

# Gloucestershire Waste Core Strategy

## Post-examination changes

### Additional Changes



tackling  
climate change

committed to a 10% reduction  
in our carbon emissions by 2012

April 2012



## **Gloucestershire Waste Core Strategy Schedule of Additional Changes**

The Waste Core Strategy (WCS) was submitted to the Secretary of State on 5<sup>th</sup> September 2011. The Strategy is subject of an Independent Examination which commenced on Tuesday 31<sup>st</sup> January 2012 until Thursday 9<sup>th</sup> February 2012 and again reconvened on Monday 12<sup>th</sup> March 2012.

The adjournment to Session 7, Issue 7, took place as scheduled on 12<sup>th</sup> March 2012. During this session a discussion took place as to the potential main modifications that would be needed to make the WCS sound. The Council have now made a request to the Inspector under section 20 (7c) as amended (by section 112 of the Localism Act 2012) of the Planning and Compulsory Purchase Act 2004.

The Council has produced a schedule of **Main Modifications** for consultation which contains the changes which must be considered and recommended by the Inspector and must be subject to public consultation. Once the consultation has ended the Inspector will consider the responses that have been received and assess whether they raise any 'soundness' issues. There may be a need for an additional hearing session, a date for which has been provisionally set for Friday 28<sup>th</sup> September 2012.

This document contains the schedule of **Additional Changes**. These are modifications that (taken together) do not materially affect the policies set out in it. These changes do not need to be recommended by the Inspector and do not need to be subject to public consultation; however the Council has decided to include them as part of the consultation process for completeness and clarity. The Council will take into account any comments you make on these additional changes.

Further additional changes may be made to correct minor errors of punctuation, referencing and to consolidate numbering, etc

## How to participate

This is the opportunity for you to comment on the soundness and legal compliance of these changes, the Sustainability Appraisal of the changes and the updated Habitats Regulations Assessment report. The Council intends to submit the Main Modifications, Sustainability Appraisal of the changes, updated Habitats Regulations Assessment report and copies of all the representations it receives to this consultation to the Inspector for him to consider as part of the Examination of the Waste Core Strategy. The Inspector will take these documents into account when considering whether the Core Strategy complies with the legal requirements and is "sound". However comments to the additional changes will be considered only by the Council, unless it considers any fundamental issues of 'soundness' are raised upon them which need to be sent to the Inspector.

The consultation will run from **Friday 27<sup>th</sup> April until 5pm on Monday 11<sup>th</sup> June 2012**. It is important that you reply before the consultation ends. Late representations will not be forwarded to the Inspector.

Please complete the questionnaire online at [www.glos.gov.uk/wcs/examination](http://www.glos.gov.uk/wcs/examination), email your comments to [m-wplans@glos.gov.uk](mailto:m-wplans@glos.gov.uk), or send written comments to Waste Core Strategy, Strategic Planning, Block 5, 1<sup>st</sup> Floor East, Shire Hall, Gloucester, GL1 2TH, by 5pm on Monday 11<sup>th</sup> June 2012.

All of the documents are available to view on the Council's website, [www.glos.gov.uk/wcs/examination](http://www.glos.gov.uk/wcs/examination), and during normal opening hours from Friday 27<sup>th</sup> April 2012 at the following places:

- Shire Hall Reception, Gloucester
- All District Councils
- Public Libraries in Gloucestershire

Copies of the documents can also be provided in formats suitable for the blind or visually impaired, or in a language other than English.

## Schedule of Additional Modifications

Changes AC1- AC18 have already been consulted on through the Focused Changes in 2011, they are provided to ensure consistency. Changes AC19-AC22 have come about through discussions at the examination sessions.

<b>AC1 (was FC1)</b>	<p><u>Paragraph 2.20</u></p> <p>Amend as follows:</p> <p>Table 1 and Figure 2 below illustrate how much waste is produced <u>and or</u> managed in Gloucestershire across the four main waste streams (note: Table 1 includes a separate figure for metal waste).</p>	<p>This has previously been consulted upon as FC1</p> <p>Reason for change:</p> <p>To clarify that Table 1 and Figure 2 include data on both the amount of waste <u>produced</u> in Gloucestershire (for municipal waste) and the amount of waste <u>managed</u> in Gloucestershire (for commercial, construction and hazardous waste).</p>
<b>AC2 (was FC2)</b>	<p><u>Table 1 – Footnote</u></p> <p>Insert additional text as follows:</p> <p>Figures are rounded to the nearest 1000. Metal (from all waste streams) is counted separately. Figures have factored in double counting. The MSW total is an arisings figure all other totals are licensed waste managed in Gloucestershire. <u>For hazardous waste it should be noted that 90,000 tpa is the total managed figure for hazardous waste which includes both pre-treatment and disposal of this waste stream. This does mean this figure indicates the management capacity rather than a total arising as there would be an element of double counting. However the EA advise that this is the correct way to consider this waste stream due to the requirements of both pre-treatment and disposal.</u></p> <p><u>Paragraph 2.65</u></p> <p>Amend as follows:</p> <p>According to the EA, the amount of hazardous waste managed in Gloucestershire in 2008 was around</p>	<p>This has previously been consulted upon as FC2</p> <p>Reason for change:</p> <p>To clarify the position in relation to hazardous waste.</p>

	<p>90,000 tonnes <u>(including pre-treatment and disposal)</u>. Most of this (94.5%) was <u>disposed of managed</u> at the specialist hazardous <u>landfill facility</u> at Wingmoor Farm (East) near Bishop's Cleeve. Additionally a number of the county's waste transfer stations, household recycling centres and End of Life Vehicle (ELV) dismantlers handle relatively small tonnages of hazardous wastes such as oils, lubricants and asbestos.</p>	
AC3 (was FC4)	<p><u>Paragraph 2.36</u></p> <p>Amend as follows:</p> <p>One of the main types of bulking and transfer facility is a Waste Transfer Station (WTS). There are currently 22 WTS in Gloucestershire dealing with MSW, C&amp;I and C&amp;D waste and two dealing specifically with the transfer of clinical waste. <u>Six Seven</u> are used for MSW transfer and these have a total capacity of <u>107,000 157,000 tonnes/year including 122,000 tonnes/year for general/residual waste to landfill disposal and 35,000 tonnes/year for the transfer of recyclables</u>. Details of these are set out in the Waste Data Paper 2010.</p>	<p>This has previously been consulted upon as FC4</p> <p>Reason for change:</p> <p>To correct a factual inaccuracy and to clarify how much of the currently available MSW transfer capacity is used for general/residual waste to landfill disposal and how much is used for the transfer of recyclables.</p>
AC4 (was FC5)	<p><u>Paragraph 2.46</u></p> <p>Amend as follows:</p> <p>There are currently <u>four five</u> commercial-scale composting facilities in Gloucestershire. <u>A sixth facility has planning permission but has not yet been built</u>. Total <u>permitted</u> capacity is <u>113,000 149,000 tonnes/year. This includes 113,000 tonnes/year IVC capacity and 36,000 tonnes/year windrow composting and transfer capacity. Of the total permitted composting capacity, 79,000 tonnes/year is for MSW and 70,000 tonnes/year for C&amp;I waste.</u></p>	<p>This has previously been consulted upon as FC5</p> <p>Reason for change:</p> <p>To correct a factual inaccuracy and to clarify the type of commercial-scale composting facilities currently operating in Gloucestershire.</p>
AC5 (was FC6)	<p><u>Paragraph 2.55</u></p> <p>Amend as follows:</p> <p>Whilst <u>generally speaking</u> landfill <u>is bad for the environment</u> <u>can have particular environmental impacts</u>, for the foreseeable future it is likely to continue to have a role to play in waste management.</p>	<p>This has previously been consulted upon as FC6</p> <p>Reason for change:</p> <p>To provide increased clarity.</p>

AC6 (was FC7)	<p><u>Key Issue 3</u></p> <p>Insert additional text as follows:</p> <p>Gloucestershire has a rich historic and natural environment including extensive areas of AONB and Green Belt <u>and sites of international, national and local nature conservation importance</u>. These are important considerations in terms of the location of new waste management facilities and supporting infrastructure.</p>	<p>This has previously been consulted upon as FC7</p> <p>Reason for change:</p> <p>To highlight as a key issue the fact that Gloucestershire includes a number of sites of international, national and local nature conservation importance.</p>
AC7 (was FC15)	<p><u>Paragraph 4.68</u></p> <p>Amend as follows:</p> <p>Any material that won't burn (glass, metal, stones) collects at the bottom of the chamber and is known as bottom ash <u>which can be used as a recycled aggregate for construction purposes</u>. Incinerators also create gases which are generally acidic and contain particles. Prior to being released into the atmosphere the gases are cleaned carefully to neutralize the acidity and remove the particles. The particles collected along with the excess cleaning chemicals are known as fly-ash (Air Pollution Control Residues (APC Residues)), which are classed as hazardous waste <u>and must be treated and/or landfilled</u>.</p>	<p>This has previously been consulted upon as FC15</p> <p>Reason for change:</p> <p>To reflect the fact that a proportion of the output from the incineration process may be used for construction purposes and that some must be treated and/or sent to landfill.</p>
AC8 (was FC16)	<p><u>Paragraph 4.69</u></p> <p>Amend as follows:</p> <p>Modern incinerators generate <u>and capture heat and</u> power <u>and in some instances capture heat</u> which may be used on or off-site thereby contributing to renewable energy targets. In some instances, incineration may be used in conjunction with other waste management processes as part of an integrated facility for example metal being collected from the waste before it is burnt or burning the RDF created through some MBT processes.</p>	<p>This has previously been consulted upon as FC16</p> <p>Reason for change:</p> <p>To reflect the fact that not all incinerators capture both heat and power.</p>
AC9 (was FC17)	<p><u>Paragraph 4.81</u></p> <p>Amend as follows:</p>	<p>This has previously been consulted upon as FC17</p> <p>Reason for change:</p>

	<p>This will essentially be a matter for the waste industry to decide and in relation to <u>Solutions for</u> MSW will be a matter for evaluation by the WDA through the residual waste contract process which is currently ongoing. <u>For C&amp;I waste, it will be a matter for the waste industry to bring forward proposals within the context of the WCS.</u></p>	<p>To clarify that for municipal waste (MSW) the Waste Disposal Authority (WDA) will determine how many and which sites come forward through the residual waste project and that for commercial and industrial (C&amp;I) waste it will essentially be a matter for the waste industry to decide within the context of the WCS.</p>
<b>AC10 (was FC18)</b>	<p><u>Paragraph 4.85</u></p> <p>Amend as follows:</p> <p>Zone C avoids those parts of the county where flood risk is most prevalent and also avoids the Cotswold Area of Outstanding Natural Beauty (AONB). It is thus <u>relatively unconstrained less constrained</u> in land use planning terms.</p>	<p>This has previously been consulted upon as FC18</p> <p>Reason for change:</p> <p>To more clearly reflect the fact that development in Zone C is not entirely 'constraint-free'.</p>
<b>AC11 (was FC19)</b>	<p><u>Paragraph 4.89</u></p> <p>Insert additional text as follows:</p> <p>Notably, our proposed approach (see Core Policy WCS4 below) whilst focusing strategic facilities into Zone C would still allow for smaller-scale facilities to come forward outside Zone C, subject to criteria, if there were to be sufficient demand from the waste industry, <u>developers, the local community and other stakeholders</u>.</p>	<p>This has previously been consulted upon as FC19</p> <p>Reason for change:</p> <p>To clarify the fact that small scale facilities can be promoted not only by the waste industry but also by other developers, the local community and stakeholders.</p>
<b>AC12 (was FC20)</b>	<p><u>Paragraph 4.91</u></p> <p>Amend as follows:</p> <p>The sites are shown on the plan below and on the Key Diagram attached at Appendix 4. <u>Each site is considered suitable for accommodating the type of waste recovery operations described earlier. In line with national policy, we do not consider it appropriate or possible to prescribe exactly what will be built on each site.</u></p>	<p>This has previously been consulted upon as FC20</p> <p>Reason for change:</p> <p>To reflect representations received and to emphasise why the Council is adopting a 'technology neutral' stance.</p>

AC13 (was FC22)	<p><u>Paragraph 4.103</u></p> <p>Amend as follows:</p> <p>We now need to consider the provision of waste water treatment facilities at a larger, commercial scale. <u>This must be considered in the context of the Water Framework Directive (WFD) which aims to protect and enhance water quality.</u> We address this issue in this section of the WCS because waste water treatment when linked to anaerobic digestion (AD) creates the potential for generating energy. At present there are 84 operational waste water treatment facilities in Gloucestershire.</p>	<p>This has previously been consulted upon as FC22</p> <p>Reason for change:</p> <p>To ensure compliance with national policy.</p>
AC14 (was FC23)	<p><u>Paragraph 4.111</u></p> <p>Insert additional text as follows:</p> <p>A further issue associated with waste water treatment is the disposal of the sewage 'sludge' that is created through the waste water treatment process. This is often spread to land for agricultural purposes – a process which <u>in some cases</u> requires planning permission.</p>	<p>This has previously been consulted upon as FC23</p> <p>Reason for change:</p> <p>To reflect the fact that planning permission is not always required for the disposal of sewage sludge to agricultural land.</p>
AC15 (was FC33)	<p><u>Paragraph 4.233</u></p> <p>Insert additional text as follows:</p> <p>AONB designations (see above) are largely concerned with conserving valued landscapes and natural beauty. Natural beauty includes biodiversity and geodiversity but protection for nature conservation features of particular importance is addressed throughout the county via policy and statutory provisions operating across international, national and local levels. <u>Importantly, the Natural Environment and Rural Communities (NERC) Act 2006 introduced a duty on all public bodies to consider biodiversity in exercising their functions.</u></p>	<p>This has previously been consulted upon as FC33</p> <p>Reason for change:</p> <p>To ensure compliance with national policy.</p>
AC16 (was FC35)	<p><u>Paragraph 4.278</u></p> <p>Amend to include reference to the Strategic Road Network (SRN) and Highways Agency as follows:</p> <p>'Guidance on Transport Assessment' (Department for Transport 2007) sets out indicative 'thresholds' that will be used to determine whether a TA is required in support of proposed development. In</p>	<p>This has previously been consulted upon as FC35</p> <p>Reason for change:</p> <p>To provide flexibility and reflect the fact that there may be development proposals that fall under the</p>

	<p>short, any major waste development generating more than 100 two-way movements a day or more than 30 movements within one hour is likely to require a Transport Assessment. <u>Proposals under this threshold may also require a TA where there could be an impact on the Strategic Road Network (SRN).</u> It is recommended that early discussion be held with the Local Highway Authority <u>and where relevant, the Highways Agency</u>, to determine whether a TA is required and, if so, to agree the scope of the TA.</p>	<p>thresholds set out in 'Guidance on Transport Assessment' (Department for Transport 2007) but still require a transport assessment due to potential impact on the Strategic Road Network (SRN).</p>
AC17 (was FC36)	<p><u>Paragraph 4.280</u></p> <p>Amend to include reference to the Highways Agency as follows:</p> <p>As with the TA, early discussion with the Local Authority <u>and where relevant, the Highways Agency</u> is recommended to agree the need for, <u>and</u> scope <u>and suitability</u> of a Travel Plan.</p>	<p>This has previously been consulted upon as FC36</p> <p>Reason for change:</p> <p>To ensure the Highways Agency are where relevant, involved in discussions regarding Travel Plans.</p>
AC18 (was FC38)	<p><u>Appendix 2</u></p> <p>Insert additional reference to the Cotswold, Wye Valley and Malvern Hills AONB Management Plans as follows:</p> <p><u>Name of Plan/Programme/Strategy</u></p> <p><u>AONB Management Plans (Cotswold, Wye Valley and Malvern Hills)</u></p> <p><u>Key Aims/Objectives/Targets</u></p> <p><u>Some of the main aims and objectives of these management plans include; tackling climate change, conserving and enhancing the character of the landscape and historic environment, sustainable transport, reducing waste, protecting water quality and resources, providing housing and employment opportunities, protecting and enhancing biodiversity and geodiversity, sustainable woodland management, rural enterprise and encouraging the use of local materials and food.</u></p> <p><u>How has this been reflected in the WCS?</u></p> <p><u>The WCS specifically identifies the presence of AONB in Gloucestershire as a key issue to be addressed. Safeguarding landscape and environmental assets forms part of the spatial vision and</u></p>	<p>This has previously been consulted upon as FC38</p> <p>Reason for change:</p> <p>To emphasise more clearly the linkages between the Waste Core Strategy (WCS) and the AONB Management Plans relevant to Gloucestershire.</p>

	<p><u>Strategic Objective 5 addresses a number of the issues raised in the AONB Management Plans including climate change, sustainable transport and the protection of national landscape designations.</u>  <u>Core Policy WCS11 relates specifically to the AONB. Other relevant policies include waste reduction, nature conservation, design and sustainable transport.</u></p>	
AC19	<p>Paragraph 2.52</p> <p>Amend as follows:</p> <p>There are a number of 'other recovery' options designed to deal with the remaining 'residual' waste that is not re-used, recycled or composted. This includes both pre-treatment technologies treatment including MBT and autoclave as well as thermal technologies including <u>incineration</u>, pyrolysis and gasification <del>which generate heat and power are considered to be energy recovery</del>. <u>Incineration can also qualify as a recovery operation where it complies with Annex II of the revised Waste Framework Directive. This requires a high level of efficiency and usually involves the generation and use of heat and power. If the definition cannot be met, incineration will be regarded as a disposal operation.</u></p>	<p>Reason for change:</p> <p>Proposed by NES CD13.45.1 - to assist with clarity</p>
AC20	<p>Paragraph 4.97</p> <p>Amend site area to 5ha</p> <p>Paragraph 4.98</p> <p>Amend site area to 7ha</p>	
AC21	<p>Paragraph 4.115</p> <p>Insert text at the end of paragraph as follows:</p> <p><u>The incineration of waste without energy recovery is classified as a disposal operation. There are currently no such facilities in Gloucestershire and it is envisaged that it will only be landfill that will play a future role in the disposal of waste in the county.</u></p>	<p>Proposed by NES CD13.45.1 - to assist with clarity</p>
AC22	<p>Paragraph 4.261</p> <p>Amend as follows:</p> <p>Importantly national and regional policy on waste requires it to be managed close to where it is generated. Often this means within or close to existing urban areas. Good design therefore has a key</p>	

	<p>role to play in integrating waste facilities into the existing built fabric. <u>In addition waste management processes such as thermal treatment often require taller buildings in order to accommodate the processing plant and emissions stacks. For these developments it is imperative that the highest architectural and design standards are applied.</u> Our proposed approach is set out in Core Policy WCS13 below.</p>	
AC23	<p>Paragraph 2.39</p> <p>At the commercial scale, Household Recycling Centres (HRC) allow for members of the public <del>and local businesses</del> to take their waste to be sorted and transferred.</p>	To reflect the fact that the County's HRCs cannot accept any form of business, commercial or trade waste.
AC24	<p>Paragraph 3.12</p> <p>The National Waste Strategy for England (2007) encourages efforts to reduce, re-use, recycle and recover energy from waste. It includes targets for recycling &amp; composting household waste (50% by 2020) and the recovery of municipal waste (75% by 2020). The strategy <del>is was</del> the subject of a <del>current recent</del> review of national waste policy <del>being</del> led by DEFRA.</p>	To reflect the fact that the DEFRA review of national waste policy is now complete.
AC25	<p>Paragraph 3.20</p> <p>Furthermore, a 'landfill tax' is payable on all waste landfilled at licensed landfill sites since 1996. This is currently <del>£48 £56</del> per tonne and will increase by £8 each year to £80 per tonne by 2014/15.</p>	To reflect the correct landfill tax figure as from April 2011.
AC26	<p>Paragraph 4.136</p> <p>The Council is currently considering a planning application to extend the life of the landfill. This is likely to be determined in <del>spring autumn</del> 2011.</p>	To reflect the fact that the application at Wingmoor Farm (East) has not yet been determined and is likely to be determined in autumn 2011.
AC27	<p>Paragraph 4.260</p> <p>Planning Policy Statement 10: Planning for Sustainable Waste Management (2005 <u>updated 2011</u>) also emphasises the need for good design stating that 'waste management facilities should be well-designed, so that they contribute positively to the character and quality of the area in which they are located.</p>	To reflect the fact that PPS10 was updated in March 2011.
AC28	<p>Paragraph 4.267</p> <p>The Council's <del>draft</del> Local Transport Plan 3 (2011-2026) supports the aspiration to identify a rail freight terminal in Gloucestershire.</p>	To reflect the fact that Local Transport Plan 3 has now been adopted.
AC29	<p>Paragraph 4.271</p> <p>The Council's <del>draft</del> Local Transport Plan 3 (2011-2026) supports the potential to restore the rail link to the port of Sharpness, should a viable business case and private finance be forthcoming.</p>	To reflect the fact that Local Transport Plan 3 has now been adopted.
AC30	<p>Paragraph 4.280</p> <p>The Council's approach as set out in its <del>draft</del> Local Transport Plan 3 (2011-2026) is that Travel Plans will be required for new development in accordance with the thresholds set out in the Department</p>	To reflect the fact that Local Transport Plan 3 has now been adopted.

	for Transport's 'Guidance on Transport Assessment'.	
<b>AC31</b>	Implementation Framework  WCS14 – Sustainable Transport  Section 106 <del>agreements</del> .	To correct a typographical error.
<b>AC32</b>	Monitoring Framework  Gloucestershire <del>Draft</del> Local Transport Plan 2011-2026: to reduce transport's emissions of carbon dioxide and other greenhouse gases, with the desired outcomes of tackling climate change.	To reflect the fact that Local Transport Plan 3 has now been adopted.
<b>AC33</b>	Glossary of Terms  A tax introduced in 1996 by HM Customs and Excise on waste deposited in licensed landfill sites, with the aim of encouraging more sustainable waste management methods and generating fund for local environmental projects. Currently <del>£48 £56</del> per tonne and will increase by £8 each year to £80 per tonne by 2014/15.	To reflect the correct landfill tax figure as from April 2011.
<b>AC34</b>	New additions to Glossary of Terms	To reflect the changes to the Waste Hierarchy.

	<b>Stages</b>	<b>Include</b>	
	<i>Prevention:</i>	<i>Using less material in design and manufacture. Keeping products for longer; re-use. Using less hazardous materials</i>	
	<i>Preparing for re-use:</i>	<i>Checking, cleaning, repairing, refurbishing, whole items or spare parts</i>	
	<i>Recycling:</i>	<i>Turning waste into a new substance or product. Includes composting if it meets quality protocols</i>	
	<i>Other recovery:</i>	<i>Includes anaerobic digestion, incineration with energy recovery, gasification and pyrolysis which produce energy (fuels, heat and power) and materials from waste; some backfilling</i>	
	<i>Disposal:</i>	<i>Landfill and incineration without energy recovery</i>	
	<p><i>Integrated and adequate waste management system</i> – A mix of facilities which must include provision for disposal of residual waste treatment as well as the provision of other options up the waste hierarchy.</p> <p><i>National Planning Policy Framework (NPPF)</i> – sets out the Government's planning policies for England and how these are expected to be applied.</p>		
AC35	<p>Appendix 2 – Influences on the Waste Core Strategy</p> <p>DEFRA: Review of National Waste Policy</p> <p>A review of waste policies and delivery in England. To ensure that the right steps are being taken towards the creation of a 'zero-waste' economy where resources are fully valued and nothing of any value gets thrown away. The review <u>published in June 2011 will look looks</u> at all aspects of waste policy and delivery including household and business waste and recycling collection arrangements. It <u>will</u> consider how the Government can incentivise the delivery of the waste hierarchy moving towards zero waste to landfill. It includes the revised waste hierarchy set out in the Waste Framework Directive 2008.</p>		

	<p>Preliminary findings from the waste policy review will be published in Spring 2011. The review was published in June 2011. Due to this timing it is not possible to take into full account the review in finalising the WCS although reference to the review and the revised waste hierarchy is made. Any significant revisions to national waste policy will need to be reflected through future revisions to the WCS.</p>	
<b>AC36</b>	<p>Appendix 2 – Influences on the Waste Core Strategy</p> <p><del>Draft</del> Third Gloucestershire Local Transport Plan 2011-2026</p> <p><del>Draft</del> Third Gloucestershire Local Transport Plan 2011-2026</p> <p>This <del>draft</del> plan sets out the transport strategy for the County from 2011 to 2026.</p>	<p>To reflect the fact that Local Transport Plan 3 has now been adopted.</p>



## tackling climate change

committed to a 10% reduction  
in our carbon emissions by 2012



Gloucestershire  
COUNTY COUNCIL