

# **Gloucestershire Waste Core Strategy Examination**

## **Further Written Statement**

on behalf of

**New Earth Solutions Group Ltd (543)**

In respect of

**Issue 5: Specific sites**

**Response to Inspectors agenda and supplementary questions: Item 7**

**Prepared by Brett Spiller BA BTP MRTPI MCIWM**

## **Introduction**

Regrettably, New Earth Solutions Group Ltd is unable to attend session 6 programmed for Tuesday 7<sup>th</sup> February. This further written statement has been prepared in response to the Inspectors agenda and supplementary questions: Issues 5, Agenda Item 7, Questions 1 & 2.

## **Agenda Item 7, Question 1**

*While the planning permission is not time limited (CD13.42.1 Appendix 1), the landowner (BWB) says that there is an unexpired lease of 25 years and that any change of use cannot take place without BWB approval. Is that New Earth Solutions' understanding too or is their use of the building less fettered?*

Whilst the lease allows some flexibility, New Earth Solutions can confirm that a significant change in the use of the existing building would require BWB approval.

New Earth Solutions' has maintained an ongoing dialogue with BWB throughout the formative stages of the Core Strategy. With respect to land ownership at Sharpness Docks, New Earth Solutions would point out that the so called 'bonfire of the quango's' introduced considerable uncertainty (now resolved) during the formative stages of the Core Strategy.

## **Agenda Item 7, Question 2**

*If that is correct, the position presented by BWB to the examination is that any further or different waste management development of the type envisaged by Policy WCS4 would not be allowed by the landowner. There must therefore be a deliverability issue as the Council says. Furthermore, it seems to be common ground that although NES has submitted a sustainability appraisal now (CD13.45.4) this has not been subject to consultation and this process has not been undertaken by the Council. In all these circumstances, would this proposal itself be sound?*

It is my understanding that BWB oppose the promotion of Sharpness Docks (as initially investigated by GCC) and / or any part therein (which includes the omission site promoted by New Earth Solutions) for the allocation of a strategic scale residual waste treatment facility of the type envisaged in Policy WCS4.

On this basis, New Earth Solutions accept that there is a deliverability issue. New Earth Solutions recognise that this may render the Inspectors supplementary question superfluous. For completeness, I have however endeavoured to answer the question.

Gloucestershire County Council has previously prepared a Sustainability Appraisal for Sharpness Docks which enveloped the omission site promoted by New Earth Solutions. However, the strategic nature of this assessment left many of the intrinsic merits of the omission site unidentified. New Earth Solutions therefore prepared its own more focussed Sustainability Appraisal in support its representations. New Earth Solutions recognise that this has been introduced at a late stage and has not been subject to public consultation. In isolation the proposal would not therefore be sound.

Notwithstanding this, the site should (if proved deliverable) have been subject to more rigorous consideration; particularly given Gloucestershire County Council's identification and proposed allocation of a site within the Green Belt. One might expect the first step in justifying an exception to Green Belt Policy (as set out in PPG2) and very special circumstances to be the identification of need, followed closely by an alternative site assessment to see whether there are any more preferable non-Green Belt sites.