



Gloucestershire  
COUNTY COUNCIL



## **Waste Core Strategy**

### **Technical Evidence Paper WCS-P**

### **Urban Growth Areas & Waste Management**

### **Living Draft**

**October 2009**

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## Section 1: Introduction

1. The purpose of this evidence paper is to consider the implications of the draft South West Regional Spatial Strategy (RSS) in terms of waste management in Gloucestershire, focusing in particular on the potential 'urban extensions' to Gloucester and Cheltenham that could come forward if the RSS is adopted in its current form.
2. It expands on the Waste Core Strategy (WCS) site options consultation paper, which acknowledges the possibility of urban extensions to Gloucester and Cheltenham coming forward if the RSS is adopted and asks for views in principle on whether these growth areas should be considered further in terms of the potential inclusion of waste treatment facilities.

## Section 2: Background

3. The South West Regional Spatial Strategy (RSS) sets out the regional planning framework that will guide future development in the south west region (including Gloucestershire) in the period 2006 – 2026. It deals with a broad range of topics including housing, employment, transport as well as minerals and waste.
4. The draft RSS was published in 2006 and considered at independent examination in 2007. Proposed changes were published for consultation in July 2008. Adoption of the final RSS has been delayed and at the time of writing it is not known when it will be adopted.
5. Notably under the 2004 Planning and Compulsory Purchase Act, the RSS will have a stronger role than its predecessor, Regional Planning Guidance (RPG) 10 and will form part of the development plan for Gloucestershire, replacing the adopted Structure Plan (1999). This means it will be a 'material consideration' in planning terms (i.e. a factor in decision making).
6. The purpose of the Gloucestershire Waste Core Strategy is to interpret and deliver the requirements of the RSS at the local level.

## Section 3: Implications of the RSS for Gloucestershire

7. The draft RSS includes a range of policies and objectives that apply across the south west region as well as a number of Gloucestershire specific policies and proposals.

### The Proposed Strategy for Gloucestershire

8. The overall strategy for Gloucestershire contained in the draft RSS can be summarised as follows:

- Gloucester and Cheltenham as the focus for development within the County
- Green Belt to be maintained but reviewed to accommodate new development around Gloucester and Cheltenham
- Improvement of key transport corridors in and between Gloucester and Cheltenham
- Regeneration of Gloucester under the Gloucester Heritage Urban Regeneration Company (GHURC) and Cheltenham under the 'Civic Pride' initiative
- Improved economic performance of Cheltenham and Gloucester

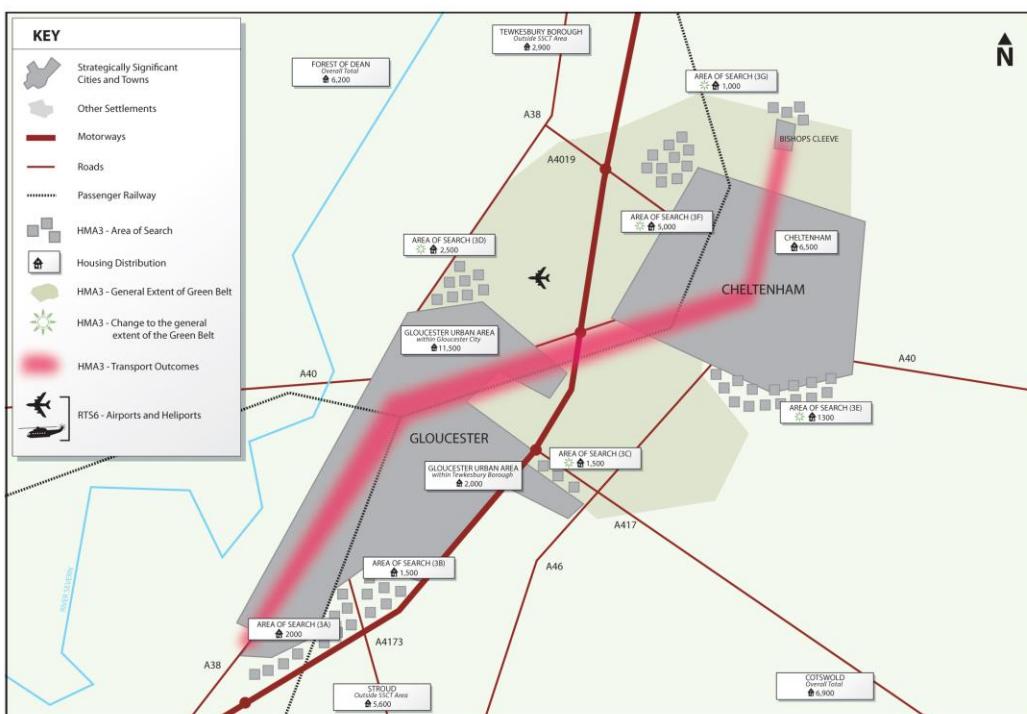
### Housing

9. With specific regard to new housing, the draft RSS Proposed Changes (2008) require 56,400 new homes to be built in Gloucestershire in the period 2006 to 2026 (although it should be noted that this level of growth is the subject of a number of objections including objections from Gloucestershire County Council). Notwithstanding this, the proposed housing is apportioned between the six Gloucestershire Districts as follows:

Gloucester	11,500 (575 new houses each year)
Cheltenham	8,100 (405 new houses each year)
Tewkesbury	14,600 (730 new houses each year)
Stroud	9,100 (455 new houses each year)
Cotswold	6,900 (345 new houses each year)
Forest of Dean	6,200 (310 new houses each year)

10. The proposed location of this housing is illustrated in broad terms on the diagram below, which is taken from the RSS (2008).

Key Diagram Inset 3 Cheltenham and Gloucester Housing Market Area



Source: South West RSS Proposed Changes (2008)

11. Gloucester and Cheltenham are defined in the draft RSS as 'strategically significant' and as such the intention is for most new housing to be provided at those two locations.
12. At Gloucester, a total of 11,500 homes will be built within the existing urban area, including at least 3,000 in the Central Area under the Gloucester Heritage Urban Regeneration Company (GHURC). Subject to the RSS being adopted, another 9,500 homes will be provided through 'urban extensions' on the edge of Gloucester within Tewkesbury Borough and Stroud District.
13. At Cheltenham, 6,500 homes will be built in the existing urban area with a further potential 7,300 new homes on the edge of Cheltenham as 'urban extensions' into Tewkesbury Borough.
14. In addition to new housing growth, the draft RSS also requires the provision of 79 hectares of new employment land at Gloucester and 39 hectares at Cheltenham.

### Waste

15. The draft RSS sets out a regional strategy for waste management, building on the 2004 South West Regional Waste Strategy; 'From Rubbish to Resource'. The draft RSS waste strategy can be summarised as follows:
  - Authorities to make provision for a network of strategic and local waste sites
  - Principal waste management facilities to be focused on the region's strategically significant cities and towns (SSCTs) including Gloucester and Cheltenham

- Provision of local facilities in smaller towns and rural areas where their needs cannot be met by strategic facilities at or near SSCTs
- Wherever possible, waste to be managed on the site where it arises or as close as practicable
- Site identification to take into account the availability of previously developed land, including established and proposed industrial sites, possibility of rail connections and the potential use of by-products (e.g. waste heat)

- 16.** With specific regard to Gloucestershire, Policy W1 of the draft RSS Proposed Changes (2008) sets out the amount of municipal waste to be managed in Gloucestershire in the years 2010, 2013 and 2020 broken down into targets for different categories including 'source separated' (recycled and composted) 'secondary treatment' (MBT, thermal treatment etc.) and 'landfill'. This is reproduced below.

Target Year	Source Separated	Secondary Treatment	Landfill	Total
2010	130,000	80,000	160,000	370,000
2013	150,000	120,000	130,000	400,000
2020	170,000	200,000	60,000	430,000

*Source: South West RSS Proposed Changes (2008)*

- 17.** These requirements are broadly consistent with the Gloucestershire Joint Municipal Waste Management Strategy (2008) which estimates that municipal waste will grow from around 324,000 tonnes per year in 2006/7 to around 457,000 tonnes by 2030/31, equivalent to an annual growth rate of 1.6%. Further, detailed information on current and forecast waste 'arisings' in Gloucestershire is set out in Technical Evidence Paper WCS A-Data (2007).

## Section 4: Waste Management Potential – Why the Urban Extensions?

18. Although they have not yet been confirmed through adoption of the RSS and are subject to some strong opposition there are a number of reasons why the potential urban extensions, if they go ahead, could be considered for waste treatment.
19. First, other than the sites at Brockworth, North Gloucester (part), South Gloucester and North of Bishop's Cleeve (part) these sites do not yet have planning permission and are at very early stage in the planning process. This provides the opportunity to consider on-site waste management from the outset in terms of the mix of uses and supporting infrastructure to be provided through the development.
20. Second, although Government policy gives priority to the re-use of previously developed land, the urban extensions if they go ahead, could be the subject of significant future development. Therefore what is currently Greenfield land would not remain so.
21. Third, the proposed urban extensions to Gloucester and Cheltenham, at around 16,800 new homes, will generate a significant amount of additional waste. The average Gloucestershire household produces around 1220 kg of waste each year<sup>1</sup>.
22. Fourth, emerging best practice<sup>2</sup> relating to 'eco-town' development makes it clear that major new development must be exemplary in terms of sustainable waste management. Whilst eco-towns are intended to be free-standing 'new settlements' it is considered that these general principles of sustainable waste management should apply equally to urban extensions to places such as Cheltenham and Gloucester.
23. Fifth, providing waste management facilities within the urban extensions would be consistent with the 'sequential approach' set out in Policy W2 of the SWRSS, which states that, '*where available, sites should be identified within the SSCT area (i.e. within Gloucester or Cheltenham). If that is not practicable, sites should be on the edge of the SSCT and if that is not practicable, sites should be within close proximity to the urban area served by the facility*'

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<sup>1</sup> Gloucestershire Joint Municipal Waste Management Strategy 2007 – 2020 (2008)

<sup>2</sup> Towards Zero Waste: Eco-Towns and Waste Management Worksheet (TCPA, CLG & Environment Agency)  
Draft PPS: Eco-Towns (CLG, 2008)

## Section 5: The Urban Extensions – Their Location and Current Status

24. There are eight 'urban extensions' identified in the draft RSS Proposed Changes (2008) five at Gloucester and three at Cheltenham.
25. The five potential Gloucester sites are:

Brockworth	2000 dwellings
South of Gloucester	2000 dwellings
South of Gloucester (east of railway line)	1500 dwellings
East of Gloucester	1500 dwellings
<u>North of Gloucester</u>	<u>2500 dwellings</u>
Total	9,500 dwellings

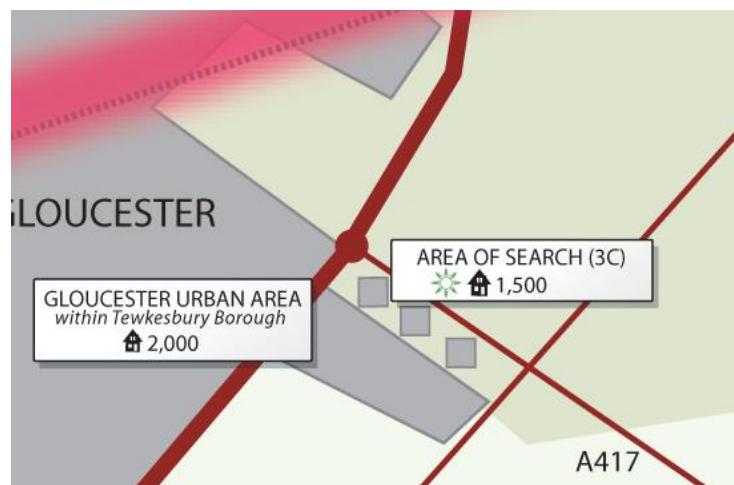
26. The three potential Cheltenham sites are:

South of Cheltenham	1300 dwellings
North of Cheltenham	5000 dwellings
<u>North of Bishop's Cleeve</u>	<u>1000 dwellings</u>
Total	7,300 dwellings

### The Gloucester Sites

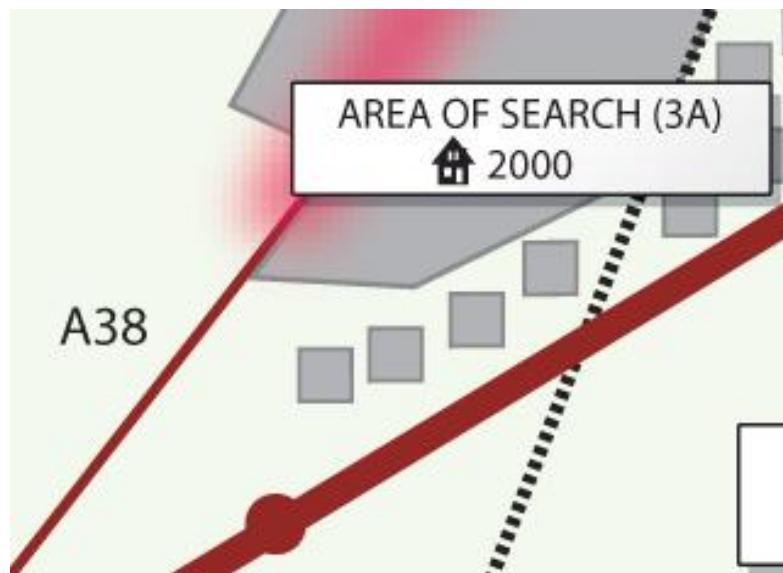
#### *Brockworth (2000 dwellings)*

27. Land at Brockworth, known as 'Cooper's Edge', already benefits from planning permission for 1,900 dwellings and is currently under construction by a consortium of different house builders. The development is on the site of the former Brockworth Airfield to the east of Gloucester and adjoins Gloucester Business Park. Part of the site falls in Stroud District and part in Tewkesbury.



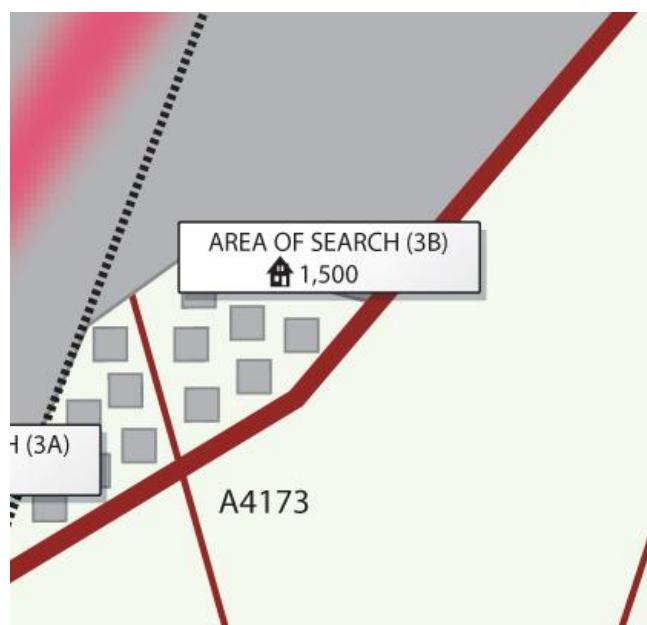
*South of Gloucester (2000 dwellings)*

28. Land to the south of Gloucester in Stroud District, known as 'Hunt's Grove' already benefits from outline planning permission for 1750 dwellings. The site is located between Waterwells Business Park and the M5 motorway (see aerial photo below). The mixed-use scheme also includes the provision of 6 ha of employment land.
29. It is understood that the developer Crest Nicholson is currently in discussions with Stroud District Council concerning Section 106 obligations, pending the submission of a detailed planning application or applications.



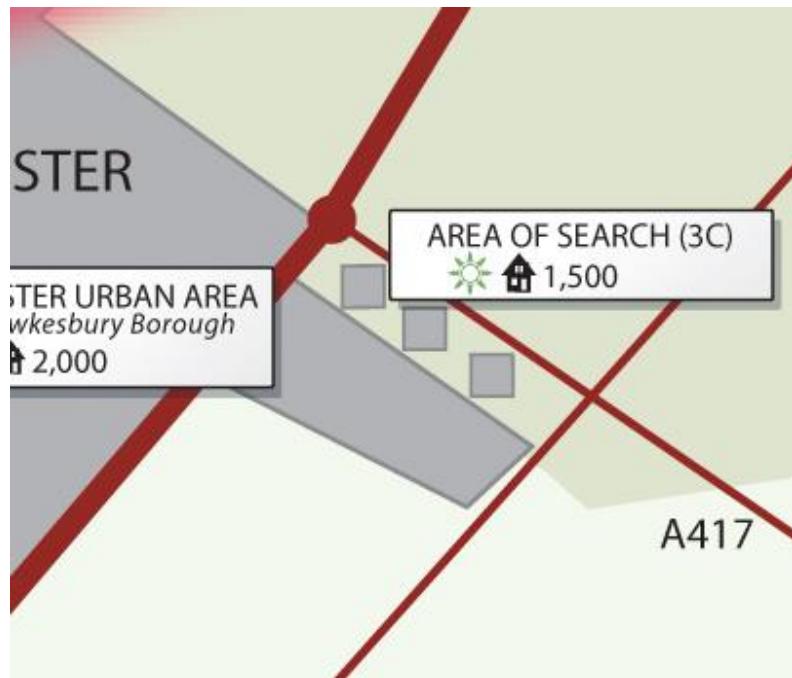
*South of Gloucester East of Railway Line (1500 dwellings)*

30. Land south of Gloucester to the east of the railway line does not have the benefit of planning permission. The draft RSS defines a broad 'area of search' between the existing built up area of Gloucester and the M5 motorway (see plan below). It should be noted that this site wasn't identified in the original draft RSS (2006) rather it was included as a Proposed Change in 2008.



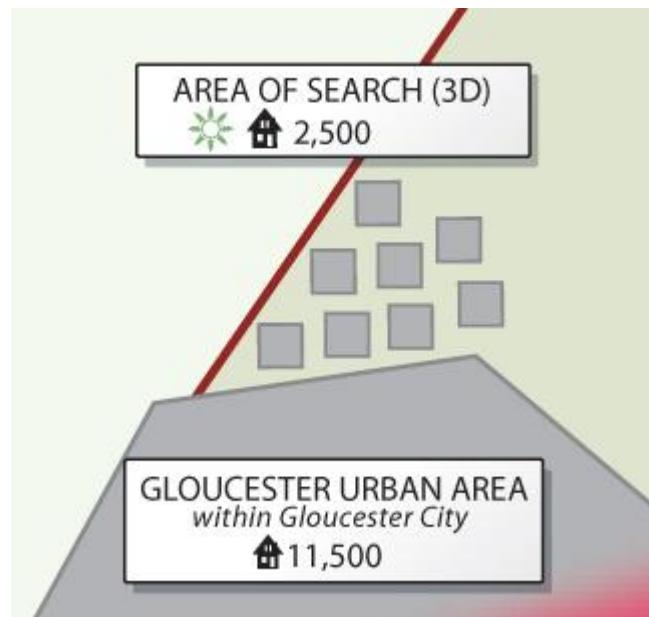
*East of Gloucester (1500 dwellings)*

31. Land east of Gloucester falls within Tewkesbury Borough and does not have the benefit of planning permission. The RSS indicates a broad 'area of search' which is effectively the area of land between the A417 and the built up area boundary of Brockworth (see plan below). It should be noted that this site wasn't identified in the draft RSS (2006) rather it was included as a Proposed Change in 2008.



*North of Gloucester (2500 dwellings)*

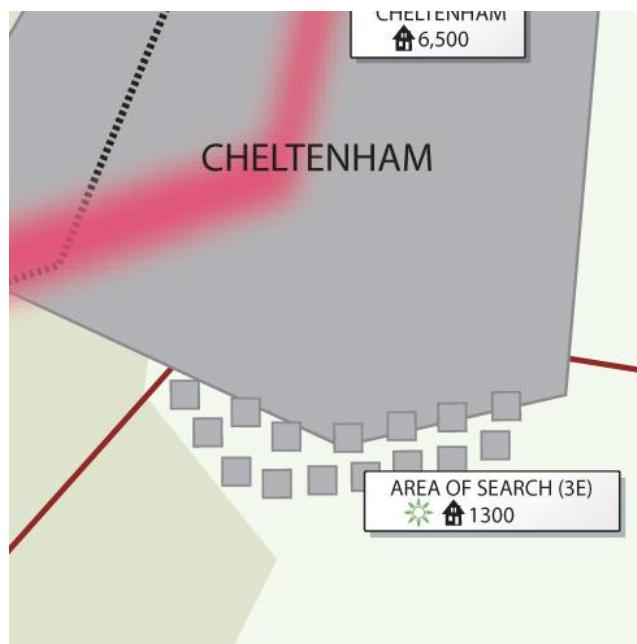
32. This area is located in Tewkesbury Borough and has planning permission for part of the site. Land at Longford has outline planning permission for 570 homes as part of a mixed-use scheme. A detailed 'reserved matters' planning application has been submitted but not yet determined.
33. An adjoining site near Innsworth is the subject of a current outline planning application for 1750 homes as part of a mixed-use scheme. The application has not yet been determined and at the time of writing, a decision is awaited on a planning appeal that was lodged on the grounds of 'non-determination' (i.e. the Council failing to approve or refuse the application in time).



### The Cheltenham Sites

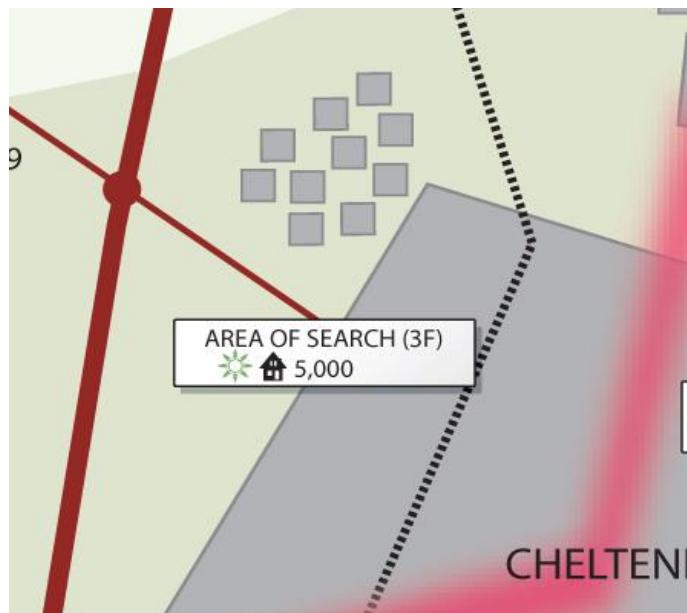
*South of Cheltenham (1300 dwellings)*

34. Land to the south of Cheltenham does not yet have planning permission. The draft RSS indicates a broad 'area of search' which straddles the District boundary with 600 dwellings proposed in Cheltenham and 700 in Tewkesbury. An outline planning permission for up to 365 dwellings on part of the site on land west of Farm Lane was appealed on the grounds of non-determination but dismissed.



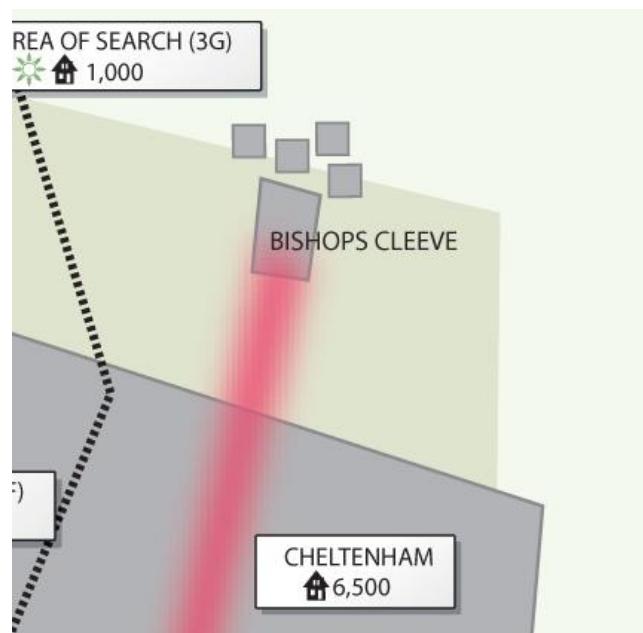
*North of Cheltenham (5000 dwellings)*

35. Land to the north of Cheltenham does not yet have planning permission. The precise boundary of the site is thus not yet defined rather the RSS indicates a broad 'area of search'. Notably, the draft RSS (2006) identified this area for 4,000 dwellings however this was increased to 5,000 in the Proposed Changes (2008). A developer consortium is understood to be currently working up a proposal.



*North of Bishop's Cleeve (1000 dwellings)*

36. Land to the north of Bishop's Cleeve is defined in the draft RSS (2008) as an 'area of search'. Part of the site (Homelands Farm) now has outline planning permission for 450 dwellings following a successful planning appeal in 2008.



## **Section 6: How will the Urban Extensions be taken forward?**

- 37.** The RSS defines the urban extensions to Gloucester and Cheltenham as broad 'areas of search'. If they are confirmed in the adopted RSS, the detailed planning of these areas will be taken forward through Core Strategies prepared by the relevant District and Borough Councils - potentially the Stroud Core Strategy and the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS).
- 38.** These Core Strategies should identify the boundaries of each urban extension, the mix of different land uses, key infrastructure requirements as well as other important issues such as design and phasing.
- 39.** Clearly if a strategic waste facility were to be located within one or more of the urban extensions there would need to be close integration between the Waste Core Strategy and the Stroud, Gloucester/Cheltenham/Tewkesbury Core Strategies to ensure that consistent policies and proposals are developed accordingly.

## Section 7: What Type of Waste Facility?

40. Clearly, the urban extensions summarised above have some potential to accommodate some form of waste management facility if they come forward. Consideration needs to be given to the scale of facility or facilities that could be provided. Should it be a 'strategic' facility capable of receiving and treating waste from across the rest of the County or should it be a smaller-scale 'local' facility or facilities designed to deal only with the additional waste generated by the development? Some consideration of this is set out below.

### Strategic Facility/Facilities

41. A 'strategic' waste facility or facilities would be capable of dealing not only with waste generated by the development but would also receive waste from elsewhere in the County.
42. In our site appraisal work to date we have defined sites as 'strategic' where they are larger than 2 hectares and have the potential to process at least 50,000 tonnes of waste per annum.
43. Clearly all of the potential urban extensions identified in the draft RSS are capable of accommodating a site of at least 2 hectares, provided this can be identified in the early stages of the planning process. Indeed, depending on the quantum and mix of other uses proposed, a larger site could be made available.
44. In the interests of promoting sustainable communities and to meet the employment land requirements of the draft RSS, each of the potential urban extensions is likely to include an element of employment as well as housing.
45. A strategic waste management facility could therefore either be incorporated into the employment land or identified as a standalone facility.
46. Clearly if a strategic waste facility or facilities were to come forward as part of an urban extension there are a number of key issues that would need to be taken into account, in particular those identified in PPS10 including:
- Physical and environmental constraints (e.g. nature conservation, visual intrusion, protection of water resources, historic environment, emissions, dust, odours, noise, potential land use conflict etc.)
  - The cumulative effect of previous waste disposal facilities on the well-being of the local community
  - The capacity of existing and potential transport infrastructure to support the sustainable movement of waste and products arising from resource recovery.
47. Another key issue is deliverability and detailed discussions would be needed with landowners in order to determine the level of interest in developing a strategic waste facility and how this might be incorporated into the overall development mix.
48. There is also of course the fact that at the time of writing, the draft RSS has not been adopted and as such, other than those sites that already have planning permission, the urban extensions are not guaranteed to come forward.

## Local Facilities

49. The development of the urban extensions if they go ahead would generate a significant amount of additional household waste. Therefore, even if none of them were to accommodate a 'strategic' waste facility, they should at least be required to provide the necessary 'local' infrastructure to deal with the additional waste generated by the development. This issue is explored below.

### *Communal Recycling and Composting Facilities*

50. The development of the urban extensions provides an excellent opportunity to provide well-designed and well-located communal facilities for household recycling such as a bring site. Such facilities would need to be incorporated into the design of scheme from the outset.
51. Similarly, some form of community composting facility would encourage people to collectively compost their organic waste. This could possibly be incorporated into other uses such as allotments or informal open space. There would of course need to be adequate separation of any sensitive uses to avoid problems of odour and any site would need to be properly managed and if necessary licensed.

### *Individual Recycling and Composting Facilities*

52. The potential urban extensions if they come forward would also provide an excellent opportunity to provide recycling and composting facilities for each household. The design of the new housing can for example help to ensure that adequate space for the storage of recyclable material and composting bins is made available.

### *Household Recycling Centres (HRCs)*

53. Some consideration might also be given to the inclusion of a Household Recycling Centre (HRC) as part of one or more of the urban extensions. HRCs provide the opportunity for householders to dispose of small and large household waste items which, wherever possible will be recycled or re-used. This would need to link with the emerging work of the Gloucestershire Waste Partnership (GWP) and the eventual move towards joint waste collection and disposal across the County.

### *Small-Scale Waste Treatment Facilities*

54. There may also be scope for the development of a small-scale waste treatment facility to deal with the additional waste generated by the development and possibly from some of the wider area depending on the capacity of the facility for example green waste or food waste.

## Other Considerations

55. Notwithstanding the provision of waste facilities the potential development of the urban extensions will also need to take into account a number of general principles in relation to sustainable waste management.

### *Waste Minimisation*

**56.** It will be essential to minimise the amount of waste that is produced through the urban extensions both during construction and subsequent occupation. The use of 'Site Waste Management Plans' or 'Waste Minimisation Statements' will help to reduce the amount of waste generated by the development through some or all of the following measures:

- Re-use of existing infrastructure (where available)
- Use of standard material sizes and pre-fabricated materials
- Use of recycled building materials (e.g. at least 10%)
- Use of sustainably sourced materials
- Waste materials to be re-used on site wherever possible

### *Building Design and Layout*

**57.** Good building design and layout also presents the opportunity to reduce the amount of waste produced. This is likely to include:

- The provision of adequate access for waste collection vehicles and their operatives
- The provision of adequate space for recycling and composting
- The provision of high quality buildings that are likely to last multiple generations
- New homes to achieve the mandatory elements of the Code for Sustainable Homes on waste (storage of non-recyclable and recyclable household waste, construction waste management and composting).
- Use of non-composite materials to encourage their re-use; and
- Design for easy access to facilities for both internal (occupier) and external (contractor) transfer of materials.

## Section 8: Summary

58. The Waste Core Strategy Site Options consultation acknowledges the potential urban extensions to Gloucester and Cheltenham that could come forward through the RSS if it is adopted in its current form. The consultation paper asks for views in principle on whether we should be looking to incorporate new waste facilities into the urban extensions if they come forward.
59. If there is support for this approach it will be explored in more detail by Officers in working towards the formal publication version of the WCS in 2010, subject to adoption of the RSS.
60. Appropriate wording and policies would also be needed in the Core Strategies of Stroud and Gloucester, Cheltenham, Tewkesbury, which are being prepared in parallel albeit via a separate process.

 recycle for Gloucestershire



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