

Waste Core Strategy

Technical Paper WCS-1 Waste Facilities in the Green Belt

Living Draft

January 2008

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Technical Paper WCS-I

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Green Belt

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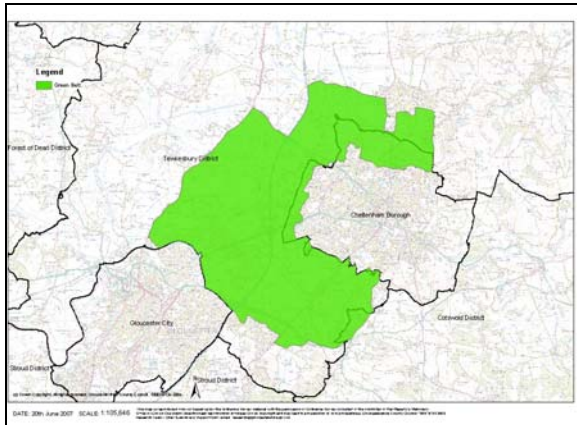


Figure 1. The extent of the current Gloucester / Cheltenham Green Belt. (Source: Gloucestershire County Council Joint Study Area work for Regional Spatial Strategy (RSS)).

Section 1 Introduction

1. The purpose of this evidence report is to consider the Gloucester / Cheltenham Green Belt¹ in terms of changes to National and Regional policy guidance, recent reviews² of the Green Belt and in terms of the appropriateness of waste management facilities being located in this area. These are important matters for Gloucestershire in terms of its potential to manage the increasing volumes of

¹ The Green Belt land between Gloucester and Cheltenham is referred to differently in different sources. For the purposes of this report it will be referred to as 'The Gloucester / Cheltenham Green Belt' in line with the Draft RSS – Policy SR11.

² The Cheltenham Green Belt Review (March 2007) produced by AERC for Cheltenham Borough Council & The Strategic Green Belt Review (February 2006) produced by Colin Buchanan for the SWRA.

waste that we all produce, particularly given that some of Gloucestershire's key sites for waste management are currently located in the Green Belt.

2. Sections 2 to 6 provide the context and background evidence that are used in Section 7 for a consideration of options including an appropriately amended Green Belt Policy to be included in the emerging Waste Core Strategy (WCS).

Section 2 History and Extent of the Gloucester / Cheltenham Green Belt

3. The current Gloucester / Cheltenham Green Belt was incorporated into the County of Gloucestershire Development Plan First Quinquennial Review published in 1960. It was considered *"essential to preserve the open character of the land between the towns of Cheltenham and Gloucester and to prevent these communities merging into one another."*³

4. In the 1981 Structure Plan the Green Belt was extended to the north of Cheltenham to prevent coalescence with Bishops Cleeve. It covers an area of approx 8,100 hectares⁴ the vast majority of this being within Tewkesbury Borough. The landscape is open, predominantly

³ Cited in the Gloucestershire Structure Plan Second Review (1999) page 89.

⁴ See web link:

http://www.communities.gov.uk/pub/929/MapApprovedgreenbeltbasedonstructureplansandlocalplans_id1143929.pdf

flat and somewhat unvarying in character. The M5 Motorway runs through the centre.

Section 3

Waste Management Facilities and Allocations in the Green Belt

5. The following table lists the key waste management facilities currently operational in the Gloucester / Cheltenham Green Belt.

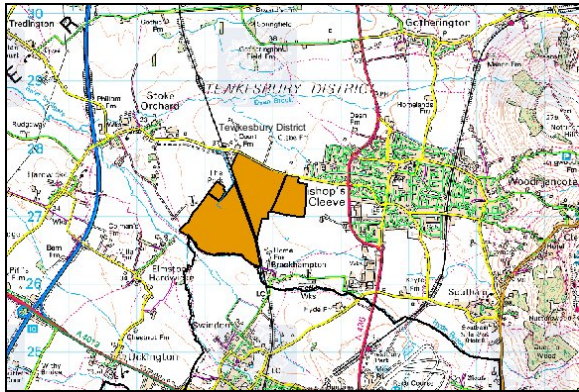
Site	Activity
Cory – Wingmoor Farm West / Bishops Cleeve	<ul style="list-style-type: none"> - Non hazardous landfill - Household Recycling Centre - Green Waste composting - Temporary storage of end of life fridges & freezers - IVC (proposed) - MBT (held)
*Grundon – Wingmoor Farm East / Bishops Cleeve	<ul style="list-style-type: none"> - Non hazardous landfill - Green waste composting - MRF
*Grundon – Wingmoor Farm	- Hazardous landfill & associated treatment / processing
*Note: The Grundon operated landfills and associated activities are time limited to 2009.	

6. These sites and processes have evolved over many years, through commercial decisions and various changes in waste management regulations.

7. The landfill sites⁵ were permitted following sand and gravel extraction, mineral extraction being 'temporary' development. Subsequent to this, permissions were granted to extract clay and to raise and re-profile restoration contours. This situation over a number of years has contributed to a large volume of voidspace.

8. The two non-hazardous waste landfill sites accept around 2-300,000 tonnes per annum of waste (one principally from households, the other from commercial/industrial activities). Between them they have a voidspace capacity of around 7 million m³. The third site takes hazardous waste which is derived nationally and also has a large voidspace capacity. In 2004, 72,000 tonnes of hazardous waste was managed in Gloucestershire. (See separate Technical Evidence Papers on Waste Data (WCS-A) and on Hazardous Waste (WCS-E) for more details). The hazardous waste landfill operation and the adjoining non-hazardous landfill site are time restricted by planning condition to 2009.

⁵ In terms of developing out of initial sand & gravel extraction, this is the case with the Grundon sites (certainly Wingmoor quarry) but not the Cory site (Wingmoor Farm West).



Wingmoor Farm sites near Bishops Cleeve allocated in the Gloucestershire Waste Local Plan (2004).

Section 4

Policy Requirements

Planning Policy Guidance Note 2: Green Belts (PPG2)

9. Contrary to popular misconception, the purposes of Green Belts are not necessarily based on an assessment of landscape quality, although areas of high value landscape can be contained within them. Green Belts are a policy designation.

10. National guidance contained in PPG2 sets out their five purposes.

Purposes of including land in Green Belts⁶

⁶ PPG2, see web link:

http://www.communities.gov.uk/pub/130/PlanningPolicyGuidance2Greenbelts_id1507130.pdf

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns from merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns;
- to assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The use of land in Green Belts

- to provide opportunities for access to the open countryside for the urban population;
- provide opportunities for outdoor sport and outdoor recreation near urban areas;
- to retain attractive landscapes, and
- enhance landscapes, near to where people live;
- to improve damaged and derelict land around towns;
- to secure nature conservation interest; and
- to retain land in agricultural, forestry and related uses.

11. As stated in Para 2, the Cheltenham / Gloucester Green Belt was defined primarily on the basis of PPG2 Purpose 2 – “preventing neighbouring towns from merging into one another.” But in the Gloucester / Cheltenham Joint Study Area Strategic Re-assessment of

the Green Belt⁷ all five purposes in PPG2 were considered.

ODPM Circular 11/05: The Town And Country Planning (Green Belt) Direction 2005

12. The publication of *Sustainable Communities: Homes for All* on 24th January 2005 announced the Government's intention to introduce a new, free-standing Green Belt Direction. This came into force on 3 January 2006. From that date applications for planning permission that fall within its scope should be referred to the Secretary of State under this Direction, rather than under the 1999 Departures Direction. The aim of this is to help to achieve a more consistent approach to the type and nature of applications that are referred.

13. Paragraph 3 of the Direction states: This Direction shall apply to any application for planning permission involving inappropriate development on land allocated as Green Belt in an adopted local plan, unitary development plan or development plan document and which would involve:

- (a) the construction of a building or buildings with a floor space of more than 1,000 square metres; or
- (b) any other development which, by reason of its scale or nature or location,

⁷ See web link:
<http://ww4.gloucestershire.gov.uk/environment/vision2026/Green%20Belt%20Background%20Paper%200105.pdf>

would have a significant impact on the openness of the Green Belt.

14. In considering whether a planning application falls within the scope of paragraph 3(b) of the Direction, a local planning authority will first need to decide whether the development would appear to be 'inappropriate', as identified in PPG2. If it appears to be inappropriate then the authority will need to decide whether it would have a *significant* impact on the openness of the Green Belt. The scale and nature of the development are also relevant considerations.

Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10)

15. There are seven key planning objectives in PPS10.⁸ The sixth is to:

"Protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications, that these locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission."

⁸ PPS10, Pages 5 & 6, Para 3. See web link:
http://www.communities.gov.uk/pub/836/PlanningPolicyStatement10PlanningforSustainableWasteManagement_id1143836.pdf

16. The term “The wider environmental and economic benefits of sustainable waste management” is open to interpretation, but is likely to represent:

- Reducing the distance that waste has to travel.
- The suitability of transport infrastructure including highway access.
- Waste related job creation or retention.
- The restoration of previously used or de-spoiled land (potentially contributing to the achievement of the objectives for the use of land in Green Belts.
- Other environmental improvements in the longer term, for example landscape enhancement.

(See Section 7 of this report for a more detailed consideration of these points and the requirements of PPS10).

Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10) Companion Guide

17. The PPS10 Companion Guide (Paras 7.34 & 7.35) contains additional guidance relating to waste management and Green Belts.

18. Para 7.34: *“In their search for sites, and in line with the Key Planning Objectives in PPS10, the WPA are expected to protect Green Belts but recognise the particular locational needs of some types of waste management facilities when defining detailed Green Belt boundaries. In certain circumstances, in particular where a*

local authority's area contains a high proportion of Green Belt land and an inadequate range of suitable sites outside the Green Belt exist, an authority may, exceptionally, wish to consider a limited alteration to the defined Green Belt boundary, to meet a specific, identified need for a waste management facility. The alteration might be to accommodate a site inset with the Green Belt.”

19. Para 7.35: *“Such a proposal should be brought forward through the LDD process. This will provide greater certainty for the WPA in providing sufficient land capacity to meet identified need for waste management facilities and to the waste industry for the purpose of submitting a planning application. Where land is removed from the Green Belt in this way, it should be specifically allocated in a DPD as a waste management facility site only. This process will need to be carefully coordinated between the District planning authority and the WPA in two tier authority areas, given that the Green Belt boundary will be defined in the district DPD.”*

20. Government policy in PPS10 requires the detailed definition of Green Belt boundaries to take account of the locational needs of waste management facilities. This implies that WPAs need to make some assessment of the boundaries in respect of the requirements for waste management facilities. If boundaries were to be proposed for amendment this would have to be undertaken in partnership with the relevant District Council(s).

21. Changes to Green Belt boundaries (either to the boundaries themselves i.e. their outer edges) or in terms of insets within the Green Belt) are the responsibility of District Councils

through Green Belt reviews feeding into LDF preparation.

22. The WCS is not a site specific document, it provides a strategic framework and only considers broad strategic locations for waste management facilities. In a two – tier authority such as Gloucestershire there are problematic issues in terms of the timing of LDF production. The Waste Site Allocations (WSA) DPD is programmed for commencement in February 2009 and is due to be adopted in 2012. District LDFs are progressing at different rates, as are District Green Belt reviews.⁹ Despite this the WCS needs to highlight the Green Belt policy steer in PPS10 and ensure that an appropriate framework is in place to feed into District LDFs (particularly Core Strategies). Thus it may be appropriate for the WCS to:

- Highlight that the waste site allocations in the WLP (that are proposed to be further saved beyond 2007) should potentially be considered (in terms of the policy steer in PPS10) as and when Green Belts boundaries are amended through District LDFs.
- Highlight that potential waste sites or allocations that come forward within the proposed broad strategic locations should also be considered (in line with PPS10) as and when Green Belts boundaries are amended.

23. The most obvious locational element in terms of siting waste development is the distance between source of waste arising and

the handling facility. Whilst such considerations were previously described (in PPG10) as relating to the 'proximity principle', this phrase no longer appears in national guidance. Instead, PPS10 seeks to enable waste to be disposed of in one of the nearest appropriate installations, and for communities to take more responsibility for the waste they produce. This is a different interpretation of what proximity means and one which needs to be translated into the WCS, both in the Green Belt policy and also in more general strategic policies.

24. Waste often requires more than one management facility to deal with it appropriately. For example, following collection, waste may be sent to a facility for sorting into different types, then bulked up, then sent to another facility for reprocessing (into other goods etc.) or sent to a landfill for final disposal. PPS10 seeks to co-locate such facilities together and in doing so the planning history of a site, for example previous and on-going operations will have a bearing in terms of attracting complementary or ancillary facilities.

25. However, notwithstanding the co-location requirement, PPS10 also seeks consideration of the cumulative impacts of operations on the well being of host communities. This creates an apparently contradictory situation, the resolution of which will be fundamental to progressing site specific DPDs following adoption of the WCS. (See Technical Evidence Paper (WCS-L) Cumulative Impact).

Draft Regional Spatial Strategy (RSS)

⁹ Cheltenham Borough completed its Green Belt review in March 2007, whilst Tewkesbury Borough are not currently proposing to conduct a review.

26. Policy SS4 of RPG 10 requires local authorities, in preparing their development plans to:

- Critically review the Green Belt to examine whether boundary alterations are needed to allow for long term sustainable development needs.
- Remove land from the Green Belt for development if, on balance, this would
- provide the most sustainable solution for accommodating future development requirements; and
- Include additional land within the Green Belt where clearly necessary for the purposes set out in PPG2.

27. Para 3.3.5 of the Draft RSS states: *“The general extent of the green belt is revised in Policies SR3, SR11¹⁰ and SR27 based on the ‘Strategic Green Belt Review’ of the role and purpose of the green belt using PPG2 criteria to accommodate the urban extensions required... The detailed green belt boundaries of the area reviewed will be defined by Unitary and District Authorities in their LDDs, taking account of these changes.”*

28. Policy SR11 states that: *“...The general extent of the Gloucester and Cheltenham green belt is maintained subject to changes in boundaries that will be defined in LDDs to:*
- Accommodate urban extensions...
- Include land to the north and north west of Bishops Cleeve...
- Include land to the south and south west of Gloucester.”

¹⁰ SR11 is the policy relating to the Gloucester / Cheltenham Green Belt.

29. During the SW RSS Examination in Public (EiP) a proposed revision to Policy SR11 was tabled (by the SWRA) as follows:

“Around the built-up areas of Gloucester and Cheltenham the inner boundary of the Green Belt shall follow generally the limits of existing development or that already committed.

The outer boundary of the Green Belt in Gloucestershire shall run south west from Gloucester to Morton Valence, east to Standish south of the M5, continuing north east, east of Upton St. Leonards to Leckhampton at Cheltenham. The outer boundary shall continue north of Cheltenham to the east of Bishops Cleeve and south of Gotherington, continuing west, south of Stoke Orchard to Down Hatherley and Gloucester.

Land within the areas of search identified in the RSS for urban extensions at Gloucester and Cheltenham will be removed from Green Belt, the detailed boundary to be established in the Local Development Document, including land required to serve development needs in the longer term.”

30. The proposed new area of Green Belt to the south of Gloucester could potentially have implications in terms of Gloucestershire's emerging Waste Core Strategy and its proposed broad locations for strategic waste development. (See Technical Evidence Paper (WCS-C) Broad Locational Analysis).

31. The WPA have been in discussions with Stroud District Council who have objections to the proposed new Green Belt areas. In the interests of serving development needs in the longer term and the effective continuance of sustainable waste management in

Gloucestershire the WPA would wish to see existing waste management facilities and allocations for future waste management and potentially B2 / B8 industrial land in the area (south of Gloucester) excluded from Green Belt designation.

Gloucestershire District Council's Local Policies

32. This section provides some context in terms of:

- current Local Plan Green Belt policies;
- Local Development Framework (LDF) progress;
- the progress (or otherwise) of Green Belt reviews.

These matters are briefly considered in this report as, (as stated in paragraphs 19-21) there will potentially be the need for 'careful coordination' between the WPA and Districts in relation to amending Green Belt boundaries. This section provides some clarity in terms of the policy stance on Green Belts in District Local Plans, progress on LDFs and the Green Belt reviews that should inform them.

(For further analysis, particularly in relation to Cheltenham's published Green Belt Review see Section 7).

Cheltenham Borough Council

▪ Adopted Local Plan - 1991 to 2011 (Adopted June 2006)

▪ Policy CO 5 (Formerly CO 48) – Definition of Green Belt

"The area of Green Belt is defined in the Proposals Map."

▪ Policy CO 6 (Formerly CO 49) – Development in the Green Belt

"Within the Green Belt, except in very special circumstances, there will be a presumption against the construction of new buildings for purposes other than:

- (a) agriculture and forestry (note 1); or*
 - (b) essential facilities for outdoor sport and outdoor recreation, for cemeteries, or for other uses of land which preserve the openness of the Green Belt and which do not conflict with the purposes of including land in it; or*
 - (c) limited rebuilding, replacement, or extension of existing dwellings, subject to policies CO 7 and CO 8; or*
 - (d) limited residential infilling (note 3) in within existing and previously undeveloped gaps in built up frontages along The Reddings, Shaw Green Lane and Bowbridge Lane, if there is no adverse impact on the openness of the Green Belt (note 4).*
 - (e) development in accordance with policy CO 8 (note 5).*
- Engineering or other operations or any material change of use will not be permitted unless they maintain the openness of the Green Belt and do not conflict with the purposes of including land in it."*

▪ Policy CO 7 (Formerly CO 50) – Rebuilding or replacement of dwellings in the Green Belt

"The rebuilding or replacement of existing dwellings in the Green Belt will only be permitted where:

- (a) the number of replacement dwellings is no greater than the number to be demolished; and*

*(b) the volume of the original building is not exceeded by more than 15% or 70 cubic metres (whichever is the greater); and
(c) there is no harm to the openness and visual amenity of, or encroachment upon, the Green Belt."*

▪ Policy CO 8 (Formerly CO 51) – Extension of dwellings in the Green Belt

*"The extension of an existing dwelling in the Green Belt will only be permitted where it:
(a) is clearly subordinate in size to and consistent in character with the original building; and
(b) does not detract from the openness of the Green Belt."*

LDF

33. The Local Development Scheme is currently under review with GOSW. The Core Strategy Preferred Options for consultation are expected early in 2008.

Green Belt Review – (Published in March 2007)

34. Cheltenham Borough Council appointed planning consultants AERC Ltd at the end of October 2006 to carry out a detailed review of the Cheltenham Green Belt. This study was able to draw on the earlier work on the Gloucester / Cheltenham Green Belt produced by the Joint Study Area Working Group and on the SWRA Colin Buchanan Report.

35. The completed review and the final report forms part of the evidence base which will underpin the Local development Framework, particularly the Core Strategy.

36. Cheltenham Borough Council investigated the possibility of undertaking a joint Green Belt review with Tewkesbury Borough, but the timing of the report was not considered appropriate for Tewkesbury, therefore a joint study could not be progressed.

37. At Paragraph 8.1.5 it is stated that the findings of the report should be relevant to the tasks of Cheltenham Borough Council in preparing the LDF Core Strategy and other development plan documents. They should also provide an objective basis to assist the dialogue between the local authorities in the sub-region on key planning issues that affect, and are affected by, the Green Belt.

38. Of the four existing Green Belt policies within the Cheltenham Local Plan, CO48, CO50 and CO51, contribute positively to Green Belt purposes, and are "fit for purpose" for inclusion in the emerging LDF. Policy CO49, is capable of contributing to Green Belt purposes and of being 'sound' if minor amendments are made to it.

39. Policy TO113 (a non-Green Belt policy) relating to Cheltenham Racecourse, could also contribute to Green Belt purposes.

40. The Review demonstrates that within the detailed Study Area all the Green Belt land assessed by the study contributes to the achievement of Green Belt purposes. A number of the sub areas (15) contribute significantly more to achieving Green Belt purposes than the others (63).

41. The ranking of the purposes used in the assessment reflect the view (shared by

stakeholders) that the most important Green Belt purposes in Cheltenham are preventing towns merging, particularly Cheltenham and Gloucester, and Cheltenham and Bishops Cleeve, and checking urban sprawl.

42. The results of the objective scoring process showed that the area between Cheltenham and Bishop's Cleeve generally contributes more to achieving Green Belt purposes than other areas.

43. Sub-areas to the north-west and west of Cheltenham scored lowest against Green Belt purposes.

44. There are limited opportunities to provide suitable "compensatory" Green Belt, to replace land lost to development, within Cheltenham Borough. Greater opportunities for compensatory Green Belt provision outside Cheltenham Borough would require agreement with adjoining local authorities, particularly Tewkesbury Borough Council in the context of the new RSS.

Tewkesbury Borough Council

Adopted Local Plan - to 2011(Adopted March 2006)

• Policy GRB 1- Green Belt

"In the Green Belt, planning permission will not be granted for development other than:

a) The construction of new buildings for the following purposes:

- i) Necessary for the efficient use of agriculture or forestry;*
- ii) Essential facilities for outdoor sport and outdoor recreation, for cemeteries and or other uses of land*

which preserve the openness of the Green Belt and which do not conflict with the purposes of including land within it; and

iii) Limited extension, alteration or replacement of dwellings provided that any extension or alteration does not result in disproportionate additions over and above the size of the original buildings and that any replacement is not materially larger than the dwelling it replaces.

b) The re-use of buildings provided:

i) It does not have a materially greater impact than the present use on the openness of the Green Belt and the purposes of including land in it;

ii) The proposal does not include any extension to the building or the associated use of land surrounding the building which would conflict with the openness of the Green Belt and the purposes of including land in it

iii) The building is of permanent and substantial construction and is capable of conversion without major or complete reconstruction and;

iv) The form, bulk and general design of the building is in keeping with the surroundings

c) The carrying out of an engineering or other operation or the making of a material change in the use of land provided that it maintains the openness of the Green Belt and does not conflict with the purposes of including land in it."

• Policy GRB 2. –Deletions from Green Belt

45. On 31st March 2006 Tewkesbury Borough Council adopted The Tewkesbury Borough Local Plan to guide development within the Borough during the period to 2011. The adopted plan was challenged during the six-week period following advertisement of its adoption. On the 3rd April 2007 the High Court quashed policies BA1 and SD2, the parts of policy HOU1 which specifically relate to these

housing sites, and the part of policy GRB2 which specifically relates to the BA1 site. The remaining part of the Tewkesbury Borough Local Plan to 2011 is now part of the Statutory Development Plan for the area.

• Policy GRB 3. – Additions to the Green Belt

The following sites as defined on the proposals map are added to the Green Belt

- A. Land adjacent Pagets Road, Bishops Cleeve
- B. Northern Edge, Innsworth Camp, Churchdown Parish
- C. Open Space off Brandon Close, Churchdown.
- D. Land between Parton Road and Brookfield Lane, Churchdown.
- E. Land adjacent Rugby Club, Brookfield Road, Churchdown.
- F. Land at John Daniels Way, Churchdown.
- G. Land at The Green, Churchdown.
- H. Playing field between Blenheim Orchard and Shurdington Road, Shurdington.
- I. Land south of Smiths Industries, Southham Parish.
- J. Land north of Smiths Industries, Bishops Cleeve.

LDF

46. The LDF is currently at evidence gathering and frontloading stage. The Preferred options stage is programmed for June 2008.

Green Belt Review

47. A Green Belt review is not proposed, but additions and deletions have been undertaken through the Local Plan making process as outlined above.

Cotswold District Council

Adopted Local Plan - 2001-2011 (Adopted April 2006)

Policy GB.1

"Within the area defined as Green Belt on the Proposals Map, development shall not conflict with the advice set out in PPG 2 and Gloucestershire Structure Plan Policy GB.1."

LDF

48. Issues & Options for consultation are due in September 2007 and Preferred Options in March 2008.

Green Belt Review

49. There is no Green Belt review proposed as only a small part of the District, at Ullenwood in the parish of Coberley, lies within the Gloucester / Cheltenham Green Belt.

Strategic Green Belt Reviews

Strategic Green Belt Review – Colin Buchanan and Partners (February 2006).

50. The purpose of this report was to advise on a robust methodology for a strategic, consistent and independent review of the Green Belts across the South West and to undertake an assessment of the technical work on Green Belt review carried out by the appropriate Joint

Study Areas. The main points and conclusions were as follows:

51. Document Review: In terms of the document review the author(s) concluded that the Gloucester / Cheltenham Joint Study Area Green Belt Review was not as comprehensive as it could have been.

52. Definition of Purpose:
The Gloucester / Cheltenham study provides a detailed explanation as to why particular purposes are attributed to areas/parts of the Green Belt including sensitivity to change needs to be provided.

53. Establishment of Sustainability Criteria and Search Area Database:
There is a need to examine matters of delineation, to clarify the extent of zones and to provide details as to the rationale for site location.

54. Application of Criteria to Search Area Database:
The approach used to review the Green Belt was sound and methodical but more explanation is required for the reader to fully understand how the points were allocated.

Gloucester/Cheltenham Joint Study Area Working Group on Green Belt – Background Paper – Strategic re-assessment of the Green Belt.

55. This study focused on a broad assessment of the Green Belt and not on detailed boundaries. This broad assessment was designed to enable strategic options for future development directions to be consulted on. The main conclusions were as follows:

56. The current Green Belt has been effective in controlling development but the officer group considered that it includes far more land than is necessary to prevent Gloucester and Cheltenham from merging.

57. The Officer Working Group considered that there is scope to remove land north of Gloucester and north west of Cheltenham without affecting, in any meaningful way, the sense of visual separation between Gloucester and Cheltenham, or between Cheltenham and Bishops Cleeve.

58. The Officer Working Group also suggested that some additional areas could be added to the Green Belt. These areas include:

- The Cotswold escarpment along the eastern edge of Cheltenham and Gloucester to give extra protection to the open countryside character.
- Along the western edge of Gloucester to safeguard the historic setting of central Gloucester.
- To the south of Gloucester and to the north of Bishops Cleeve to prevent sprawl into areas that are poorly related to PUA centres.

59. (Note: The above position altered as a result of a change of political administration. See below for the County Council's Cabinet altered position on Green Belt.)

Cheltenham / Gloucester First Detailed Proposals (September 2005) – From Gloucestershire County Council Cabinet Report (7 September 2005)

60. (Para 2.2) *"The Cabinet last considered a report on the JSA work in March 2005. Since that time the County Council has been reconsidering its position in relation to the advice it wishes to submit to the SWRA particularly with regard to the Green Belt. The following components constitute the County Council's current position in relation to its advice:*

61. *The advice with regard to the Green Belt has been strengthened and goes further than no development in the Green Belt before 2016 – i.e. no development in the Green Belt is envisaged in the RSS period, i.e. to 2026.*

62. *The County Council will seek to investigate with Gloucester City Council and Stroud District Council the designation of new Green Belt, particularly to the south and east of Gloucester City."*

Waste Local Plan (Adopted October 2004) Policy 35 – Green Belt

63. Given changed National and Regional policy requirements (in PPG2 / PPS10 / RPG10 / Draft RSS) changes to the current WLP Policy 35 are likely to be necessary. (See Section 7). The policy currently reads as follows:

"In the Green Belt, waste management development will only be permitted where it can be demonstrated to be the best practical environmental option and does not conflict with the purposes of the Green Belt designation in the following instances:

A – The construction of a waste management facility will only be permitted where it comprises an essential facility which is genuinely required and whose form, bulk and general design is in keeping with its surroundings and where waste management operations of a temporary nature include the likely duration of the waste management operation.

B – The re-use of a building for waste management purposes will be permitted provided:

- (I) It does not have a materially greater impact than the present use on the openness of the Green Belt and the purpose of including land in it;*
- (II) The building is of permanent and substantial construction and is capable of conversion without major or complete reconstruction; and*
- (III) The form, bulk and general design of the buildings is in keeping with its surroundings."*

Green Belt Matters raised in Recent District / County Partnership Working Meetings

Note: For the full notes of these meetings, see Joint Technical Evidence Paper (WCS-MCS-C) Links with Districts & Neighbouring Authorities.

Cheltenham Borough Council (Meeting held on 1/11/2006)

64. (Contribution from Cheltenham Borough): Three Development Plan Documents are due next year, namely:

- Core Strategy
- Employment
- Housing

A slight delay has been experienced on the production of the above DPDs. This is due to CBC's insistence that a Green Belt (GB) review was necessary in order to provide a good evidence base for Employment and Housing DPDs. Attention was drawn to the fact that the Green Belt review should have due regard to PPS10 Planning for Sustainable Waste Management. GOSW wanted employment land document produced but CBC argued that this was not possible without the Green Belt review document being produced, this was eventually agreed, consequently the following evidence base studies are being undertaken:

- Green Belt review, land audit being prepared.
- Comparative site study for allocations.
- Retail study.

65. A significant amount of land between Cheltenham and Gloucester is part of the Green Belt in Gloucestershire, consequently this may restrict opportunities for waste management facilities however, a key objective of PPS10 is to *protect green belts but recognise the particular locational needs of some types of waste management facilities*. In doing so there is a need to consider the *wider environmental and economic benefits of sustainable waste management*. Essentially this suggests that identification of waste management facilities receives an 'amber' light, although the loss of GB land should be compensated for, this is in part the principle behind the schemes for redrawing and relocating Green Belts. CBC is awaiting the results from the Applied Environmental Research Council (AERC) regarding this."

Cotswold District Council

(Meeting held on 8/03/2007)

66. No discussions on Green Belt matters.

Forest of Dean District Council (Meeting held on 1/03/2007)

67. No discussions on Green Belt matters.

Gloucester City Council (Meeting held on 9/10/2006)

68. (Contribution from Gloucester City): "Green Belt proposals to the south of the City around Robinswood Hill, Winecroft Farm and Tuffley (reflecting the SLA designation). The inner boundary of the proposed Green Belt, in line with the draft RSS follows the built up area of the City taking into account existing commitments. The southern, outer boundary of the Green Belt would need to be fixed by Stroud in their LDF. There is a potential knock-on effect as waste uses get removed from central Gloucester due to regeneration, and are then pushed to edge of town sites, but if the Green Belt boundary closely follows the built area then by default this pushes necessary waste infrastructure further into rural areas. Gloucester City would rather see sites developed for waste uses in the urban areas as opposed to rural areas, but subject to amenity issues and tight impact conditions."

Stroud District Council (Meeting held on 20/03/2007)

69. (Contribution from Stroud District): How will you decide where facilities go? BPEO? (GCC response): Based on WLP sites but BPEO has been deleted as a policy direction in

PPG10. However look at where main arisings are i.e. Gloucester and Cheltenham.

(Stroud District response): What about Green Belt issues?

(GCC response): Waste management could potentially take place. PPS10 makes specific reference to Green Belts as justifiable locations for waste – proximate to arisings. Javelin Park (non Green Belt) and Bishops Cleeve (in Green Belt) are already in the WLP. Gloucester City regeneration pushing waste uses out to the periphery.

70. (Contribution from GCC): A number of sites around the M5, J12 were considered at WLP preparation stage and then again during PFI.

(Stroud District response): New Green Belt boundary proposals South of Gloucester City. Stroud objected to proposal in RSS

- not properly justified;
- lack of evidence;
- seemed predicated on a 'swap' for other releases;
- not linked to other Green Belt parcels.

**Tewkesbury Borough Council
(Meeting held on 08/11/2006)**

71. (Contribution from GCC): The Green Belt boundary around Cheltenham/Gloucester is fairly tightly drawn around the urban areas and there are major waste management facilities in this locality (Wingmoor Farm) in adjoining LPA areas. Guidance in PPS10 indicates waste facilities could be a consideration in redrawing the boundaries to exclude such operations. The locational requirement of waste facilities, i.e. proximity to arisings, is an important factor that needs to be taken into account otherwise facilities will need to be located in rural areas effectively 'jumping' the Green Belt.

Section 5

WCS Issues & Options

Responses - Comments on Issue W9

72. The WCS Issues and Options consultation took place over an 8-week period between the weeks of the 17th July 2006 and the 15th September 2006. In relation to the Gloucester / Cheltenham Green Belt, the Issues and Options questionnaire, Issue 9, asked respondents to consider:

The factors that should be used in determining the appropriateness of waste management facilities in the Green Belt. Whether redefining the Green Belt boundary to take into account and provide more potential for waste management facilities on existing sites/brownfield land is appropriate.

Stakeholder Response:

73. Only a few respondents to the WCS Issues and Options paper provided comments on the first issue. Of those that did, the majority identified the following issues as factors that should be used to determine the appropriateness of waste development in the Green Belt:

74. Proximity to arisings and reducing the distance waste has to travel;

75. Suitability of local roads to handle traffic and site access;

76. Co-locating complementary or ancillary activities with existing activities; and

77. Re-using previously developed land or redundant agricultural buildings.

78. On 22 March 2006 the waste planning team and the waste management team held a joint waste forum. (For details see the Technical Evidence Paper (WCS-K) Joint Working with the WDA). General issues arising from the stakeholder event included the need to consider transport connections and sustainable transport modes when deciding on the locations of waste facilities.

79. The principle of re-using brownfield land is supported by national policy. However, not all brownfield land is suitable for redevelopment or represents the most sustainable location for future development. The fact that land is brownfield does not imply it is suitable for development.

80. The second part of Issue 9 was concerned with the appropriateness of redefining the Green Belt to take into account existing waste sites and brownfield land which offers the opportunity to accommodate waste management facilities. More respondents (9) suggested that it is not appropriate, than suggested it was (5).

Section 6

SA Reports

81. The Sustainability Appraisal (SA) Report on the WCS Issues and Options Paper considered Issue W9 'The appropriateness of proposals for new waste management facilities in the Green Belt', which included 4 Options:

1. Business as usual.
2. New waste management facilities in the Green Belt.
3. No new waste management facilities in the Green Belt.
4. Redefining the Green Belt.

82. Option 4 was considered to be most positive in terms of the test against the 15 SA Objectives. Major positive effects were anticipated in terms of providing employment opportunities, reducing the adverse impacts of lorry traffic on communities and reducing contributions to and adapting to Climate Change.

Section 7

WCS Potential Amendments to Green Belt Policy

83. Given the evidence presented in Sections 1 – 6 of this report, there is a clear need to:

(a) Consider the potential opportunities to look at Green Belt boundaries in respect of waste management facilities, following changes brought in through PPS10 and RPG10 / RSS requirements for Green Belt review.

84. (b) Make amendments to WLP Policy 35 'Green Belt', primarily stemming from changes to National policy (particularly in PPS10).

85. In terms of (a) Green Belt reviews and the potential for detailed boundary changes, the following points can be made:

86. PPS10 Companion Guide suggests that it may be appropriate for Green Belt boundaries to be altered in recognition of the particular locational needs of some types of waste management facilities. In two-tier authority areas, the WPA is advised to work closely with Districts given that Green Belt boundaries will be defined in the District DPD. Therefore what does this mean in Gloucestershire?

87. **Cotswold** – A very small area of Green Belt is located in Cotswold District (and this is All within the AONB).

88. **Cheltenham** – Cheltenham Borough Council have completed their Green Belt Review and the report was published in March 2007. The WPA made representations in respect of current Strategic waste sites and

allocations in the Green Belt and new provisions within PPS10. (See Appendix A). These comments do not seem to have been reflected in the review, but Gloucestershire County Council as the WPA will continue to raise these matters through consultation with Cheltenham Borough Council as their Core Strategy progresses.

89. **Tewkesbury** – Tewkesbury Borough Council have not undertaken a Green Belt review, but it is likely that they will undertake one at some point in the near future. Due to timing issues, they did not undertake a joint review with Cheltenham Borough. However additions and deletions to the Green Belt have been made through the Local Plan process (as has been detailed in Section 4 of this report). The WPA will work in partnership with Tewkesbury Borough in terms of any Green Belt review they may undertake and through consultation on their Core Strategy the new provisions within PPS10 and the status of the current waste sites and allocations in the Green Belt will be raised.

90. **Gloucester** – There is currently no Green Belt land within Gloucester City's administrative area, but the WPA will work in partnership with Gloucester city through consultation on their LDF specifically in relation to new areas of Green Belt to the south of Gloucester that may come forward through the implementation of RSS policy.

91. **Stroud** – Similar comments apply to Stroud District as to Gloucester (above).

92. In terms of (b) Amendments to WLP Green Belt Policy:

93. As discussed in Section 4, PPS10 states

that whilst Green Belts should be protected, *'recognition should be given to the particular locational needs of some types of waste management facilities...'*

94. In Gloucestershire particular locational needs *could* include a number of things:

95. The need to be close to major sources of waste arising i.e. Gloucester and Cheltenham

The main rationale being to limit traffic movements, and carbon emissions etc. This 'proximity' issue could be both described as a 'particular locational need' and also a 'wider environmental and economic benefit'. Gloucester and Cheltenham are classified in the Draft RSS as Strategically Significant Cities & Towns (SSCTs) Draft RSS Policy W2 advocates a sequential approach for the provision of waste facilities for SSCTs as follows:

- Within
- On the edge of, and/or
- In close proximity to (i.e. within 16 kilometres) of the urban area primarily served by the facility.

96. Technical Evidence Paper (WCS-C)

Broad Locational Analysis contains more detail on the advantages of locating waste facilities close to arisings. It includes a summary of the main messages that emerged from a waste stakeholder event held in March 2006. One of the main conclusions, supported by stakeholders, was that:

"GCC should seek to use waste sites that have good transport access, particularly by sustainable modes, and that are generally in close proximity to waste arisings."

97. The need for co-location with other waste activities or processes.

Waste often requires more than one management facility to deal with it appropriately. For example, following collection, waste may be sent to a facility for sorting into different types, then bulked up, then sent to another facility for reprocessing (into other goods etc.) or sent to a landfill for final disposal. PPS10 seeks to co-locate such facilities together and in doing so the planning history of a site, for example previous and on-going operations will have a bearing in terms of attracting complementary or ancillary facilities. However, notwithstanding the co-location requirement, PPS10 also seeks consideration of the cumulative impacts of operations on the well being of host communities. This creates an apparently contradictory situation, the resolution of which will be fundamental to progressing site specific DPDs following adoption of the WCS. For more information on cumulative impacts see [Technical Evidence Paper \(WCS-L\)](#).

98. Specific geological conditions.

The appropriateness of the geology and general surrounding topography are particularly relevant locational aspects for landfill operations. The underlying geology is fundamental to the ability to satisfactorily dispose of certain wastes without having to undertake prohibitively expensive engineering works.

99. The suitability of transport infrastructure including highway access.

The suitability of transport infrastructure is another important consideration when considering site location in the Green Belt. Ideally more waste should be transported by rail or by water (See [Technical Evidence Paper WCS-MCS-B](#)) but where road transport is practically the only option having roads and junctions that are suitable for HGV traffic is an

important consideration potentially contributing to an assessment of 'particular locational need'.

100. As well as considering 'the particular locational needs of some types of waste management facilities' PPS10 encourages a consideration¹¹ of 'the wider environmental and economic benefits of sustainable waste management.'

101. For Gloucestershire, these wider benefits could include:

102. Reducing the distance that waste has to travel.

The most obvious locational element in siting waste development is the distance between the source of waste arising and the handling facility. Whilst such considerations were previously described (in PPG10) as relating to the 'proximity principle', this phrase no longer appears in national guidance. Instead, PPS10 seeks to enable waste to be disposed of in one of the nearest appropriate installations, and for communities to take more responsibility for the waste they produce. This is a different interpretation of what proximity means and one which needs to be translated into the WCS, both in the Green Belt policy and also in more general strategic policies.

103. Waste related job creation / retention and other economic benefits.

Economic Benefits are considered to relate primarily to direct issues such as job creation, but it could also have an indirect effect on matters such as hauling waste over greater distances having a financial impact on municipal waste contract matters, which the

¹¹ A material consideration that should be given significant weight.

taxpayer ultimately funds.

104. PPS10 has introduced new requirements with regards the demonstration of 'need' for waste management facilities. This seeks to encourage competition in the waste industry and states that *"when proposals are consistent with an up-to-date development plan, waste planning authorities should not require applicants for new or enhanced waste management facilities to demonstrate a quantitative or market need for their proposal."* Consequently, any amendments to WLP Policy 35 will have to reflect this either in the policy itself or in the supporting text.

105. Restoration of land and other environmental benefits.

Restoration of previously used or de-spoiled land (potentially contributing to the achievement of the objectives for the use of land in Green Belts.

106. Environmental benefits include aspects such as reclamation of de-spoiled land, good design of buildings, landscape/visual enhancement, access to the countryside by footpath creation etc. These can be seen as reflecting 'before', 'during' and 'after' scenarios. 'Before' relates to the current state of the land/buildings (including previous uses), the 'during' relates to the site's operation and facility design), and 'after' concerns restoration issues of temporary sites (including benefit to the local 'host' community by for example creating recreational opportunities).

107. Landscape / visual enhancement and other environmental improvements in the longer term.

Landscape/Visual Enhancement – PPS10 requires that in deciding which sites to identify

for waste management facilities, that priority should be given to the re-use of previously developed land and redundant agricultural buildings (including their curtilages). Where waste management proposals come forward on such sites in the Green Belt, PPG2 is clear that the re-use of buildings need not prejudice the openness of Green Belts provided that strict controls are placed on any re-development. Such re-development may offer the opportunity for environmental improvement without conflicting with Green Belt objectives.

108. Good Design.

The design aspects to WLP Policy 35 (“form, bulk and general design”) requiring waste management facilities to be in keeping with their surroundings echo the requirement in PPS10 (para.36) to contribute positively to the character and quality of an area. The statement that “poor design... should be rejected” is a strong affirmation of this principle and one which could be carried forward into the new policy. Criteria B of Policy 35 could be subsumed within a policy requirement relating to design. The detail could then be set out in the supporting text. This would have the benefit of making the policy more succinct. However this level of detail may be appropriate for the Development Control Policies DPD.

109. Access to the Countryside.

This is one of the objectives for defining land as Green Belt. It may be that following cessation of current uses that the restoration package can offer greater access to the countryside for the urban population, for example by provision of footpaths, cycleways, outdoor sport/recreation etc. Other issues include matters as diverse as restoration to improve nature conservation (biodiversity), or returning land to agricultural production.

Policy Options

Option A: (No specific policy in the WCS but text in the WCS to state that waste development in the Green Belt is to be in accordance with PPG2 & PPS10).

110. This report has highlighted the requirements of PPG2 *Green Belts* and PPS10 *Planning for Sustainable Waste Management*. One option for the WCS could be to have no specific Green Belt Policy but to refer in text to the requirements of national guidance / policy.

Option B: (Revise WLP Policy 35 to reflect guidance in PPS10 in relation to waste management in Green Belts).

111. An amended two part policy could read as follows:

(A) Waste management in the Green Belt (not re-using an existing building)

Waste management development in the Green Belt (not re-using an existing building) will need to demonstrate a particular identified locational need to contribute to sustainable waste management in Gloucestershire. This would require rigorous justification against the following criteria.

It will only be permitted in very special circumstances where it does not conflict with the purposes of the green belt designation. For Gloucestershire, the following may constitute ‘very special circumstances’:

- The facility is of a type that can demonstrate particular locational needs by being:

- a) *Proximate to major sources of waste arisings; or*
- b) *Directly linked to landfill operations enabling significantly reductions in the amount of waste going to landfill.*

The wider environmental and economic benefits of sustainable waste management in the Green Belt are also material considerations that should be given significant weight.

(B) The re-use of a building for waste management purposes in the Green Belt

112. The re-use of a building for waste management purposes in the Green Belt will be permitted provided:

- a) It does not have a materially greater impact than the present use on the openness of the green belt and the purpose of including land in it;
- b) The building is of permanent and substantial construction and is capable of conversion without major or complete reconstruction; and
- c) The form, bulk and general design of the buildings is in keeping with its surroundings. Poor design will be rejected.

113. Supporting text would be added to the WCS to reflect the potential that temporary waste development in the Green Belt, particularly that which is linked to other waste management operations on the site, is more likely to meet the very special circumstances

test as there would not be a permanent conflict with the purposes of Green Belt designation.

Option C: (A statement in the WCS requiring a limited alteration to the defined Green Belt boundary, by means of an 'inset' site, to meet a specific identified need for waste management facilities).

114. This is an option that may be pursued in conjunction with options A and B It follows the requirement in PPS10 to recognise the particular locational needs of some types of waste management facilities when defining Green Belt boundaries.

(A) Waste management in the Green Belt (not re-using an existing building)

Reasoning:

115. The suggested policy wording incorporates new guidance on waste management facilities in Green Belts from PPS10. It also incorporates wording from PPG2.

116. The phrase "...will need to demonstrate a particular identified locational need to contribute to sustainable waste management in Gloucestershire..." is a reflection of PPS10.¹²

117. The wording "...very special circumstances..." is a direct reference to PPG2.¹³

118. The wording "...particular locational needs..." is a reference to PPS10.¹⁴ The particular locational needs cited in relation to the Gloucestershire context i.e. "...proximity to

¹² PPS10, Paragraph 3, Key Planning Objective 6.

¹³ PPG2, Paragraph 3.1.

¹⁴ PPS10, Paragraph 3, Key Planning Objective 6.

major sources of waste arising...” and being “...linked to landfill operations...” are discussed in the below paragraphs.

119. In theory the particular locational needs¹⁵ of some types of waste management facilities could be many and various as discussed in Section 4 of this report, but perhaps these could be alluded to in supporting text. The principal locational needs in the policy would be proximity to waste arisings and direct association with landfilling activities – helping to reduce waste to landfill.

120. The Gloucester / Cheltenham Green Belt contains existing sites and allocations with significant landfill void capacity.¹⁶

121. The Government’s clear aim is to move waste up the waste hierarchy away from landfill, and this is also a priority for the WCS. But until other disposal solutions are available landfilling will not just come to an end, particularly as society is increasing the levels of waste it produces year on year.

122. PPS10 is not specific about what types of waste management facilities might be able to demonstrate a particular locational need to be located in Green Belts.

123. PPS10 needs to be applied locally, thus for Gloucestershire it is proposed that the types

of waste management facilities able to demonstrate a particular locational need are those directly related and proximate to landfill sites, helping to significantly reduce the tonnages of materials being landfilled.

124. The rationale is that these landfill voids already exist, they are permitted, they are geologically suitable and they are near to waste arisings. They also happen to be in the Green Belt.

125. The wording “*The wider environmental and economic benefits of sustainable waste management in the Green Belt are also material considerations that should be given significant weight.*” is taken directly from PPS10.¹⁷

(B) The re-use of a building for waste management purposes in the Green Belt

The wording in part B of the policy closely reflects PPG2.

128. The wording “*Poor design should be rejected*” reflects PPS10.¹⁸

Option C

A statement in the WCS requiring a limited alteration to the defined Green Belt boundary, by means of an ‘inset’ site, to meet a specific identified need for waste management facility(s).

129. This is an option that could be pursued in conjunction with either Option A or B

130. Currently allocated sites in the Green Belt, or even new sites if they come forward, could

¹⁵ There is a clear locational need for strategic facilities near to waste arisings and this reflects policy in the Draft RSS and the emerging WCS spatial strategy as detailed in Evidence Reports on Gloucestershire’s ‘Spatial Portrait and Vision’ and ‘Broad Locational Analysis’.

¹⁶ Note: This is without prejudice to any applications that may or may not be submitted to the County Council as WPA for time extensions on existing landfill permissions.

¹⁷ PPS10, Paragraph 3, Key Planning Objective 6.

¹⁸ PPS10, Paragraph 36.

be excluded from the Green Belt, by means of an inset, if an inadequate range of suitable sites did not exist outside the Green Belt. This would be in line with PPS10 Companion Guide Paragraphs 7:34 and 7:35.

131. Para 7.34: *“In their search for sites, and in line with the Key Planning Objectives in PPS10, the WPA are expected to protect Green Belts but recognise the particular locational needs of some types of waste management facilities when defining detailed Green Belt boundaries. In certain circumstances, in particular where a local authority's area contains a high proportion of Green Belt land and an inadequate range of suitable sites outside the Green Belt exist, an authority may, exceptionally, wish to consider a limited alteration to the defined Green Belt boundary, to meet a specific, identified need for a waste management facility. The alteration might be to accommodate a site inset with the Green Belt.”*

132. Para 7.35: *“Such a proposal should be brought forward through the LDD process. This will provide greater certainty for the WPA in providing sufficient land capacity to meet identified need for waste management facilities and to the waste industry for the purpose of submitting a planning application. Where land is removed from the Green Belt in this way, it should be specifically allocated in a DPD as a waste management facility site only. This process will need to be carefully coordinated between the District planning authority and the WPA in two tier authority areas, given that the Green Belt boundary will be defined in the district DPD.”*

Discounted Options

■ No new waste management facilities in the Green Belt.

Reasons:

133. This is an option that has been discounted for a number of reasons:

134. Society in general, including communities in Gloucestershire continue to produce more and more waste year on year and there is a recognised and increasingly urgent need for reduction and effective management. In this context, ruling out new waste management facilities in the Green Belt would be counterproductive.

135. When this option was tested against the 15 SA Objectives in the WCS Issues & Options SA Report (as part of the Issues & Options consultation) this option scored poorly.

136. The practicality of this option has to be questioned given that there is currently a large volume of landfill void remaining in the Green Belt¹⁹ and additional facilities may be required (proximate to landfills) to reduce material going to landfill and to beneficially recover as much as material as possible.

137. Green Belt land is a sustainable option if the proximity to arisings is taken into consideration. Gloucestershire has limited options given the number and variety of other constraints in the County e.g. AONB, Flood Plain, and other important designations.²⁰

¹⁹ Note, this is without prejudice to any applications that may or may not be submitted to the County Council as WPA for time extensions on existing landfill permissions.

²⁰ Over 50% of the County is designated AONB and there are very extensive areas of Flood Plain and increasing flood risk to other areas. See other Evidence Reports on Landscape & AONB, Ecology, Hydrological Issues and Broad Locational Analysis.

- **Amending Green Belt Boundaries to allow for waste management allocations.**

Reasons:

138. This is not a 'discounted' option as such, but it is one that may have to be pursued at the appropriate time through consultation with the six District Authorities in the preparation of their LDFs.

Section 8

Conclusion

139. This report has considered the Gloucester / Cheltenham Green Belt in terms of changes to National and Regional policy, recent reviews of the Green Belt in Gloucestershire and in terms of the appropriateness of waste management facilities being located in the Green Belt. It provides background information and evidence on Green Belt matters that are raised in the WCS Preferred Options paper which will go out to consultation in January 2008.

140. In terms of the policy options presented in Section 7 of this report, it seems clear that in terms of waste management facilities in the Gloucester / Cheltenham Green Belt, the emerging WCS needs to consider the following:

141. The potential benefits to sustainable waste management in Gloucestershire through Green Belt reviews as Districts prepare their LDFs.

142. Also that the specific *site inset* approach suggested in the PPS10 Companion Guide may be worth pursuing through District consultation at the appropriate time.

143. Consideration needs to be given to:

- (a) Whether there is a need for a specific Green Belt Policy in the WCS or whether a reliance on the stipulations of PPG2 and PPS10 would be adequate and appropriate.
- (b) What form any amended Green Belt policy would take in the light of the changed policy direction through the publication of PPS10.

144. This report has presented evidence and made recommendations in respect of the above.

Appendix A: Response to Cheltenham Borough Council's Green Belt Review

Comments from the WPA sent to Cheltenham Borough Council in relation to their Green Belt Review Consultation

"In respect of your Green Belt Review it may be useful to highlight the PPS10 policy context (as discussed at our partnership meeting last month). The important section is the 6th bullet point of para 3. Additional info is then provided in PPS10 Companion Guide at paras 7.34 and 7.35.

For ease of reference I have copied the relevant sections for you below.

PPS10 (para 3, 6th bullet) protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications, that these locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission;

PPS10 Companion Guide (paras 7.34 and 7.35)

7.34 In their search for sites, and in line with the Key Planning Objectives in PPS10, the WPA are expected to protect Green Belts but recognise the particular locational needs of some types of waste management facilities when defining detailed Green Belt boundaries. In certain circumstances, in particular where a local authority's area contains a high proportion of Green Belt land and an inadequate range of suitable sites outside the Green Belt exist, an authority may, exceptionally, wish to consider a limited alteration to the defined Green Belt boundary, to meet a specific, identified need for a waste management facility. The alteration might be to accommodate a site inset with the Green Belt.

7.35 Such a proposal should be brought forward through the LDD process. This will provide greater certainty for the WPA in providing sufficient land capacity to meet identified need for waste management facilities and to the waste industry for the purpose of submitting a planning application. Where land is removed from the Green Belt in this way, it should be specifically allocated in a DPD as a waste management facility site only. This process will need to be carefully coordinated between the District planning authority and the WPA in two tier authority areas, given that the Green Belt boundary will be defined in the district DPD."



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