



Waste Core Strategy

Technical Paper WCS-L
Cumulative Impact

Living Draft

September 2007

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Contact Details for Gloucestershire County Council

Minerals & Waste Planning Policy:

Tel: 01452 425704

m-wplans@gloucestershire.gov.uk

Minerals & Waste Development Control:

Tel: 01452 425704

Waste Management Unit:

Tel: 01452 426601



Council Direct:

Tel: 01452 505345

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Introduction

1. The consideration of the cumulative impacts of development is a particularly complex matter, made more so because of subjective elements and difficulties with definitions. Planning Policy Statement 10 – Planning for Sustainable Waste Management (PPS10) and its companion guide highlight the need to consider what the potential cumulative impacts may be on the well-being of local communities when identifying sites and areas suitable for new or enhanced waste management facilities.

2. There are two issues here:

- 1) The Sustainability Appraisal (SA) process fulfils the function of testing all options (right from the initial Issues and Options stage of DPD production)
- 2) But an additional cumulative impact assessment may be needed at some level. Cumulative impacts are best assessed at a 'site' level through a Site Allocations DPD, but it may be for the Waste Core Strategy (WCS) to consider these issues at a strategic level and to provide criteria or a policy framework on this matter.

3. This report is split into two parts:

Part 1 will consider how cumulative impact is assessed through the Environmental Impact Assessment (EIA) and SA processes.

Part 2 will consider how the issue of cumulative impact should be dealt with in the emerging WCS.

PART 1: CUMULATIVE IMPACTS ASSESSED THROUGH THE EIA & SA/SEA PROCESS

Section 1 Definitions & Requirements to consider Cumulative Impact through EIA & SA/SEA Processes

4. 'Cumulative impact' is a broad term and some of the issues this report covers are related to issues of 'environmental acceptability'¹ which is covered in Technical Evidence Paper (WCS-M). (See also the main Evidence Paper on Hazardous Waste (WCS-E).

5. In terms of definitions of 'cumulative impact' there does not appear to be a consensus or a commonly used definition. Most uses of the term occur in EIA and Strategic Environmental Assessment (SEA) methodologies.

Cumulative impact requirements in the EIA process

¹ The term 'environmental acceptability' in this context comes from Draft RSS Hazardous Waste Policy W3 and is considered in the context of hazardous waste sites.

6. EIA is a procedure that must be followed for certain types of development before they are granted development consent. The requirement for EIA comes from European Directive (85/33/EEC as amended by 97/11/EC). The procedure requires the developer to compile an Environmental Statement (ES) describing the likely significant effects of the development on the environment and proposed mitigation measures.

7. Government Circular 02/99 Environmental Impact Assessment states:²

"In general, each application (or request for an opinion) should be considered for EIA on its own merits. The development should be judged on the basis of what is proposed by the developer."

8. It continues:

*"However, in judging whether the effects of a development are likely to be significant, local planning authorities should always have regard to the possible cumulative effects with any existing or approved development. There are occasions where the existence of other development may be particularly relevant in determining whether significant effects are likely, or even where more than one application for development should be considered together to determine whether or not EIA is required."*³

9. In terms of the preparation and content of an Environmental Statement (ES) it is stated:⁴

"In addition to the direct effects of a development, the ES should also cover indirect,

² Paragraph 45.

³ Paragraph 46.

⁴ Paragraph 84.

secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects.”

It should be noted that not all waste proposals will require an EIA. Proposals should be appropriately screened and scoped according to regulations. This inevitably means that not all proposals will be subject to a cumulative impact assessment, i.e. those that fall outside of Schedules 1 and 2 will not be assessed. However this is likely to be acceptable given the fact that:

- (a) the very fact that they fall outside the EIA Schedules means that the impacts are not likely to be significant;
- (a) cumulative impact assessment is required through SA/SEA.

Cumulative impact requirements in the SEA process

10. The SEA Directive 2001/42/EC requires that certain plans and programmes are tested in order to ascertain potential adverse environmental impacts. Annex II of the SEA Directive – Criteria for determining the likely significance of effects referred to in Article 3(5) includes: *The cumulative nature of the effects.*

Cumulative impact requirements in the SA process

11. SA effectively extend the remit of SEA to consider potential socio –economic impacts of plans and programmes. In November 2005 the Office of the Deputy Prime Minister (ODPM)⁵ published finalised guidance on SA - *Sustainability Appraisal of Regional Spatial*

⁵ Now Department for Communities and Local Government (DCLG).

Strategies and Local Development Documents
This guidance document states:⁶

“Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects (e.g. noise, dust and visual) have a combined effect.”

12. In terms of the principles of assessing cumulative effects this guidance suggests that any assessments needs:

- To be considered throughout the SA process;
- To focus on receptors, which may include natural resources, sections of the population, or ecosystems and species;
- To consider the nature and extent of receptors (such as ecosystems and communities) rather than administrative boundaries;
- To consider plan effects and the effects of other plans and programmes;
- To take account of how close receptors are to capacity in terms of remaining productive or sustainable.
- To be aware of the considerable level of uncertainty in the process and this should be documented.

Other guidance on cumulative impact

13. The EU report: *Guidelines for the Assessment of Indirect and Cumulative Impacts as well as Impact Interactions* (European Commission 1999)⁷ considers the assessment cumulative effects within the EIA process. It presents the results of research and

⁶ Appendix 13, Page 137 & 138.

⁷ Available at:

<http://ec.europa.eu/environment/eia/eia-studies-and-reports/guidel.htm>

consultations conducted by *Hyder* for the European Commission:

14. The reports makes clear that in terms of cumulative impacts there are “no agreed and accepted definitions.”⁸ However it does include the following definition:

“Cumulative Impacts: impacts that result from incremental changes caused by other past, present or reasonably foreseeable actions together with the project.”⁹

Cumulative impact requirements related to SA in Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10) Companion (Companion Guide)

15. This companion guide contains little guidance or information on cumulative impacts i.e. – what they may be or how to measure them, but there is a reference relating to SA of Local Development Documents (LDDs) as follows:

“In predicting impacts of LDD, SA should have regard to the impacts predicted by the SA at regional level. There may be information that is transferable to local level in the form of: impacts which apply equivalently across the region; impacts which can reasonably be apportioned to the local level; assessment techniques which have been used; information on likely future trends which will shape the sustainability context for LDD (this may also be useful for considering cumulative impacts).”¹⁰

⁸ Page ii.

⁹ Page iii.

¹⁰ Box 1, Page 101.

Cumulative impact requirements related to SA in Planning Policy Statement 12: Local Development Frameworks (PPS12)

16. PPS12 and its companion guide also contain little guidance on cumulative impact. Where there is a brief reference, it relates to the SA process in LDD production:

“In carrying out the appraisal, local planning authorities should have regard to the specific objectives and principles of sustainable development as outlined in Planning Policy Statement 1. The potential direct, indirect and cumulative impacts of different policy options need to be identified and appraised in order to integrate sustainable development objectives in the formulation of policy and to inform decisions on which options should be promoted in local development documents.”¹¹

¹¹ Sustainability Appraisal Key Considerations, Page 24.

Section 2

The Cumulative Impact element of the SA of the Waste Core Strategy (WCS) Issues & Options

17. The WCS Issues & Options were tested against the SA Objectives and an SA Report was produced and went out to consultation with the Issues & Options documentation.¹²

18. The test of each option included:

- A matrix test of cumulative, secondary and synergistic impacts.¹³
- A tabulated analysis of effects including:
 - Potential cumulative / secondary / synergistic effects of the option.
 - Potential cumulative impact receptors & past / present / future human activities that have affected or will possibly affect these receptors.
 - Predicted impacts on the receptor as a result of the plan in combination with other human activities, and the significance of the impacts.
 - Possible mitigation measures & management suggestions and pointers for other plans and strategies.

19. The test was basically of in-plan cumulative impacts for each of the options considered. The note in the Appendix stressed that at the next stage of the process i.e.

¹² For further details of the SA process see: <http://www.gloucestershire.gov.uk/index.cfm?articleid=11577>

¹³ See Appendix 4 of the Waste Core Strategy Issues & Options Sustainability Appraisal Report (July 2006).

Preferred Options, cumulative impacts would be considered within each option.¹⁴

20. So all the options were tested in terms of their cumulative impact but additionally (and potentially somewhat confusingly) Issue W7(a) in the Issues & Options document was: *Cumulative Impact*. Under this issue there were two options that were tested:

(1) Having a policy framework against which cumulative impact can be assessed.

(2) Having a policy framework where cumulative impacts are not a specific consideration.

21. In the test Option 1 was favoured, as it was envisaged that not considering cumulative impacts in the WCS could have negative impacts in terms of:

- The overall objective to promote sustainable development (SA Objective 1).
- Health and well-being of people living and working on Gloucestershire (SA Objective 4).
- The amenity of local communities (SA Objective 6).
- Gloucestershire's biodiversity, natural environment, landscape, tourist assets – including historic environment (SA Objective 9).
- Flooding risk (SA Objective 10).
- Gloucestershire's environment – the land, the air and water (SA Objective 11).
- The impacts of lorry traffic on communities (SA Objective 12).¹⁵

¹⁴ This approach was approved by consultants *Levett – Therivel* who conducted a peer review exercise on behalf of GCC. More info available at: <http://www.levett-therivel.fsworld.co.uk/>

Part 2:

Cumulative Impacts - The need for a specific WCS Policy and a consideration of Criteria

Section 3

Policy Requirements

National Policy

22. As has been demonstrated in Part 1 of this report, much of the guidance in PPS10 and PPS12 relates to the need to consider cumulative impact through the SA process. Section 2 of this report demonstrates that this has been done for the Issues & Options stage and further work will be done in terms of the SA Reports that are consulted on at Preferred Options and at Submission stage.

23. In terms of a need for a specific policy on cumulative impact, the SA test (referred to in Section 2) indicated that there could be a number of negative effects if there were no consideration of cumulative impact within the WCS policy framework. So the SA indicates that a consideration of cumulative impact is necessary, as does PPS10.

¹⁵ See pages 78 to 80 of The Waste Core Strategy Issues & Options Sustainability Appraisal Report (July 2006).

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

24. Significantly the main reference to cumulative impact or 'cumulative effects' in PPS10, is under the heading '**Identifying suitable sites and areas**' as follows:

"In deciding which sites and areas to identify for waste management facilities, waste planning authorities should [consider]

The cumulative effect of previous waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential."

25. So a major part of the cumulative impact assessment will occur through the comprehensive sites work as part of the Waste Site Allocations DPD.¹⁶

26. The Waste Core Strategy provides the broad framework for the sites work. So what is required is that as part of this framework an indication is given as to what should be considered in terms of cumulative impacts. It will then be for the Waste Site Allocations DPD to follow the Core Strategy policy direction and consider the matter in detail (amongst numerous other factors). The physical and environmental constraints on development, including existing and proposed neighbouring

¹⁶ Work on this DPD is programmed to commence early in 2009.

land uses are contained in Annex E of PPS10.¹⁷ The details are contained in Appendix C of this report.

27. In terms of the consideration of cumulative impact at the level of determining planning applications, clearly this will be appropriately outlined in the Development Control Policies DPD.¹⁸ However in PPS10, under the section heading 'Determining Planning Applications' a consideration of cumulative impacts is not specifically mentioned. But this is because these matters are comprehensively dealt with through the EIA process (as described in Section 1 of this report).

28. The WCS will consider cumulative impact as an issue relating to site selection, along with the other considerations in PPS10 paragraphs 20 & 21. The Technical Evidence Paper (WCS-C) Broad Locational Analysis covers these other considerations.

29. The advice within paragraphs 20 and 21 is potentially contradictory in that opportunities for the co-location of facilities are encouraged (Para 20) whilst the potential cumulative impacts of too much waste development (Para 21) are warned against. This complex issue is discussed in the following paragraphs:

¹⁷ Page 23 to 25. Locational criteria include (a) protection of water resources (b) land instability (c) visual intrusion (d) nature conservation (e) historic environment and built heritage (f) traffic and access (g) air emissions, including dust (h) odours (i) vermin and birds (j) noise and vibration (k) litter (l) potential land use conflict.

¹⁸ Work on this DPD is due to commence early in 2009.

Co-locating Advantages & Cumulative Impact Issues

30. PPS10 states:

"In searching for sites and areas suitable for new and enhanced waste management facilities, waste planning authorities should consider:

- opportunities for on-site management of waste where it arises;*
- a broad range of locations including industrial sites, looking for opportunities to co-locate facilities together with complementary activities – (footnote: reflecting the concept of resource recovery parks)."*¹⁹

31. The PPS10 Companion Guide (see paragraphs below) also makes reference to the potential advantages of resource recovery or eco-parks.

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

32. In relation to identifying sites for waste management this guidance states:

"PPS10 points the WPA in their search for sites and areas for new or enhanced waste management facilities to:

- opportunities for on-site management of waste where it arises; and,*
- a broad range of locations including industrial sites, looking for opportunities to co-locate facilities together and with complementary*

¹⁹ Page 11, Paragraph 20.

activities (e.g. under the Town & County Planning (Use Classes) Order 1987).²⁰

“The search for sites for waste management has traditionally focussed on opportunities for landfill and, or, on existing waste management facilities. Waste management needs are however changing. Most waste management activities are now suitable for industrial locations, and many fall within the general industrial class in the Use Classes Order. This is particularly the case given the increased move towards enclosing waste management activities in purpose-designed buildings.”²¹

“With advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development...”²²

“In looking for sites for waste management the WPA are encouraged by PPS10 to consider the concept of resource recovery parks, sometimes referred to as resource management parks, or eco parks. The concept offers particular advantages for integrated waste management and driving waste management up the waste hierarchy.”²³

33. The guidance recommends looking at best practice examples on the ground such as those promoted by the Wales Environment Trust Ltd²⁴ and the London Waste facility.²⁵

²⁰ Page 75, Paragraph 7.29.

²¹ Pages 75 –76, Paragraph 7.29.

²² Page 76, Paragraph 7.31.

²³ Page 76, Paragraph 7.32.

²⁴ See www.walesenvtrust.org.uk

²⁵ See www.londonwaste.co.uk

34. This difficulty of how to harness the benefits of co-locating complementary waste activities without causing detrimental cumulative impacts is something that the WCS will have to address.

35. Under the heading ‘Testing the Suitability of Sites and Areas’ the guidance also states:

“The criteria in PPS10 mostly focus on environmental concerns, but the WPA are also required to consider, as a test of suitability, the cumulative effect of previous waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential. This reflects the Government’s commitment to developing strong, vibrant and sustainable communities. PPS1 expects consideration to be given to the impact of development on the social fabric of communities and planning authorities to seek to reduce social inequalities. Delivering safe, healthy and attractive places to live is a key component of this.

The WPA should not assume that because a particular area has hosted, or hosts, waste disposal facilities it is appropriate to add to these or extend their life. It is important to consider the cumulative effect of previous waste disposal facilities on a community’s wellbeing. Impacts on environmental quality, social cohesion and inclusion and economic potential may all be relevant. Engagement with the local communities affected by previous waste disposal decisions will help in these considerations.”²⁶

²⁶ Pages 78 -79, Paragraphs 7.37 & 7.38.

36. This reference to PPS1 is considered below.

Planning Policy Statement 1: Delivering Sustainable Development (PPS1)

37. PPS1 states:

“The Government is committed to developing strong, vibrant and sustainable communities and to promoting community cohesion in both urban and rural areas. This means meeting the diverse needs of all people in existing and future communities, promoting personal well-being, social cohesion and inclusion and creating equal opportunity for all citizens.”²⁷

“Plan policies and planning decisions should be based on:

- up-to-date information on the environmental characteristics of the area;*
- the potential impacts, positive as well as negative, on the environment of development proposals (whether direct, indirect, cumulative, long-term or short-term); and recognition of the limits of the environment to accept further development without irreversible damage.”²⁸*

Planning Policy Statement 23: Planning and Pollution (PPS23)

38. PPS 23 states:

“Local Development Documents (LDDs) are prepared by LPAs as part of their local development schemes to apply national policies stated by the Government and the policies of the RSS to their areas. The Core Strategy of LDDs should include strategic land use

policies on the location of potentially polluting developments and on the location of sensitive developments (such as housing, schools, hospitals etc.) in proximity to existing sources of pollution (including, for example, roads and certain industrial processes). Priority should be given, where appropriate, to developments, where the availability of suitable alternative sites is limited. Constraints on further development in particular areas arising from the cumulative impact of existing and future polluting uses of land, should be identified. For example, where several developments exist within an area that will give rise to air pollution, the total impact from these developments on that area should be considered. Policies to reduce these impacts should also be identified, through measures such as landscaping and good design layout, and opportunities to facilitate access by more sustainable transport, including public transport. Account should also be taken of existing development surrounding any identified sites, and any future plans which may improve air quality including road and rail schemes.”²⁹

“LDDs should provide a framework for most development control decisions. They should include an appropriate combination of site-specific policies for the location of potentially polluting development, and set out criteria by which applications for such development may be determined. These criteria should not be drawn up to exclude all provision in plans for potentially polluting development projects, or to prohibit all applications to set them up. Appendix A to PPS23 provides a list of matters for consideration in preparing

²⁷ Page 7, Paragraph 14.

²⁸ Page 8, Paragraph 19.

²⁹ Page 8, Paragraph 1.27. Emphasis added.

development plans.”³⁰

39. For reference, this extensive list of considerations is provided in Appendix D of this report.

Regional Policy

40. Draft RSS Policy W2 ‘Waste Facilities and the Waste Hierarchy’ does not specifically highlight cumulative impact issues or requirements. However the policy does state that: *“In all areas, identification of sites for facilities will take account of the following: Established and proposed industrial sites, in particular those that have scope for the co-location of complementary activities, such as proposed resource recovery parks...”*³¹ In so doing it accords with the PPS10 Companion Guide’s³² affirmation of the potential of resource / eco parks to move waste up the hierarchy and away from landfill.

Current Policy in the Adopted Gloucestershire Waste Local Plan (WLP) - 2004

41. There is currently no specific cumulative impact policy in the WLP. However there are policies that are related to some degree:

Policy 7 – ‘Safeguarding sites for Waste Management’

42. *“Existing sites in permanent waste management use (including sewage and water*

*treatment works) and proposed sites for waste management use will be safeguarded by local planning authorities, where they make a contribution to a sustainable waste management system in accordance with BPEO for Gloucestershire. The waste planning authority will normally oppose proposals for development within or in proximity to these sites where the proposed development would prevent or prejudice the use of the site for an appropriate waste management development.”*³³

43. The policy seeks to safeguard existing and allocated sites for waste management facilities from incompatible land-uses. Development of non-waste activity encroaching on established waste management facilities can increase the likelihood of generating adverse cumulative impacts. Thus this is an issue that needs to be considered and addressed.

Policy 37 – ‘Proximity to other Land Uses’.

44. *“Proposals for waste development will be determined taking into account such matters as the effect on the environment, occupants’ and users’ amenity and health, the countryside, the traditional landscape character of Gloucestershire, the local highway network, any hazardous installation or substance and any adverse cumulative effect in combination with other development in the area. Where appropriate suitable ameliorative measures shall be incorporated in the proposals to mitigate, attenuate and control noise, dust, litter, odour, landfill gas, vermin, leachate and flue emissions.”*³⁴

³⁰ Page 9, Paragraph 1.28.

³¹ Draft SW RSS, Page 167, Policy W2.

³² Page 76, Paragraph 7.32.

³³ WLP, Page 101.

³⁴ WLP, Pages 124 & 125.

45. The most appropriate DPD in which to review this policy will be the Development Control Policies DPD, which is programmed to commence in early 2009. However the matters that it takes into account may be seen as significant in the context of looking to see what criteria might be relevant to determine cumulative impact.

Section 4

WCS Issues & Options Responses³⁵ - Comments on Issue W7 (Cumulative Impact)

46. The WCS Issues and Options Consultation questionnaire, (Question 7), sought views on appropriate criteria for determining cumulative impact and safeguarding existing waste management facilities from encroachment by potentially incompatible land-uses.

Stakeholder's views on potential criteria

47. Stakeholders were asked to suggest criteria that could be used to assess the cumulative impact of waste management facilities on a host community in an open-ended question (as opposed to being provided options). Whilst acknowledging the limited value of the questionnaire process, (due to the low return rate), a number of common themes became evident namely:

- Impact on the local community
- Impact of noise
- Impact of smell
- Traffic impact
- Visual impact
- Impact of dust
- Health impacts

³⁵ There were no specific comments relating to the SA test of Issue W7.

48. Therefore stakeholders have (to some degree) indicated what criteria they consider relevant to determine cumulative impact. These criteria reflect Development Control type criteria that were previously assessed through a suite of policies in the Waste Local Plan and Annex E of PPS10, which include (a) protection of water resources (b) land instability (c) visual intrusion (d) nature conservation (e) historic environment and built heritage (f) traffic and access (g) air emissions, including dust (h) odours (i) vermin and birds (j) noise and vibration (k) litter (l) potential land use conflict.

Summary of the views of Safety in Waste and Rubbish Disposal (SWARD) in meeting on 12/09/07³⁶

49. In September 2007, the minerals and waste planning policy team met with SWARD and the Local Member for Cleeve and discussed the matter of cumulative impact in relation to the Wingmoor Farm waste sites. They agreed that the broad list of criteria / considerations that stakeholders had previously arrived at, through the 2006 joint waste forum and through consultation on Issues & Options, was reasonable and reflective to some degree of their experience in Bishops Cleeve. However, it was their view that traffic impacts were the most significant impacts likely to arise through cumulative waste (and other) development.

³⁶ For the full notes of this meeting – see Appendix A.

Section 5

Possible Criteria as to what Constitutes Cumulative Impact for Gloucestershire & Policy Options

50. Sections 1 to 4 of this report have provided some background evidence in terms of:

- The extent to which the SA process has considered cumulative impact and in terms of the sufficiency of this consideration;
- What National and Regional policy requires,
- Stakeholders' views.

51. So given the above, what are the potential options at a Core Strategy level, in terms of providing the broad framework for a future Waste Site Allocations DPD, how should Gloucestershire consider:

*"The cumulative effect of previous waste disposal facilities on the well-being of the local community, including any significant adverse impacts on **environmental quality, social cohesion and inclusion or economic potential**."*³⁷

Policy Option A: Addressing cumulative impact through the WCS Strategic Objectives

52. Cumulative impacts could be included as part of the delivery mechanism for Strategic Objective 5. The specific part of the delivery

³⁷ The key phrase in PPS10 relating to CI – emphasis added. Pages 12-13, Para 21(i).

mechanism to which this issue relates, as set out in section 7, states:

- 'To encourage the co-location of complementary facilities together, reflecting the concept of resource recovery parks, where the cumulative impact is not unacceptable on the host location.'

53. The following wording could be added to the end of the bullet point:

"...in terms of significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential."

Reasoning:

54. The reasoning behind, and the development of the WCS's strategic objectives is detailed in Evidence Report WCS – B Spatial Portrait and Vision. This option just adds to Objective 5 and to the wording of the delivery mechanism.

55. The wording directly reflects Draft RSS Policy W2 in terms of the reference to resource recovery parks and guidance in PPS10 on 'Identifying suitable sites and areas'.³⁸

Policy Option B: A Separate Cumulative Impact Policy in the WCS

56. Such a policy could read:

"As part of the process to identify suitable sites and areas for waste management for new or enhanced waste management facilities, the cumulative effects of previous and existing

³⁸ PPS10, Pages 11&12, Paragraph 21(i).

waste disposal facilities on the well-being of local communities will be considered alongside the potential benefits of co-locating complementary facilities together.”

For facilities that come forward on unallocated sites, a similar cumulative impact assessment will be required.”

57. The supporting text could then read:

“In terms of any significant cumulative impacts, careful consideration should be given to potential adverse impacts on:

- *Environmental quality;*
- *Social cohesion and inclusion; and*
- *Economic potential.*

Within these broad categories, the following impacts on local communities should be given particular attention, both in terms of any individual impact and in terms of any potential cumulative impacts:

- *Impact of noise*
- *Impact of smell*
- *Traffic impact**
- *Visual impact*
- *Impact of dust*
- *Health impacts*

**Traffic impacts should be afforded particular attention as, they are diffuse by their nature and thus not contained on sites.*

Reasoning:

58. The wording of the policy and the proposed supporting text reflects PPS10 and the Companion Guide (see footnote 36).

59. The list of impacts to be given particular attention reflect the views of stakeholders gauged from forum events and responses to the Waste Core Strategy Issues & Options consultation. Traffic impacts are singled out as requiring particular attention in any assessment following discussions with local action group SWARD³⁹

60. In terms of health impacts, it may be appropriate for assessments to draw on the experience and expertise of bodies such as the Primary Care Trust (PCT) or the Health Protection Agency (HPA)⁴⁰

Discounted Options

61. A policy which addresses the need to look at cumulative impact but not balanced against the potential positive benefits for society of co-locating complementary waste facilities together.

Reasoning:

62. Draft RSS Policy W2 and PPS10 (including the companion guide) both indicate the advantages of co-locating complementary waste facilities together.

³⁹ See Appendix A.

⁴⁰ See Appendix B for the summary of the final report of Gloucestershire’s Health Overview and Scrutiny Committee: Wingmoor Farm Task Group and the Primary Care Trust’s (PCT) Health Impact Assessment. In terms of futures sites work, the conclusions of this report, and any other future reports on other areas of the County may be significant.

Section 6

Conclusion

63. This report has considered the issue of how and when the potential cumulative impacts of waste development should be considered, in terms of the SA process and new national and regional policy requirements.

64. There is a need to consider the cumulative impacts of proposed strategic options – and this has been done (and continues to be done through the SA process).

65. But there is also a requirement in PPS10 to consider any cumulative impacts as part of the multiplicity of assessments⁴¹ that will need to be undertaken in considering the identification of suitable sites and areas. It is necessary for the WCS to set the framework and come up with suitable criteria or policy to inform any future waste sites DPD and potentially a Development Control Policies DPD.

66. In respect of the above, two potential options have been put forward.

⁴¹ For instance the comprehensive lists in Annex E of PPS10 and Appendix A of PPS23. (See Appendix C and D).

Appendix A: Notes of meeting with SWARD – 12th September 2007

GCC:	Attendees	SWARD:
<ul style="list-style-type: none"> • Cllr Ceri Jones (Cllr CJ) (Local Member for Cleeve) • Kevin Phillips (KP) – Minerals & Waste Policy Team Leader • Nick Croft (NC) – Leading on Waste Core Strategy (WCS) preparation • David Ingleby (DI) – Working on WCS & Sustainability Appraisal (SA) 		<ul style="list-style-type: none"> • Barbara Farmer (BF) – External Liaison for SWARD • Ted Fryer (TF) – Local resident and member of SWARD • John Beattie (JB) – Bishops Cleeve Resident (member of the Bristol Group – considering the effect of living near incinerators)

List of Acronyms:

APC	Air Pollution Control residues
C&D	Construction and Demolition waste (generally inert)
C&I	Commercial and Industrial waste (generally biodegradable)
EA	Environment Agency
EfW	Energy from Waste
EiP	Examination in Public
JMWMS	Joint Municipal Waste Management Strategy
GCC	Gloucestershire County Council
GOSW	Government Office for the South West
IPC	Independent Planning Commission
MSW	Municipal Solid Waste
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SoS	Secretary of State
SE	South East
SW	South West
SWARD	Safety in Waste and Refuse Disposal
WCA	Waste Collection Authority (the 6 District Councils)
WCS	Waste Core Strategy
WDA	Waste Disposal Authority (the County Council)
WLP	Waste Local Plan
WM	West Midlands
WPA	Waste Planning Authority (the County Council)

ALL Introductions and respective roles were made.

The issue of waste minimisation was discussed – prevention better than cure – the WCS is developing work undertaken recently to prepare a supplementary planning document to get developers and local planning authorities to consider the waste and recycling implications of new development.

KP Provided an update on WLP saved policies – reply from GOSW expected imminently on which policies can be saved until replaced by WCS and subsequent plans.

Update on WCS preparation:

- It is a countywide document.
- Site Allocations Document will follow adoption of the WCS.
- There is also intended to be a policy document for regulating development.
- A proposals map will indicate allocations and designations.
- Independent examination – The Planning Inspectorate will adjudicate and hopefully the WCS will be adopted in 2009.

NC / ALL There was a general discussion about the Independent Planning Commission (IPC) – the concept derived from Heathrow Terminal 5 Inquiry, supported by the Barker Review.

- Need national policy statements.
- Planning white paper suggests thresholds.
- The jury's out on how the IPC will operate.
- But the IPC is unlikely to be put in place in near future.
- Wingmoor Farm East application – could be “called in” by SoS.
- SoS makes decision based on Inspector's Report.
- The “call in” often triggered by the Local Planning Authority.
- SoS is likely to be interested in Wingmoor Farm application because of its Regional and National implications.

Cllr CJ Cllr Jones stated that he was particularly unhappy that the decision could be taken out of local hands – issue of democratic accountability.

WCS preparation

- KP Forum was held in March 2006.
WCS Issues & Options consultation – 17th July to 15th September & ongoing.
The GOSW response indicated that more evidence of discussions / partnerships was required.
The WPA have held discussions with the six districts, industry, local groups, and statutory bodies (e.g. sewage companies).
The new planning system relies on ‘evidence-based’ work – the WPA is currently preparing papers. These will be put on the GCC website as ‘living documents’.
A public forum will be held to help shape the Preferred Options stage of WCS preparation – this will be on 30th Oct 2007 in the Gloucester Guildhall.
- DI Member involvement – Members will be invited nearer the time once we are aware of stakeholder numbers.
- KP - Members Information Sheet is being prepared.
The intention is that the Preferred Options documentation will go to GCC Cabinet on the 28th November 2007.
Evidence testing through independent examination – 9 tests of soundness.
The WPA need evidence to support soundness.
- Preferred Options timetabled for publication in Jan2008 for which there would be a consultation period of 6 weeks.
Then the WCS is submitted to SoS in Dec 2008 (there will also be a 6 week consultation period).
Examination timetabled for June 2009.
There will then be a binding Inspector's report.

RSS Hazardous Waste Policy W3

- KP Panel report into the draft RSS is expected by end 2007 – this will be a public document.
It is then expected that the revised RSS will be published mid/late 2008
This will replace structure plans.
- The WPA is currently working with a draft version of the RSS, which could change following the panel report.
GCC officers also attended the SE RSS EiP (Dec 2006) on hazardous waste issues. Their policy stated that they need hazardous waste landfill capacity in the Kent/Sussex part of the SE. GCC argued that they cannot guarantee capacity outside the region – especially given the Wingmoor Farm planning permission end date of 2009.
Panel recommendation – the SE region needs to look at wider SE region rather than just Kent/Sussex.
- Cllr CJ Cllr Jones considered that the lack of debate at the RSS EiP on waste issues was scandalous.
- DI In terms of the SA requirement the SW region only did a minimal assessment.
- KP SW Region prepared a paper on hazardous waste requirements which assumed a level of APC arisings and thus a need for facility(ies) but not clear yet which way authorities will go with their MSW strategies - Cornwall/Devon going for energy from waste technology therefore APC arising at other end of the region.

- BF Juniper Report – Waste technologies report on proven technologies - who decides on evidence?
- KP The JMWMS will guide the WCS in terms of technologies for managing MSW. The WCS will not determine the particular technology, that debate is being had in relation to the Residual Waste Management Strategy being prepared by the County Council (in its role as WDA).

Data

- NC WDA provide info on MSW (which is good), the EA provide data on all other waste streams. Operator information is also sought to provide additional evidence.
Import and export of waste takes place from Gloucestershire.
Most recent data returns from EA relate to year 2004/05 and NC explained how this is broken down into biodegradable and inert.
Hazardous waste is provided by EA from the more detailed hazardous waste interrogator.
The data only relates to licensed waste and not for the exemptions.
The 2004/05 collations were provided which includes a total arising of c.1.2 mt (c.309,000 MSW, 462,000 C&I, 401,000 C & D and 72,000 hazardous).
Region sets capacity requirements for C&I/MSW/C&D. the WPA has looked at existing capacity of current facilities to determine the 'gap' in provision, and hence what needs to be planned for.
The was discussion as to what happens with hazardous waste in that up to 2004 much of the Glos arsing's leave the County yet we manage a significant importation figure.
KP & NC explained that of the 20 or so sub categories of Hazardous waste each requires different forms of treatment and disposal. As these are relatively small tonnages in themselves it has resulted (largely through market decisions) to a limited number of specialist facilities spread around the Country. However the bulky or hazardous C&D waste are likely to end up in landfill as they can't be recycled or recovered easily.
Wingmoor Farm takes APC residues that other sites can't.
The Purton site (Wilts) doesn't take APCs.
SNRHW cells could be used to minimise transport distances.
2006 (Grundon's data) shows that APC inputs have reduced, but the input of contaminated soils has increased. This has resulted in an increased tonnage because soils are more bulky.

Cumulative Impact

- DI Cumulative impact is a complex issue and one on which we need your input and your views.
- TF In terms of cumulative impacts the traffic impact is particularly significant – but there are others as well. The proximity to housing is a key issue (new housing adj to waste site shouldn't be permitted). In Europe they use a 200m buffer zone but UK Government rejected this. There shouldn't be impacts from sites (noise, dust, smell) they should be controlled, but this isn't the case.
- DI The WCS provides the framework for allocating sites. National policy requires the WPA to address cumulative impact however there could be conflict with the eco-park concept (from PPSIO).
- TF There is concern locally that gradual increases at a site eventually become too much. Whilst each new issue doesn't breach acceptability on its own -together they do.
- CIlr In Bishops Cleeve it is not just a case of waste traffic but anything else that generates traffic
- CJ - extra housing creates more traffic - therefore need to look at a wider area. The impact on the community grows over time. We wouldn't put a hazardous waste site where it is now, so why not treat it as if it is new site? The whole package of impacts can provide 'stresses' to the community.
- DI 'Stress' and 'Fear' can be a material planning consideration.
EIA (at planning application stage) should cover cumulative impact.
The WCS looks at a higher level – the SA process covers this issue as well.
The March 2006 forum provided some evidence in terms of stakeholder's views of what

- constitutes cumulative impact.
- BF Perceived health impacts are important - Links to fear/perception of risk.
Not just big health issues (e.g. cancer) but smaller ailments e.g. headaches, sore throat etc.
- DI - How can we use the results of the Health Overview and Scrutiny Report?
- BF It will probably state that better communications (especially from the EA) are needed from the beginning to allow more stakeholder input – needs to be taken more seriously. It should also set out what processes must be followed when finding a site.

Environmental Acceptability (taken from RSS Policy W3)

- DI What factors comprise 'environmental acceptability' for hazardous waste sites in Gloucestershire?
Grundon's initial thoughts are that provided the activity is not polluting and in accordance with the PPC permit then by definition it's environmentally acceptable.
- BF But SWARD considers that the PPC permit is not acceptable as it allows a particular level of emissions – none should be allowed. All impacts should be 100% contained within site e.g. shouldn't have dirty hedges a mile away. These are enforcement issues.
- KP However care is required that we are dealing with issues relating to environmental acceptability in a hazardous waste context and not just general enforcement issues.
- Cllr CJ But you wouldn't put the site in this location if it were a new application.
- NC GCC raised this issue at a regional level – the RSS Policy W3 issue is that it seeks to retain existing sites 'provided they are environmentally acceptable', so it comes back to how we should measure environmental acceptability.
- KP Being located at the extreme boundary of the SW region is not helpful for the SW but is potentially for wider WM/SE regions.
- JB In terms of the issue of the technology being employed SWARD consider that it is fairly primitive at moment – the process is not good enough but realise that this is a market issue – investment in plant.
- KP The process issue is difficult as it largely goes beyond the planning authority remit. The EA need to advise the industry, maybe nationally. However, if the EA are willing to license the operation it comes down to what are the locational issues that the WPA can consider? e.g. geology.
- Cllr CJ We need to get sites away from population – potential for spillage/accidents.
- BF Those areas employing EfW should have the facilities for managing the APCs.
- KP The WCS evidence gathering doesn't stop here; please get back to us with any other ideas on these issues.

MSW Waste collection issues

- TF Is the County considering charging for waste collection etc
There are many different mechanisms for charging – clip/tag wheelie bins. However, there is a difficulty bringing together County and District collection/management methods.
- NC Commercial recycling collection sites are a positive approach - ongoing discussions, but there is a difficulty for local authority to undertake such activities due to LATS implications of additional biodegradable material and waste handling/site requirement liability.
- ALL It was felt by participants to be a constructive and useful meeting.
The WPA will type up and e-mail notes for group approval.

Appendix B: Summary of Gloucestershire Health Overview and Scrutiny Committee: Wingmoor Farm Task Group and the Primary Care Trust's (PCT) Health Impact Assessment

To be added – this report is pending, awaiting the PCT's input (18/01/08)

Appendix C: Annex E of PPS10

Locational Criteria

In testing the suitability of sites and areas against the criteria set out in paragraph 20, waste planning authorities should consider the factors listed below. They should also bear in mind the envisaged waste management facility in terms of type and scale, taking account of best available technologies (not involving excessive costs). Advice on likely impacts and the particular issues that arise with specific types and scale of waste management facilities is given in accompanying practice guidance.

a. protection of water resources

Considerations will include the proximity of vulnerable surface and groundwater. For landfill or land-raising, geological conditions and the behaviour of surface water and groundwater should be assessed both for the site under consideration and the surrounding area. The suitability of locations subject to flooding will also need particular care.

b. land instability

Locations, and/or the environs of locations, that are liable to be affected by land instability will not normally be suitable for waste management facilities.

c. visual intrusion

Considerations will include (i) the setting of the proposed location and the potential for design-led solutions to produce acceptable development; (ii) the need to protect landscapes of national importance (National Parks, Areas of Outstanding Natural Beauty and Heritage Coasts).

d. nature conservation

Considerations will include any adverse effect on a site of international importance for nature conservation (Special Protection Areas, Special Areas of Conservation and RAMSAR Sites) or a site with a nationally recognised designation (Sites of Special Scientific Interest, National Nature Reserves).

e. historic environment and built heritage

Considerations will include any adverse effect on a site of international importance (World Heritage Sites) or a site or building with a nationally recognised designation (Scheduled Monuments, Conservation Areas, Listed Buildings, Registered Historic Battlefields and Registered Parks and Gardens).

f. traffic and access

Considerations will include the suitability of the road network and the extent to which access would require reliance on local roads.

g. air emissions, including dust

Considerations will include the proximity of sensitive receptors and the extent to which adverse emissions can be controlled through the use of appropriate and well-maintained and managed equipment and vehicles.

h. odours

Considerations will include the proximity of sensitive receptors and the extent to which adverse odours can be controlled through the use of appropriate and well-maintained and managed equipment.

i. vermin and birds

Considerations will include the proximity of sensitive receptors. Some waste management facilities, especially landfills which accept putrescible waste, can attract vermin and birds. The numbers, and movements of some species of birds, may be influenced by the distribution of landfill sites.

Where birds congregate in large numbers, they may be a major nuisance to people living nearby. They can also provide a hazard to aircraft at locations close to aerodromes or low flying areas. As part of the aerodrome safeguarding procedure (ODPM Circular 1/200316) local planning authorities are required to consult aerodrome operators on proposed developments likely to attract birds. Consultation arrangements apply within safeguarded areas (which should be shown on the proposals map in the local development framework).

The primary aim is to guard against new or increased hazards caused by development. The most important types of development in this respect include facilities intended for the handling, compaction, treatment or disposal of household or commercial wastes.

j. noise and vibration

Considerations will include the proximity of sensitive receptors. The operation of large waste management facilities in particular can produce noise both inside and outside buildings. Intermittent and sustained operating noise may be a problem if not kept to acceptable levels and particularly if night-time working is involved.

k. litter

Litter can be a concern at some waste management facilities.

l. potential land use conflict

Likely proposed development in the vicinity of the location under consideration should be taken into account in considering site suitability and the envisaged waste management facility.

Appendix D: Appendix A of PPS23

The following matters (not in any order of importance) should be considered in the preparation of development plan documents and may also be material in the consideration of individual planning applications where pollution considerations arise:

- the possible impact of potentially polluting development (both direct and indirect) on land use, including effects on health, the natural environment or general amenity;
- the potential sensitivity of the area to adverse effects from pollution, in particular reflected in landscape, the quality of soil, air, and ground and surface waters, nature conservation (including Sites of Special Scientific Interest (SSSIs), National Parks, Areas of Outstanding Natural Beauty (AONBs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Wetland of International Importance (RAMSAR sites), agricultural land quality, water supply (Source Protection Zones), archaeological designations and the need to protect natural resources;
- the environmental benefits that the development might bring, such as:
 - resulting reductions in the need to travel;
 - accompanying improvements to transport infrastructure;
 - restoration of former habitats;
 - enhancement or creation of habitats; and
 - the remediation of past contamination.
- the economic and wider social need for development (including potentially polluting development) such as the provision of a product or service, the generation of secondary trade with local businesses, the creation of new jobs and meeting regional or national environmental objectives including:
 - the need to identify land, or establish criteria, for the acceptable location of potentially polluting developments and the availability of alternative sites; and
 - the need to separate necessary but potentially polluting and other land uses (recognising the potential conflict with sustainable development over mixed-use developments) so as to reduce conflicts, for example by identifying where necessary areas around existing sources of pollution (including roads) in which proposed new developments and uses should be carefully considered in terms of their potential as pollution receptors.
- the existing, and likely future, air quality in an area, including any Air Quality Management Areas (AQMAs) or other areas where air quality is likely to be poor (including the consideration of cumulative impacts of a number of smaller developments on air quality, and the impact of development proposals in rural areas with low existing levels of background air pollution). The findings of air quality reviews and assessments will be important in the consideration of local air pollution problems and the siting of certain types of development;
- the need for compliance with any statutory environmental quality standards or objectives (including the air quality objectives prescribed by the Air Quality Regulations 2000 and Amending Regulations 2002, the water quality objectives prescribed in EU legislation including the 1991 Urban Waste Water Treatment Directive and Nitrate Vulnerable Zones identified under the 1991 Nitrates Directive (see Appendix 1D of Annex 1 on Pollution Control, Air and Water Quality);
- the need to ensure that land, after development, is not capable of being determined as contaminated land under Part IIA of the EPA 1990 and that all unacceptable risks have been addressed;
- the need to limit and where possible reduce greenhouse gas emissions and take account of potential effects of climate change;
- the possible adverse impacts on water quality and the impact of any possible discharge of effluent or leachates which may pose a threat to surface or underground water resources directly or indirectly through surrounding soils;
- the need to make suitable provision for the drainage of surface water;
- the provision of sewerage and sewage treatment and the availability of existing sewage infrastructure; existing action and management plans with a bearing on environmental quality including: Air Quality Management Area Action Plans (prepared by LAs under Part IV of the Environment Act 1995), inspection strategies and programmes for contaminated land (prepared by LAs under Part IIA of the EPA 1990), River Basin Management Plans (Water Framework Directive 2000/60/EC), Catchment Abstraction Management Strategies (prepared by the Environment Agency), Catchment Flood

Management Plans (prepared by the Environment Agency), Biodiversity Action Plans (prepared by English Nature, local partnerships and the UK Biodiversity Steering Group), Noise Management

Plans and Noise Action Plans (prepared by the LA, and in London, the Mayor's London Ambient Noise Strategy), Local Agenda 21s (Sustainable Development initiatives prepared by the LA), Community Strategies (prepared by the LA under the Local Government Act 2000), State of the Environment Reports (prepared by some LAs and the Mayor of London) the possibility that (whether or not some aspects of the development are subject to pollution control), emissions of smoke, fumes, gases, dust, steam, smell, vibration or noise from the development might nevertheless be seriously detrimental to amenity in addition to constituting a statutory nuisance under Part III of the Environmental Protection Act 1990;

- the possibility that the development might present a Major Accident Hazard under the Control of Major Accident Hazard Regulations 1999;

- the objective perception of unacceptable risk to the health or safety of the public arising from the development; and

- the need to limit and, where possible, reduce the adverse impact of light pollution, e.g. on local amenity, rural tranquility and nature conservation.



Minerals & Waste Planning Policy
Environment Directorate
Gloucestershire County Council
Shire Hall
Westgate Street
Gloucester
GL1 2TH

www.gloucestershire.gov.uk