oxford Meadows, Cothill Fen, Little Wittenham and Hackpen Hill Special Areas of Conservation and a 200 metre dust impact buffer zone adjacent to these SACs.

As indicated on the Waste Key Diagram, strategic and non-strategic waste management facilities (that comprise major development) should not be located within Areas of Outstanding Natural Beauty except where it can be demonstrated that the 'major development test' in the NPPF (paragraph 116), and as reflected in policy C8, is met.

Specific sites for waste management facilities (other than landfill) to meet the requirements set out in Policy W3 will be allocated in accordance with this locational strategy in the Minerals and Waste Local Plan: Part 2 - 1 Site Allocations Document. The suitability of any new sites for allocation in the Site Allocations Document will be assessed against the criteria in requirements of policies W5 and C1 – C11 C12.

#### Supporting text update

Change the supporting text, in particular paragraphs 5.33 and 5.34, to reflect this alternative, including to reflect the fact that lorry route, AONB and SAC related requirements are now included in policy text and to cross refer to proposed new policy C12 on Green Belt.

In addition, increase the zone around Oxford for strategic and non-strategic waste management facilities to 15km from Oxford City Centre (this is approximately equivalent to including a zone of 12km from the built up area of Oxford as proposed in a representation). This further extends the zone proposed in Document M9/1 which was for 12km from Oxford City centre, this itself being an extension on the 10km in the Submitted Plan.

NB: Representations have also suggested using a 20km zone from the built up area of Oxford for strategic waste management facilities and a 15km zone from the built up area of Oxford for non-strategic facilities. These distances are considered to be too large, for example, the zone of 20km from the built-up area covers all the other large towns in Oxfordshire with the exception of Banbury. They are therefore not considered to be reasonable alternatives.

#### Key Diagram Update

Amend the Key Diagram to increase the zone around Oxford from 10km to 15km (from City centre); and show Banbury as a location for strategic waste management facilities.

#### **ALTERNATIVE 4**

This alternative builds on Alternative 3 by 'reclassifying' Banbury and expanding the zone around Oxford from 10km to 15km (as in Alternative 3), and adding small towns with 2km zones to b).

#### Policy W4: Locations for facilities to manage the principal waste streams

Facilities (other than landfill) to manage the principal waste streams should be located as follows:

- a) Strategic waste management facilities should normally be located in or close to <u>Banbury</u>, Bicester, Oxford, Abingdon and Didcot, as indicated on the Key Waste Diagram. <u>Locations further from these towns may be appropriate where there is access to the Oxfordshire lorry route network in accordance with Policy C10</u>.
- b) Non-strategic waste management facilities should normally be located in or close to <u>Banbury</u> Bicester, Oxford, Abingdon and Didcot, the other large towns (<u>Banbury</u>, Witney and Wantage & Grove) <u>and the small towns</u> (<u>Carterton, Chipping Norton, Faringdon, Henley-on-Thames, Thame and Wallingford</u>), as indicated on the Key Waste Diagram. <u>Locations further from these towns may be appropriate where there is access to the Oxfordshire lorry route network in accordance with Policy C10.</u>
- c) Elsewhere in Oxfordshire, and particularly in more remote rural areas, facilities should only be small scale, in keeping with their surroundings.

The locations for strategic and/or non-strategic waste facilities around Oxford, Abingdon, Didcot and Wantage and Grove exclude the Oxford Meadows, Cothill Fen, Little Wittenham and Hackpen Hill Special Areas of Conservation and a 200 metre dust impact buffer zone adjacent to these SACs.

As indicated on the Waste Key Diagram, strategic and non-strategic waste management facilities (that comprise major development) should not be located within Areas of Outstanding Natural Beauty except where it can be demonstrated that the 'major development test' in the NPPF (paragraph 116), and as reflected in policy C8, is met.

Specific sites for waste management facilities (other than landfill) to meet the requirements set out in Policy W3 will be allocated in accordance with this locational strategy in the Minerals and Waste Local Plan: Part 2 - 1 Site Allocations Document. The suitability of any new sites for allocation in the Site Allocations Document will be assessed against the criteria in requirements of policies W5 and C1 – C12.

#### Supporting text update

Change the supporting text, in particular paragraphs 5.33 and 5.34, to reflect this alternative, including to refer to the inclusion of the small towns (with 2km zones from the centres of the towns) as locations for non-strategic waste management facilities, to reflect the fact that lorry route, AONB and SAC related requirements are now included in policy text and to cross refer to proposed new policy C12 on Green Belt.

In addition, increase the zone around Oxford for strategic and non-strategic waste management facilities to 15km from Oxford City Centre (this is approximately equivalent to including a zone of 12km from the built up area of Oxford as proposed in a representation). This further extends the zone proposed in Document M9/1 which was for 12km from Oxford City centre, this itself being an extension on the 10km in the Submitted Plan.

NB: Representations have also suggested using a 20km zone from the built up area of Oxford for strategic waste management facilities and a 15km zone from the built up area of Oxford for non-strategic facilities.

These distances are considered to be too large, for example, the zone of 20km from the built-up area covers all the other large towns in Oxfordshire with the exception of Banbury. They are therefore not considered to be reasonable alternatives.

#### Key Diagram Update

Amend the Key Diagram to increase the zone around Oxford from 10km to 15km (from City centre); show Banbury as a location for strategic waste facilities; and add 2km zones from the centres of the small towns of Carterton, Chipping Norton, Faringdon, Henley-on-Thames, Thame and Wallingford as locations for non-strategic waste facilities.

#### **ALTERNATIVE 5**

This alternative is a dispersal strategy which combines a) and b) in Alternative 2 to locate both strategic and non-strategic waste management facilities at all of the specified locations, including within an expanded 15km zone around Oxford and at the small towns with 2km zones.

#### Policy W4: Locations for facilities to manage the principal waste streams

Facilities (other than landfill) to manage the principal waste streams should be located as follows:

- a) Strategic waste and non-strategic management facilities should normally be located in or close to <u>Banbury</u>, Bicester, Oxford, Abingdon, Didcot, Witney, Wantage & Grove, <u>Carterton</u>, <u>Chipping Norton</u>, <u>Faringdon</u>, <u>Henley-on-Thames</u>, <u>Thame and Wallingford</u>, as indicated on the Key Waste Diagram. <u>Locations further from these towns may be appropriate where there is access to the Oxfordshire lorry route network in accordance with Policy C10.</u>
- b) Elsewhere in Oxfordshire, and particularly in more remote rural areas, facilities should only be small scale, in keeping with their surroundings.

The locations for strategic and/or non-strategic waste facilities around Oxford, Abingdon, Didcot and Wantage and Grove exclude the Oxford Meadows, Cothill Fen, Little Wittenham and Hackpen Hill Special Areas of Conservation and a 200 metre dust impact buffer zone adjacent to these SACs.

As indicated on the Waste Key Diagram, strategic and non-strategic waste management facilities (that comprise major development) should not be located within Areas of Outstanding Natural Beauty except where it can be demonstrated that the 'major development test' in the NPPF (paragraph 116), and as reflected in policy C8, is met.

Specific sites for waste management facilities (other than landfill) to meet the requirements set out in Policy W3 will be allocated in accordance with this locational strategy in the Minerals and Waste Local Plan: Part 2 - 1 Site Allocations Document. The suitability of any new sites for allocation in the Site Allocations Document will be assessed against the criteria in requirements of policies W5 and C1 – C12.

#### Supporting text update

Change the supporting text, in particular paragraphs 5.33 and 5.34, to reflect this alternative, including to reflect the lack of distinction between locations for strategic and non-strategic waste management facilities (including the small towns, with 2km zones from the centres of the towns), to reflect the fact that lorry route, AONB and SAC related requirements are now included in policy text and to cross refer to proposed new policy C12 on Green Belt.

In addition, increase the zone around Oxford for strategic and non-strategic waste management facilities to 15km from Oxford City Centre (this is approximately equivalent to including a zone of 12km from the built up area of Oxford as proposed in a representation). This further extends the zone proposed in Document M9/1 which was for 12km from Oxford City centre, this itself being an extension on the 10km in the Submitted Plan.

NB: Representations have also suggested using a 20km zone from the built up area of Oxford for strategic waste management facilities and a 15km zone from the built up area of Oxford for non-strategic facilities. These distances are considered to be too large, for example, the zone of 20km from the built-up area covers all the other large towns in Oxfordshire with the exception of Banbury. They are therefore not considered to be reasonable alternatives.

### Key Diagram Update

Amend the Key Diagram to remove the distinction between locations for strategic and non-strategic facilities; increase the zone around Oxford from 10km to 15km (from City centre); and add 2km zones from the centres of the small towns of Carterton, Chipping Norton, Faringdon, Henley-on-Thames, Thame and Wallingford as locations for strategic and non-strategic waste facilities.