

Waste Core Strategy Issues and Options

**Sustainability Appraisal
(SA) Consultation
Response Report**

January 2007

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Section 1 Introduction



The Waste Core Strategy Issues and Options Papers (both a Part A and a Part B) went out to consultation from the 17th July to the 15th September 2006. The consultation exercise took the form of a mailed out letter to over 1400 local, regional and national stakeholders. In accordance the County's adopted SCI¹, copies of all consultation documents were made available to view at each of the County libraries, County and District Offices and were posted on the County Council's website. In the event that consultees required 'hard' copies of the documentation, these were made available free-of-charge. In the spirit of the new planning system, and requirements for continuous stakeholder involvement at this stage of plan preparation, representations were received and considered after the end date for consultation. The Issues &

Options Papers were accompanied by an **SA Report** presenting information on the likely effects of the plan and considering alternative options.

A number of representation were received relating specifically to the SA Report. These representations are detailed here in this report, and will feed into, and be considered in the preparation of:

- An update to the SA Framework – The Context & Scoping Reports (Particularly the baseline information, which needs to be regularly updated).
- The Waste Core Strategy Preferred Options Paper.
- The SA Report for the Waste Core Strategy Preferred Options Paper.

Section 2 Representations on the SA Report

The following are the representations specifically related to the SA Report. (Note: The full list of respondents to the Waste Core Strategy Issues and Options paper is provided in Appendix A). An officer response to each comment has not been provided in *this report*², but comments will be provided in the SA Report that will be produced at the next stage (Preferred Options) of the Waste Core Strategy process.

¹ The County Council adopted a Statement of Community Involvement (SCI) in Dec 2005. It sets out how local communities will be involved in the preparation of planning documents and County Council planning applications.

² A brief response has been provided in this report in relation to the Government Office for the South West (GOSW) representation.



CAMPAIGN TO PROTECT RURAL ENGLAND

Would like to see any WCS satisfy national/local waste policies of CPRE. Whilst the WCS is inevitably 'time limited', CPRE must look to the environmental issue 'in perpetuum'.

GLOUCESTERSHIRE COUNTY ECOLOGIST

Issue W11 (SA Report) – I direct you to a table I have compiled with David Ingleby entitled 'Appropriate Assessment (AA) Screening of Gloucestershire County Council's Waste Core Strategy Issues & Options (Summer 2006)' which is relevant to Appendix 5 of the SA Report. I presume you are aware of this document already. Section 5 (Plan issues and options) is useful and I would not question the summarised commentary provided at 5.2, as it is a reasonable appraisal of the issues and options under consideration.

EGERTON, JO.

I have lived in an area where green recycling bins were used, and black bins were only collected on a 2 week basis. This had a massive impact on the residential area, due to the lack of recycling to support the 2 week bin collection. To accompany a 2 week collection there is also a need for food waste, recycling, plastic collection (i.e. milk cartons, plastic bottles etc) also cardboard allowance in with garden rubbish.

GILL PAWSON PLANNING

Can't honestly feel that the resources and work involved have added much to the main problem, or solving it.

GOVERNMENT OFFICE FOR THE SOUTH WEST (GOSW) LOCAL PLANNING TEAM

Although the SA goes some way to inform the document, some of the justifications for its assessment are unclear and therefore undermines the suitability of the options put forward.

The SA states that Vision 'Option 2' will meet a number of objectives but doesn't explain why or how – for example, protecting the environment, preventing development in the floodplain etc.

Given that the Regional Spatial Strategy sets the framework for all spatial plans, it would seem logical for the Core Strategy to look to 2026. We appreciate that flexibility within the plan is important, but the overarching strategy of where future development will take place will be set out to 2026 in the RSS. It is not clear from the explanation in your SA on this subject as to why the 2026 date is uncertain in respect of a number of objectives – on what evidence or advice are these uncertainties based on? Are there any possible mitigation measures that could overcome them?

Whilst we do not comment in detail on the Sustainability Appraisal we have made a couple of observations which you may wish to consider. As expressed in our response to Question 2 above, you may wish to revisit some of your explanations so that your SA better articulates your reasoning for marking in the way that you have. For example, page 50, W2, Options 2,3 and 4, SA Objective 12 seems to suggest that if fuel technology results in less CO₂ emissions then lorry movements will not need to be reduced, but surely CO₂ emissions are not the only adverse impact of lorry traffic on communities – what about safety, noise etc.

You appear to have taken a slightly different approach to the same issue in W3 (page 53).

Note: On the 17th November 2006 GCC Minerals & Waste Planning Policy Team met with GOSW to discuss issues raised in their response to the Waste Core Strategy Issues & Options Paper. The following outcomes (in terms of the SA) were recorded in the agreed meeting minutes:

Agenda Item 7: Sustainability Appraisal – Level of detail in explanations / examples of the test of options within the SA Report which would benefit from clarification/justification.

GCC: We are aware that the level of explanation in the SA is somewhat brief in places but the justification is:

- (a) It is a Core Strategy;
- (b) ODPM SA Guidance states that the required level of detail at Issues & Options is less than at Preferred Options stage;
- (c) The SA has been tested and audited by expert consultants and they are happy with our approach.

GOSW: GOSW acknowledge that they are not experts in this area, and that their response was inaccurate in respect of the level of detail / inconsistencies etc. Their intention was to flag up a few issues in order to help Gloucestershire progress the plan – and they are generally happy with the SA approach.

RADWAY, T. (SMITHS GLOUCESTER LTD)
Sustainability and economics go hand-in-hand. 15% of sorted waste in a WTS HAS to go to landfill because it cannot be used elsewhere. The LPA MUST be flexible in finding/allowing land in the Severn Vale to be used for that

purpose. It is not SUSTAINABLE to take the residue to the Water Park or beyond.

STROUD DISTRICT GREEN PARTY

It is not emphasised nearly enough in the SA that landfill is a fundamentally unsustainable process in the medium to long term. Any process is by definition unsustainable if it piles up large quantities of material in sites that will admittedly be full within a few years. Regarding Issue W10 of the WCS (page 28), it is not true that Option 2 is the most positive. The table on page 105 shows no difference except a marginal one for flooding, which seems irrelevant in this case.

ENVIRONMENT AGENCY – TEWKESBURY OFFICE

We are generally satisfied with the SA assessment of the WCS.

GLOUCESTERSHIRE COUNTY COUNCIL WASTE MANAGEMENT UNIT

Very detailed and seems thorough.

WOODCHESTER PARISH COUNCIL

Generally support conclusions in the SA report but the adverse effects of environmental change (e.g. flooding) due to global warming and any unanticipated economic downturn on employment /housing/transport in the next 20 years need to be given greater emphasis.



Appendix A

List of respondents

Chartered Institute Of Waste Management
Severn Trent Water Ltd
Tacr Consultancy
Batchelor, T.
Billings-Ferrand, J.
Cotswolds Conservation Board
Campaign to Protection Rural England
Gloucestershire County Ecologist
Director Of Planning, Transport & Economic
Strategy - Warwickshire County Council
Dursley Town Council
Egerton, J.
Gerry, R.
Gill Pawson Planning
Gloucester City Council
Government Office for the South West
GVA Grimley
Hooker, I.
Jones, C.
Landscape Officer
McCurry, P.
Natural England
Network Rail
Newland Parish Council
Nott, D.
Quenington Parish Council
Quest, D.
Radway, T.
Regulatory Waste Team - Environment Agency
Route Management Highways Agency
Shurdington Parish Council
South West Region Liaison Environment Agency
Strategic Land Use Team – Cheltenham Borough
Council
Stroud District Green Party
SWARD
Tewkesbury Borough Council
Tewkesbury Office Environment Agency
Tewkesbury Town Council
Thames Water Plc
Uley Parish Council

Gloucestershire Waste Management Unit
Wessex Water Services Ltd
Woodchester Parish Council





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