

Mr Kevin Phillips
Gloucestershire County Council
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Our ref: Waste CS site study
Your ref:
Date: 16 February 2009

Dear Mr Phillips

GLOUCESTERSHIRE'S WASTE CORE STRATEGY – SITE ASSESSMENT CRITERIA – FLOOD RISK AND WATER QUALITY

Thank you for consulting us on the Waste Core Strategy work you have undertaken to date. I apologise for the delay in providing a formal written response.

Flood Risk

We have reviewed the CD submitted by Halcrow and support the work undertaken. We consider the methodology used to assess the suitability of waste sites to be an appropriate and sound basis on which to make strategic waste site allocations and for applying the Sequential Test.

In particular we welcome the 'rating' system that has been applied to the sites to represent risk and appropriateness. We welcome the precautionary approach of reducing the rating number if other sources of flooding have been identified or if there is uncertainty over the accuracy of data.

We would support the advice of Halcrow that no waste sites should be allocated within flood zone 3b. In addition we consider that it would be unwise and counter to the ethos of PPS 25 to allocate any sites within flood zone 3a. This is because the PPS advocates a precautionary approach to allocating development and aims to steer development away from the high and medium risk floodplain (the Sequential Test). Furthermore the PPS includes the requirement to consider climate change. In line with this we consider that taking a precautionary approach and avoiding zones 3a and where possible zone 2 as well, will be an appropriate way of avoiding locations that may in the future experience more frequent and serious flooding.

Therefore we would consider that only sites with a rating of 4 or 5 should be taken forward at this stage. If this creates difficulty going forward in terms of other material considerations or sufficient numbers of sites, then sites with a rating of 3 might be considered, but clearly there may be more work needed to identify the appropriateness of these sites, such as Level 2 SFRA.

We would welcome discussion with you on whether the findings of the assessment cause you concern on any particular sites (for instance whether the large amount of sites in zone 3b could present a problem for you in terms of numbers of sites going forward.)

We support the advice in section 1.4.9 to provisionally only allocate uses that are fully compatible with the vulnerability classification in PPS 25 (**a key issue to highlight with regards to waste planning is that landfill and sites used for waste management facilities for hazardous waste are a “more vulnerable” use, whereas other waste treatment uses are deemed “less vulnerable”, as per Table D2 in PPS25**). The report has correctly identified that where more vulnerable uses may be sought in flood zone 3a the Exception Test should be undertaken and this triggers the need for a Level 2 SFRA for those areas.

We welcome the approach of using the SFRA maps that incorporate climate change as this is appropriate for any strategic planning work due its long-term nature, including the allocation of waste sites. We also welcome the approach of assuming zone 3a where no 3b floodplain is identified – this is in accordance with the precautionary, risk-based approach of PPS 25 and the recommendations within the completed Level 1 SFRA.

Paragraph 2.1.5 includes a recommendation to consider carrying out surface water mapping when a smaller ‘preferred list’ of potential sites is ready. This is reiterated in paragraph 2.10.3. We support this approach, and recommend that surface water mapping is undertaken for the preferred sites. This exercise may reveal that certain sites may not be appropriate afterall and flexibility should be built in to allow for this.

We would point out that site specific detailed FRAs will be needed to develop all proposals over 1ha in size (paragraph 2.1.7 highlights this), but FRAs will also be needed for any proposals in flood zones 2 or 3 regardless of size. This is in accordance with PPS 25. We would also recommend that FRAs are carried out for any sites where other sources of flooding are identified or where ordinary watercourses are present (as there may be flood risk associated with these watercourses that is not mapped on the Environments Agency’s flood zone Maps due to the catchment area being less than the 3 square kilometres that we map.)

We welcome the strong stance in paragraph 2.10.5 on the goal of reducing flood risk, and equally support this approach. This will be relevant at a

planning application stage but should also form part of any development control policies included in DPDs, or the Waste Core Strategy itself.

Likewise, we support the stance in paragraph 2.11.1 of the need for developers to carry out drainage impact assessments at the early masterplanning stage as too often this is left until late in the planning process and does not adequately inform site layout. The recommendations of the Pitt report also support a move away from the way this has been handled in the past. Again, this is a policy recommendation that should be included in the Core Strategy.

Finally paragraph 2.12.1 advises on identifying opportunities to open up culverts. This is an approach we strongly support and advise it is also included as a policy in the WCS. The benefit of identifying this in a strategic document is that the matter is raised at the earliest possible stage for developers which is always preferable and particularly so when considering opening up culverts which can be an expensive option, but one with many positive environmental impacts.

Water Quality

We thank you also for consulting us previously on the water quality elements of the site allocation work.

We are pleased you have included our previous informal comments to include a data set of aquifers and Source Protection Zones (SPZs). These data sources are important for identifying groundwater locations that are particularly sensitive and require additional protection. We understand that you intend at this stage not to locate any waste sites on SPZs or major aquifers. We support this approach as it is a suitably precautionary approach to protecting water quality. Locating waste sites on minor aquifers would not be ideal, however we recognise that this may be necessary in some areas. There are ways of incorporating sound pollution prevention measures into the design of site infrastructure and drainage measures, as well as the operating methods used, that can protect water quality and avoid pollution incidents. However it is never possible to completely remove risk, and therefore the precautionary approach of avoiding locating waste sites on SPZs and major aquifers is considered justifiable in line with PPS 23. Furthermore we would advise that minor aquifers are avoided where possible in line with this precautionary approach.

If you find going forward that this limits your options for sites due to other constraints and considerations, and you need to revise this approach, then we would advise that certain types of waste sites may be more appropriate than others on major aquifers, (for instance landfilling should be avoided, but waste

transfer stations represent less of a risk to groundwater) and this should be taken into consideration if necessary.

We thank you for consulting us on these matters, and would emphasise that we would welcome further consultation on your work at both the pre-formal consultation stage and in a formal/statutory capacity. I apologise again that our advice was not made in a more timely manner and would note that we will endeavour to improve our response times in future. I trust that in this instance, the positive comments we have given here will not cause you too significant an amount of work in any changes you may wish to make following our advice. We are conscious that we would like to inform the plan-making process and therefore look forward to working further with you on the Core Strategy in the near future.

Please do not hesitate to contact me directly if you have any queries regarding the comment sin this letter, or other matters relating to he Waste Core Strategy.

Yours sincerely

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