

## Gloucestershire Waste Core Strategy (WCS)

### Schedule of Focused Changes

June 2011

## **1. Introduction**

- 1.1 The Gloucestershire Waste Core Strategy (WCS) was formally published in December 2010. In response, 48 individuals and organisations commented raising just over 200 separate comments.
- 1.2 Whilst it is the Council's view that none of these comments raise fundamental issues of soundness or legal compliance, it has been decided that it would be beneficial to publish a revised version of the WCS incorporating a number of 'focused changes' with representations on the changes invited over a period of 6-weeks. The revised WCS and supporting documents are available to view online at [www.goucestershire.gov.uk/wcs](http://www.goucestershire.gov.uk/wcs) at the County Council and District Council Offices and at all Gloucestershire Libraries.
- 1.3 The publication of 'focused changes' is recommended by the Planning Advisory Service (PAS) [www.pas.gov.uk](http://www.pas.gov.uk) in cases where local authorities consider that some post-publication amendments would be useful but more extensive changes are not needed.
- 1.4 Comments on the focused changes are invited over the 6-week period **27<sup>th</sup> June – 8<sup>th</sup> August 2011**.
- 1.5 The WCS will then be formally submitted to the Secretary of State in August 2011 to be followed by independent examination in November 2011 and formal adoption in Spring 2012.
- 1.6 This schedule explains each focused change and why it has been made. It should be read in conjunction with the revised publication WCS, the response schedule, key issues summary and other background documents available at the locations specified above.
- 1.7 If you have any questions on this schedule or the focused changes in general please email [m-wplans@goucestershire.gov.uk](mailto:m-wplans@goucestershire.gov.uk) or telephone 01452 425667

## Schedule of 'Focused Changes'

Focused Change	Reason	Respondents who have raised this issue
<p><b>FC1</b></p> <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>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>	<p>Katy Wallis Grundon Waste Management Ltd. (111/4)</p>
<p><b>FC2</b></p> <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</u></p>	<p>To clarify the position in relation to hazardous waste.</p>	<p>Katy Wallis Grundon Waste Management Ltd. (111/1)</p>

that this is the correct way to consider this waste stream due to the requirements of both pre-treatment and disposal.

Paragraph 2.65

Amend as follows:

According to the EA, the amount of hazardous waste managed in Gloucestershire in 2008 was around 90,000 tonnes (including pre-treatment and disposal). Most of this (94.5%) was disposed of managed at the specialist hazardous landfill facility 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.

Focused Change	Reason	Respondents who have raised this issue
<p><b>FC3</b></p> <p><u>Paragraph 2.21</u></p> <p>Inset additional text as follows:</p> <p>It can be seen that the largest waste stream in Gloucestershire is C&amp;I, followed by MSW, C&amp;D and hazardous. <u>In December 2010, DEFRA published a Survey of Commercial and Industrial Waste Arisings (2010). For Gloucestershire the survey estimated the total amount of C&amp;I waste arising in 2009 to be 526,188 tonnes, higher than the managed figure of 375,000 tonnes set out in Table 1 and Figure 2 above. However, because the DEFRA survey has a number of limitations, does not take account of exported waste and includes a proportion of metals (which the managed figure of 375,000 tonnes does not) the managed figure is considered to represent a robust basis on which to make future provision for C&amp;I waste.</u></p> <p>Although MSW is not the largest waste stream it is perhaps the most important because of the financial penalties faced by local authorities that continue to landfill it. This is discussed later on.</p>	<p>To reflect the findings of the DEFRA study of C&amp;I waste arisings for 2009 published in December 2010 after the WCS had been formally published under Regulation 27.</p>	<p>Katy Wallis Grundon Waste Management Ltd. (111/2, 111/3, 111/4, 111/5, 111/6)</p> <p>Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD) (439/1, 439/10)</p> <p>Alan Watson Public Interest Consultants on behalf of SWARD and Bishop's Cleeve Parish Council (endorsed by Gloucestershire Friends of the Earth Network) (1853/3)</p>

Focused Change	Reason	Respondents who have raised this issue
<p><b>FC4</b></p> <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. <del>Six Seven</del> are used for MSW transfer and these have a total capacity of <del>107,000</del>  <u>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>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>	<p>Ben Stansfield Cory Environmental (Gloucestershire) Ltd. (60/4)</p>
<p><b>FC5</b></p> <p><u>Paragraph 2.46</u></p> <p>Amend as follows:</p> <p>There are currently <del>four</del> <u>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 <del>113,000</del> <u>149,000</u> tonnes/year. <u>This includes 113,000 tonnes/year IVC</u></p>	<p>To correct a factual inaccuracy and to clarify the type of commercial-scale composting facilities currently operating in Gloucestershire.</p>	<p>Tim Quinton Natural England (244/2)</p> <p>Ben Stansfield Cory Environmental (Gloucestershire) Ltd. (60/5)</p>

<p><u>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><b>FC6</b></p> <p><u>Paragraph 2.55</u></p> <p>Amend as follows:</p> <p>Whilst <del>generally speaking</del> landfill <del>is bad for the environment</del> can have particular environmental <u>impacts</u>, for the foreseeable future it is likely to continue to have a role to play in waste management.</p>	<p>To provide increased clarity.</p>	<p>Ben Stansfield Cory Environmental (Gloucestershire) Ltd. (60/6)</p>
<p><b>FC7</b></p> <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>To highlight as a key issue the fact that Gloucestershire includes a number of sites of international, national and local nature conservation importance.</p>	<p>Tim Quinton Natural England (244/3)</p>

Focused Change	Reason	Respondents who have raised this issue
<p><b>FC8</b></p> <p><u>Paragraph 3.23</u></p> <p>Amend as follows:</p> <p><u>Notwithstanding our aspiration for achieving zero-growth by 2020, forecasts</u> Forecasts suggest that the amount of MSW will increase to 359,612 tonnes in 2027/8.</p>	<p>To clarify that whilst it is the Council's aspiration to achieve zero-growth in municipal waste arisings by 2020, this is at a household level and waste forecasts suggest modest overall growth in MSW arisings beyond 2020.</p>	<p>Nick Dummett Campaign to Protect Rural England (CPRE) (365/1)</p> <p>Diane Mautterer Gloucestershire VCS Environment Strategy Group (67/2, 67/3, 67/4)</p> <p>Ben Stansfield Cory Environmental (Gloucestershire) Ltd. (60/11)</p>
<p><b>FC9</b></p> <p><u>Paragraph 3.24</u></p> <p>Insert additional text as follows:</p> <p>Unlike MSW it is difficult to determine how much C&amp;I waste will need to be managed in the future because there are no obvious past trends. For the purposes of the WCS it has been assumed that there will be a 0% growth rate for C&amp;I waste. <u>We can calculate how much additional C&amp;I capacity is required using the targets set out in the South West Regional Spatial Strategy (RSS). The RSS recycling/re-use target for Gloucestershire is 300,000 – 320,000 tonnes/year by 2020 which leaves a capacity gap of between 96,000 – 116,000 tonnes/year</u></p>	<p>To clarify how the C&amp;I capacity requirements set out in the WCS have been established (i.e. using the targets for C&amp;I recycling/re-use and recovery set out in the Regional Spatial Strategy for the South West (RSS).</p>	<p>Katy Wallis Grundon Waste Management Ltd. (111/4, 111/5, 111/6)</p> <p>Alan Watson Public Interest Consultants on behalf of SWARD and Bishop's Cleeve Parish Council (endorsed by Gloucestershire Friends of the Earth Network) (1853/3)</p>

<p><u>when set against the current capacity of 204,000 tonnes/year. The recovery target for 2020 (including transfer) is between 260,000 – 290,000 tonnes/year which set against the current capacity of 213,000 tonnes/year leaves a capacity gap of between 47,000 – 77,000 tonnes/year.</u></p>		
<p><b>FC10</b></p> <p><u>Spatial Vision</u></p> <p>Amend as follows:</p> <p>'By 2027 Gloucestershire is a clean, green, healthy and safe place in which to live, work and visit. Residents and businesses are fully aware of the economic and environmental importance of waste management, including its impact on climate change and proactively minimise their waste production to achieve 'zero-growth' <u>across all waste streams</u> by 2020.</p> <p>Opportunities for re-using, recycling and composting waste are maximised across all waste streams. Effective joint working through the Gloucestershire Waste Partnership (GWP) has led to a more consistent and co-ordinated approach towards municipal waste collection across the county with everyone able to recycle and compost a broad range of materials easily and conveniently. At least 60% of household waste is</p>	<p>To clarify that the Council's aspiration for zero-growth applies to all waste streams.</p> <p>To better reflect the National Waste Strategy (2007) and to emphasise that the strategic sites are geared towards the recovery of both municipal and commercial waste.</p> <p>To more fully emphasise the importance of providing sufficient waste management capacity to fully meet the needs of Gloucestershire.</p>	<p>Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council (1850/3, 1850/4, 1850/10, 1850/11, 1850/12)</p> <p>Tim Quinton Natural England (244/5)</p> <p>Simon Steele-Perkins Strategic Land Partnerships (601/1)</p> <p>Dr Shona Arora NHS Gloucestershire (449/2)</p> <p>David Adams AXIS PED Ltd. on behalf of Urbaser Ltd. (266/5)</p> <p>Diane Mautterer Gloucestershire VCS Environment Strategy Group (67/3)</p> <p>Ben Stansfield Cory Environmental (Gloucestershire) Ltd. (60/11)</p> <p>Nick Dummett Campaign to Protect Rural England (CPRE) (365/1, 365/17)</p>

<p>recycled and composted by 2020.</p> <p>The 'residual' <a href="#">municipal and commercial</a> waste that cannot <a href="#">reasonably</a> be re-used, recycled or composted is seen as a valuable resource and is managed through a number of 'strategic' waste recovery sites (&gt;50,000 tonnes/year) located in the central area of the county, proximate to the main urban areas along the M5 corridor including Gloucester and Cheltenham.</p> <p>Strategic sites will be located so as to maximise the potential use of heat and power and give priority to the re-use of previously developed land and buildings.</p> <p>'Local' facilities (&lt;50,000 tonnes/year) including supporting infrastructure such as waste transfer and bulking are dispersed more widely around the county including those more distant rural areas such as the Forest of Dean and the Cotswolds.</p> <p>These strategic, local and existing waste facilities will form an integrated sustainable waste management system <a href="#">ensuring enough capacity is made available to meet for</a> Gloucestershire's needs.</p> <p>Gloucestershire's communities, key landscape/environmental assets and land liable to current and future potential flood risk, are safeguarded from the adverse impacts of waste management</p>		
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<p>activities.</p> <p>The continuing role of landfill is recognised but increasingly seen as a last resort'.</p>		
<p><b>FC11</b></p> <p><u>Paragraph E.24</u></p> <p>Amend as follows:</p> <p>At least 60% household waste recycled/composted by 2020 with an aspiration for 70% <u>by 2030</u>.</p> <p><u>Paragraph 3.34</u></p> <p>Amend as follows:</p> <p>At least 60% household waste recycled/composted by 2020 with an aspiration for 70% <u>by 2030</u>.</p> <p><u>Paragraph 4.32</u></p> <p>Amend as follows:</p> <p>The Council's target is to recycle/compost at least 60% of its household waste by 2020 with an aspirational target of 70% <u>by 2030</u>.</p>	<p>To clarify that the target year for achieving the County Council's aspiration for 70% recycling/composting is 2030. This has arisen through the Council's review of its residual waste project.</p>	<p>Stephen Moore (936/1)</p> <p>Nick Dummett Campaign to Protect Rural England (CPRE) (365/1, 365/12)</p> <p>Diane Mautterer Gloucestershire VCS Environment Strategy Group (67/3, 67/4)</p> <p>Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD) (439/11)</p> <p>Alan Watson Public Interest Consultants on behalf of SWARD and Bishop's Cleeve Parish Council (endorsed by Gloucestershire Friends of the Earth Network) (1853/2)</p>

Focused Change	Reason	Respondents who have raised this issue
<p><b>FC12</b></p> <p><u>Core Policy WCS1 – Waste Reduction</u></p> <p>Amend to include reference to working with local communities as follows:</p> <p>The County Council will continue to work in partnership with <u>local communities</u>, 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.</p>	<p>To more fully emphasise the importance of working with local communities.</p>	<p>Diane Mautterer Gloucestershire VCS Environment Strategy Group (67/5)</p> <p>Dr Shona Arora NHS Gloucestershire (449/9)</p>
<p><b>FC13</b></p> <p>Various amendments to Section 4 as follows:</p> <p><u>Paragraphs 4.24 – 4.39</u></p> <p>Amend text as follows:</p> <p>4.24 Where waste cannot be eliminated or re-used, our priority should be to recycle <u>or</u> compost <u>or process</u> it <u>by means of AD facilities</u>. This helps to recover resources from the waste rather than simply disposing of it.</p>	<p>To simplify Core Policy WCS2, to more fully highlight the potential energy recovery benefits of Anaerobic Digestion (AD) and to more clearly explain the Council's approach towards bulking and transfer.</p>	<p>Michael Ratcliffe Cheltenham Chamber of Commerce (455/1, 445/2, 455/3, 455/5)</p> <p>Nick Dummett Campaign to Protect Rural England (CPRE) (365/1, 365/3)</p> <p>Diane Mautterer Gloucestershire VCS Environment Strategy Group (67/4, 67/6, 67/7)</p> <p>Holly Jones Tewkesbury Borough Council (24/2)</p> <p>Adam Neil New Earth Solutions Group Ltd.</p>

<p>4.26 Windrow composting is generally suitable for green or garden waste, whereas in-vessel composting is more suitable for food wastes (plate scrapings etc). Food waste can also be processed through an anaerobic digester <u>which has the added benefit of generating renewable energy (see below).</u></p> <p><b>4.27</b> <del>Anaerobic digestion is the natural process by which bacteria break down organic material in the absence of oxygen. An AD facility is a controlled version of this process taking place in a vessel or series of vessels.</del></p> <p><b>4.28</b> <del>Almost any organic material can be processed using AD including paper, cardboard, grass cuttings, food, industrial effluents, energy crops (grown specifically such as maize silage), sewage and animal waste. This makes AD suitable for dealing with organic MSW and C&amp;I waste (which includes a lot of organic material) waste water and agricultural waste. It is not suitable for some waste such as inert C&amp;D waste.</del></p> <p><b>4.29</b> <del>The AD process produces biogas and digestate. Biogas can be used to generate heat and electricity through combined heat and power (CHP) and can also be turned into 'biomethane' which can be used as a vehicle fuel or injected in the mains gas grid. Digestate is a solid and liquid residue made up of leftover, indigestible material and dead micro-organisms. It is</del></p>		<p>(725/5)</p> <p>Ben Stansfield Cory Environmental (Gloucestershire) Ltd. (60/12)</p> <p>Tim Perkins Entec UK Ltd. on behalf of Viridor Waste Management Ltd. (70/2, 70/3, 70/5, 70/6)</p> <p>Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council (1850/9)</p> <p>Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD) (439/5)</p> <p>Meyrick Brentnall Gloucester City Council (1370/2)</p> <p>Jane Hennell British Waterways (South) (127/2)</p>
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~~used as a fertiliser and soil conditioner, but this has to meet certain quality standards.~~

~~4.30 There are limitations to AD including the fact that it requires a consistent, segregated supply of waste such as kitchen waste which is not always available, depending on the waste collection arrangements that may be in place. AD facilities in England have, to date tended to be geared towards agricultural and sewage waste. However, the Government is very keen to roll the technology out further to deal with MSW and C&I waste, but there will be a need for industry to come forward with arrangements that satisfy the pollution control agencies.~~

~~4.31 There are currently no operational AD facilities in Gloucestershire treating MSW or C&I waste. For MSW in Gloucestershire it is likely that AD would generally be used for segregated waste (i.e. not residual waste) that currently goes to composting facilities but nevertheless could form a useful part of an integrated system.~~

~~4.34 First, we need to consider the provision of larger scale recycling and composting facilities such as bring sites (bottle banks etc.) household recycling centres, materials recycling facilities and composting facilities. We also include within this bracket the provision of waste bulking and transfer facilities because materials passing through such facilities are generally destined~~

~~for further processing operations.~~

~~4.38 Although our forecasts suggest that sufficient capacity exists for bulking and transfer facilities, there may be different spatial arrangements in the future for example those arising from the shadow Joint Waste Board (JWB). It is important therefore for the WCS to be sufficiently flexible.~~

4.39 Having regard to the relatively modest requirement for additional recycling and composting capacity for MSW, ~~the need for flexibility in relation to bulking and transfer~~ and having regard to previous consultation responses, the most appropriate way forward is considered to be a 'criteria-based' approach.

#### Core Policy WCS2

Amend policy as follows:

#### Core Policy WCS2 – Recycling & Composting

##### ~~/Anaerobic Digestion (including Bulking and Transfer)~~

In order to achieve the Gloucestershire local authorities' household recycling and composting target of at least 60% by 2020, the Council will support in principle, proposals relating to the development of new and expanded recycling ~~and~~ composting ~~anaerobic digestion, bulking and transfer~~ facilities including businesses that process recyclates and re-

use waste.

Planning permission will be granted subject to the following criteria being met:

1. It can be demonstrated that the impact on the environment and neighbouring land uses is acceptable. Proposals for composting/~~AD~~ generally must be at least 250m from sensitive land uses such as housing unless it can be demonstrated that it can operate in closer proximity without adverse impact.
2. The highway access is suitable for the proposed vehicle movements.
3. The proposal contributes towards providing a sustainable waste management system for Gloucestershire.
4. If the proposal is of a 'strategic' scale (>50,000 tonnes/year) it is located in the area defined as 'Zone C' (see Key Diagram).

Particular support will be given to proposals that:

- Are located within<sup>1</sup> or close to an urban area; and/or
- Involve the re-use of previously developed land, vacant or underutilised employment land and/or redundant rural buildings

<p>including farm diversification opportunities; and/or</p> <ul style="list-style-type: none"> <li>- Involve co-location with an existing operation of a similar or complimentary nature; and/or</li> <li>- Incorporate alternatives to the transport of waste by road (rail, water etc.), and/or</li> <li>- Are well located to allow employees to reach the site by foot, cycle or public transport.</li> </ul> <p><b>Proposals for the development of markets for recycled materials, in particular initiatives to assist small to medium-sized businesses to re-use/recycle their discarded waste materials will be supported and encouraged through partnership working including the Gloucestershire Waste Partnership.</b></p> <p><sup>1</sup> <i>It is acknowledged that in the case of composting <del>or anaerobic digestion</del> it may prove difficult to locate within an urban area due to a 250m buffer generally being required for issues relating to bio-aerosols. This should not however apply to recycling and bulking/transfer facilities.</i></p> <p><b>How will we know if the policy is working?</b></p> <p>4.43 There are a number of measures including:</p> <ul style="list-style-type: none"> <li>▪ Percentage of household waste sent for re-use, recycling and composting.</li> <li>▪ Percentage of municipal waste landfilled.</li> <li>▪ Total available recycling/composting capacity.</li> <li>▪ Number of planning applications refused on the</li> </ul>		
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<p>basis of Policy WCS2.</p> <ul style="list-style-type: none"> <li>▪ Number of new/expanded recycling and composting/<del>AD</del> facilities permitted per year.</li> <li>▪ Number of 'strategic' composting, <del>AD</del> and recycling facilities permitted inside and outside 'Zone C' per year</li> <li>▪ Number of recyclates 're-processing' facilities in Gloucestershire.</li> </ul> <p><u>Section 4</u></p> <p>Insert new text as follows:</p> <p><b><u>Anaerobic Digestion</u></b></p> <p><b>4.53a</b> <u>Anaerobic Digestion is the natural process by which bacteria break down organic material in the absence of oxygen. An AD waste facility is a controlled version of this process taking place in a vessel or series of vessels. It is very similar to IVC and generally suited to source segregated organic waste such as food waste, waste water and agricultural waste. It is not suitable for inert C&amp;D waste.</u></p> <p><b>4.53b</b> <u>Because of the similarities with IVC and because AD is not generally used to manage mixed residual waste, we deal with it in this section of the WCS (although it can also be classed as 'other recovery' or 'energy recovery' which we address later in Section 4.0).</u></p>		
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<p>4.53c Almost any organic material can be processed using AD including paper, cardboard, grass cuttings, food, industrial effluents, energy crops (grown specifically such as maize silage), sewage and animal waste. AD can be carried out on a small-scale (e.g. a farm based system managing livestock manure) or on a larger, commercial-scale such as the management of food waste collected by local authorities. It can also be used to manage the sewage sludge created by the treatment of waste water (see Core Policy WCS5).</p> <p>4.53d The AD process produces biogas and digestate. Biogas can be used to generate renewable energy in the form of heat and electricity through combined heat and power (CHP) and can also be turned into 'biomethane' which can be used as a vehicle fuel or injected in the mains gas grid. Digestate is a solid and liquid residue made up of leftover, indigestible material and dead micro-organisms. It is used as a fertiliser and soil conditioner, but this has to meet certain quality standards.</p> <p>4.53e There are limitations to AD including the fact that it requires a consistent, segregated supply of waste such as food waste which is not always available, depending on the waste collection arrangements that may be in place. AD facilities in England have, to date tended to be geared towards agricultural and sewage</p>		
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<p>waste. However, the Government is very keen to roll the technology out further to deal with MSW and C&amp;I waste and in March 2010 published 'Accelerating the Uptake of Anaerobic Digestion in England: an Implementation Plan'.</p> <p>4.53f The implementation plan highlights the potential use of AD in dealing with food waste, agricultural material such as manure and slurry and sewage sludge. There will however be a need for industry to come forward with arrangements that satisfy the pollution control agencies.</p> <p>4.53g There are currently no operational AD facilities in Gloucestershire treating MSW or C&amp;I waste<sup>33</sup>. In accordance with Government Policy, the Council will therefore support in principle, proposals for new AD facilities in appropriate locations and our policy on this matter is set out overleaf. For MSW in Gloucestershire it is likely that AD would generally be used for segregated waste (i.e. not residual waste) that currently goes to in-vessel composting facilities but nevertheless could form a useful part of an integrated system.</p> <p>4.53h Our approach towards the management of residual waste is set out in Core Policy WCS4.</p>		
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<sup>33</sup> There is permission for an MSW AD facility at Rose Hill Farm in Dymock, but this is not yet operational. There is also permission for a small AD at

Stanley's Quarry in the Cotswolds, but this is for agricultural waste.  
Additionally some AD processes are undertaken at Hayden and Netheridge  
Sewage Treatment Works and the Unilever factory in Gloucester.

**Core Policy WCS3a – Anaerobic Digestion**

In the interest of maximising the recovery of value (energy) from organic waste the Council will support in principle, proposals relating to the development of new or expanded anaerobic digestion facilities in Gloucestershire.

Planning permission will be granted subject to the following criteria being met:

1. It can be demonstrated that the impact on the environment and neighbouring land uses is acceptable.
2. The highway access is suitable for the proposed vehicle movements.
3. The proposal contributes towards providing a sustainable waste management system for Gloucestershire.
4. If the proposal is of a 'strategic' scale (>50,000 tonnes/year) it is located in the area defined as 'Zone C' (see Key Diagram).

Particular support will be given to proposals that:

- Incorporate Combined Heat and Power (CHP)

<p><u>where practicable; and/or</u></p> <ul style="list-style-type: none"> <li>- <u>Are located within or close to an urban area; and/or</u></li> <li>- <u>Involve the re-use of previously developed land, vacant or underutilised employment land and/ or redundant rural buildings including farm diversification opportunities; and/or</u></li> <li>- <u>Involve co-location with an existing operation of a similar or complimentary nature; and/or</u></li> <li>- <u>Incorporate alternatives to the transport of waste by road (rail, water etc.), and/or</u></li> <li>- <u>Are well located to allow employees to reach the site by foot, cycle or public transport.</u></li> </ul> <p><b><u>How will we know if the policy is working?</u></b></p> <p>4.53i <u>There are a number of measures including:</u></p> <ul style="list-style-type: none"> <li>▪ <u>Total available AD capacity for food waste.</u></li> <li>▪ <u>Total available AD capacity for agricultural waste.</u></li> <li>▪ <u>Total available AD capacity for sewage sludge.</u></li> <li>▪ <u>Number of planning applications refused on the basis of Policy WCS3a.</u></li> <li>▪ <u>Number of new/expanded AD facilities permitted per year.</u></li> <li>▪ <u>Number of 'strategic' AD facilities permitted inside and outside 'Zone C' per year.</u></li> <li>▪ <u>Renewable energy generation.</u></li> </ul>		
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4.53j Further information is set out in Section 6.0 – Measuring Progress.

Paragraph 4.264

Amend text as follows:

**Sustainable Transport**

4.264 Most of Gloucestershire's waste is transported by road. Whilst Gloucestershire has an extensive road network including good links to the M4 and M5 motorways and other strategic routes, clearly in the interests of sustainability and reducing the impact of road transport on the environment, we need to consider first how to minimise the impact of transporting waste by road e.g. through bulking and transfer and second, whether more of our waste can be transported by alternative sustainable modes of transport in particular water (river and canal) and rail. This could potentially help to reduce the overall impact of waste management operations within the county.

**Section 4**

Insert new text as follows:

**Bulking and Transfer**

4.264a One of the main ways in which we can reduce the impact of waste being transported by road is through the effective use of 'bulking and transfer' facilities. These are temporary waste storage facilities where waste is taken to be sorted and stored before being transported onwards for further management or disposal. Some facilities deal with mixed-waste, others with single waste types such as asbestos. Some include an element of waste recycling and recovery.

4.264b Importantly, the bulking of waste for onward transport to other waste facilities allows for greater efficiency, helps reduce journey length and in turn can help reduce traffic impacts.

4.264c If for example we provide bulking and transfer facilities in the right locations across Gloucestershire, some bin lorries will be able to drop their load close to where it was collected from allowing for the waste to be 'bulked up' and put onto larger vehicles for onward transfer to an appropriate facility as currently happens at Lydney and Cirencester. This is particularly applicable to more remote areas which are some way distant from the main waste management facilities.

4.264d As we described earlier, there are a number of existing waste bulking and transfer facilities in

<p><u>Gloucestershire dealing with different waste types including MSW, C&amp;I, C&amp;D and clinical waste. An element of waste transfer also takes place at other facilities including Household Recycling Centres (HRC).</u></p> <p><u>4.264e Whilst our Waste Data Paper suggests that we already have adequate transfer capacity, there are a number of reasons why new or expanded facilities or a different spatial arrangement might be required in the future. These include changes in local authority contracts, different collection arrangements (for example arising from the implementation of the Joint Municipal Waste Management Strategy (JMWMS)) and commercial changes.</u></p> <p><u>4.264f This may result in the need for new or expanded bulking and transfer facilities either to replace existing ones or to serve other parts of the County not currently covered.</u></p> <p><u>4.264g Policy WCS13a overleaf therefore provides a criteria-based approach for bringing forward new bulking and transfer facilities in appropriate locations across the County. It should be noted that any waste transfer proposal which includes an element of recycling will also be considered having regard to Core Policy WCS2 as well as any other relevant core policies.</u></p>		
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**Core Policy WCS13a – Bulking and Transfer**

In order to promote greater efficiency and to reduce the potential impact of transporting waste by road, particularly on the Strategic Road Network (SRN) the Council will support in principle, proposals relating to the development of new and expanded bulking and transfer facilities.

Planning permission will be granted subject to the following criteria being met:

1. It can be demonstrated that the impact on the environment and neighbouring land uses is acceptable.
2. The highway access is suitable for the proposed vehicle movements.
3. The proposal contributes towards providing a sustainable waste management system for Gloucestershire.

Particular support will be given to proposals that:

- Are located within or close to an urban area; and/or
- Involve the re-use of previously developed land, vacant or underutilised employment land and/or redundant rural buildings including farm diversification opportunities;

<p><u>and/or</u></p> <ul style="list-style-type: none"> <li>- <u>Involve co-location with an existing operation of a similar or complimentary nature; and/or</u></li> <li>- <u>Incorporate alternatives to the transport of waste by road (rail, water etc.), and/or</u></li> <li>- <u>Are well located to allow employees to reach the site by foot, cycle or public transport.</u></li> </ul> <p><b><u>How will we know if the policy is working?</u></b></p> <p><u>4.264h</u> There are a number of measures including:</p> <ul style="list-style-type: none"> <li>▪ <u>Total available bulking and transfer capacity.</u></li> <li>▪ <u>Number of planning applications refused on the basis of Policy WCS13a.</u></li> <li>▪ <u>Number of new/expanded bulking and transfer facilities permitted per year.</u></li> </ul> <p><u>Paragraph 4.265</u></p> <p>Amend text as follows:</p> <p><b><u>Sustainable Transport</u></b></p> <p><u>4.265</u> <u>As we have outlined above, most waste in Gloucestershire is transported by road. Whilst the impact of this can be mitigated to a certain extent through effective bulking and transfer, in the interest of sustainable development we need to consider whether</u></p>		
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more of our waste can be transported by alternative modes of transport e.g. rail and water. The main issue militating against this is generally 'economies of scale' where the movement of waste or any bulk goods by rail or water only generally works with large tonnages over long distances. For example, significant quantities of waste are moved by rail from Bristol to Buckinghamshire.

Implementation Framework

Various amendments to reflect the changes set out above (see revised publication WCS).

Monitoring Framework

Various amendments to reflect the changes set out above (see revised publication WCS).

Focused Change	Reason	Respondents who have raised this issue
<p><b>FC14</b></p> <p><u>Policy WCS3</u></p> <p>Amend to include reference to Transport Assessment under Criteria 2 as follows:</p> <p>2. Where viable, the proposal incorporates the use of alternatives to road transport such as rail and water and that where road transport is used the highway access is suitable for the proposed vehicle movements and is supported by a <u>transport assessment and</u> travel plan setting out measures to encourage employees to reach the site by foot, cycle or public transport.</p>	<p>To ensure that proposals for inert waste recycling and recovery facilities are supported by a transport assessment as well as a travel plan.</p>	<p>Neil Chapman Highways Agency (447/4)</p>
<p><b>FC15</b></p> <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</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>	<p>Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council (1850/10)</p>

<p>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><b>FC16</b></p> <p><u>Paragraph 4.69</u></p> <p>Amend as follows:</p> <p>Modern incinerators generate <u>and capture heat and power</u> <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>To reflect the fact that not all incinerators capture both heat and power.</p>	<p>Adam Neil New Earth Solutions Group Ltd. (725/6)</p> <p>Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council (1850/9)</p>

Focused Change	Reason	Respondents who have raised this issue
<p><b>FC17</b></p> <p><u>Paragraph 4.81</u></p> <p>Amend as follows:</p> <p><del>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></del></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>	<p>Nick Dummett Campaign to Protect Rural England (CPRE) (365/1, 365/5, 365/6)</p>
<p><b>FC18</b></p> <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>To more clearly reflect the fact that development in Zone C is not entirely 'constraint-free'.</p>	<p>Malcolm Watt Cotswolds Conservation Board (219/1)</p>

Focused Change	Reason	Respondents who have raised this issue
<p><b>FC19</b></p> <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>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>	<p>Nick Dummett Campaign to Protect Rural England (CPRE) (365/1)</p>
<p><b>FC20</b></p> <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</u></p>	<p>To reflect representations received and to emphasise why the Council is adopting a 'technology neutral' stance.</p>	<p>Simon Hanes (1847/1)</p> <p>Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council (1850/6)</p> <p>Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD) (439/5)</p> <p>Josephine Marsden (299/1)</p> <p>Meyrick Brentnall Gloucester City Council</p>

<u>each site.</u>		(1370/2)  Diane Mautterer Gloucestershire VCS Environment Strategy Group (67/1)  Robert Purton David Lock Associates on behalf of Lichen Renewal (1852/1)  Dr Shona Arora NHS Gloucestershire (449/3)
<b>FC21</b>  <u>Policy WCS4</u>  Amend as follows:  'Non-strategic' residual waste recovery facilities (<50,000 tonnes/year) will be permitted both within and outside Zone C where the facility forms part of a sustainable waste management system and would be subject to the following criteria:  - The proposal is located on an industrial estate or <u>permitted/allocated</u> employment land <del>permitted or allocated for B2 general industrial use</del> ; and/or  - The proposal is located on previously developed land; and/or  - The proposal involves the development of an existing waste management facility or mineral site; and	To reflect the fact that waste recovery facilities may come forward on other types of employment land, not just B2 general industrial uses.	Ben Stansfield Cory Environmental (Gloucestershire) Ltd. (60/13)  Tim Perkins Entec UK Ltd. on behalf of Viridor Waste Management Ltd. (70/6, 70/7)

<p>- The facility would meet the relevant policies and criteria of the development plan.</p>		
<p><b>FC22</b></p> <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>To ensure compliance with national policy.</p>	<p>Ruth Clare Environment Agency (149/5)</p>
<p><b>FC23</b></p> <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</p>	<p>To reflect the fact that planning permission is not always required for the disposal of sewage sludge to agricultural land.</p>	<p>Thames Water Utilities Ltd. (1796/2)</p>

process which <u>in some cases</u> requires planning permission.		
<b>FC24</b>  <u>Policy WCS5</u>  Amend as follows:  The development or expansion of waste water treatment facilities will be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the development plan, or in the interests of Gloucestershire's waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact, and that any such adverse impacts can be satisfactorily mitigated <u>and that the proposal would be consistent with the objectives of the Water Framework Directive (WFD).</u>	To ensure compliance with national policy.	Ruth Clare Environment Agency (149/5)

Focused Change	Reason	Respondents who have raised this issue
<p><b>FC25</b></p> <p><u>Paragraph 4.125</u></p> <p>Amend as follows:</p> <p>For non-hazardous landfill, having regard to the current voidspace available and rates of tipping, it is estimated that there is at least 10-13 years remaining capacity. However this is a conservative estimate and the likelihood is that, due to future reductions to landfill as a result of mechanisms such as the Landfill Tax, landfill void could last for significantly longer <u>potentially to the end of the plan period (2027) or beyond depending on future diversion rates from landfill across all waste streams.</u></p>	<p>To reflect more clearly the fact that landfill in Gloucestershire could potentially last beyond the 10-13 years identified in the publication WCS.</p>	<p>Ben Stansfield Cory Environmental (Gloucestershire) Ltd. (60/8, 60/9)</p> <p>Alan Watson Public Interest Consultants on behalf of SWARD and Bishop's Cleeve Parish Council (endorsed by Gloucestershire Friends of the Earth Network) (1853/4)</p>
<p><b>FC26</b></p> <p><u>Paragraph 4.129</u></p> <p>Amend as follows:</p> <p>Given the capacity available, we do not propose to make provision for additional landfill at this stage and have therefore not included a core policy on this issue. However, this position will be monitored and is likely to</p>	<p>To reflect the fact that the landfill operation at Wingmoor Farm is the subject of a current planning application which has not yet been determined and that if the application is refused, there will need to be an earlier review of the WCS, or preparation of a separate development plan document.</p>	<p>Mary Newton Forest of Dean Friends of the Earth (1743/3)</p> <p>Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council (1850/2)</p> <p>Alan Watson Public Interest Consultants on behalf of SWARD and Bishop's Cleeve Parish</p>

<p>require further consideration through a review of the WCS or preparation of a separate development plan document starting in 2017/18 <u>or potentially earlier, depending on the outcome of the current planning application at Wingmoor Farm (East).</u></p>		<p>Council (endorsed by Gloucestershire Friends of the Earth Network) (1853/1)</p> <p>Claire Cullen-Jones Cheltenham Borough Council (27/3)</p> <p>Dr Shona Arora NHS Gloucestershire (449/4)</p> <p>Kathryn Oakey Elmstone Hardwicke Parish Council (818/1)</p> <p>Diane Mautterer Gloucestershire VCS Environment Strategy Group (67/8)</p> <p>Katy Wallis Grundon Waste Management Ltd. (111/3)</p>
<p><b>FC27</b></p> <p><u>Policy WCS6</u></p> <p>Insert additional text as follows:</p> <p>Factors to be included in any assessment of environmental acceptability will include:</p> <p>1.The quality of life, amenity and health of local residents and other land users;</p> <p>2.Impacts on neighbouring land-uses (including the local road network) and the potential for the achievement of appropriate 'stand-off distances'</p>	<p>To provide a clearer spatial dimension to Core Policy WCS6.</p>	<p>Tim Perkins Entec UK Ltd. on behalf of Viridor Waste Management Ltd. (70/1)</p> <p>Kathryn Oakey - Elmstone Hardwicke Parish Council (818/1)</p>

<p>between the facility and residential properties;</p> <p>3. The need for the facility, where applicable, its relationship with existing activities and the potential wider environmental implications of not managing the waste stream; <b><u>and</u></b></p> <p>4. Where applicable, the potential for successful land restoration; <b><u>and</u></b></p> <p><b><u>5. That the hazardous waste is managed as high up the waste hierarchy and as close to source as possible.</u></b></p>		
<p><b>FC28</b></p> <p><u>Policy WCS7</u></p> <p>In determining proposals for waste related development for new or enhanced waste management facilities the Council will have regard to the cumulative effects of previous and existing waste management facilities on local communities alongside the potential benefits of co-locating complimentary facilities together. <b><u>Planning permission will be granted where the proposal would not have an unacceptable cumulative impact.</u></b></p> <p>In considering the issue of cumulative impact, particular regard will be given to the following:</p>	<p>To strengthen the policy and to clarify the circumstances in which planning permission will be granted.</p> <p>To clarify that the nature and scale of proposed development will be taken into account in assessing potential cumulative impacts.</p> <p>To clarify that consideration of traffic issues will include an assessment of accessibility and sustainable transport.</p>	<p>Neil Chapman Highways Agency (447/6)</p> <p>Nick Dummett Campaign to Protect Rural England (CPRE) (365/7)</p> <p>Ben Stansfield Cory Environmental (Gloucestershire) Ltd. (60/14)</p>

<p>1. Environmental quality;  2. Social cohesion and inclusion; and  3. Economic potential.</p> <p>Within these broad categories this will, <u>subject to the scale and nature of the proposal</u>, include an assessment of the following issues: noise, odour, traffic (<u>including accessibility and sustainable transport considerations</u>), dust, health and visual impacts.</p> <p>Traffic impacts will be given particular attention as they are diffuse by their nature and thus not contained on sites.</p>		
<p><b>FC29</b></p> <p><u>Policy WCS8</u></p> <p>Insert additional text as follows:</p> <p>Existing and allocated sites for waste management use<sup>1</sup> will be safeguarded by local planning authorities who must consult the Waste Planning Authority where there is likely to be incompatibility between land uses.</p> <p>Proposals that would adversely affect, or be adversely affected by, waste management uses will not be permitted unless it can be satisfactorily demonstrated by the applicant that there would be no conflict.</p>	<p>To clarify that the principle of safeguarding applies to both temporary and permanent waste management facilities.</p>	<p>Lucy Binnie Land and Mineral Management Ltd. on behalf of Smiths (Gloucester) Ltd. (767/3)</p>

<p>The Waste Planning Authority (WPA) will oppose proposals for development that would prejudice the use of the site for waste management.</p> <p><sup>1</sup>includes sewage treatment works <u>and temporary waste management operations</u></p>		
<p><b>FC30</b></p> <p><u>Policy WCS9</u></p> <p>Amend as follows:</p> <p>In order to reduce the likelihood and impact of flooding both on and off-site there will be a general presumption that all waste-related development will be located in areas of low flood risk, (Flood Zone 1) unless it can be demonstrated that there are no suitable, alternative sites available.</p> <p>Only if no suitable sites are available in Flood Zone 1 will consideration be given to sites within Flood Zone 2 and only if no suitable sites are available in Zone 2 will consideration be given to sites within Flood Zone 3a. Proposals <u>relating to sewage treatment works</u> which are classified as 'less vulnerable' may come forward in Flood Zones 1, 2 and 3a although the sequential approach will still apply.</p>	<p>To bring the policy in line with national policy and to ensure that adequate consideration is given to all sources of flood risk.</p>	<p>Adam Neil New Earth Solutions Group Ltd. (725/7)</p> <p>Ben Stansfield Cory Environmental (Gloucestershire) Ltd. (60/16)</p> <p>Thames Water Utilities Ltd. (1796/5)</p> <p>Ruth Clare Environment Agency (149/4, 149/11)</p>

<p>Proposals for 'more vulnerable' waste development including landfill/landraise and hazardous waste treatment and disposal will only be permitted in Flood Zone 3a where it can be demonstrated through application of the 'exception test' that:</p> <ul style="list-style-type: none"> <li>- The development provides wider sustainability benefits to the community that outweigh flood risk having regard to the Gloucestershire Strategic Flood Risk Assessment (SFRA); and</li> <li>- The site is previously developed or if not, that there are no reasonable and available alternative sites on previously developed land; and</li> <li>- The development will be safe without increasing flood risk elsewhere and where possible, will reduce flood risk overall.</li> </ul> <p>Proposals for waste-related development within Flood Zone 3b (the functional floodplain) will not be permitted other than 'water compatible' proposals such as sewage transmission infrastructure and pumping stations <u>and, subject to the exception test, development which is classified as 'essential infrastructure'.</u></p> <p>A Flood Risk Assessment (FRA) will be required for all development of 1 hectare or more and for any proposal</p>		
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<p>located within Flood Zone 2 and 3a. <u>The FRA should consider all sources of potential flood risk.</u></p> <p>The design of all new development will be required to take account of current and potential future flood risk <u>from all sources</u> both on and off-site including in particular the use of Sustainable Drainage Systems (SUDS).</p>		
<p><b>FC31</b></p> <p><u>Policy WCS10</u></p> <p>Delete text as follows:</p> <p><del>In accordance with Core Policy WCS13 poor design will be rejected.</del></p>	<p>To achieve greater consistency and avoid unnecessary cross-referencing between policies.</p>	<p>Ben Stansfield Cory Environmental (Gloucestershire) Ltd. (60/1)</p>
<p><b>FC32</b></p> <p><u>Paragraph 4.223</u></p> <p>Amend as follows:</p> <p><u>Whilst the potential impact of development is a general consideration for all landscapes, as</u> As a national designation, AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty.</p>	<p>To emphasise the fact that the impact of development is a consideration for all landscapes, not just designated AONB.</p>	<p>Nick Dummett Campaign to Protect Rural England (CPRE) (365/1, 365/18)</p>

Focused Change	Reason	Respondents who have raised this issue
<p><b>FC33</b></p> <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.</p> <p><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>	To ensure compliance with national policy.	Tim Quinton Natural England (244/10)
<p><b>FC34</b></p> <p><u>Core Policy WCS12</u></p> <p>Amend policy as follows:</p> <p><b>Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR) will be safeguarded from inappropriate waste management development.</b></p>	To strengthen the policy in line with representations received from Natural England.	Tim Quinton Natural England (244/10)

**Planning permission for waste management development within or outside a Site of Special Scientific Interest (SSSI) or National Nature Reserve (NNR) will only be granted where it can be demonstrated that:**

- The development would not conflict with the conservation, management and enhancement of the site unless the harmful aspects can be satisfactorily mitigated; ~~or and~~
- The benefit of the development clearly outweighs the impacts that the proposal would have on the key features of the site; and
- The proposal complies with other relevant policies of the development plan; and
- In the case of a SSSI, there would be no broader impact on the national network of SSSIs.

**Local nature conservation designations will also be safeguarded from inappropriate development and planning permission will only be granted for development affecting such designations where it can be demonstrated that the impact of the development can be satisfactorily mitigated ~~or and~~ that the benefit of the development clearly outweighs any impact.**

<p><b><u>Development proposals will be required to assess their impact on the natural environment and make a contribution to local nature conservation targets to ensure gain for net biodiversity.</u></b></p> <p>Proposals that incorporate beneficial biodiversity or geological features into their design and layout will be favourably considered particularly where the proposal would result in a positive contribution to a Strategic Nature Area (SNA) as identified on the Nature Map for Gloucestershire.</p> <p><b><u>Where proposals for major developments are within or close to Strategic Nature Areas (SNAs) they will be required to assess and make an appropriate contribution to nature conservation targets in those areas.</u></b></p>		
<p><b>FC35</b></p> <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 short, any major</p>	<p>To provide flexibility and reflect the fact that there may be development proposals that fall under the 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>	<p>Neil Chapman Highways Agency (447/8)</p>

<p>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><b>FC36</b>  <u>Paragraph 4.280</u>  Amend to include reference to the Highways Agency as follows:  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 scope and suitability</u> of a Travel Plan.</p>	<p>To ensure the Highways Agency are where relevant, involved in discussions regarding Travel Plans.</p>	Neil Chapman Highways Agency (447/9)

Focused Change	Reason	Respondents who have raised this issue
<p><b>FC37</b></p> <p><u>Policy WCS14</u></p> <p>Amend as follows:</p> <p>Any development exceeding the thresholds set out in the Department for Transport publication 'Guidance on Transport Assessment' must be supported by a Transport Assessment (TA) and Travel Plan.</p> <p><u>Consideration will also be had to the location of the proposed development in determining whether a TA is required.</u></p>	<p>To ensure that in determining whether a Transport Assessment (TA) is needed, regard is had not only to Department of Transport thresholds but also to the location of the proposed development.</p>	<p>Neil Chapman Highways Agency (447/10)</p> <p>Nick Dummett Campaign to Protect Rural England (CPRE) (365/9)</p>
<p><b>FC38</b></p> <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>To emphasise more clearly the linkages between the Waste Core Strategy (WCS) and the AONB Management Plans relevant to Gloucestershire.</p>	<p>Malcolm Watt Cotswolds Conservation Board (219/2)</p>

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.

How has this been reflected in the WCS?

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 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. Core Policy WCS11 relates specifically to the AONB. Other relevant policies include waste reduction, nature conservation, design and sustainable transport.

<b>Focused Change</b>	<b>Reason</b>	<b>Respondents who have raised this issue</b>
<p><b>FC39</b></p> <p><u>Appendix 5 - General Development Criteria</u></p> <p>Amend sub-heading as follows:</p> <p>Contaminated <u>and Unstable</u> Land</p> <p>Amend criteria to include reference to unstable land as follows:</p> <p>Where contaminated <u>and/or unstable</u> land has been identified or could be present, development should provide the opportunity for investigation and remediation.</p>	<p>To take account of any potential land instability issues resulting from former coal mining activities.</p>	<p>David Berry The Coal Authority (133/1, 133/2)</p>
<p><b>FC40</b></p> <p><u>Appendix 5 - General Development Criteria</u></p> <p>Amend to include reference to proximity to the rail network as follows:</p> <p>New sub-heading:</p> <p><u>Proximity to Railway Network</u></p> <p>New text:</p>	<p>To ensure that Network Rail is consulted in relation to any waste management proposal within 250m of railway property.</p>	<p>Brian Clifford Network Rail (Derby) (1103/1)</p>

<p><u>Network Rail should be consulted on all planning applications for waste management proposals within 250m of the railway property.</u></p>		
<p><b>FC41</b></p> <p><u>Appendix 5 - Site Schedules</u></p> <p>Insert additional information on local heritage assets as follows:</p> <p><u>Wingmoor Farm East</u></p> <p>Possible evidence of prehistoric or Roman settlement in the area; archaeological potential of the site is uncertain. <u>There are four Grade II Listed buildings within 1km of the site boundary.</u></p> <p><u>Javelin Park</u></p> <p>Within Moreton Valence WWII airfield, later used for aircraft assembly/testing. The archaeological potential of the site is uncertain; some disturbance of the site has taken place recently. <u>There are eight Grade II Listed buildings within 1km of the site boundary and one Scheduled Monument.</u></p> <p><u>Moreton Valence</u></p> <p><u>There are six Grade II Listed buildings within 1km of the</u></p>	<p>To more clearly identify heritage assets relevant to the strategic site allocations.</p>	<p>Caroline Power English Heritage (1132/2, 1132/3)</p>

<u>site boundary and one Scheduled Monument.</u>		
<p><b>FC42</b></p> <p><u>Appendix 5 - Site Schedules</u></p> <p>Update/ rename aquifers as follows:</p> <p><u>Wingmoor Farm East</u></p> <p><del>The site is adjacent to, but not within, a minor aquifer although the EA identified the site as a non-aquifer with unproductive strata and low risk to groundwater.</del></p> <p><del>The EA identified the site as overlying unproductive strata with the groundwater risks associated with the location as low for the geological setting.</del></p> <p><u>Wingmoor Farm West (Areas A &amp; B)</u></p> <p><del>The EA identified the site as overlying unproductive strata with the groundwater risks associated with the location as low for the geological setting. The two areas are partially overlying a minor aquifer, although the EA identified the sites as a non-aquifer with unproductive strata and low risk to groundwater.</del></p> <p><u>Javelin Park</u></p> <p><del>The EA identified the site as overlying a secondary (undifferentiated) aquifer with the groundwater risks associated with the location as low for the geological setting. The site is within 250m of a Minor Aquifer</del></p>	<p>To reflect updated information provided by the Environment Agency (EA)</p>	Ruth Clare Environment Agency (149/3)

<p><del>Intermediate 1 and Minor Aquifer High (H3) although the EA identified the site as a non aquifer with unproductive strata and low risk to groundwater.</del></p> <p><u>Moreton Valence</u></p> <p><del>The EA identified the site as overlying a secondary (undifferentiated) aquifer with the groundwater risks associated with the location as low for the geological setting. Site 546 is mostly lying over a Minor Aquifer Intermediate 1. The site is also within 250m of a Minor Aquifer High (H3) although the EA identified the site as a non aquifer with unproductive strata and low risk to groundwater.</del></p>		
<p><b>FC43</b></p> <p><u>Appendix 5 – Site Schedules</u></p> <p>Amend the planning status in relation to Wingmoor Farm West (Areas A&amp;B) as follows:</p> <p><del>The Park currently has district permissions for warehousing type operations and recycling operations by Printwaste. Cory Environmental Ltd. have permission for an IVC and a dirty MRF, but both are subject to a Section 106 agreement, but the MRF is unlikely to be implementable due to the time limit for implementation having expired.</del></p> <p><del>A resource recovery park proposal for 160,000 tpa was submitted in 2005, but withdrawn in 2010 due to the</del></p>	<p>To clarify the existing planning permissions relating to Areas A and B Wingmoor Farm (West).</p>	<p>Ben Stansfield Cory Environmental (Gloucestershire) Ltd. (60/13)</p>

~~operator wishing to make material amendments which would require re-submission of the application.~~

~~Wingmoor West – this site is currently permitted for use as a HRC.~~

The Park - currently has district permissions for warehousing type operations. Planning permission has also been granted for an In-Vessel Composting (IVC) facility.

Wingmoor West – this site is currently permitted for use as a Household Recycling Centre and the location for a sealed asbestos disposal facility.