

Gloucestershire Waste
Core Strategy (WCS)

Regulation 30(d)
Statement of
Consultation

Prepared in accordance
with Regulation 30(d)
of the
Town & Country
Planning (Local
Development)
(England)
(Amendment)
Regulations 2008

September 2011

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1. Introduction

- 1.1 This 'statement of consultation' has been produced in support of the publication Gloucestershire Waste Core Strategy (WCS) December 2010 and fulfils the requirements of Regulation 27 and 30(d) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.
- 1.2 The purpose of the statement is to set out the following:
 - *Which bodies and persons were invited to make representations during the preparation of the WCS (the stage known as 'Regulation 25')*
 - *How those bodies and persons were invited to make those representations*
 - *A summary of the main issues raised; and*
 - *How those issues have been addressed in the WCS.*
- 1.3 Preparation of the WCS has taken place in three main stages; issues and options (2006) preferred options (2008) and site options (2009). A certain amount of ongoing consultation has also been carried out in between each stage.
- 1.4 Below we outline who was consulted at each stage, how they were consulted, the main issues raised and how these have been taken into account in the publication WCS.

2. Who was consulted?

- 2.1 A broad range of organisations and individuals were invited to get involved in preparing the WCS. Appendix 2 sets out a list of the 'specific' and 'general' consultation bodies invited to comment.
- 2.2 In addition, over 1,000 'other' individuals and organisations held on the Council's in-house database were contacted. The database has been developed over several years and consists of a range of different people and organisations that have previously expressed an interest in the WCS process. The complete list of 'persons' is rather too long to include in this statement but can be made available on request.
- 2.3 At the 'site options' stage in October 2009, in addition to the specific, general and other consultees referred to above, the Council wrote to all properties (residential and business) within 250m of the 13 sites identified in the site options paper. This resulted in a further 2,000+ people and businesses being invited to comment.
- 2.4 Whilst there are too many to list individually here, all those who responded to the site options consultation are listed in the site options response report which is available on the Council's website www.goucestershire.gov.uk/wcs/publication

3. How were they consulted?

3.1 The methods of engagement used at each stage are summarised below.

Issues and Options (2006)

- Colour newsletter (Nov 2005) - over 1,000 copies distributed and also made available on website
- Joint (with the Waste Disposal Authority) 'Attitudes' Survey (Nov 2005) - looking at attitudes towards waste management and recycling; sent to around 1200 people
- Stakeholder Workshop (March 2006) - exploring a potential vision and objectives, key issues and the criteria to be used for locating new waste facilities (see Appendix 3 for a list of workshop attendees)
- Stakeholder workshop report published and made available on the Council's website (May 2006)
- Issues and options 'consultation pack' published (July 2006) comprising; Issues and Options Part A (summary) Part B (full report) Sustainability Appraisal (SA) report and Habitat Regulations Assessment (HRA) Screening Report
- Consultation letter sent to over 1200 individuals and organisations advising of the issues and options consultation. A colour newsletter accompanied the letter to encourage participation.
- Copies of the Issues and Options consultation documents sent to each 'specific' consultation body (see Appendix 2) made available on request, placed on the County Council's website and at libraries and District Council offices
- To further assist stakeholders, a standard response form was provided both in hard copy and electronic format.
- The 'Great Gloucestershire Debate' (November 2006) – debate on waste issues including; global warming, reduction and re-use, recycling, waste collection and technology
- Report of the Issues and Options consultation made available on the Council's website (March 2007) - see www.goucestershire.gov.uk/wcs/issuesandoptions

Preferred Options (2008)

- Oct 2006 – March 2007 meetings with Gloucestershire District Councils and neighbouring authorities including Wiltshire, South Gloucestershire and North Somerset. Minutes of these meetings made available online as part of the WCS evidence base
- Stakeholder Workshop (Oct 2007) - focusing on a number of key policy options including provision (how to meet targets for waste management including the treatment of residual 'black-bin' waste) and location (in broad terms where are the best locations for waste management facilities). See Appendix 4 for a list of workshop attendees.
- Stakeholder workshop report published and made available on the Council's website (Nov 2007)
- Preferred options 'consultation pack' published (Jan 2008) comprising; Preferred Options Paper, Sustainability Appraisal (SA) Report, SA Report (Non-Technical Summary) Habitats Regulations Assessment (HRA) Appropriate Assessment (AA) and various evidence papers – www.goucestershire.gov.uk/wcs/evidence
- Consultation letter sent to over 1200 people and organisations advising of the preferred options consultation.
- Copies of the preferred options consultation documents sent to each 'specific' consultation body (see Appendix 2) made available on request, placed on the County Council's website and at libraries and District Council offices
- To further assist stakeholders, a standard response form was provided both in hard copy and electronic format.
- Report of the 'Preferred Options' consultation made available on the Council's website (June 2008) – see www.goucestershire.gov.uk/wcs/preferredoptions

Site Options (2009)

- Various press releases and newspaper supplement (Sept – Nov 2009)
- Members internal briefing (Sept 2009)
- 130 posters circulated to various venues (Sept/Oct 2009)
- 'Pre-consultation' direct mail (letter and leaflet) to residents and businesses within 250m of each potential site advising them of the forthcoming consultation (September 2009) – over 2,000 letters sent out
- Direct mail to MPs, County Councillors, District Councillors and 263 Parish/Town Councillors (Oct 2009)
- 'Consultation' direct mail to residents and businesses within 250m of each site (Oct 2009) plus all stakeholders (1200+) held on the Council's database
- Email to Area Lead Officers (ALOs) Village and Community Agents
- 'E-zine' headline article (Oct 2009) circulated to 723 individual stakeholders, including Parish Councillors
- 'E-zine' article (Nov 2009) circulated to 723 stakeholders, including Parish Councillors
- 'E-bulletin' circulated to 350 members of the Gloucestershire Conference (Nov 2009)
- Site Options 'consultation pack' published (October) online at www.glos.gov.uk/wcs/siteoptions and made available at the County Council Offices, all Gloucestershire District Council Offices and all libraries. This included the Site Options paper, Site Options summary paper, Sustainability Appraisal (SA) report, SA non-technical summary, Habitat Regulations Assessment (HRA) report and Equality Impact Assessment (EIA).
- Waste 'Roadshows' (Oct – Nov 2009) – roaming, manned exhibition held at various venues throughout the County local to each potential site. Ten external events held in total plus one internal event for Members and Officers.
- Site options response report providing more detail on the issues raised during the site options consultation and how these were considered, made available as part of the publication WCS pack online and at all Gloucestershire District Councils and Libraries in December 2010.

4. How many responses were received?

- 4.1 A total of 43 stakeholders responded to the 'Issues and Options' consultation. It is likely that this relatively low level of response was due to the fact that the Issues and Options consultation paper was quite 'generic' in terms of its content and did not focus on specific sites, which is often where most interest arises.
- 4.2 A total of 52 people/organisations responded to the main 'Preferred Options' consultation and a further 87 people/organisations completed a shorter questionnaire. Again, it is likely that this relatively low response was due to the generic nature of the WCS at the preferred options stage and the fact it only identified broad locations for development rather than specific sites.
- 4.3 A total of 457 people/organisations responded to the 'Site Options' consultation. This higher level of response can be largely attributed to the fact that the consultation document identified 13 sites that could potentially be used for waste management purposes. Most responses were received from neighbouring properties.
- 4.4 Over 200 people attended the waste roadshow events.

5. What were the main issues raised and how have these been taken into account?

5.1 The schedule attached at Appendix 1 sets out the main issues raised by respondents at each stage of the process and explains how they have been taken into account in the publication WCS. It should be noted that some issues were raised during more than one stage (e.g. at both issues and options and preferred options). The comments received in relation to the site options consultation have been sub-divided into general comments and those relating specifically to each site.

Issues and Options (2006)

| Issue Raised | How has this been taken into account in the WCS? |
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| Wording needs to be clear and easy to understand. | The WCS has been drafted in a manner that is considered to be easy to read and understand. An executive summary is provided and each section is colour coded for ease of reference. Illustrations and photographs are included throughout. It is the case that waste planning is a technical subject and to further aid understanding, a glossary of key terms is also provided for ease of reference. |
| Need to reflect the importance of climate change and greenhouse gas emissions. | The importance of climate change is fully acknowledged and reflected in the WCS. It is highlighted as a key issue with specific reference to the potential impact on flood risk. Strategic Objective 5 aims to ensure the environmental and social impacts of waste management are minimised particularly climate change and risks to human health. The impact of waste management on climate change is also highlighted in the spatial vision. Additional commentary is set out at paragraphs 4.165 – 4.175 and a separate evidence paper on climate change has been made available alongside the preparation of the publication WCS. |
| Concern about importation of waste from outside Gloucestershire. | The proposed spatial strategy is based on the management of waste close to source in line with national policy. The four strategic site allocations will help to ensure that residual municipal and commercial/industrial waste (i.e. the waste that cannot be reused, recycled or composted) is able to be treated within the County. Whilst the County Council as Waste Disposal Authority (WDA) has control over municipal waste, it does not have the same control over commercial/industrial, construction and hazardous waste which may be imported into or exported from Gloucestershire depending on private waste management arrangements that may be in place. Notwithstanding this, the WCS in providing a framework for additional waste management infrastructure within Gloucestershire will help to increase the degree of waste management 'self-sufficiency' of the county. This in turn will help to provide the framework for the consideration of these issues by the Council as Waste Planning Authority (WPA) at the development management stage. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Need to tackle the issue of packaging waste generated by retailers. | The issue of retailer packaging is highlighted in Section 4.0 of the WCS with reference made to the Courtauld Agreement – a voluntary national agreement between WRAP (Waste & Resources Action Programme) and over 40 major retailers, brand owners, manufacturers and suppliers which aims to reduce household waste by designing out packaging waste. However, other than raising awareness of the issue there is little that the WCS can do directly to tackle it as it falls outside the scope of the planning system. |
| The vision needs to have a geographic component and clearly set out what Gloucestershire will look like in the future. | The vision set out in the publication WCS clearly articulates in spatial (geographic) terms how Gloucestershire will change in the period to 2027 including in particular the development of strategic waste management facilities (>50,000 tonnes/year) recovering waste directly from landfill within the central area of the county, defined as 'Zone C'. |
| Must consider the generation and capture of heat and power (CHP). | The strategic site allocations identified in the WCS have all been subjected to an assessment of their potential for combined heat and power (CHP). The assessment is available in a separate CHP evidence paper which considers each site (along with the other sites identified in the October 2009 site options consultation) and estimates local heat demand from existing and proposed development nearby. The findings of the CHP assessment are summarised in the strategic site schedules attached at Appendix 5 of the WCS. |
| Importance of waste reduction (minimisation) and re-use. | The importance of waste reduction and re-use are fully acknowledged and reflected throughout the WCS. The spatial vision for example aims to ensure residents and businesses proactively minimise their waste production to achieve zero-growth by 2020 and that opportunities for re-using, recycling and composting waste are maximised. Strategic Objectives 1 and 2 deal with waste reduction and re-use respectively. Core Policy WCS1 aims to ensure that waste is minimised and re-used as far as possible in all new development. All major development must be supported by a 'waste minimisation statement'. The policy is supported by a separate supplementary planning document (SPD) on waste minimisation. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Locate waste facilities close to point of waste production. | The need to manage waste close to source is fully recognised and is reflected in the spatial strategy of the WCS which seeks to locate strategic waste management facilities (>50,000 tonnes/year) within the central area of Gloucestershire (Zone C) allowing for waste generated at the main urban areas of Gloucester and Cheltenham to be managed close to source in line with national policy. |
| Need to link to the Joint Municipal Waste Management Strategy (JMWMS). | Paragraph 1.8 of the WCS explains the links to a number of other plans and strategies including the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS). Appendix 2 is a detailed schedule of plans and programmes including the JMWMS explaining how each is related to the WCS. Further commentary is set out in Section 3.0. Paragraph 3.14 explains the role of the JMWMS, including who prepared it and most importantly the level of additional waste recovery capacity for municipal waste that it identifies. |
| Encouragement of recycling and composting through facilities for residents. Use of incentives/penalties. | The importance of recycling and composting is fully recognised within the WCS including the vision, objectives, core policies and supporting text. The target is to achieve at least 60% recycling/composting of household waste by 2020. Core Policy WCS1 aims to ensure the provision of recycling facilities for residents and employees in new development whilst Core Policy WCS2 provides the policy framework against which proposals for commercial-scale recycling and composting facilities will be considered. The use of incentives/penalties to encourage higher rates of recycling and composting is however outside the scope of the WCS. |
| Need to consider the issue of agricultural waste. | The need to address all waste streams, including agricultural waste is reflected in the WCS. Section 2.0 provides a range of information on current waste management arrangements in relation to agricultural waste. Section 3.0 provides information on the amount of agricultural waste which for Gloucestershire represents less than 1% of the total amount of managed waste. As such it is considered that there is sufficient existing waste management capacity available. For this reason, whilst the supporting text at paragraphs 4.152 – 4.161 provides general commentary on the issue of agricultural waste, no specific policy is proposed. There will however be a general presumption in favour of development proposals that would help move the management of non-natural agricultural waste up the waste hierarchy. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Need to consider the issue of waste water. | It is acknowledged that the WCS must address all waste streams including waste water. Section 2.0 sets out the current situation regarding waste water treatment facilities in Gloucestershire. With regard to making provision, unfortunately, at the present time there is some doubt about the quantum and location of future housing and employment growth in Gloucestershire due to the potential abolition of the RSS through the localism bill. For this reason the WCS adopts a criteria-based approach towards waste water provision rather than the identification of site allocations. Particular support will be given to proposals involving Anaerobic Digestion (AD). |
| Promotion of sustainable modes of transport. | Most of the waste managed in Gloucestershire is transported by road. This is recognised as a key issue within the WCS. Further commentary in relation to sustainable transport is set out in paragraphs 4.264 – 4.284 which highlight the current situation including the fact that the majority of waste in Gloucestershire is transported by road and explains the potential for more sustainable alternatives including rail and water. Core Policy WCS14 – Sustainable Transport lends support for waste-related development proposals that utilise alternative modes of transport such as rail and water. The policy also sets out the circumstances in which a Transport Assessment (TA) and Travel Plan will be required. |
| Importance of reduction in landfill and the need to achieve LATS targets (landfill allowance trading scheme). | The importance of diverting waste from landfill is fully recognised and reflected in the WCS which whilst recognising the continuing role of landfill for certain wastes aims to reduce Gloucestershire's reliance on landfill as the primary method of waste management. Specific reference is made to the LATS scheme at paragraph 3.11. The rising costs of waste management associated with the LATS scheme are highlighted as one of the key drivers for the WCS. The current situation regarding landfill in Gloucestershire is set out in detail in Section 4.0. Due to existing remaining landfill capacity within the county no additional provision is proposed at this stage. As stated in the WCS, this situation will however need to be reviewed towards 2020. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Effective monitoring required throughout the plan period. | The importance of monitoring is fully recognised. The WCS includes a detailed monitoring framework at Section 5.0 that will be used to measure the degree to which the various core policies are being implemented and whether they are having any unintended significant effects. Where policies are failing to deliver their objectives or may be having unintended effects they will be revised or replaced accordingly. The proposed monitoring framework is based on the established 'objectives, policies, targets and indicators' approach to monitoring. |
| Contingency needed if sites fail to achieve planning permission. | The need for contingency is recognised. Four strategic sites have been identified as site allocations for waste recovery within the WCS. These sites have been selected for a number of reasons including their likely prospects of delivery. However, Core Policy WCS4 adopts a criteria-based approach which will ensure other site options are able to come forward subject to certain criteria. There are also criteria based policies WCS2 & WCS3 within the WCS which provide a policy framework for most supporting activities such as recycling, composting, bulking and transfer. The implementation framework set out in Section 5.0 provides specific commentary on potential contingency/mitigation for the core policies should they fail to come forward and deliver their objectives as anticipated. |
| Need to take into account the issue of cumulative impact. | The importance of cumulative impact is recognised. PPS10 makes it clear that in deciding which sites and areas to identify for waste management, waste planning authorities should have regard to the 'cumulative effect' of previous waste disposal facilities on the well-being of the local community. Strategic Objective 5 of the WCS aims to minimise environmental impact including the use of existing waste sites or previously developed land 'where the cumulative impact is not unacceptable to the host location'. Core Policy WCS7 – Cumulative Impact sets out the Council's proposed approach towards this issue. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Importance of safeguarding existing waste facilities including hazardous waste facilities subject to environmental acceptability. | The importance of safeguarding existing and proposed waste facilities is acknowledged. Strategic Objective 5 – minimising impact refers to safeguarding existing and proposed waste sites and this is reflected in Core Policy WCS8 which aims to safeguard existing and allocated waste management sites from proposals that would adversely affect or be adversely affected by, waste management uses. Hazardous waste is dealt with through Core Policy WCS6 – Hazardous Waste. |
| Waste to be seen as a resource from which 'value' can be recovered. | The importance of recovering value or energy from waste is fully recognised and is reflected in the vision and objectives of the WCS. Core Policy WCS4 deals specifically with the issue of waste recovery facilities for residual waste (i.e. the waste that cannot be re-used, recycled or composted). |
| Prioritise the use of previously developed (brownfield) land in preference to greenfield whilst recognising the biodiversity and geological interest of some brownfield sites. | Strategic Objective 5 aims to minimise the environmental and social impacts of waste management including the use of existing waste sites or previously developed land in preference to Greenfield locations. Core Policy WCS2 emphasises that particular support will be given to proposals that involve the re-use of previously developed land. Further information specifically regarding nature conservation (biodiversity and geo-diversity) is set out in paragraphs 4.239 – 4.245 and Core Policy WCS12. |
| The WCS should allocate strategic sites and use criteria based policy for smaller-scale proposals. | Four strategic site allocations have been identified in the WCS capable of managing more than 50,000 tonnes per year. The allocation of these sites will provide certainty for landowners, residents and businesses and will help to improve the prospects of delivery. Other strategic facilities will be permitted elsewhere in Zone C where the strategic site allocations are unavailable and there is a clear justification that proposals will meet the identified recovery capacity and not compromise any other policies contained in this strategy. Smaller scale facilities (<50,000 tonnes/year) will be permitted both within and outside Zone C subject to a number of criteria. This approach will help to provide certainty whilst offering flexibility. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Need to be specific about the number and type of waste management facilities needed within given timeframe. | The need for certainty is recognised. Section 3.0 of the WCS explains in detail future forecast capacity requirements in the period to 2027 and Table 3 sets out the number and type of new facilities needed. |
| Must take account of potential impact on residential amenity. | The need to minimise the social and environmental impacts of waste management is recognised in the spatial vision of the WCS and supporting Strategic Objective 5. Paragraphs 4.176 – 4.187 deal with the related issues of amenity and cumulative impact. Part of the site selection process for the strategic site allocations identified in Core Policy WCS4 has involved the consideration of the proximity of nearby sensitive uses such as housing. The four site allocations identified all have relatively few sensitive uses nearby. The various criteria set out in the remainder of the WCS core policies will also help to ensure that any potential impact is minimised. It should be remembered that amenity will also be considered/safeguarded through saved Waste Local Plan (WLP) criteria based policies which will remain in force until reviewed through a Development Management DPD. |
| Need to recognise the importance of education, communication and awareness raising. | The importance of education, communication and awareness raising is acknowledged. Attitudes towards waste and recycling will have a direct impact on the amount of waste that is re-used, recycled or composted and the amount of residual waste that subsequently needs to be managed. The spatial vision set out in the WCS aims to ensure that residents and businesses are fully aware of the economic and environmental importance of waste management including its impact on climate change so that they proactively minimise waste to achieve zero-growth by 2020. Core Policy WCS1 – Waste Reduction states that 'the County Council will continue to work in partnership with the District Councils and other public and private sector organisations including local schools and colleges to raise awareness and positively influence attitudes and behaviour so as to reduce the amount of waste produced and ensure a greater proportion of waste is re-used'. |

Preferred Options (2008)

| Issue Raised | How has this been taken into account in the WCS? |
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| Major waste facilities to be located within close proximity to the biggest urban areas. | The proposed spatial strategy set out in the WCS which is focused on the central area of the county defined as 'Zone C' will help to ensure that strategic scale waste management facilities (>50,000 tonnes/year) are located in close proximity to Gloucester and Cheltenham, Gloucestershire's two largest urban areas and the main source of waste arisings in the county. |
| For strategic facilities (>50,000 tonnes/year) identify sites and also use criteria. | Four strategic site allocations for waste recovery have been identified in the WCS capable of managing more than 50,000 tonnes of waste per year. The allocation of these sites will provide certainty for landowners, residents and businesses and will help to improve the prospects of delivery. Other strategic facilities will be permitted elsewhere in Zone C where the strategic site allocations are unavailable and there is clear justification that proposals will meet the identified recovery capacity and not compromise any other policies contained in the WCS. |
| For local facilities use a criteria-based approach. | The proposed spatial strategy set out in the WCS is based on focusing strategic facilities (>50,000 tonnes/year) into the central area of the county defined as Zone C. Smaller scale facilities (<50,000 tonnes/year) will be permitted both within and outside Zone C subject to a number of criteria. This approach will help to provide certainty whilst offering flexibility. |
| The continuing role of landfill needs to be recognised. | The WCS acknowledges that landfill will continue to play an important role in Gloucestershire in the future in disposing of certain types of waste. In line with national policy the WCS seeks to reduce Gloucestershire's reliance on landfill as the primary method of waste management. This is reflected in the spatial vision, strategic objective 4 and the supporting text set out at paragraphs 4.116 – 4.129. Given the forecast available voidspace, no specific provision is made for additional landfill within the county as there is sufficient capacity for the foreseeable future. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Concern about incineration (thermal treatment) | <p>The process of incineration or 'modern thermal treatment' is explained in Section 4.0 of the WCS alongside a number of other waste recovery technologies including gasification, pyrolysis, autoclaving and mechanical biological treatment. The strategic site allocations identified in the WCS are capable of accommodating a range of waste recovery technologies.</p> <p>As PPS10 guides the Waste Planning Authority (WPA) down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 – Planning for Sustainable Waste Management, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy.</p> |
| Need to address the issue of waste water provision – what additional capacity is needed and where having regard to future growth. | <p>It is acknowledged that the WCS must address all waste streams including waste water. Section 2.0 sets out the current situation regarding waste water treatment facilities in Gloucestershire. With regard to making provision, unfortunately, at the present time there is some doubt about the quantum and location of future growth in Gloucestershire due to the potential abolition of the RSS. For this reason the WCS adopts a criteria-based approach towards waste water provision. Particular support will be given to proposals involving Anaerobic Digestion (AD).</p> |

| Issue Raised | How has this been taken into account in the WCS? |
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| Need to consider the potential role of Sharpness Docks and the potential for sustainable transport of waste presented. | Reference to Sharpness Docks is made at paragraph 4.270 and 4.271 of the WCS including reference to the potential restoration of the rail link should a viable business case and private finance be forthcoming. With regard to the potential role of Sharpness for waste management, the site was considered during the site selection process leading up to publication of the WCS but was excluded from further consideration as a strategic waste site because the landowner British Waterways did not wish to promote the site for waste management purposes raising question marks over its deliverability. This does not remove the fact that there are several permitted waste facilities operating in the Sharpness Docks area and that future waste operations could come forward for consideration under the criteria based policies of the WCS. |
| Flood risk is a critical issue and must be addressed through an appropriate policy. | <p>Flood risk and the potential implications of climate change are identified as one of the ten issues for the WCS to address. Safeguarding land subject to current and potential future flood risk is also identified in the spatial vision. Avoiding current and potential flood risk areas is included in Strategic Objective 5.</p> <p>Section 4.0 – Spatial Strategy includes Core Policy WCS9 – Flood Risk and supporting text as appropriate, with specific reference to the location and design of new development. Core Policy WCS9 is consistent with and amplifies national policy. The importance of flood risk to Gloucestershire is such that it warrants the inclusion of a specific core policy on this issue within the WCS.</p> |
| Emphasise the importance of good design. | The importance of achieving high quality design in new development including waste management is fully acknowledged. Good design is an integral feature of planning policy at the national level. The importance of good design is reflected in strategic objective 5, the supporting text at paragraphs 4.254 – 4.261 and Core Policy WCS13 – Design. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Need to prioritise the re-use of previously developed (brownfield) land. | Strategic Objective 5 aims to minimise the impact of waste management by prioritising the co-location of similar or related facilities on existing waste sites or previously developed sites in preference to greenfield locations where appropriate. The strategic site allocations identified in Core Policy WCS4 all involve the re-use of previously developed land. Any speculative development on greenfield land will be considered on its merits. |
| Each District should deal with its own waste. | Strategic objective 1 aims to raise awareness of waste issues and generate collective responsibility for waste. With regard to the provision of waste facilities in each District, the proposed spatial strategy contained in the WCS seeks to focus large-scale facilities into the central area of the county (defined as Zone C). The four strategic site allocations lie within Stroud District and Tewkesbury Borough. The criteria set out in Core Policy WCS4 would allow for other facilities to come forward in Districts where the operating capacity is less than 50,000 tonnes per year and the other criteria in the Strategy are met. In addition there are also criteria based policies WCS2 & WCS3 within the WCS which provide a policy framework for most supporting activities such as recycling, composting, bulking and transfer. |
| Need to address all waste streams not just household waste. | The WCS addresses all waste streams. Household waste is of particular importance given the pressing need to divert from landfill and the potential financial penalties associated with the Landfill Allowance Trading Scheme (LATS). However, in line with national policy, the WCS address all waste streams. |
| Need to provide accurate information in relation to waste data including future requirements and how this equates to additional capacity needed. | The publication WCS is based on the best available waste data. The overall capacity requirements are set out in the executive summary and Section 3.0. The WCS is supported by a separate Waste Data evidence paper setting out in detail the various assumptions made concerning data and future capacity requirements. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Need to achieve higher recycling/composting targets. Stronger action needed. | The composting/recycling target set out in the WCS (at least 60% by 2020) is 10% higher than the national target of 50% over the same period set out in the Waste Strategy for England (2007). Whilst it is acknowledged that the National Waste Strategy is under review, the target of at least 60% is considered to be appropriate for Gloucestershire. It is also pertinent to note that this is a minimum target and not a maximum. |
| Concern about importation of waste from outside Gloucestershire. | The proposed spatial strategy is based on the management of waste close to source in line with national policy. The four strategic site allocations will help to ensure that residual municipal and commercial/industrial waste (i.e. the waste that cannot be reused, recycled or composted) is able to be treated within the County. Whilst the County Council as Waste Disposal Authority (WDA) has control over municipal waste, it does not have the same control over commercial/industrial, construction/demolition and hazardous waste which may be imported into or exported from Gloucestershire depending on private waste management arrangements that may be in place. Notwithstanding this, the WCS in providing a framework for additional waste management infrastructure within Gloucestershire will help to increase the degree of waste management 'self-sufficiency' of the county. This in turn will help to provide the framework for the consideration of these issues by the Council as WPA at the development management stage. |
| Need to consider the role of Anaerobic Digestion (AD). | Paragraph 2.50 sets out the current situation regarding the provision of AD facilities in Gloucestershire. Paragraph 3.21 highlights AD as an example of a technology that started out on a small-scale and is now being used on a wider, commercial scale. Paragraphs 4.24 – 4.42 provide further additional information on recycling, composting and anaerobic digestion (including bulking and transfer). Core Policy WCS2 sets out the criteria to be applied when consideration is given to such facilities. In addition, Core Policy WCS5 states that particular support will be given to proposals for waste water management that involve the use of AD in order to provide heat and/or power that may be used locally or exported to the national grid. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Need to address the issue of hazardous waste. | The WCS clearly sets out the position in relation to hazardous waste management in Gloucestershire at paragraphs 4.130 – 4.137. Core Policy WCS6 – hazardous waste provides support for proposals that would help to move the management of hazardous waste up the waste hierarchy. |
| Need to provide a clearer, more positive approach to delivering new facilities including where appropriate the identification of sites. | The WCS identifies a clear spatial strategy based on locating strategic facilities (>50,000 tonnes/year) within the central area of the county (defined as Zone C). Within Zone C, four strategic sites have been allocated for the recovery of residual municipal and commercial/industrial waste. The allocation of these sites will help to provide certainty to both the waste industry and local residents and businesses. Other speculative proposals may come forward within and outside Zone C subject to certain criteria. |
| Need to fully consider the impacts on European sites. | Further to the site options consultation (2009) Natural England advised that further Habitat Regulations Assessment (HRA) work was required and a separate report, prepared by independent consultants has been made available alongside the publication Waste Core Strategy (WCS). This report provides more detail on the HRA already carried out on the site options and provides further guidance in relation to the four strategic site allocations identified in the publication WCS. |
| Need to avoid repeating national policy. | The need to avoid repeating national policy within local development plan documents is acknowledged. Whilst there is some overlap between the WCS and issues addressed in national policy these are considered to be locally important issues. Flood risk for example is an issue covered through national policy but is considered to be of such particular local importance within Gloucestershire that it warrants the inclusion of a specific core policy within the WCS. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Promotion of sustainable modes of transport. | <p>The potential sustainability benefits associated with non-road modes of transport (rail, water etc.) are fully acknowledged. The fact that most waste in Gloucestershire is transported by road is highlighted as a key issue within the WCS. The potential movement of waste by rail and water is also highlighted. Core Policy WCS14 lends particular support for waste proposals that utilise alternative modes of transport should any such proposals come forward. Notably two of the strategic site allocations identified in the WCS are located in close proximity to the railway line presenting some potential for movement of waste by rail subject to the provision of new sidings. This issue is highlighted in the strategic site schedules.</p> |
| Need to clearly define what is meant by a 'strategic facility'. | <p>The WCS clearly sets out the definition of 'strategic' facility as being a waste facility that handles more than 50,000 tonnes per year and is at least 2 hectares in size. This threshold is based on other planned and existing municipal waste facilities in the UK. They also reflect the definition of 'strategic' in the adopted Waste Local Plan and a number of studies on potential facilities requirements for different types of waste technologies.</p> |
| Smaller district wide sites would be preferable to a major waste facility. | <p>Whilst the proposed spatial strategy is focused on the provision of strategic scale facilities (>50,000 tonnes/year) within Zone C the various core policies including Core Policy WCS2 and WCS4 allow for smaller scale facilities to come forward both within and outside Zone C subject to certain criteria.</p> |
| Need to take account of the impact on the Strategic Road Network (SRN). | <p>The importance of potential highway impact is fully acknowledged. The strategic site allocations have been subjected to an initial highway assessment with any particular issues highlighted in the key development criteria set out in the site schedules attached at Appendix 5. The sites have also been subject to consultation with the Highways Agency who raised no major constraints to development. Proposals will need to be supported by a Transport Assessment (TA) and Travel Plan.</p> |

| Issue Raised | How has this been taken into account in the WCS? |
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| Strategic objectives should be specific and measurable and deliverable through the planning system. | The importance of having in place measurable and specific strategic objectives is fully recognised. The objectives set out in the publication WCS have been refined since the preferred options stage and have been made as SMART as possible i.e. Specific, Measurable, Achievable, Realistic and Time-Related. The implementation framework set out in Section 5.0 will ensure that the impact of the strategic objectives is able to be measured. |
| People need to have good access to recycling facilities. | The importance of recycling and composting is fully recognised. Core Policy WCS1 – Waste Reduction aims to ensure the provision of recycling and composting facilities within new development through the requirement to prepare a Waste Minimisation Statement. Core Policy WCS2 allows for commercial-scale recycling and composting facilities to come forward in appropriate locations subject to certain criteria. |
| Need to take account of the proximity of any heat market. | The strategic site allocations identified in the WCS have been subjected to an assessment of their potential for combined heat and power (CHP). The assessment is available in a separate evidence paper which considers each site (along with the other sites identified in the October 2009 site options consultation) and estimates local heat demand from existing and proposed development nearby. The findings of the CHP assessment are summarised in the strategic site schedules attached at Appendix 5 of the WCS. |
| Support for safeguarding existing and proposed waste facilities. | The importance of safeguarding existing and proposed waste facilities is acknowledged. Strategic Objective 5 – minimising impact refers to safeguarding existing and proposed waste sites and this is reflected in Core Policy WCS8 which aims to safeguard existing and allocated waste management sites from proposals that would adversely affect or be adversely affected by, waste management uses. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Support the protection of the Green Belt but need to recognise that waste facilities already exist or may come forward in the Green Belt in some circumstances. Particular support for re-use of existing buildings within the Green Belt. | Key Issue 3 identifies Gloucestershire's extensive area of Green Belt which covers over 8,000 hectares. Paragraphs 4.212 – 4.220 explain the role of the Green Belt and highlight the fact that a number of Gloucestershire's main waste management facilities are located within the Green Belt having been allowed to develop incrementally over time. Core Policy WCS10 sets out the proposed approach towards new waste development within the Green Belt including a number of specific criteria relating to the re-use of existing buildings. |
| Waste collection and disposal need to be more closely linked. | The importance of a properly integrated waste management system is fully recognised. Waste collection arrangements are however largely outside the direct scope of the WCS. Whilst the WCS can make provision for waste management facilities, collection arrangements (i.e. frequency, type of waste collected etc.) are a matter for the District Councils in relation to municipal waste and the private sector for all other types of waste. The WCS includes reference to the Joint Waste Board which has been set up and is likely to lead to a more consistent and integrated approach towards waste collection and disposal in Gloucestershire in the future. |
| Location of composting facilities needs to be carefully considered. | The particular issues raised by new or expanded composting operations are fully acknowledged. The WCS highlights the need for a relatively modest amount of additional composting capacity for municipal waste and to assist with the diversion of C&I waste from landfill. However there is potentially no upper limit to the amount of composting capacity which could come forward in order to move waste further up the waste hierarchy. Core Policy WCS2 sets out the criteria that will be used to determine proposals relating to composting, recycling, anaerobic digestion (AD) and bulking and transfer. Specifically, composting and AD facilities must be located at least 250m from sensitive land uses such as housing unless it can be demonstrated that they can operate in closer proximity without adverse impact. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Must recognise the importance of air quality. | <p>The importance of air quality is recognised as a potential significant effect within the monitoring framework set out in Section 6.0 of the WCS. The supporting Habitat Regulations Assessment (HRA) available separately considers the potential effects of air quality on European sites protected by law under the habitats directive. With regard to general air quality it is important to note that planning and pollution control regimes are separate but complimentary. Pollution control is concerned with preventing pollution through the use of measures to prohibit or limit the release of substances to the environment to the lowest practicable level. It also ensures that ambient air and water quality meet standards that guard against impacts to the environment and human health. The planning system controls the development and use of land in the public interest and should focus on whether development is an acceptable use of the land, and the impacts of those uses on the development and use of land. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced.</p> |
| Need to recognise the potential role of quarries in providing for waste management development. | <p>The role of quarrying in relation to waste management is recognised at paragraph 2.55 which refers to the use of inert waste in restoring quarries once they have been worked out. Further commentary is provided at paragraphs 2.62 and 4.49. Core Policy WCS3 includes specific reference to inert waste recycling and recovery facilities within mineral workings.</p> |
| Gloucestershire County Council should lead by example. | <p>This issue is outside the direct scope of the WCS. Notwithstanding this, the County Council operates its OHIO (own house in order) waste minimisation scheme.</p> |

| Issue Raised | How has this been taken into account in the WCS? |
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| Need to recognise the importance of Biodiversity Action Plan (BAP) and the South West Nature Map. | The spatial portrait within the WCS highlights the importance of Gloucestershire's natural environment. Specific information on local nature conservation (biodiversity and geo-diversity) designations is set out in paragraphs 4.239 – 4.245 including reference to the Gloucestershire Biodiversity Action Plan and Nature Map. Core Policy WCS12 sets out the Council's proposed approach towards the protection of national and local nature conservation designations with proposals for major developments within or close to Strategic Nature Areas (SNAs) being required to assess and make an appropriate contribution towards nature conservation targets in those areas. |
| Important to maintain flexibility. | The importance of flexibility in the plan making process is fully acknowledged. The implementation and monitoring frameworks set out in Section 5.0 and 6.0 will help to measure the progress being made with the WCS and where policies are failing to deliver their objectives or may be having unintended consequences, they may be revised or replaced as appropriate. With specific regard to the location of waste management facilities, whilst the WCS proposes a spatial strategy based on locating large-scale facilities within the central area of the county (Zone C) it offers flexibility allowing for smaller-scale facilities to come forward within and outside Zone C subject to certain criteria and where the operating capacity is less than 50,000 tonnes per year and other criteria in the Strategy are met. In addition there are also criteria based policies WCS2 & WCS3 within the WCS which provide a policy framework for most supporting activities such as recycling, composting, bulking and transfer. |
| Avoid the use of the phrase 'will normally' as this is open to interpretation. | The WCS aims to provide certainty and the core policies have been drafted with this issue in mind. For the sake of clarity and certainty, no core policies include the use of the phrase 'will normally'. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Co-location with industrial users/importance of synergies with existing site users. | The potential relationship between waste management and industrial uses is acknowledged and is consistent with national policy set out in PPS10. The importance of linking with existing site users is also recognised. Core Policy WCS2 states that particular support will be given to proposals that involve 'co-location with an existing operation of a similar or complimentary nature'. Core Policy WCS4 in dealing with non-strategic residual waste recovery facilities (<50,000 tonnes/year) states that planning permission will be granted subject to a number of criteria including 'the proposal is located on an industrial estate or employment land permitted or allocated for B2 general industrial use'. |
| Support for protection of the AONB and local element to national policy. Reference to AONB management plans welcomed. | Whilst national designations are covered by national planning policy, there was strong support expressed for the inclusion of a local policy on this issue during consultation on the WCS. The importance of the AONB is reflected throughout the supporting text, key issues, vision and objectives. Core Policy WCS11 sets out the Council's approach towards waste development within or affecting the setting of the three AONBs that fall within Gloucestershire. The policy also emphasises the Council's commitment towards partnership working with the AONB Conservation Boards and/or Joint Advisory Committees. |
| Support for protection of SSSI. | The importance of Sites of Special Scientific Interest (SSSI) is fully acknowledged and reflected in the WCS both within the supporting text and within Core Policy WCS12 – Nature Conservation (Biodiversity and Geodiversity) which aims to safeguard SSSIs from inappropriate waste management development. Planning permission will only be granted where certain criteria can be met. |

| Issue Raised | How has this been taken into account in the WCS? |
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| National policy on archaeology likely to be sufficient. | The importance of Gloucestershire's historic environment is recognised in the WCS within the key issues, vision, strategic objectives and supporting text. The approach taken has been to rely on national planning policy set out in PPS5 rather than include a specific core policy dealing with archaeology. It should be noted that there are a number of existing policies set out in the adopted Waste Local Plan (2004) which will continue to remain in force until they are replaced through a separate development management document. Through the WCS there will be a general presumption against development which would cause damage or involve significant alteration to Gloucestershire's heritage assets and their settings. |
| Support for broad areas of search so as to not constrain development. | The importance of flexibility is acknowledged. However it is also important for the WCS to provide a degree of certainty. For this reason, the overall spatial strategy of the WCS is to focus strategic-scale facilities (>50,000 tonnes/year) into the central area of the county defined as 'Zone C'. Within Zone C, four strategic site allocations have been identified. However, Core Policy WCS4 makes it clear that other proposals may come forward within or outside Zone C depending on the scale of the facility and compliance with a number of specified criteria. |

Site Options (2009) – General Comments

| Issue Raised | How has this been taken into account in the WCS? |
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| Write in concise, plain English. | The WCS has been drafted in a manner that is considered to be easy to read and understand. An executive summary is provided and each section is colour coded for ease of reference. Illustrations and photographs are included throughout. It is the case that waste planning is a technical subject and to further aid understanding, a glossary of key terms is also provided. |
| Concern expressed about the importation of waste from outside Gloucestershire. | The proposed spatial strategy is based on the management of waste close to source in line with national policy. The four strategic site allocations will help to ensure that residual municipal and commercial/industrial waste (i.e. the waste that cannot be reused, recycled or composted) is able to be treated within the County. Whilst the County Council as Waste Disposal Authority (WDA) has control over municipal waste, it does not have the same control over commercial/industrial, construction/demolition and hazardous waste which may be imported into or exported from Gloucestershire depending on private waste management arrangements that may be in place. Notwithstanding this, the WCS in providing a framework for additional waste management infrastructure within Gloucestershire will help to increase the degree of waste management 'self-sufficiency' of the county. There are no specific proposals contained in the WCS that encourage the importation of waste from outside the county. |
| Higher recycling/composting target needed. | The composting/recycling target set out in the WCS (at least 60% by 2020) is 10% higher than the national target of 50% over the same period set out in the Waste Strategy for England (2007). Whilst it is acknowledged that the National Waste Strategy is under review, the target of at least 60% is considered to be appropriate for Gloucestershire. It is also pertinent to note that this is a minimum target and not a maximum. Strategic Objective 2 even identifies an aspiration for a 70% target. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Need to consider the issue of excessive retail packaging. | The issue of retailer packaging is highlighted in Section 4.0 of the WCS with reference made to the Courtauld Agreement – a voluntary national agreement between WRAP (Waste & Resources Action Programme) and over 40 major retailers, brand owners, manufacturers and suppliers which aims to reduce household waste by designing out packaging waste. However, other than raising awareness of the issue there is little that the WCS can do directly to tackle it as it falls outside the scope of the planning system. |
| Concerned about the potential for incineration. | The process of incineration or 'modern thermal treatment' is explained in Section 4.0 of the WCS alongside a number of other waste recovery technologies including gasification, pyrolysis, autoclaving and mechanical biological treatment. The strategic site allocations identified in the WCS are capable of accommodating a range of waste recovery technologies. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 – Planning for Sustainable Waste Management, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. |
| Need to fully consider the impacts on European sites. | Further to the site options consultation (2009) Natural England advised that further Habitat Regulations Assessment (HRA) work was required and a separate report prepared by independent consultants has been made available alongside the publication Waste Core Strategy (WCS). This report provides more detail on the HRA already carried out on the site options and provides further guidance in relation to the four strategic site allocations identified in the publication WCS. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Concerned about health impact. | <p>Planning Policy Statement 10 – Planning for Sustainable Waste Management, states that ‘modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health’. Furthermore, the detailed consideration of a waste process and the implications, if any, for human health is the responsibility of the pollution control authorities. PPS10 – Planning for Sustainable Waste Management also states that, “where concerns about health are raised, waste planning authorities should avoid carrying out their own detailed assessmentsrather they should ensure, through drawing from Government advice and research and consultation with the relevant health authorities and agencies, that they have any advice on implications for health..’ The WPA duly sought the advice from the PCT/NHS through the site options consultation and no specific issues were raised.</p> |
| Premature to comment on the Regional Spatial Strategy (RSS) at this stage/the future of the RSS is in doubt. | <p>The Coalition Government is committed to the abolition of Regional Spatial Strategies (RSS). However in the interim CLG have advised WPAs that they should press ahead with waste plans based on available data and any available evidence used in the preparation of the RSS. This situation is reflected in the publication WCS. Notably the data in the RSS was informed by the Regional Waste Strategy which is extant. Notwithstanding the current doubt cast over the future of the RSS, in accordance with transitional guidance, this data has been used in conjunction with our own waste data as a basis for preparing the WCS.</p> |
| Need to reduce travel distances/reduce waste miles. | <p>The proposed spatial strategy seeks to focus strategic waste management facilities (>50,000 tonnes/year) into the central area of the county (defined as Zone C). It is within this central area that most of Gloucestershire's waste originates. The proposed strategy will therefore help to ensure that most of Gloucestershire's waste is managed close to source in line with national policy.</p> |

| Issue Raised | How has this been taken into account in the WCS? |
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| Cannot comment without knowing which methods of waste disposal are being considered. | The strategic site allocations identified in the WCS are capable of accommodating a range of different waste recovery technologies. Section 4.0 explains the main recovery technologies available. As PPS10 guides the WPA down the direction of assuming that the control of process is a matter for the pollution control authorities such as the Environment Agency, it is considered that when a particular technology is known the broad planning issues will not be much different. This approach is considered consistent with the Companion Guide to PPS10 – Planning for Sustainable Waste Management, which states that local authorities in preparing Waste Core Strategies and other development plan documents, should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. |
| Need to consider all waste types, not just municipal. | The publication WCS clearly sets out the situation in Gloucestershire regarding all waste types including municipal waste, commercial and industrial, construction and demolition, hazardous, waste water, agricultural, radioactive and clinical waste. The strategic site allocations identified in Core Policy WCS4 focus on municipal and commercial/industrial waste whilst the other various criteria-based policies deal with the other waste types. In the case of agricultural, radioactive and clinical waste no specific provision is proposed due to the relatively small amounts of waste involved and the amount of current provision available. For waste water the current doubt cast over the RSS and the associated growth areas means that specific provision is inappropriate and a criteria-based approach is more appropriate. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Need to ensure traffic impact is minimised/considered. | <p>The strategic site allocations identified in the WCS are supported by an initial highways assessment and comments have also been sought from the highways agency. The general criteria set out in Appendix 5 – Strategic Site Schedules identifies the need for a Transport Assessment (TA) for all proposals and the key development criteria also in Appendix 5 identify the specific highway issues relevant to each site allocation including in some instances potential improvements to the local network (junction improvements etc.). Further detailed assessment will be required at the planning application stage should detailed proposals come forward on any of the strategic site allocations or through speculative development.</p> |
| Consideration to be given to sustainable modes of transport (rail, water etc.) | <p>The potential sustainability benefits associated with non-road modes of transport (rail, water etc.) are fully acknowledged. The fact that most waste in Gloucestershire is transported by road is highlighted as a key issue. The potential movement of waste by rail and water is highlighted subject to issues of viability. Core Policy WCS14 lends particular support for waste proposals that utilise alternative modes of transport should any come forward. Notably two of the strategic site allocations identified in the WCS are located in close proximity to the railway line presenting some potential for movement of waste by rail subject to the provision of new sidings. This is highlighted in the strategic site schedules.</p> |
| Need to consider the potential for energy generation and capture of heat and power locally. | <p>Strategic Objective 3 aims to recover the maximum amount of value including energy from any waste that cannot be re-used, recycled or composted. Particular reference is made to the potential use of Combined Heat and Power (CHP) within Section 4.0. Importantly the WCS is supported by an evidence paper which considers the CHP potential of the strategic site allocations identified in the WCS and the remaining site options not taken forward. The paper considers the proximity of existing and potential heat users or 'clients' in relation to each site and provides an estimate of the total heat demand. The potential to tap into local gas infrastructure is also considered. It will be for the developer to undertake further, more detailed assessment of CHP potential should a detailed proposal come forward.</p> |

| Issue Raised | How has this been taken into account in the WCS? |
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| Stronger focus needed on prevention and reduction of waste. | The spatial vision in the publication WCS includes reference to residents and businesses pro-actively minimising waste production to achieve zero-growth by 2020. Strategic Objective 1 – Waste Reduction aims to raise awareness of waste issues amongst Gloucestershire residents and businesses in order to generate collective responsibility for waste, ensure it is seen as a potential resource and to reduce the amount of waste produced, with zero-growth achieved across all waste streams by 2020. Core Policy WCS1 is aimed directly at the issue of waste reduction with all major development required to be supported by a waste minimisation statement. |
| Need to set out a clear framework for implementation and monitoring progress. | Section 5.0 of the publication WCS provides a detailed implementation framework setting out how each core policy will be delivered by whom, how and when. The framework also identifies potential constraints to delivery of the policy objectives and how these may be overcome. Section 6.0 of the publication WCS sets out a proposed monitoring framework that will be used to measure the progress made with each core policy and highlight where policies are failing to deliver their objectives or having unintended consequences. The framework will form the basis of future monitoring to be undertaken through the Council's Annual Monitoring Report (AMR). |
| Waste should be dealt with close to main centres of population (where most waste is generated). | The proposed spatial strategy seeks to focus strategic waste facilities (>50,000 tonnes/year) into the central area of the county referred to as 'Zone C'. There are a number of reasons why this approach is considered to be the most appropriate including the fact that it includes the two main urban areas of Gloucester and Cheltenham where a large proportion of the county's waste is produced. This approach will allow most of Gloucestershire's waste to be managed close to source in line with national policy. The criteria-based approach set out in the various core policies will allow for speculative proposals away from the main urban areas to be considered on their merits. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Sites should be located well away from urban areas/concern about impact on amenity of residential areas. | Whilst the desire to locate waste management facilities in remote areas where they will have no impact on anyone is understandable it also runs contrary to national policy which requires waste to be managed close to where it is produced. Typically this means urban areas and inevitably this will mean some waste facilities having to be located close to existing residential and business occupants. The WCS recognises the potential impact that waste development can have on existing and proposed occupants and the various core policies will help to ensure that any impact is minimised. For example Policy WCS 2 identifies key criteria for composting/AD proposals which should generally be at least 250m from sensitive land uses such as housing. |
| Need to take account of the environmental impact of waste proposals (AONB, Green Belt, SSSI etc.) | The importance of Gloucestershire's natural and historic environment is highlighted in the spatial portrait set out in Section 2.0 of the WCS. It is also identified as a key issue. The spatial vision includes reference to the protection of key landscape/environmental assets and Strategic Objective 5 aims to minimise the environmental impacts of waste management including the protection of national and local areas of landscape and nature conservation importance. This is reflected in Core Policies WCS7 – WCS14. |
| Need to prioritise the re-use of previously developed (brownfield) land. | Strategic Objective 5 aims to minimise the impact of waste management by prioritising the co-location of similar or related facilities on existing waste sites or previously developed sites in preference to greenfield locations where appropriate. This is reflected in the criteria of Policy WCS2. The strategic site allocations identified in Core Policy WCS4 all involve the re-use of previously developed land. Any speculative development on greenfield land will be considered on its merits. |
| Concern about impact of waste development on property prices. | The potential impact of waste related development on property prices is outside the scope of the planning system and has therefore not been directly addressed in the WCS. Notwithstanding this the WCS recognises the potential impact that waste development can have on existing and proposed occupants and the various core policies will help to ensure that any impact is minimised. |

| Issue Raised | How has this been taken into account in the WCS? |
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| Waste should be dealt with locally through a network of smaller facilities. | The WCS proposed spatial strategy focuses on strategic facilities (>50,000 tonnes/year) located within the central area of the county defined as 'Zone C'. Four strategic site allocations within Zone C are identified through Core Policy WCS4. Core Policy WCS4 allows for smaller scale facilities (<50,000 tonnes/year) to come forward within and outside Zone C subject to certain criteria and where they would form part of a sustainable waste management system. This approach is considered sufficiently flexible allowing for small-scale proposals to come forward, whilst safeguarding the proposed spatial strategy and strategic site allocations. In addition there are also criteria based policies WCS2 & WCS3 within the WCS which provide a policy framework for most supporting activities such as recycling, composting, bulking and transfer. |
| Makes sense to utilise existing waste sites. | The use of existing waste management sites is consistent with national policy although care is needed to ensure unacceptable cumulative impact. This is reflected in Core Policy WCS7 and the supporting text at paragraphs 4.176 – 4.187. Of the four strategic sites allocated in the WCS, three relate to existing waste operations and the fourth is previously developed land. |
| Concerned about odour, noise and dust. | National policy encourages the management of waste close to the source of production. Locating waste facilities near urban areas will potentially create concerns regarding potential impact on amenity. The spatial vision of the WCS aims to ensure that Gloucestershire's communities are safeguarded from the adverse impacts of waste management activities. This is reflected in Strategic Objective 5 which seeks to minimise the environmental and social impacts of waste management. Furthermore, the various criteria set out in the WCS will help to ensure that the impact of any waste management proposal in Gloucestershire is kept to an acceptable level. Odour, noise and dust are detailed issues to be explored at the planning application stage once the detailed nature of any waste operation are known (i.e. type of waste being managed, nature of the process involved etc.) |

| Issue Raised | How has this been taken into account in the WCS? |
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| Important to maintain flexibility. | <p>The importance of flexibility in the plan making process is fully acknowledged. The implementation and monitoring frameworks set out in Section 5.0 and 6.0 will help to measure the progress being made with the WCS and where policies are failing to deliver their objectives or may be having unintended consequences, they may be revised or replaced as appropriate. With specific regard to the location of waste management facilities, whilst the WCS proposes a spatial strategy based on locating large-scale facilities within the central area of the county (Zone C) it offers flexibility allowing for smaller-scale facilities to come forward within and outside Zone C subject to certain criteria. In addition there are also criteria based policies WCS2 & WCS3 within the WCS which provide a policy framework for most supporting activities such as recycling, composting, bulking and transfer.</p> |
| Concerned about the visual impact of large-scale facilities. | <p>Like any form of development, waste management facilities will have some degree of visual impact. In general terms the larger the facility the more prominent the visual impact is likely to be although this will depend on a number of factors such as siting, design, use of materials, landscaping and so on. The spatial vision of the WCS seeks to ensure that the landscape impacts of waste management are minimised. Strategic Objective 5 aims to reduce impact through the use of high quality sustainable design. Core Policy WCS13 and the relevant supporting text deal specifically with the issue of design. It is the case however that with any site, whilst an initial landscape appraisal can be carried out in broad terms (as has been done for the WCS in selecting the strategic site allocations) it is at the planning application stage, when a detailed proposal comes forward, that the potential visual impact of a waste management facility will be assessed in more detail and a judgement can be made at that time based on all available supporting information. The key development criteria for each site allocation (WCS Appendix 5) include specific landscape matters which would need to be considered at the planning application stage.</p> |

Site Options (2009) – Site Specific Comments (other than those already summarised as general comments above)

| Areas A, B and C Wingmoor Farm East | How has this been taken into account in the WCS? |
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| <p><u>Main Issues</u></p> <p>The Wingmoor Farm area already supports too much waste development</p> <p>Stoke Road is inadequate</p> <p>There is a key Wildlife Site within 500m of Areas A and B</p> <p>Impact on existing and proposed housing development nearby</p> <p>Visible from AONB</p> <p>Potential movement of waste by rail</p> <p>Current site operation poor</p> <p>Located within the Green Belt</p> | <p>The publication WCS identifies part of Area C as a strategic site allocation under Core Policy WCS4. This site has been taken forward because it forms part of an existing waste management facility with support from the landowner/waste operator, which greatly increases the prospect of delivery. The site is also close to Cheltenham one of the county's two main urban areas. Furthermore the site is not at risk from flooding and there are relatively few sensitive uses located nearby. The importance of traffic issues in this area is recognised and any development would need to be supported by a Transport Assessment (TA) as appropriate. Areas A & B have not been taken forward into the publication WCS. Following discussions with the waste operator it is evident that Area B is likely to be needed for other waste uses associated with the existing landfill operation and subsequent site restoration. Area A is closer to sensitive land uses than Area C. Neither area A or B is needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although Areas A and B have not been formally allocated in the publication WCS it does not mean they are unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.</p> <p>For a full response to each of the points raised opposite, please see the site options response report available separately.</p> |

| Areas A, B and C Wingmoor Farm West | How has this been taken into account in the WCS? |
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| <p><u>Main Issues</u></p> <p>The Wingmoor Farm area already supports too much waste development</p> <p>Impact on adjoining employment uses at the Park</p> <p>Object to the loss of a recreational facility (gun club)</p> <p>Impact on existing and proposed housing development nearby</p> <p>Flood risk & potential increase in surface water flooding</p> <p>Access road and railway bridge unsuitable for HGVs</p> | <p>The publication WCS identifies Area B as a strategic site allocation under Core Policy WCS4. This site has been taken forward because it forms part of an existing waste management facility with support from the landowner/waste operator, which greatly increases the prospect of delivery. The site is also close to Cheltenham one of the county's two main urban areas. Furthermore the site is not at risk from flooding and there are relatively few sensitive uses located nearby. Area A has not been taken forward because it is unallocated greenfield land within the Green Belt and there has been no significant interest from the waste industry for strategic waste recovery, raising question marks over the deliverability of a strategic waste management operation on this site. In relation to Area C it has come to light through the site options consultation (2009) and discussions with Tewkesbury Borough Council that there is some doubt about the availability of this site for waste management purposes due in part to leasehold arrangements for existing occupants. For this reason the site has not been taken forward into the publication Waste Core Strategy (WCS). Although Areas A and C have not been formally allocated in the publication WCS it does not mean they are unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.</p> <p>For a full response to each of the points raised opposite, please see the site options response report available separately.</p> |

| Easter Park | How has this been taken into account in the WCS? |
|---|---|
| <u>Main Issues</u> <p>Impact on the road network including Junction 9 of the M5</p> <p>Culvert runs through the site – potential for pollution</p> <p>Site is allocated for employment use</p> <p>Offices, schools and housing nearby</p> <p>Waste could inhibit other development nearby</p> <p>Flood risk and potential increase in height of the water table</p> | <p>The site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.</p> <p>For a full response to each of the points raised opposite, please see the site options response report available separately.</p> |
| Javelin Park | How has this been taken into account in the WCS? |
| <u>Main Issues</u> <p>Impact on views from Haresfield Beacon</p> <p>Site should be used as a wind farm</p> <p>No proximate market for waste heat</p> <p>Impact on Junction 12 of the M5</p> | <p>The site has been taken forward into the publication WCS because there is support from the landowners which greatly increases the prospects of delivery, the site is located close to Gloucester one of the county's main urban areas, the site enjoys good access to the strategic road network (SRN) is not at risk of flooding, has no other significant nearby environmental constraints and there are relatively few sensitive uses located nearby. Furthermore whilst the site is not currently in waste management use, it is previously developed (brownfield) land.</p> <p>For a full response to each of the points raised opposite, please see the site options</p> |

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| <p>Site previously identified in the Waste Local Plan</p> <p>Site has planning permission for employment use</p> <p>Impact on AONB</p> <p>Visual impact of a large-scale facility in a flat, open part of the landscape</p> <p>Too near people's homes</p> | <p>response report available separately.</p> |
| <p>Land adjacent to Quadrant Business Centre</p> <p><u>Main Issues</u></p> <p>Potential to offer waste heat to Hunts Grove development nearby</p> <p>Large parts of Quedgeley and Hardwicke are already gridlocked at certain times</p> <p>Impact on AONB</p> <p>Too close to housing/employment</p> | <p>How has this been taken into account in the WCS?</p> <p>The site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore the site is not needed in capacity terms (i.e. the 4 sites that <u>are</u> going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.</p> <p>For a full response to each of the points raised opposite, please see the site options response report available separately.</p> |

| Land at Moreton Valence | How has this been taken into account in the WCS? |
|---|---|
| <p><u>Main Issues</u></p> <p>Relatively isolated from the urban area</p> <p>Already dealing with a substantial throughput of waste</p> <p>Impact on AONB</p> <p>Too near to people's homes/impact on amenity</p> <p>Site already has planning permission for additional waste treatment facilities</p> <p>Flood risk</p> <p>Traffic impact</p> <p>Precedent for development on adjoining Greenfield land</p> <p>Additional noise and light pollution</p> <p>Landscape impact</p> <p>Impact on camping and caravan facility nearby</p> | <p>The site has been taken forward into the publication WCS because it forms part of an existing waste management facility and there is support from the operator which greatly increases the prospects of delivery, the site is located close to Gloucester one of the county's two main urban areas, thereby allowing waste to be managed close to source in line with national policy, the site is not at risk of flooding and has no other significant nearby environmental constraints. Furthermore there are relatively few sensitive uses located nearby.</p> <p>The area allocated in the publication WCS is however the original site identified in the site options consultation in October 2009 and not the proposed site extension put forward in response to that consultation. This will allow for future operations to be more readily controlled than would be the case with a more extensive site.</p> <p>For a full response to each of the points raised opposite, please see the site options response report available separately.</p> |

| Land north of the Railway Triangle | How has this been taken into account in the WCS? |
|--|--|
| <p><u>Main Issues</u></p> <p>Urban area not suitable/ too close to houses, schools and offices</p> <p>Potential impact on regeneration</p> <p>Traffic impact including disruption to hospital access</p> <p>Site could be better used for other purposes</p> <p>Flood risk to properties in Blinkhorn's Bridge Lane and Armscroft Gardens</p> <p>Difficult access to strategic road network</p> <p>Area is an important 'gateway' to the City</p> <p>Limited potential for use of any 'waste heat'</p> | <p>The site has not been taken forward into the publication WCS because the site does not have direct access onto the Principal Road Network (PRN), but takes such access indirectly off the A38 via London Road, Horton Road and Myers Road. This route involves HGV traffic passing through mixed use areas comprising residential, health care, educational and religious land uses, as well as sections of the network that are prone to congestion. Of particular concern is the intensification of use of Horton Road outside St. Peters Primary School, especially at those times of day when children are being delivered and collected. It is highly unlikely that any material impact on Horton Road could be properly mitigated within the confines of the existing public highway. Direct access to the site could theoretically be provided via a new link to Metz Way, but this would involve crossing the railway and third party land in Network Rail ownership. Deliverability of the direct access to the PRN is therefore doubtful both on grounds of cost and control of land.</p> <p>Furthermore, whilst the contribution of the existing waste management facility towards the County's needs is recognised, the evidence suggests that the operator handles mainly inert waste with only a small proportion of biodegradable waste. At this stage there appears to be some uncertainty over the prospect of delivering residual waste recovery at this site. The site is also not needed in capacity terms (i.e. the 4 sites that <u>are</u> going forward provide enough land to meet the potential capacity requirements to 2027).</p> <p>Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative</p> |

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| | <p>proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.</p> <p>For a full response to each of the points raised opposite, please see the site options response report available separately.</p> |
| Nastend Farm | How has this been taken into account in the WCS? |
| <u>Main Issues</u> <p>Nearby potential users of any waste heat</p> <p>Site identified as being suitable for housing</p> <p>Site allocated for employment use</p> <p>The site is Greenfield/agricultural</p> <p>Concern about proximity to food manufacture</p> <p>Sloping site</p> <p>Poor site access</p> <p>Impact on historic environment</p> <p>Impact on AONB</p> <p>Impact on biodiversity</p> | <p>The site has not been taken forward into the publication WCS because although the County Council is the landowner, following discussions with the County Council's Waste Disposal Authority (WDA) it would appear that there is significant uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that <u>are</u> going forward provide enough land to meet the potential capacity requirements to 2027).</p> <p>Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. Should a speculative proposal come forward this will be considered having regard to the relevant general policies of the WCS, national policy and any other material considerations.</p> <p>For a full response to each of the points raised opposite, please see the site options response report available separately.</p> |

| Netheridge Sewage Treatment Works | How has this been taken into account in the WCS? |
|--|---|
| <u>Main Issues</u> <p>Flood risk</p> <p>Traffic impact and access</p> <p>Proximity to housing</p> <p>Site would require extensive re-configuration</p> <p>Potential ecological issues</p> <p>Could not accommodate a one-site solution</p> | <p>The site has not been taken forward into the publication WCS because following discussions with the landowner and the lack of waste industry interest in response to this site through the WCS site options consultation, it would appear that there is some uncertainty over the prospect of delivering a strategic waste management facility on this site. Furthermore, the site is not needed in capacity terms (i.e. the 4 sites that are going forward provide enough land to meet the potential capacity requirements to 2027). Although the site has not been formally allocated in the publication WCS it does not mean it is unsuitable for waste management purposes and does not preclude the possibility of proposals for waste management coming forward. The site's existing Anaerobic Digestion (AD) capacity for waste water and other assorted wastes is recognised and any additional increase in these facilities would be considered through other criteria-based policies in the Waste Core Strategy (WCS).</p> <p>For a full response to each of the points raised opposite, please see the site options response report available separately.</p> |

| The Park, Wingmoor Farm West | How has this been taken into account in the WCS? |
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| <p>Main Issues</p> <p>The Wingmoor Farm area already supports too much waste development</p> <p>Existing and proposed housing nearby</p> <p>Access road and railway bridge unsuitable for HGV's</p> <p>Potential movement of waste by rail</p> <p>Industrial site, already accommodating a waste use</p> <p>Visible from AONB</p> | <p>The site has been taken forward into the publication WCS because it forms part of an existing waste management facility and there is support from the landowner which greatly increases the prospects of delivery, the site is located in close proximity to Cheltenham, one of the County's two main urban areas where most of Gloucestershire's waste arises, the site is not at risk of flooding and has no other significant nearby environmental constraints and there are relatively few sensitive uses located nearby.</p> <p>For a full response to each of the points raised opposite, please see the site options response report available separately.</p> |
| Foss Cross Industrial Estate | How has this been taken into account in the WCS? |
| <p>Main Issues</p> <p>Isolated location, remote from Gloucester and Cheltenham</p> <p>Located over 'source protection zone'</p> <p>Proximity to SSSI</p> <p>Traffic impact on hamlet of Calmsden</p> <p>Impact on wildlife including birds</p> | <p>On balance, having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as 'Zone C' (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. Furthermore, the Environment Agency (EA) has raised concerns in response to this site in relation to groundwater issues.</p> <p>For a full response to each of the points raised opposite, please see the site options</p> |

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| Site is over major high aquifer | response report available separately. |
| Already a successful recycling facility | |
| Hurst Farm, Lydney | How has this been taken into account in the WCS? |
| <u>Main Issues</u> | |
| Allocated for employment use | On balance, having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as 'Zone C' (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. |
| Potential utilisation of Lydney Docks | |
| Potential impact on the regeneration of the docks area | |
| Traffic impact on A48 | |
| Close to AONB | For a full response to each of the points raised opposite, please see the site options response report available separately. |
| Site is Greenfield farmland | |
| Suitable for waste transfer only | |
| Biodiversity site nearby | |
| Flood risk | |
| Too remote | |

| Land at Lydney Industrial Estate | How has this been taken into account in the WCS? |
|--|---|
| <p><u>Main Issues</u></p> <p>Need to define smaller area</p> <p>Existing waste use</p> <p>Potential impact on the regeneration of the docks area</p> <p>Traffic impact on A48</p> <p>Flood risk – no dry access to the site</p> <p>Close to AONB</p> <p>Too remote</p> | <p>On balance, having regard to forecast capacity requirements (i.e. the number of sites needed) and the need to manage waste close to source in line with national policy, it has been decided not to allocate any strategic sites outside the area referred to as 'Zone C' (the central area of Gloucestershire). As this site is outside Zone C it is not being taken forward. Also, the lack of waste industry interest in response to this site through the site options consultation (2009) raises question marks over the deliverability of the site for waste management purposes. Existing facilities for waste management are present on the site and their contribution to the County's waste network is recognised.</p> <p>For a full response to each of the points raised opposite, please see the site options response report available separately.</p> |

LIST OF CONSULTEES

SPECIFIC CONSULTEES

Specific consultees are those listed in The Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) and relate to organisations responsible for services and utilities and infrastructure provision.

South West Regional Assembly (SWRA)
Government Office for the South West (GOSW)
Gloucester City Council
Cheltenham Borough Council
Tewkesbury Borough Council
Forest of Dean District Council
Stroud District Council
Cotswold District Council
Wiltshire Council
Swindon Borough Council
South Gloucestershire Council
Herefordshire Council
Worcestershire County Council
Warwickshire County Council
Oxfordshire County Council
Monmouthshire County Council
Malvern Hills District Council
Wychavon District Council
West Oxfordshire District Council
Vale of White Horse District Council
Stratford-on-Avon District Council
North Wiltshire District Council
All Gloucestershire Town and Parish Councils and those that adjoin the County boundary
Gloucestershire Police Authority
Gloucestershire Constabulary
The Coal Authority
The Environment Agency
English Heritage
Natural England
Secretary of State for Transport
South West Regional Development Agency (SWRDA)
British Telecommunications (BT)
Gloucestershire Primary Care Trust (NHS Gloucestershire)
Gloucestershire Health Authority
Gloucestershire Hospitals NHS Foundation Trust

Avon, Gloucestershire and Wiltshire Strategic Health Authority

TRANSCO

Severn Trent Water

Thames Water

Wessex Water

Welsh Water

Note: Not included on the list above is the Homes and Communities Agency (HCA) as it has only been a requirement to consult the HCA since April 2010. The HCA will be invited to comment on the publication WCS.

GENERAL CONSULTEES

General consultation bodies include the following: voluntary bodies some or all of whose activities benefit any part of the Council's area as well as bodies which represent the interests of different ethnic or national groups, religious groups, disabled people and people carrying on business in the Council's area.

Cheltenham Chamber of Commerce

Cheltenham First Church of Christ Scientist

Cheltenham Mosque

Cotswold Centre Voluntary Services

Diocese of Gloucester

Gloucester Association for the Disabled

Gloucester Centre Voluntary Services

Gloucester Chamber of Trade and Commerce C/O Marketing Gloucester Ltd.

Gloucester Diocesan Board of Finance

Gloucester Heritage Urban Regeneration Company Ltd.

Gloucester Partnership

Gloucestershire Chamber of Commerce and Industry

Gloucestershire Federation of Women's Institute

Gloucestershire VCS

Forest Of Dean Centre Voluntary Services

Stroud and District Centre Voluntary Services

United Synagogues – Cheltenham

OTHER CONSULTEES

This includes other relevant agencies and organisations not listed above. Note: individuals are not listed here as there are too many to mention. These details can be made available on request.

A and C Coaches/Coachlink Services
Abberley and Malvern Hills Geopark
Action Against Quarrying
AEA Technology Future Energy Solutions
Aggregate Industries UK Ltd
Agricultural Lime Association
Agricultural Supplies Co (Fairford) Ltd
Al Ashraf Primary School
Alexcars Ltd
Alkington Parish Council
Alliance Environment and Planning Ltd
Allstone Sand and Gravels
Applegate Coaches
Association of Geotechnical and Geo Environmental Specialist
Astonbridge Quarry
Avoning Society
B and K Dismantlers
BBC Midlands
BBC Radio Gloucestershire
BBC TV West
Balfour Beatty
Barratt Homes
Barton Residents Association
Barton Wilmore Planning Partnership
Bath and North East Somerset Council
Beaumont Travel Ltd
Beavis Coaches
Bell Cornwell Partnership
Bell Waste
Biffa Waste Services
Birch Hill Quarry
Bishops College
Bloor Homes Western
Bovis Homes
Boyer Planning
Bristol and Gloucestershire Archaeological Society
Bristol City Council
British Aggregates Association
British Ceramic Confederation

British Coal Opencast - South Wales Region
British Gas Properties
British Geological Survey
British Marine Aggregate Producers Association
British Metal Recycling Association
British Natural Stone
British Waterways
Bromford Housing Group
Burke Bros (Cheltenham)
Coleford Brick and Tile Co Ltd.
Hogarth Waste and Recycling
Wood Hardwick Planning Ltd.
Needham and James Cotswold Seeds Limited
Forest Of Dean Partnership
Pro Vision Planning and Design Federal Mogul Corporation
Robert Turley Associates Ltd
Seitani Cotswold Canal Trust
Terence O'Rourke Plc Arlington Property Developments Ltd
CBI - South West Office
CPRE (Gloucestershire Branch)
Cainscross and Ebley Community Centre
Campaign Against Gravel Extraction
Camphill Village Trust
Carillion Plc
Carter Jonas
Cemex UK Operations
Central TV
Centre for Ecology and Hydrology
Chairman - Friends of the Forest
Chartered Institute of Waste Management
Cheltenham Citizens Advice Bureau
Cheltenham Civic Society
Cheltenham and Gloucester Independent
Chequers Bridge Centre
Churchdown Community Centre
Cirencester Citizen Advice Bureau
Cirencester Civic Society
City Auto Breakers
Civil Aviation Authority
Clean Rivers Trust
Clearwell Against Quarrying
Clearwell Quarries Ltd
Cleave Motor Salvage
Cluttons

Coleford Community Centre
Colefordian (Willetts) Ltd
Colin Buchanan and Partners
Colliers CRE
Combined Heat and Power Association
Commercial Boat Operators Association
Commission for Architecture and the Built Environment (CABE)
Complete Circle
Confederation of UK Coal Producers (Coalpro)
Copes Quarry
Cory Environmental (Gloucestershire) Ltd
Cotswold AONB Partnership
Cotswold Business Supplies
Cotswold Canal Trust
Cotswold Conservation Board
Cotswold Conservative Office
Cotswold Farm Park Ltd
Cotswold Hill Stone Masonry Ltd
Cotswold Natural Stone Ltd
Cotswold Skip Hire
Cotswold Stone Quarries Ltd.
Cotswold Youth and Community Office
Cotswolds Water Park Society
Council for British Archaeology
Countryside and Community Research Institute
Gloucestershire Guide Association
Crest Nicholson (South West) Ltd
Crossways and Scowles Action Group
D A Cook (Builders) Ltd
DPDS Consulting Group
David Brooke Chartered Surveyor
David Jarvis Associates Ltd
David L Walker Chartered Surveyors
David Wilson Homes
Dean Community Compost
Defence Estates
Department for Culture Media and Sport
Department for Environment, Food and Rural Affairs Government Office For The South West
Department for Environment, Planning and Countryside Welsh Assembly
Department for Productivity, Energy and Industry Government Office For The South West
Department of Constitutional Affairs
Department of Geology - British Institute for Geology
Department of Health - South-West Regional Public Health Group
Deputy Gavellers Office

Dev Plan UK
Diocese of Clifton
Director of Sustainable and Rural Development Advantage - West Midlands
Disability Rights Commission
Dorset County Council
Down Ampney Community Action
Dowty Sports and Social Society
Drivers Jonas
Dursley Auto Dismantlers
Dursley Community Centre
Dursley and Cam Society
E-On Energy
ELG Haniel Metals Ltd
EMR (Sharpness)
Ebley Coaches Ltd
Ecotricity
EDF Energy
Elliott and Sons Ltd
Elmbridge Neighbourhood Partnership
Elmscroft Community Centre
Energy from Waste Association
Engelhard Sales Ltd
Entec UK Ltd
Environmental Services Association - Gloucestershire
Environmental Waste Controls Plc
Equality and Human Rights Commission
European Metal Recycling Ltd.
Evesham and Cotswold Journal
F R Willetts and Co (Yorkley) Ltd
FM 102 - The Bear
Forest And Wye Valley Review
Forest Auto Salvage
Forest of Dean Badger Patrol
Forest of Dean Citizens Advice Bureau
Forest of Dean Railway Ltd
Forest of Dean Small Miners Association
Forestry Commission
Forestry Enterprise
Fosse Dogotel and Cattery
Freeminers Association
Freightliner
Friends of the Earth (Forest Of Dean)
Friends of the Earth Gloucestershire Network
Friends of the Forest

Furniture Recycling Project
G and M Motors (Glos) Ltd
GVA Grimley
George Wimpey Bristol
Gill Pawson Planning
Glos Association of Primary Heads
Glos Fire and Rescue Service HQ
GlosAIN
GlosVAIN
Gloucester Civic Trust
Gloucester Heritage Urban Regeneration Company Ltd
Gloucester News Service
Gloucester Partnership
Gloucester and District Citizens Advice Bureau
Gloucestershire Airport Ltd
Gloucestershire Association of Parish and Town Councils
Gloucestershire County Scout Office
Gloucestershire Echo - Cheltenham
Gloucestershire Echo - Stow on the Wold
Gloucestershire Echo - Tewkesbury
Gloucestershire Environmental Partnership
Gloucestershire Federation of Women's Institute
Gloucestershire Fire and Rescue Service
Gloucestershire First
Gloucestershire Gazette
Gloucestershire Geology Trust
Gloucestershire Green Party
Gloucestershire NHS
Gloucestershire Rural Community Council
Gloucestershire Society for Industrial Archaeology
Gloucestershire Wildlife Trust
Good Energy Company
Gordon Wood and Co
Government Office for the South West (GOSW)
Great Western Company
Great Western Trains Co Ltd
Greenfield Associates
Grundon Waste Management
H T Waste Recycling
HM Inspectorate of Mines - Health and Safety Executive
Ministry of Defence (South West)
HTV
Halcrow
Hallam Land Management Ltd.

Hanson Aggregates UK
Hartpury College
Help the Aged - England
Hemming Group
Hemming Waste Management
Hempsted Residents Association
Hewelsfield Against Quarrying
Highways Agency
Hills Minerals and Waste Ltd
Hilton Hotels Corporation
Horton Road Depot Objectors Consortium
Howard Tenens (Associates) Ltd.
Hucclecote Community Centre
Humphrey Cook Associates
Hunter Page Planning
Huntsman's Quarries Ltd
Infrastructure Services E W S
Institute of Directors South West Office
Institute of Environmental Mgmt and Assessment
J C Autos
Jackies Coaches
Jones Day
Kemble Air Services Ltd
Keyway (Glos) Ltd
Knockdown Stone
Lafarge Aggregates Ltd
Land and Mineral Management
Tarmac Quarry Products Limited
Land Use Consultants
Lechlade and District Society
Leckhampton with Warden Hill
Local Government Chronicle
Longlevens Community Centre
Lydney Citizens Advice Bureau
Lydney Sand and Gravel
Lydney Youth and Community Centre
MLAGB - The Muzzle Loaders Association of Great Britain
Malvern Hills AONB Office
Marwalk Development Ltd
Metcourt Industries Ltd
Member of Parliament for Gloucester
Midlands and Western Region Road Haulage Association
Midlands, West and Wales Office Freight Transport Association
Mine Train Quarry

Mineral Policy Section - Health and Safety Executive
Mineral Products Association
Mitcheldean Community Centre
Mitchell Vehicle Dismantlers
Mobile Operators Association (MOA)
Monument Quarry
Moreton C Cullimore (Gravels) Ltd
Moreton-In-Marsh Charity
Municipal Journal
NASUWT
NJL Consulting LLP
NOTE UK Ltd
NUT Glos Assoc
Nathaniel Lichfield and Partner
National Council of Women - Cheltenham
National Express
National Farmers Union
National Grid
National Mining Engineer - Network Rail
National Playing Fields Association
National Stone Centre
Network Rail
Never Despair Breakers
New Earth Solutions Ltd
Newent Civic Society
Newent Community Centre
Newtown Area Community and Residents Association
Northway Area Residents and Homeowners Association
Northwick Estate - Stanleys Quarry
Office of Government Commerce
P.E. Duncliffe Limited
Packwood Estates Limited
Parklands Community Association
People Against Incineration
Persimmon Severn Valley
Planning Publications Ltd
Planning and Built Environment Glos Community Health Council - C/O Capitec, Part Of Nhs Estates
Podsmead Community Centre
Pressweld Ltd
Property Services Thames Water
Public Enquiry Team Home Office
Pulham and Sons (Coaches) Ltd
RAF Fairford
RJB Mining UK

RMC Weston
RPS Group Plc
Rail Freight Group
Ramblers Association
Regional Director for The South West British Telecommunications Plc
Department for Education and Skills
Residents Against Gravel Extraction (Rage) - Twyning
Richard Read Transport Ltd
Ringway Highway Services - Gloucester Office
Robert Gardner Ltd
Robert Hitchins Ltd
Roberts Limbrick Architects
Roberts and Lloyd Solicitors
Route Management Highways Agency
Roxburgh Youth and Community Centre
Royal Agricultural College
Royal Forest Of Dean Freeminers Association
Royal Society for The Protection Of Birds (RSPB)
Ruardean Residents Assocation
Ruardean Women's Institute
SWARD
Savills Ltd.
School Of Earth, Ocean and Planetary Sciences Severn Estuary Partnership
Scottish and Southern Energy Plc
Sea and Water
South West Councils
Severn & Avon Valley Combined Flood Group
Severn Sound
Shakemantle Quarry Action Group
Sharpness Dock Limited
Smith, Stuart and Reynolds
Smiths (Gloucester) Ltd
South East Division Welsh Development Agency
South East England Development Agency (Seeda)
South East England Partnership Board
South West Regional Aggregate Working Party
Southern Brick Federation
South East England Regional Assembly
Sport England
Springfields Nursery
St Briavels Against Quarrying
St Marks and Hesters Way Community Association
Stagecoach West
Stanley's Quarry

Stewart Ross Associates
Stone Federation Great Britain
Stone Supplies (Cotswold)
Stow and District Civic Society
Stowe Mork Fence Residents Association
Malvern Hills District Council
Strategic Land Partnerships
Stroud Civic Society
Stroud College in Gloucestershire
Stroud News and Journal/ Chelt and Glos Independent
Stroud Valleys Project
Stroud and District Citizens Advice Bureau
Sunhill Action Group
Swanbrook Transport Ltd.
TACR Consultancy
Tarmac Ltd.
Teg Environmental Ltd
Terence O' Rourke Ltd
Tetbury Civic Society
Tewkesbury Citizens Advice Bureau
Tewkesbury Civic Society
Tewkesbury Conservation Association
Tewkesbury Youth and Community Centre
Thames Planning and Amenity Forum
Thames Water Plc
The Citizen Newspaper
The Co-Operative Group
The Composting Association
The Filkins Stone Company
The Living Green Centre
The Planning Inspectorate
The Reddings Community Association
The Stone Garden Company
The UK Cast Stone Association
Threatened Valleys Campaign (Upper Thames Branch)
Tlt Solicitors
Transco - National Grid
Transport 2000
Traveller Law Reform Project
Trenchard Collieries Ltd
Tribal MJP
Trust HQ Gloucestershire NHS Health Authority
Tuffley Community Association
Tufnell Town and Country Planning

Twigworth Breakers Ltd
University Of Gloucestershire
Urbaser Ltd
Virgin Trains
Viridor
Vision 21 Waste and Pollution Working Group
Wessex Trains
WRAP
Wales Environment Agency
Wales and West Utilities
Wardell Armstrong LLP
Warner Estate Holdings Plc
Waste Exchange Uk Ltd
Waste Recycling Group Ltd.
Wellington Park Properties Ltd
Wessex Water
West Gloucestershire Green Party
The Salvation Army - West Midlands Divisional HQ
West Midlands Regional Assembly
Westgrove (Properties) Ltd
Whaddon Youth and Community Centre
Wilderness Stone Ltd
Wildfowl and Wetlands Trust
Wilts and Glos Standard
Women's National Commission
Woods Hardwick Planning Ltd
Wotton-Under-Edge Civic Society
Wye Valley AONB Office
Wynstones School
Zone 4/24 Disabled Persons Transport Advisory Committee

Workshop 22nd March 2006
Gloucester Guildhall - List of Attendees

| | |
|-----------------------------|--|
| Mrs J Adamson | |
| Ms Rose Ashton | |
| Ms Jessica Barley | |
| Dr David Beard | |
| Mr John Beattie | |
| Mr Chris Boseley | Tewkesbury Borough Council |
| Mr Brian Brazington | Farmington Parish Council |
| Mrs Mavis Buxton | Rodborough Parish Council |
| Mrs Kim Carpenter-Richards | Forest of Dean District Council |
| Mr Geoff Chapman | Poulton Parish Council |
| Mr John Connell | Classic Landscaped Ltd. |
| Dr John Cordwell | Gloucestershire County Council |
| Mr Michael Cowdell | Cory Environmental |
| Mr J Cripps | Gloucestershire Chamber of Commerce and Industry |
| Cllr Derek Davies | Tewkesbury Borough Council |
| Mrs J Dixon | |
| Ms Tracey Dixon | |
| Mr Martin Everett | Environment Agency |
| Mr Ted Fryer | Safety in Waste and Rubbish Disposal (SWARD) |
| Mrs Judy Fryer | SWARD |
| Mr Andrew McKenzie | |
| Janet Gaskell | Chalford Parish Council |
| Mr Steven George | |
| Cllr Charles Gillams | Gloucestershire County Council |
| Mrs Govan | |
| Ms Verna Green | Tewkesbury Borough Council |
| Mrs Marie Griffiths | Newland Parish Council |
| Mr Terry Hale | Newland Parish Council |
| Mr Chris Hanman | SWARD |
| Cllr Sue Hillier-Richardson | Tewkesbury Borough Council |
| Mr Paul Holliday | Stoke Orchard Parish Council |
| Mrs Sheila Jeffery | Cotswold District Council |
| Mr Martin Litherland | Wiltshire County Council |
| Mr R Ludlow | |
| Cllr Robin Macdonald | Gloucestershire County Council |
| Mr David Mockford | |
| Mr Jack Newell | Hempsted Residents Association |
| Mr Carlos Novoth | Stroud District Council |
| Cllr Shaun Parsons | Gloucestershire County Council |
| Mr Darren Peck | BIFFA Waste Services Ltd. |

| | |
|-------------------------|---|
| Mr Oliver Perrin | Sunhill Action Group |
| Miss Cat Phelps | Gloucester City Council |
| Mavis Reynolds | Consumer |
| Mrs Jill Rixon | Quenington Parish Council |
| Ms Frances Robertson | Gloucestershire Friends of the Earth |
| Mr Tony Rutherford | |
| Mr Venk Shenoi | Forest of Dean District Council |
| Mr Ian Smith | Environment Agency – South West Regional Office |
| Cllr Clara Sudbury | Gloucestershire County Council |
| Cllr Lloyd Surgenor | Cheltenham Borough Council |
| Mr Paul Symonds | Forest of Dean District Council |
| Cllr Stan Waddington | Gloucestershire County Council |
| Mrs Alison Wantenaar | Gloucestershire County Council |
| Miss Diana Way | |
| Mr Pete West | Severn Wye Energy Agency |
| Mr Scott Williams | Cheltenham Borough Council |
| Ms Lizzie Willis | Environment Agency – Tewkesbury |
| Cllr Will Windsor-Clive | Gloucestershire County Council |
| Mr Paul Wormald | Grundons Waste Management |
| Mr Ralph Young | Cotswold District Council |

Workshop 30th October 2007
Gloucester Guildhall - List of Attendees

| | |
|--------------------|-------------------------------|
| John Beattie | SWARD |
| Lucy Binnie | Land and Mineral Management |
| Meyrick Brentnall | GCC |
| Mrs Chaplin | Shurdington Parish Council |
| Trevor Colbeck | Shurdington Parish Council |
| Cllr John Cordwell | GCC |
| Allan Davies | North Somerset Council |
| Nick Dean | Worcestershire County Council |
| Hazel Edwards | Gill Pawson Planning |
| Ted Fryer | SWARD |
| Judy Fryer | SWARD |
| Richard Geary | Cheltenham Borough Council |
| Derek Greedy | Warwickshire County Council |
| Marie Griffiths | Newland Parish Council |
| Chris Harmer | Horsley Parish Council |
| Christine Headley | Rodborough Parish Council |
| Mr Hickey | Cheltenham Centre for Change |
| Tim Holton | GCC |
| Adam James | Warwickshire County Council |
| Cllr Ceri Jones | GCC |
| Jonathan Manning | Wiltshire County Council |
| Peter Martin | Smiths |
| Darren Peck | Biffa Waste Services Ltd |
| Andy Pritchard | GCC |
| Dawn Quest | GCC |
| Trevor Radway | TACR Consultancy |
| Jill Rixon | Sunhill Action Group |
| Ian Smith | Environment Agency |
| Terry Smith | GCC |
| Paul Symonds | FoD District Council |
| Anna-Marie Yates | Glos PCT |
| Mark Parsons | |
| Mr Symes | Co-op |
| Cllr Windsor Clive | GCC |
| Kevin Phillips | GCC |
| Nick Croft | GCC |
| Lorraine Brooks | GCC |
| David Ingleby | GCC |
| Stewart Mitchell | Grundons |