

---

**Statement prepared by Gloucestershire County Council | May 2019****Main Matter 3 | Whether the Plan makes adequate provision for the encouragement of the use of secondary and recycled aggregates?****Issue: Whether the Plan sufficiently promotes the use of secondary and recycled aggregates?****Question 18:****Does the Plan provide clear guidance regarding the contribution that secondary and recycled aggregates should make as an alternative to primary land won aggregates?**

1. Yes – it is the view of the County Council that the contribution secondary and recycled aggregates should make as an alternative to primary land-won aggregates has been made clear. Through the plan period, *‘the contribution’* to aggregate supplies should represent the optimum achievable level taking into account viability and sustainability matters including avoidance of adverse impacts on local communities, the environment and also the ability to successfully achieve the restoration of mineral sites. This position is presented as one of the plan’s objectives covering secondary and recycled aggregates (page 22, [SUB 001](#)).
2. For good reason, the County Council does not consider it appropriate at this time to attempt to establish a ‘contribution’ defined by a range of values / or a fixed value based on either an overall tonnage or annual supply rate. Existing datasets, particularly at the local level, are too limited and would not yield sufficiently accurate evidence to justify the setting of a figure(s). This circumstance is observed within the discussion of the 6<sup>th</sup> Gloucestershire LAA about the role of secondary and recycled aggregates ([SUB 019](#)).
3. Nevertheless, the County Council does not consider current data limitations as a valid reason in which to avoid attempts to sustain or uplift secondary and recycled aggregate use. Policy SR01 presents an ideal opportunity in which to attribute ‘planning value’ to the maximum use of secondary and recycled aggregates within new development and thus act as a desirable and positive stimulus. It will also be an important tool in expanding the evidence base in respect of this matter over the coming years.

---

**Question 19:**

**How realistically can Policy SR01 be applied and monitored with particular regard to the demonstration of circumstances wherever the use of secondary and recycled aggregates in preference to primary aggregates is ‘reasonable and practicable to do so?’**

4. It is the view of the County Council that Policy SR01 can be applied and monitored. It is understood that the application of the policy will involve a degree of collaboration between the County Council and Gloucestershire’s district councils. However, this is not a unique circumstance and is already occurring with other planning matters including the implementation of waste minimisation through the adopted Gloucestershire Waste Core Strategy (WCS) Policy WCS 2: Waste Reduction ([PSD1](#)).
5. The County Council considers it has taken a pragmatic approach with Policy SR01 by making a clear distinction between scales of development (i.e. major and non-major) for the purposes of setting policy expectations. For all non-major development, the use of secondary and recycled aggregates is about embracing the principle and taking up opportunities to deviate from conventional primary mineral use. Applicants will be able to ‘convert’ any positive decision making in respect of this matter into policy support / planning weight when their development is ready to be determined.
6. In terms of the ‘reasonableness’ test, this is a matter dependent upon individual circumstances. However, the supporting text to Policy SR01 highlights construction and design quality constraints and also environmental limitations and impacts on nearby local communities (from using secondary and recycled aggregates) as influential issues (page 30, [SUB 001](#)). The ‘practicableness’ test is also covered in the supporting text to Policy SR01 and is concerned with the realistic availability of materials.

---

**Question 20:**

**Does the supporting text to Policy SR01 provided sufficient guidance to applicants and City, Borough and District Council's as to how compliance with the policy is expected to be achieved?**

7. Yes – it is the view of the County Council that the supporting text to Policy SR01 provides sufficient guidance to all concerned in terms of demonstrating compliance with the policy. Information is provided to explain what type of information should be provided and in what form it might most efficiently be presented (pages 30 to 32, [SUB 001](#)). Specifically in the case of major development applications, it is expected that evidence is submitted about the value of construction materials that will be derived from recycled and secondary sources with a target equivalent to 10%. Where it is not deemed possible to achieve the target, applicants will be expected to provide a robust justification to explain why. The 10% target is already in use as part of the implementation for the adopted Gloucestershire Waste Core Strategy (WCS) Policy WCS 2: Waste Reduction ([PSD1](#)).

**Question 21:**

**How will the effectiveness of Policy SR01 be monitored?**

8. The Monitoring Schedule for the plan includes Policy SR01 (page 135, [SUB 001](#)). It sets out how policy implementation data will be sought, what policy targets will be used and what policy triggers will be employed. For Policy SR01, its effectiveness will largely be established over annual cycles through the monitoring of major planning applications in Gloucestershire. Monitoring will involve determining the degree of adherence to the 100% target for permitted major development proposals which have committed to the use secondary and / or recycled aggregates within their construction. It will also include the annual change in the supply of secondary / recycled aggregates and the presence in any given year of permitted major development proposals within the county that are not committed to using any secondary and recycled aggregates.

**Questions 18 to 21 response word count: 884**