



Waste Core Strategy

Technical Paper WCS-C
Broad Locational Analysis

Living Draft

January 2008

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Summary

- S1.** This report sets out the work undertaken by the Waste Planning Authority to determine broad locations for waste management facilities in Gloucestershire. The work has been guided by national and regional planning policy (in particular draft Regional Spatial Strategy Policy W2).
- S2.** In order to meet the sequential search criteria of draft regional Policy W2, locations within urban areas should be considered first. However, there is limited opportunity for allocating brownfield or industrial type land within the four urban areas beyond that which was allocated in the Gloucestershire Waste Local Plan 2002-2012. This has led to the creation of a 16km search zone, firstly covering most of the county, and then more specifically around Cheltenham and Gloucester.
- S3.** In trying to identify areas suitable for the location of waste management facilities, the Waste Planning Authority has undertaken a broad consideration of environmentally sensitive assets (e.g. avoiding flood plain and national landscape designations). This has resulted in particular areas being potentially removed from the search, which narrows the area under consideration to a central part of the County encompassing the two main urban areas of Cheltenham and Gloucester. It is referred to in this document as Zone C and runs north-south between Tewkesbury and Stroud along the M5 corridor.
- S4.** This zone can then be further sub-divided into five parts (labelled C1 – C5)

representing search options that are 'on the edge of' and 'in close proximity to' the main urban areas. This has led to the Waste Planning Authority preparing four potentially deliverable options in terms of broad locational search areas:

Option A

A broad search area based on the full 16km Regional Policy W2 (using the search criteria outlined for Options B, C & D). Under this approach, strategic sites that are remote from arisings could be appropriate if they are able to demonstrate sustainable transport linkages.

Option B

Use urban locations and the area labelled Zone C as the broad locational area in which strategic waste management facilities should be sited.

Option C

Use urban locations and areas labelled C2, C3 and C4 as the broad locational area in which strategic waste management facilities should be sited.

Option D

Use area C4 as the broad locational area for strategic waste management facilities. If land is not forthcoming then the fall-back position is to search in areas C2 and C3 and then the wider Zone C.

- S5.** Within these zones national and regional search criteria focus on industrial areas (areas either allocated in development plans, or with permission for B2 general industrial uses) and previously developed land. Draft Regional Policy W2 additionally encourages waste planning authorities to consider mineral extraction sites and landfill sites. This ties in with the national waste policy objective of co-locating complementary activities. Gloucestershire stakeholders have provided additional locational criteria that could also be used.

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Section 1

Introduction

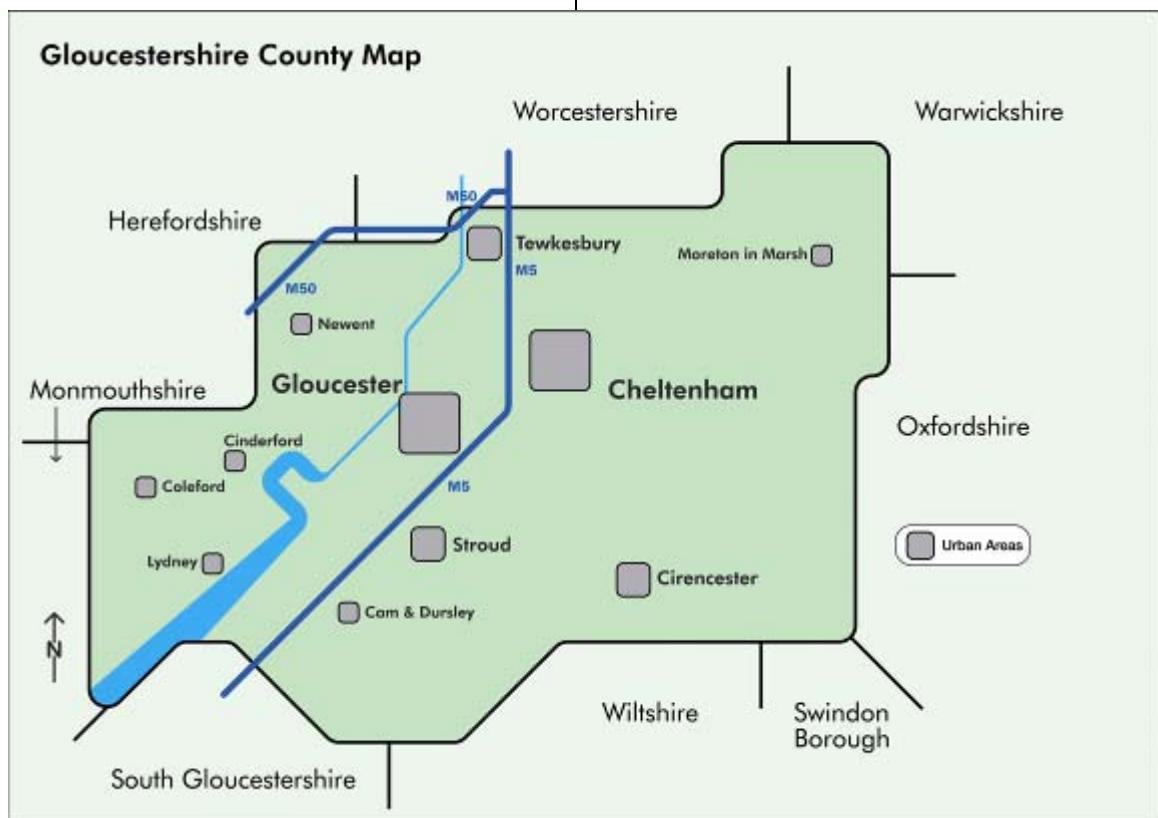
1. This report details the work undertaken by the Waste Planning Authority (WPA) to determine broad locations for waste management facilities in Gloucestershire. Figure 1 (below) indicates the area within the County Council's responsibility.
2. It is the role of WPAs to set out in Development Plan Documents (DPDs) policies and sites suitable for new or enhanced waste management facilities for the waste management needs of their areas.

Figure 1

3. In order to undertake this effectively a broad locational strategy needs to be prepared. This will be set out in the Waste Core Strategy (WCS). Once adopted, this will provide the framework for identifying specific sites in the Waste Site Allocations DPD.

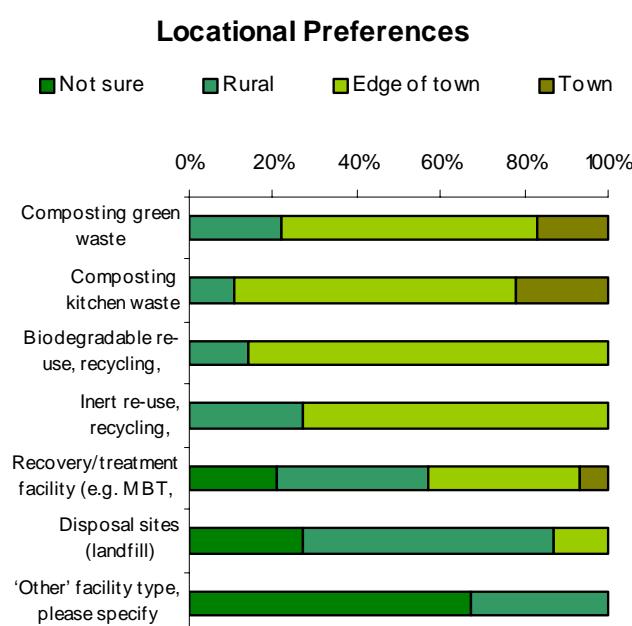
Evidence Gathering

4. Substantial work in respect of locational analysis has been carried out by the County Council, through its waste planning and waste management functions.



Issues and Options Consultation

5. An Issues and Options consultation was carried out in 2006 to gather information as to stakeholders' views on locational issues. Key issues that arose are summarised in the graph below.



6. The following types of facilities were considered by stakeholders to be most appropriately situated on 'edge of town' locations:

- Composting green / kitchen waste;
- Biodegradable reuse, recycling, transfer/bulking up;
- Inert reuse, recycling, transfer/bulking up;

7. The preferred siting for a recovery/treatment facility was split between the edge of town and rural locations.

8. A majority of respondents indicated that it is preferable to locate disposal sites in rural areas.

9. The following operations were preferred in dispersed locations i.e. local facilities in each district:

- Composting green / kitchen waste;
- Biodegradable re-use, recycling transfer/bulking-up;
- Inert re-use, recycling, transfer/bulking-up.

10. Recovery/treatment facilities should preferably be sited on centralised facilities near the strategic city and town of Gloucester and Cheltenham.

11. No clear preference was evident for waste disposal sites. An equal number of respondents preferred either dispersed facilities or a combination of both centralised and dispersed.

Stakeholder Forum Events

12. Two public forum events have been held by the Waste Planning Authority to provide stakeholder input into locational issues. The first was held in March 2006 (jointly with the Waste Disposal Authority) and was used to shape the Issues & Options paper. The second was held in October 2007 and provided input into the Preferred Options document.

13. A priority of locational issues for siting future waste facilities was generated through the first stakeholder forum. These were:

- Good transport access, particularly by sustainable modes;
- Generally in close proximity to waste arisings;
- Locational criteria should be applied differently according to the size and type of facility;

Environmental impacts were considered to be very important, including: pollution control and the potential impacts of sites on human health.

14. To respond to these views the consultants that independently facilitated the event (March 2006) recommended that the following criteria receive the highest weighting in evaluating potential facility sites:

- Proximity to waste arisings
- Proximity to good road transport connections
- Proximity to sustainable transport modes
- Remoteness from residential areas
- Potential for reducing environmental pollution and human health risk

The consultants also recommended that consideration should be given to applying criteria differently according to the size and type of facility.

15. The detailed outcomes of the March 2006 forum are set out in the Entec report (26th May 2006).

16. The second forum event (October 2007) built on these issues by asking stakeholders to consider them in relation to their impact on matters that are of particular importance in Gloucestershire: namely the floodplain, national landscape designations and green belt land. The consultant's conclusions from this event are set out in summary below.

17. There was common consensus that the floodplain, as a location for waste management facilities, would not be acceptable. Although a small number of stakeholders felt that if there was no other option, this may be acceptable. In terms of local facilities in the floodplain, these were viewed as slightly more acceptable if appropriate risk assessment and mitigation took place, although many of the stakeholders were still of the opinion that they would not be acceptable.

18. Stakeholders generally did not feel that strategic facilities would be appropriate in Areas of Outstanding Natural Beauty (AONB), although some felt that an exception could be made if the buildings were of agricultural scale and designed to the highest standards with use of good quality materials. Although some stakeholders felt that this also applied to local facilities, it was generally felt that local facilities would be more appropriate than strategic facilities in AONBs provided that impacts were mitigated.

19. Stakeholders appeared to be more accepting of waste management development in the green belt. Again, strategic facilities were viewed as less appropriate, but were generally not ruled out by stakeholders. A key finding of the

Forum is that the green belt should not be seen as generating a fundamental objection to the development of waste facilities.

20. In terms of locational criteria, the majority of stakeholders felt that the top three positive criteria for siting of waste facilities were: proximity to the primary road network; siting waste management facilities close to the source of waste arisings; and siting waste management facilities alongside complementary existing uses.
21. The negative criteria that the highest number of stakeholders felt were top three priorities were avoiding proximity to sensitive land uses, potential pollution control difficulties and potential impact on the floodplain. Few stakeholders considered nature conservation, cultural heritage and landscape as top priority criteria. Although landscape was not seen as a key constraint by stakeholders this is potentially at odds with the view held of the AONB (above).
22. Additionally, stakeholders also considered a number of other issues to be important for finding sites to manage waste:
 - Using brownfield/derelict land
 - Allowing use of sustainable modes of transport (e.g. rail or water rather than road)
 - Protecting nature conservation and built heritage sites
 - Recognising that different technologies will affect site suitability
 - Supporting innovative technologies
 - Potential for community benefits derived from waste facilities (e.g. energy generation)

23. One group of stakeholders noted that it is difficult to distinguish between environmental criteria as they are all essential and should be taken into consideration before any other criteria are contemplated.

24. The detailed outcomes of the October 2007 forum are set out in the Land Use Consultant's report (November 2007).

Great Gloucestershire Debate

25. The Great Gloucestershire Debate was a wide ranging public discussion about all things waste related. It ran for around three months during 2006/07 and was facilitated by local media (newspapers, radio, television etc.). Participants brought forward their thoughts and concerns in respect of the locational priorities for new waste management facilities:

- preventing environmental pollution,
- safeguarding nature conservation interests,
- avoiding greenfield land, and
- good highway access.

Partnership Working

26. The WPA has undertaken, and continues to undertake, meetings and discussions with a range of stakeholders concerning locational issues. It should be noted that at the time of many of the meetings the WLP site allocations were still 'saved', and therefore discussions progressed on this basis.

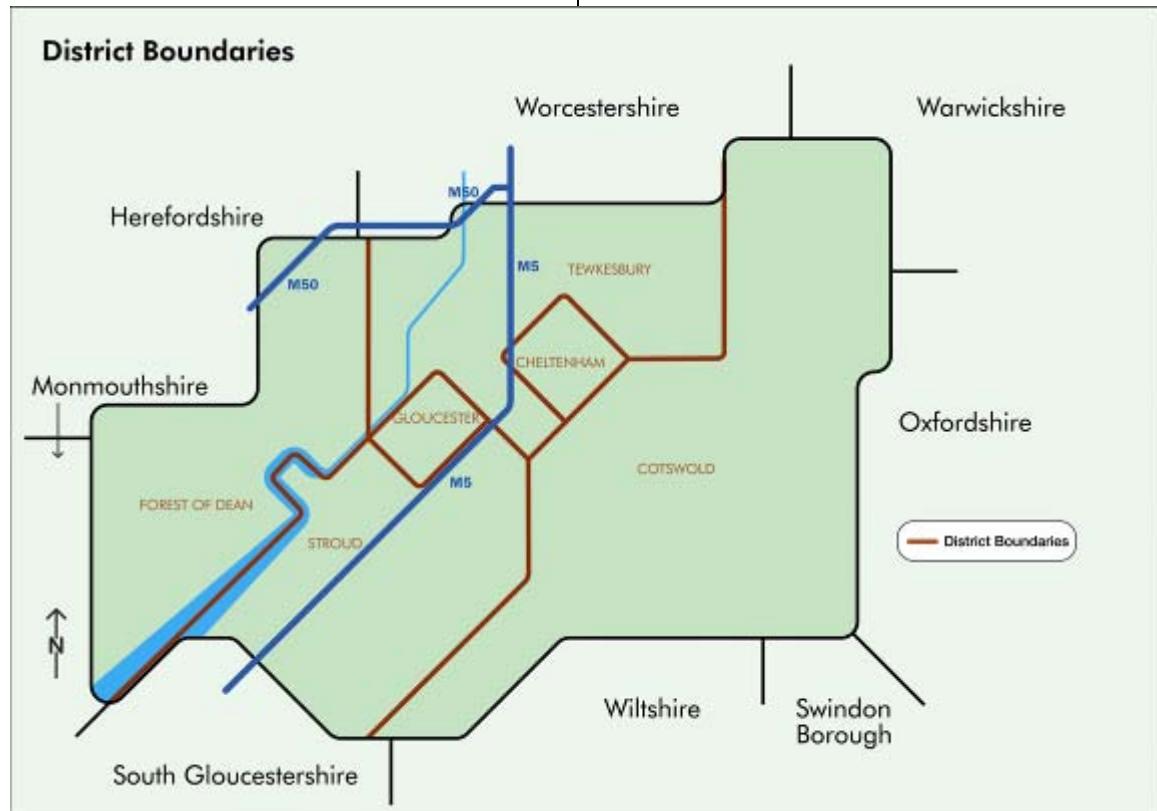
27. A summary of the key outcomes from meetings with each of the six districts (their administrative areas are shown in Figure 2) is set out in Appendix D.

Discussions with Waste Operators

28. The Waste Planning Authority have also held discussions with the main waste operators in the County. This either took the form of group seminar/workshop or individual discussions. The key locational issues that emerged from these meetings were:

- Situation complicated by high land values
 - not sustainable – have to look to agricultural land. Therefore just identify the strategic sites, otherwise a criteria based approach is more pragmatic. A problem that the waste industry has is that landowners do not want to know about waste. And general industrial estates do not want to know – do not want to accommodate waste uses.
- The NIMBY problem is strong in the County. Also designations such as green belt and AONB make it difficult to get waste facilities on the ground. There needs to be a better balance and an understanding of the commercial needs and constraints of operators.

Figure 2



- County Highways don't recognise that Gloucestershire is a predominantly rural County with a rural road network and they shouldn't always be objecting to proposals on highways grounds.
- Potential for expanding existing waste operations to form cluster of related activities along the lines of an eco recovery park.
- 'Y-Waste' introduced into County - taking commercial and business waste. Funding for the scheme is through Stroud District Council. Looking at Cotswold District as well. The scheme operates a bag / bin exchange system. The bags are pre-bought (the price included the whole collection / management / disposal costs) Bags contain mixed recyclables (paper, cans, card, plastic bottles etc) bins contain non-recyclable waste. Everything comes back to central site for processing. The residual goes to Wingmoor Farm landfill.
- There is potential to open a business / commercial focused CA site, but there are issues with this e.g. with people needing waste carriers licenses etc. The 'Y-Waste' scheme is proving to be very effective with good take up.
- Problems with end markets for certain recyclables e.g. cardboard goes to China and some plastics go to Kent but not that commercially viable at the moment. [Prices for plastics have dropped from £120 per tonne to about £5 -10 pounds].
- Markets for recyclables include: Steel - South Wales; Alluminium – Banbury; Plastic - Stratford on Avon [for pipe manufacture]; Paper - China, Holland or UK [market led, the process in Holland is

a secondary industry to turn paper into more 'pure' fractions]; Glass - Brentford / Bristol [to create light weight aggregate]; Heavy materials such as recycled glass go to docks at Bristol / Avonmouth & Liverpool.

- The County needs to work on the creation of markets e.g. for plastics – sub regional 8000 – 9000 tonnes is required to be viable. [HDP – milk bottles] [PET - coke bottles] – international markets currently exist for both.
- Wood recycling – taking scrap back to the mills to be made into chipboard etc. The problem has been that the mills created too big a demand and now no longer need the volume of scrap wood.
- Generally there is a problem with a lack of waste facilities in the County. Materials are being transported too far and in terms of the economics of recycling – this does not add up. More sites are needed for gasification – that is the way forward for waste management. A criteria based approach rather than a site based approach is what is needed. The current system where proposals on sites are compared again sites in the plan is not effective.
- Licensed sites don't want soils – they are protecting them for household waste. If the landfills in Gloucestershire took more soils they would be filled in 2 years. Void space at Hempsted is being conserved and diverting non-local authority waste to the Wingmoor Farm landfill site. May need transfer facilities in Gloucester if Hempsted closes. The County needs to make provision for additional landfill

capacity. Basically landfill sites are driven by geological considerations – i.e. clay.

- There should be a lot more small exempt landfill sites. There are enough sand & gravel pits in the Cotswold Water Park – other mineral sites which come forward should be restored to level. There have been questions / issues in the past about there not being enough inert material, but the material is currently available. The CWP reaching a saturation point with these holiday homes therefore scope for alternative uses such as inert landfill. Mineral restoration – the need for large void spaces. These are present but not well located to main waste arising. Transport is currently not the most sustainable option. A small-scale dispersed pattern is also suggested.
- Sharpness has good transport links from Gloucester via canal and railway using Netheridge as a transfer area. Canal was relocated due to the new bypass and there is no potential for access via new bypass and access must be via Bristol Road.
- A combined approach to site identification - sites in plans but a criteria policy against which other sites can be judge against – this will provide appropriate flexibility. Small sites should be decided from criteria based approach to avoid additional hurdles for the smaller operators.
- C&D operators are looking for sites to dispose of thousands of tonnes. They have been quite restricted by the approach in the Waste Local Plan and by the EA, and added to this people don't want waste operations next to them.

- C&D operators have nowhere to go because areas are being regenerated for 'pretty' development.

Section 2 Policy Context

29. This section sets out the national, regional and local planning policies that relate to locational aspects of waste management.

National Waste Policy

National Waste Strategy

30. The National Waste Strategy for England 2007 sets out the current national strategy for managing waste. It requires waste management to be moved up the waste hierarchy (see Diagram 1, *below*).

Diagram 1 – The Waste Hierarchy



31. Implementing the waste hierarchy requires reducing the amount of waste we produce as a priority, and then making the best use of waste through re-use, recycling/composting, then deriving (recovering) value from the waste through energy recovery, with disposal as the last option.

PPS10

32. National planning policy for the management of waste is contained in Planning Policy Statement 10 'Planning for Sustainable Waste Management' (PPS 10) (July 2005). This document is supported by the 'PPS10 Companion Guide' (June 2006).

33. PPS10, requires regional and local waste planning authorities to prepare planning strategies that deliver sustainable waste management by:

- Driving waste management up the waste hierarchy
- Considering waste as a resource
- Providing for waste disposal (though to be used only as a last resort)
- Ensuring that communities take responsibility for their own waste
- Enabling timely and sufficient provision of facilities
- Implementing European, national, regional and local targets
- Recovering value from waste without harm to the environment or endangering human health
- Enabling waste to be disposed of in one of the nearest appropriate installations
- Reflecting the concerns and interests of communities, the waste collection and disposal authorities, and businesses (including encouraging competitiveness)

- Protecting green belts, whilst recognising particular locational requirements of some types of waste management facilities
- Ensuring that the design and layout of facilities supports sustainable waste management

34. In terms of the WCS, waste planning authorities are required to identify areas suitable for new or enhanced facilities for managing the waste needs of their areas. Waste planning authorities should in particular:

- Allocate sites to support the pattern of waste management facilities set out in the Regional Spatial Strategy (RSS) in accordance with the broad locations identified in the RSS; and
- Allocate sites and areas suitable for new or enhanced waste management facilities to support the apportionment set out in the RSS.

35. In searching for areas suitable for new or 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 and with complementary activities (reflecting the concept of resource recovery parks)

36. In deciding which areas to identify for waste management facilities, waste planning authorities should assess their suitability for development against each of the following criteria:

- The extent to which they support the policies in PPS10;
- The **physical and environmental constraints** on development, including existing and proposed neighbouring land uses (see Annex E);
- 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. The WPA has prepared a separate evidence paper (WCS-L 'Cumulative Impact'), which covers this issue in detail.
- The capacity of existing and potential **transport infrastructure** to support the sustainable movement of waste, and products arising from resource recovery, seeking when practicable and beneficial to use modes other than road transport. The WPA has prepared a separate evidence paper (WCS-MCS-1 'Transport'), which covers this issue in detail.

37. Waste planning authorities should also give priority to the re-use of previously-developed land, and redundant agricultural and forestry buildings and their curtilages.

38. The PPS10 Companion Guide (paragraphs 7.29-7.38) provides further advice on how to implement these requirements. It also provides three summary bullet points (page 80), which state that:

- The core strategy should set out policies and proposals for waste management in line with RSS, ensuring sufficient

opportunities for waste management provision in appropriate locations.

- The core strategy should not reopen consideration of either the principles set out in RSS or the annual rates of waste to be managed.
- Land allocations will not be made through the core strategy, but it should provide sufficient spatial guidance so as to ensure there will be sufficient and suitable land allocations to support the waste strategy set out in RSS and its own policies for waste management³.

39. This last issue, regarding how site-specific a waste core strategy should be, has been subject of much discussion between Central Government, Regional Government Offices, Waste Planning Authorities and the Planning Inspectorate (PINS). The latter have prepared a note on 'Local Development Frameworks: Lessons Learnt Examining Development Plan Documents' (June 2007), which puts forward PINS' stance.

40. An annex to the PINS Report provides a note specific to waste core strategies. It states that *"to ensure sufficient opportunities for the provision of waste management facilities in appropriate locations, the core strategy should set out how sites and areas suitable for new or enhanced waste management facilities will be identified, including the criteria that will guide actual allocations and the*

broad locations where these will be sought."

41. Importantly, this statement clearly requires waste planning authorities to use criteria to set out 'how' provision will be made in subsequent site specific DPDs that 'nest' in the core strategy. It does not state that sites should be identified. Indeed it requires 'broad locations' to be shown (this is clearly not a site specific reference⁴). However, the next paragraph of this guidance note appears to contradict this statement by noting that *"the clarity of this framework can be improved by allocating strategic sites and areas critical to the delivery of the strategy's vision including sites to support the pattern of waste management facilities set out in RSS in accordance with the broad locations identified in the RSS."*

42. PINS has therefore embellished the PPS10 guidance by stating how to improve the clarity of the framework for identifying sites. This clarity, it notes, would be improved by identifying the sites themselves. This PINS annex cross-references this to PPS10 (paras 11 and 12) and PPS11 (para 1.17), both of which relate to regional policy rather than locally prepared waste core strategies.

43. The Planning White Paper (May 2007) also makes it clear that it is acceptable for core strategies to include strategic sites, and that this can reduce the need in some cases to produce further more detailed planning documents.

³ The Government Office for the South West have advised that this policy is in the process of formally being amended to make it explicit that strategic sites can be allocated within core strategies.

⁴ PPS11 Paragraph 1.17 states: *"By 'broad location' is meant the area of search suitable for the development in question, consistent with criteria set out in the RSS, within which a number of suitable sites may exist. Broad locations may include town or city centres."*

44. The marriage of strategy with specific sites is one that the WPA initially proposed, but was warned against by GOSW. Their response (25th Feb 2005) to the WPA's development scheme noted that "*All the overarching strategic matters for... waste can be in a single core strategy... the... Waste Site Allocations DPD you have timetabled later on in the development scheme appropriately deals with the site specific aspects of the strategy and we are content with it.*" Consequently the WPA had not timetabled site-specific work at this time. This stance was re-affirmed at a meeting between the WPA and GOSW on 17th November 2006 and through approval of the revised (third) M&WDS (March 2007). During a further meeting with GOSW representatives (6th July 2007) it was noted that work the WPA are doing in respect of identifying broad locations was an appropriate way forward.

45. Since this approach was agreed the Secretary of State has issued a Direction (dated 5th October 2007), which, whilst saving a number of WLP policies, crucially does not save the site allocations. The reason for this being that they were linked to a policy in the WLP that referenced Best Practical Environmental Option (BPEO – a process no longer required by PPS10), and that by default they were no longer compliant with current government guidance. The site allocations have therefore lost their development plan status on a technical matter rather than as an issue of merit.

46. This has serious implications for the most appropriate way forward for the WCS. In particular in respect of the 'vacuum' of

waste site allocations that will now exist until the Site Allocations DPD is adopted in 2012 (as per the approved M&WDS). This potentially has significant implications for managing waste development through the planning application determination process and in particular for the development of a facility (or facilities) to meet Landfill Allowance Trading Scheme (LATS) targets.

47. In seeking to clarify the most appropriate way forward, the WPA and GOSW have held a number of meetings during October/November 2007, including exchanges of written correspondence at senior officer and Ministerial levels. The outcome of these discussions are now that the Government Office view is that the WCS needs to contain a specific site allocation to address the issue of pre-treating municipal solid waste to meet landfill allowance targets (under the LATS).

48. The GOSW view is that where the County Council is certain that a particular site will be used for meeting LATS targets that that site should be identified in the WCS. This position was reiterated in a letter (dated 23rd November 2007) where the GOSW felt that this situation provides the WPA with an opportunity to engage the community and stakeholders on the status and future role of 'preferred sites' (which presumably refers to the allocations in the WLP). GOSW encourage the WPA to "consult on specific proposals where possible".

49. As set out in the discussion above, the WPA has progressed the WCS on the basis of currently adopted national guidance in PPS10 and PPS12 (rather than the more recent ideas contained in the Planning White Paper). The County Council has

allocated its resources to progress on this basis.

50. There are a number of ways that such an approach could be pursued. However each way has both advantages and disadvantages at this point in time. The options and their implications are outlined in Appendix C. It should be noted that this list is not exhaustive and other approaches may emerge as time progresses.
51. Following careful consideration by the WPA, in particular taking account of the position of the WDA residual procurement strategy at this point in time, it is not possible to include a site (or sites) in the WCS preferred options consultation to meet Regulation 26 milestone of January 2008. Subsequently the WPA will consider carefully responses that are made in respect of this issue.
52. If a site (or sites) need to be included within the WCS the WPA view is that this would require additional consultation line with Regulation 26. At this stage it is uncertain as to when the WPA/WDA would have the confidence that sites being proposed were the best available and deliverable. This would have a subsequent impact on the timetable and milestones for WCS preparation and adoption.
53. Without prejudice to the responses to the preferred options consultation the WPA would foresee that any formal sites are identified in a Site Allocations DPD for which the preparation could be brought forward, resources permitting (See Appendix C Option 4). The WPA will take a formal view on this matter following

consideration of response to consultation on the preferred options (January 2008).

PPS22

54. Planning Policy Statement 22 'Renewable Energy' (PPS22) and its companion guide notes that local planning authorities should encourage the installation of renewable energy schemes in urban areas, but should be realistic in their expectations. However, it goes on to state that the nature of waste treatment technologies means that they are not generally well suited to integration in urban environments. (PPS22 companion guide, para 6.16). This statement on location needs to be viewed in the context of the South West Regional Policy W2 set out below.
55. There are a number of practical considerations limiting the suitability of various renewable technologies for urban settings. Among these may be issues of noise, odour, traffic or visual impacts (PPS22 companion guide, para 6.21). Issues in respect of whether waste facilities were enclosed or outdoor, strategic or local were considered by stakeholders at the October 2007 waste forum (please see the Land Use Consultants report of the event as referred to in section 1 above). More information in respect of the planning requirements for different types of waste management technologies is set out in Technical Evidence Paper WCS-G 'Waste Facility Types'.

Regional Waste Policy

Regional Planning Guidance Note 10

56. Regional Planning Guidance Note 10 (RPG10) (September 2001) forms the

interim RSS until the emerging RSS itself is adopted. It included the Government targets and policies for waste management at that time and advocated policies to reduce the amount of waste generated and to increase waste recovery (including recycling, composting and energy recovery).

57. The weight given to RPG10 in the preparation of the WCS is low because:

- The RPG10 was only seen as forming interim waste management guidance at the time (RPG10 paragraph 9.26);
- A key area of RPG10 identified that the South West Regional Planning Body (RPB) should as soon as possible prepare a Regional Waste Management Strategy (RWS) in which proposals for facilities and waste management practices to meet the national waste strategy could be met (RPG 10 paragraph 9.31);
- RPG10 identified that the setting of sub-regional waste management or capacity targets should be identified and incorporated as soon as possible into a review of RPG10 (RPG10 paragraphs 9.24 and 9.31);
- ‘From Rubbish to Resource’ – the Regional Waste Strategy for the South West 2004-2020 (RWS) has since been prepared and approved by the RPB in October 2004;
- The draft RSS for the South West 2006-2026 was submitted to the Secretary of State in April 2006 and the main sub regional capacity targets from the RWS are identified within it (RSS Section 7.4 and Appendix 2). The guidance in RPG 10 has effectively been replaced by the

draft RSS and the RWS which are, accordingly, of principal relevance as up-to-date regional planning policy;

- Reviews to national guidance have also overtaken RPG10 including the publication of PPS10 in July 2005.
- 58. PPS10 requires regional planning bodies, and in turn Waste Planning Authorities (WPAs) (potentially as sub-regions as in the case of Gloucestershire), to develop a realistic approach to future waste management.

The Regional Spatial Strategy

59. The South West Regional Spatial Strategy (RSS) is prepared by the South West Regional Planning Body. It sets out an ‘apportionment’ of waste for each County (see Policy W1) and forms part of the development plan for Gloucestershire.

RSS Policy W1 Provision of Waste Sites

Waste Planning Authorities will make provision in their Waste Development

Frameworks for a network of strategic and local waste collection, transfer, treatment (including recycling) and disposal sites to provide the capacity to meet the indicative allocations for their area shown in Appendix 2, for 2010, 2013 and 2020.

60. The RSS (paragraph 7.4.6) states, “*it is important that proper account is taken of the need for appropriate waste facilities to service places where major development is taking place following the proximity principle in order to reduce emissions from transport.*” It should be noted however that PPS10 does not contain reference to the proximity principle.

61. The RSS is also required to identify the pattern of waste management facilities required across the region to deal with this waste, including the broad locations for facilities. Accordingly, it goes on to state, in respect of the spatial distribution of facilities, that, *“the provision of waste facilities should generally avoid protected landscapes such as National Parks and Areas of Outstanding Natural Beauty, and would generally be inappropriate in statutory green belts. Some proposals to meet local needs may be appropriate, such as providing small scale recycling centres or on-farm composting facilities. Enhancement of environmental assets should be considered within proposals, including provision for appropriate restoration after-use with good design to mitigate visual and other environmental impacts of both built facilities and landfill sites.”*

62. For Gloucestershire the allocations referred to in Policy W1 are set out in Table 1 (below). The RSS requires that Waste Development Frameworks should include allocated sites or preferred areas for new waste management facilities, sufficient to accommodate these indicative capacity allocations. Advice from the Government Office for the South West⁵ is that specific sites should NOT be allocated in the WCS but that broad locations should be indicated.

Table 1: Draft RSS - Gloucestershire Waste Facilities Allocations
(All figures are 000's tones)

MSW	2010	2013	2020
Min source separated	130	150	170
Max secondary treatment	80	120	200
Max landfill	160	130	60
C&I	2010	2013	2020
Recycling / re-use	260-280	270-300	300-320
Recovery	150-180	170-190	260-290
Landfilled	285-315	240-260	110-120
C&D*	2010	2013	2020
Treatment	70	70	70
Transfer	110	110	110
Landfill	210	210	210

*this waste stream has been omitted from RSS Appendix 2, but is set out in the Regional Waste Management Strategy (2004).

63. Draft RSS Policy W2 is set out below:

RSS Policy W2 Waste Facilities and the Waste Hierarchy

Provision of waste facilities will take account of the following waste hierarchy:

- *Waste should be managed on the site where it arises, wherever possible (waste minimisation), and*
- *Waste that is not managed at its point of arising should be managed according to the proximity principle*

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, and*
- *Other previously developed land, including use of mineral extraction and landfill sites during their*

⁵ As stated at a meeting on 17th November 2006

period of operation for the location of related waste treatment activities

For SSCTs and other named settlements in Section 4, the location of new waste management or disposal facilities should accord with the following sequential approach:

- *Within*

- *On the edge of, and/or*

- *In close proximity to (ie within 16km) of the urban area primarily served by the facility*

For rural areas and smaller towns there should be provision of:

- *A network of local waste management facilities concentrated at, or close to, centres of population identified through Development Policy B, and/or*
- *An accessible network of strategic waste facilities*

Major sources of waste arising in rural areas will be treated locally, unless specialised facilities are required.

64. RSS draft Policy W2 provides some guiding criteria as to the **types** of land that may be suitable for waste facilities i.e. industrial sites, existing waste facilities and previously developed land. It also introduces a hierarchy of **proximity** locations that waste planning authorities should use in searching for suitable locations for waste facilities. The starting point is to look within strategically significant cities and towns (SSCT) and 'named settlements'. The two SSCTs are:

- Gloucester
- Cheltenham

The 'other named settlements' are:

- Stroud

- Tewkesbury
- Coleford
- Lydney
- Cinderford
- Cirencester⁶

65. The next preference in Policy W2 is a search area on the edge of these SSCTs/settlements – though it is unclear to what extent – and then beyond this a 16km area of search around SSCTs and 'named settlements' is required.

Local Policy

66. The local (county-wide) policies for assessing the appropriateness of waste management facilities is set out in Gloucestershire's Waste Local Plan (WLP), as amended by Secretary of State (SoS) Direction (5th October 2007).

67. The Gloucestershire WLP was a site specific document. It contained 29 allocated sites and areas of search (shown on 21 inset maps) and formed the basis for work undertaken by the WDA in seeking suitable sites for managing municipal waste. These are discussed in more detail in Section 3 of this Technical Evidence Paper.

68. Additionally, the WLP (para 4.13) encouraged additional waste management proposals on sites in locations that are on designated industrial land (employment), derelict despoiled and brownfield land,

⁶ Cirencester is named in paragraphs 4.1.3 & 4.2.32 and Policy J, whereas the others are all named in either paragraph 4.2.44 or Policy SR14

former or existing mineral workings and waste management facilities, existing or redundant buildings, suitable sites located to rail or water transport. District local plan employment land allocations therefore potentially comprise important allocations in respect of waste provision (as referred to in PPS10 companion guide paragraphs 7.3-7.5, 7.19 and 7.29-7.33).

69. The effect of the SoS Direction (5th October 2007) is to remove the site allocations from the development plan. However, it should be noted that this Direction is inconsistent with an earlier Direction (dated September 2007) in respect of Gloucestershire Structure Plan policies referring to the BPEO⁷ process. The former direction saves the Structure Plan Second Review Policy WM1, which is explicitly based on the principle of BPEO, yet the second Direction states that policies which refer to BPEO have been superseded by PPS10 and should therefore not be extended. Interestingly in this respect, South Gloucestershire have been Directed to save a policy (Policy 42) in their Minerals & Waste Local Plan which refers to BPEO. There is clearly an inconsistency between these Directions.

70. The Gloucestershire Direction is also inconsistent with the government's own advice on the criteria for saving policies (the protocol for which stated, "*the government will have particular regard to policies for waste management, including unimplemented site allocations.*"), the strategy of the WLP was based on a fundamental objective of PPS10, which is to deliver sustainable development through

driving waste management up the waste hierarchy (see Diagram 1, above), addressing waste as a resource and looking at disposal as a last option.

71. This matter is further confused by the Kent County Council situation in which their Direction saves three policies relating to waste site allocations, which, as their WLP was adopted in March 1998, pre-dates PPG10 (the government policy document which introduced BPEO). Kent's sites have therefore been saved due to them being adopted six years before those in Gloucestershire. Cursory scanning of other Directions across the country indicates that there are other inconsistent Directions (for example three policies in the Staffordshire WLP relate to the BPEO).

72. The saved WLP policies provide only detailed DC criteria for specific applications and do not provide proactive strategic guidance as desired by PPS10 and PPS12. However, whilst Gloucestershire was previously in the fortunate position of having recently adopted its WLP (October 2004), and therefore had a locally derived statutory basis on which to develop the WCS, the lack of waste site allocations caused by the Direction potentially causes difficulties for all parties concerned in terms of how to appropriately determine waste planning applications until such time as alternative site allocations are adopted.

73. The WPA has naturally raised their concerns with both GOSW and DCLG, but in each case Central Government have backed themselves over the reasons behind the Direction and now urge the County Council to effectively compensate for the outcome of the Direction by inclusion

⁷ BPEO – best practicable environmental option

of a site (or sites) to meet residual treatment of MSW within the WCS (see previous discussion in paragraphs above).

74. The WPA has also sought legal advice on this matter and the status of 'unsaved' policies, proposals and site allocations in that they are a material consideration in the absence of more up-to-date parts of the development plan being in place. The County Council is still considering its position in this respect and a position statement may be forthcoming in the near future.

Joint Municipal Waste Management Strategy

75. The County Council, as part of its waste disposal authority (WDA) function is required to prepare a municipal waste management strategy. This document will set out how householder waste is to be managed over the next 20 years. The County Council is preparing this document in partnership with the six district councils, who together are called the Gloucestershire Waste Partnership (GWP). The document is titled the Joint Municipal Waste Management Strategy (JMWMS).

76. The overarching approach of the JMWMS is contained in a 'front-end' document, which addresses the issues waste minimisation, recycling and composting. The strategy for residual waste management (energy recovery and final disposal) is set out in a Residual Waste Strategy document being prepared by the WDA.

77. In October 2007, Cabinet approved Gloucestershire's Joint Municipal Waste Management Strategy (JMWMS). This includes the aim to push recycling and

composting of household waste to 60% by 2020 (10% higher than the national target). This will result in the need to deal with approximately 150,000 tonnes of residual waste per year. (However, in the worse case scenario, the County Council would need to manage up to 270,000 tonnes per annum of residual waste by 2020).

78. Residual waste is currently landfilled and continuing to do so is not environmentally or financially sustainable. Landfill space is running out and the landfill tax escalator and fines for landfilling more biodegradable waste than allowed means the County Council faces huge financial risks. Landfill tax is currently £24 per tonne and increasing at a rate of £8 each year (£48 per tonne is expected by 2010). Gloucestershire currently landfills about 200,000 tonnes of household waste every year, resulting in a landfill tax bill of £1.6 million next financial year (2007/08). Landfill allowances, allocated to the County Council under the Landfill Allowance Trading Scheme ("LATS"), are now trading at about £40 per tonne, but in the coming years are likely to soar above £100 per tonne.

79. Doing nothing is not an option and alternative solutions are required. Recognising this, Gloucestershire's Cabinet (on the 10th October 2007) approved five short listed residual waste management options as the best for Gloucestershire at the present time:

- Mechanical biological treatment with residues to landfill;
- Mechanical biological treatment with residues to combined heat and power facility;

- Autoclaving technology with residues to combined heat and power facility;
- Combined heat and power facility (Modern Thermal Treatment (MTT)); and
- Advanced thermal treatment (gasification, pyrolysis).

80. These options were to be taken forward for further detailed lifecycle cost modelling which will become part of a detailed Business Case. The objective of the Residual Waste Procurement Plan is to procure a long term residual waste solution to flexibly manage Gloucestershire's residual municipal waste up to 2040. The procurement is expected to commence in 2008. The exact commencement date will depend on which funding route represents most value for money.

81. The County and District Councils plan to minimise waste arisings, and improve source-segregation of waste at the kerbside to increase recycling and composting to 60% by 2020. However, modelling has determined that there will still be a LATS deficit in 2009/10 and thereafter until the successful commissioning of Gloucestershire's long term residual waste solution. The facility might not be operational until April 2015, causing over a 5 year period of LATS exposure.

82. The County Council has and may continue to purchase LATS permits to avoid penalties all the time they are available to buy. However, there may be other opportunities from landfill diversion including sending waste to existing facilities, procuring an interim technology and working with existing partners on innovative solutions. These options are currently being evaluated.

83. An integral part of the Residual Procurement Plan is the acquisition of a suitable site for waste management purposes to reduce deliverability and procurement risks. Following Cabinet approval in July 2007, negotiations continue to purchase 12 acres of land at Javelin Park (near M5 Junction 12) whilst exploring other potential sites. A firm decision on which site (or sites) may be taken forward to meet residual waste management requirements will not be made until mid 2008.

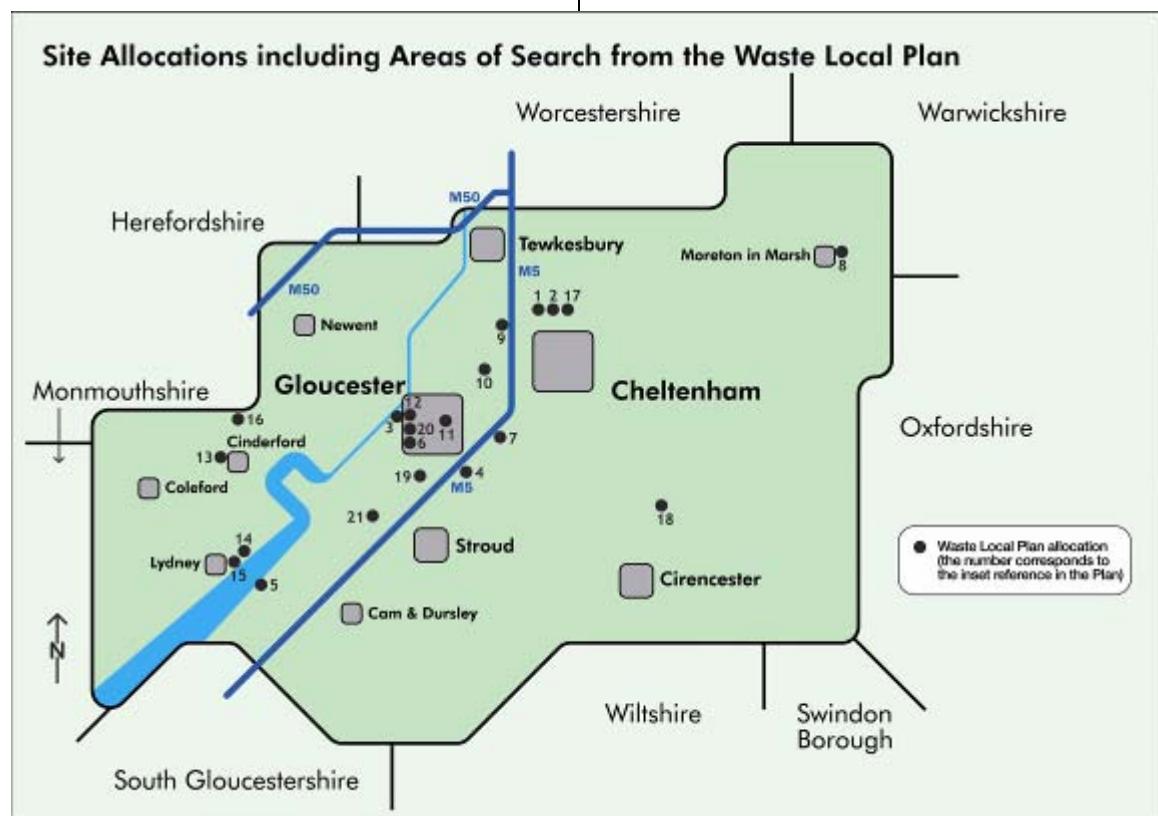
84. It is important to align stakeholders' objectives and contributions with those of the project. In order to effectively engage with key stakeholders, the County Council has developed a Communications and Engagement Strategy. The Strategy recognises that informing and getting the support of community and stakeholders for the County Council is vital to achieving the delivery of a residual waste solution for the County. Part of this work will involve setting up a stakeholder group to discuss the long term residual waste procurement project as part of a structured engagement process.

Section 3 Gloucestershire Waste Local Plan Allocations

85. This section needs to be read in the context of the SoS Direction (5th October 2007), as discussed earlier, which removes the Waste Local Plan (WLP) site allocations from Gloucestershire's formal development plan (although as highlighted above they are material considerations which may have significant weight until such time as they are replaced by new DPD site allocations).

86. The WLP was a site specific planning document containing 21 Inset Maps that identified 29 'preferred sites' and 'areas of search' for waste management facilities. These are indicated in Figure 3 (below). The WLP was prepared under the former national guidance PPG10 'Planning and Waste Management'. Paragraph 29f advised Waste Planning Authorities to *"where possible, identify in their development plans sites for waste management and disposal facilities over the period of the plan"*.

Figure 3



87. The end date of the WLP is 2012 and it had therefore been envisaged that the sites in the Plan would be available to enable provision to be made throughout that timeframe. On this basis the WPA had proposed to 'save' all of the site allocations (including areas of search) contained in the adopted WLP. The Direction did not concur with this approach.

88. The WLP allocations were a combination of brownfield land (this is land which has previously been developed), industrial estates, and existing waste facilities (where there is potential to expand activities). WLP allocations were divided into two categories: strategic and local. These are differentiated by their potential throughput of waste each year. Strategic sites being those with the potential for handling in excess of 50ktpa. Local sites are expected to handle less than 50ktpa. This threshold was based on the Environmental Impact Assessment Circular 02/99 (paragraph A36). Attached to each of the WLP site allocations was an indicative schedule of the types of processes that could potentially be located at particular Inset Map sites. These schedules comprised information on existing waste uses, potential for expansion, or new types of operations.

90. Strategic sites were predominantly located centrally in the County. The exception to this being Inset Map 5 (Sharpness Docks), whose allocation was considered as having potential to strategically manage waste provided that sustainable forms of transporting the waste could be employed (i.e. canal or rail). Site 6 (Netheridge) was identified as a strategic transfer station to serve the Sharpness Docks allocations.

91. Local sites were allocated around the County, but generally concentrated in areas of main population. Table 2 (below) illustrates the broad dispersal of preferred sites / areas of search by district. Whilst there are 21 Inset Maps some contain more than one site.

Table 2:
Spatial Distribution of WLP Site Allocations

District	Strategic allocations	Local Allocations
Cheltenham Borough	0	0
Cotswold District	0	3
Forest of Dean	0	7
Gloucester City	1 (1)	3
Stroud District	3	2 (2)
Tewkesbury Borough	1 (2)	4
County Total	8	21

(Bracketed numbers are areas of search)

WLP Strategy

89. All of the sites in the WLP were identified with the intention of providing for potential waste management options by driving waste up the waste hierarchy and were, and still are, therefore consistent with the key objectives of PPS10. The WLP was prepared on the basis of locating provision near to the majority of waste arsings, in accordance with the proximity principle.

92. Although no areas were allocated in Cheltenham there are sites in close proximity, lying within Tewkesbury District which abuts Cheltenham on three sides.

WLP Strategic Sites

93. As part of preparing the WLP each of the Inset Map allocations went through a rigorous process, including a public local inquiry, to demonstrate their broad suitability for locating waste management facilities.

Inset Map 1

94. Inset Map 1 Wingmoor Farm West Sites A and B at Bishop's Cleeve - includes around 66 hectares of land within the green belt.

95. Site A is allocated as an 'Area of Search', which follows the boundary of the existing landfill permission. It includes other waste facilities: a Household Recycling Centre (HRC); fridge storage area; energy from waste (methane use from landfill); and inert waste recovery.

96. Preferred Site B occupies 4.8 ha and contains existing buildings. There is a planning permission for a 35kt in-vessel composting on part of the site. There is planning permission for a material recycling facility, which has potential to divert waste away from the adjacent landfill. An earlier application for mechanical biological treatment / anaerobic digestion has been held in abeyance at the applicant's request.

Inset Map 2

97. Inset Map 2 Wingmoor Farm East, Bishops Cleeve – includes around 49 hectares of land also allocated as an 'Area of Search' within the green belt, which follows the boundary of an existing landfill permission and ancillary development.

98. Land adjacent to the railway line is used for treating and disposing of hazardous wastes derived from across the country. The remainder of the site accepts general biodegradable waste. A materials recovery facility associated with the landfill operation has received planning permission on the adjacent 'local' site allocation (WLP Inset Map 17).

Inset Map 3

99. Inset Map 3 Sudmeadow, Hempsted – includes around 142 hectares of land within the floodplain. This is allocated as an 'Area of Search', following the boundary of the existing landfill and other facilities such as an HRC, landfill gas extraction, and windrow composting.

Inset Map 4

100. The allocation at Javelin Park (the former Moreton Valence airfield) is 11.2 ha of cleared industrial estate. It currently has outline planning permission for warehousing (B8 use). The site is not constrained by environmental designations, is close to the major arisings in Gloucestershire and is proximate to the highway network.

101. This site is currently being considered by the Waste Disposal Authority (WDA) for managing MSW due to its location proximate to arisings and the strategic road network. In particular, the range of possible waste recycling and recovery uses indicated in the WLP (pg.36) as suitable for Site 4 provides significant potential and versatility for driving waste up the 'waste hierarchy'.

Inset Map 5

102. Inset Map 5 Sharpness Docks – Two preferred site allocations A and B occupy

around 25 hectares of mainly former industrial land. Any proposal would need to address the potential for use of sustainable transport uses by rail and water due to its location on the periphery of the County. A recent planning permission has been granted for an in-vessel composting facility adjacent to the western-most allocation.

Inset Map 6

103.Inset Map 6 Reclaimed Land, Netheridge – This is a 1 hectare site adjacent to the Gloucester / Sharpness canal whose identification is for a transfer facility linked to the Sharpness Inset Map 5 sites. This is located adjacent to a ready mixed concrete plant which is supplied in part by water borne sand and gravel.

Inset Maps 7 – 21

104.Inset Maps 7 – 21 are for ‘local’ sites but these have a significant role to play in the wider strategic delivery of sustainable waste management in the County. For example, some of these allocations are related to existing waste operations that are performing a strategic waste management function, e.g. the Smith’s waste operations at Moreton Valance (Inset Map 19).

WLP Strategic Sites Comparison

105.The WLP does not set out a hierarchy to indicate which of the six strategic sites is ‘the best’ or could be deemed ‘most preferred’ as such an assessment can only be made based on the needs of a particular proposal. It is possible, nonetheless to make some broad assumptions regarding

the waste management land use potential of these sites.

106.With regards to Inset Maps 1- 3 the existing waste management operations permitted are predominately landfill with ancillary waste facilities linked to the life of the landfills. The long-term duration of these landfills is uncertain and subject to a range of planning constraints. For example Site 2 has a time limit condition for completion by 2009 (although the WPA received [Dec 2006] a scoping opinion from the operator in respect of extending activities until 2035), while Site 3 has a projected life to around 2013.

107.Having regard to the prospective level of investment required for a waste management facility this may restrict long-term facilities coming forward. In consequence of these uncertainties sites 1-3 are designated as being ‘Areas of Search’ rather than ‘Preferred Sites’, the one exception being around 4.8 ha of land identified as a Preferred Site B on Inset Map 1. The WLP sets out specific criteria for development associated with each of the WLP Sites.

108.Waste management at Inset Map 4 would minimise environmental damage by being on a ‘brown field’/industrial site away from any national or local environmental designations. It also has advantage of being further away from existing or proposed residential areas than strategic sites 1-3.

109.Inset Map 4 is proximate to the main areas of waste arisings of Gloucester, Cheltenham and Stroud and would potentially help to minimise waste transportation distances, although residues

post treatment may need to be transferred to Wingmoor Farm landfill sites for disposal.

110. Inset Map 5 'Sharpness Docks', in comparison with the other strategic sites, is relatively distant from the main sources of arisings. It falls outside of the 16km areas of search for Gloucester and Stroud⁸. The allocation of Inset Map 6 'Netheridge' seeks to overcome proximity issues by being allocated as a strategic transfer facility to allow the canal to be used to carry waste.

111. The sites identified in the WLP have been through a comprehensive process to test the acceptability of their location in broad terms in relation to harm to the environment or endangering human health (WLP paragraphs 4.7 – 4.11). The review of WLP sites and their suitability for retention for future waste facilities was timetabled in the adopted development scheme to be a matter for consideration in the future Waste Site Allocations DPD.

Role of Waste Local Plan Allocations

112. The WLP site allocations are no longer 'saved'. They now need to be replaced by allocations in the Waste Site Allocations DPD. Under the adopted Minerals & Waste Development Scheme this is due to begin preparation in 2009 following submission of the WCS. In Gloucestershire there is consequently a waste facilities site

⁸ Inset Map 5 falls within a 16km area of search drawn around Lydney but this lies on the opposite side of the River Severn. If the waste is to be barged across the river then this potentially would overcome proximity issues.

allocation 'vacuum'. Advice from GOSW is that if there is certainty in Gloucestershire that a particular key site is to be used to pre-treat MSW then this site should be identified within the WCS. However, conversely, where there remains uncertainty then a specific site should not be allocated.

113. If the WLP sites had been saved this would have meant that proposals for waste development should still seek to locate on these sites, unless policies in the WCS override that requirement – for example if the WCS follows a strategy of composting proposals being determined by a criteria based approach to encourage waste management to follow the waste hierarchy then this would negate the need to demonstrate why an unallocated site was not identified in the WLP. These issues are discussed in some detail earlier in this evidence paper.

WDA Comparative Site Work

114. The WDA have undertaken a considerable amount of comparative site work as part of an ongoing search for suitable locations for municipal waste management facilities.

115. As part of preparing the Residual Strategy for procuring a waste treatment technology to pre-treat MSW under LATS requirements the WDA specifically employed consultants during 2007 to assess the appropriateness of WLP site allocations (which at that time were still 'saved') on which to locate a facility(ies).

Section 4

Broad Locational Options

116. This section sets out alternative ways in which broad locational areas for future waste management could be identified in the County. The intention is to provide a framework for deriving a spatial strategy for delivering sustainable waste management.

117. The division of the County in this section is only indicative. At this stage it should **not** be considered to have any status other than as illustrative material for the preferred options.

Spatial Search of the County

118. The county of Gloucestershire is physically split in half, east-west, by the M5 motorway. This divides the County into two roughly equal halves in terms of population, urban/rural mix, environmental designations and waste generation.

Regional Policy Implementation

119. The regional policy (draft RSS policy W2) requires the search for sites suitable for waste management facilities to first consider locations within Strategically Significant Cities and Towns (SSCT) and 'named settlements'. Following this, 'edge of town' locations and then those 'in close proximity' to such urban areas (defined as within 16km) should be considered.

120. Accordingly, Figure 4 (below) transposes a 16km (10 mile) radius centered on the strategically significant cities and towns (SSCT) and 'named settlements' in Gloucestershire (see Section 2). This area of search covers the majority of Gloucestershire, excluding only the extremities of the County.

121. Land not falling within this search area is predominantly rural, the area largest lying within the AONB in the east of the Cotswold District. Whilst it is unlikely such locations would meet the search criteria for major waste facilities, their communities still require infrastructure to manage the waste they produce. Consequently, exclusion from a broad locational area of search at this stage does not preclude smaller local facilities being required to meet the needs of such rural communities (as required by the last part of draft RSS Policy W2).

122. In terms of identifying sites where strategic waste management facilities could be located, a more spatially meaningful interpretation of Policy W2 is to draw the 16km area of search around the two main sources of waste arisings i.e Gloucester and Cheltenham (see Figure 6 later).

123. This area of search also encompasses the towns of Tewkesbury and Stroud, which are two further significant sources of waste arisings. Around 70% of MSW arises in these four main areas (see Figure 5). Around 15% of MSW arisings are produced in the Forest of Dean District.

124. For simplicity the 16km circles have been drawn indicatively from the centre of the

urban areas. In practice these areas would be slightly wider and not circular, reflecting the irregular shape of the urban fringe. The Waste Planning Authority consequently considers that this 16km area is **not** a definitive exclusion zone beyond which waste facilities serving Cheltenham and Gloucester could not be located. Notwithstanding these limitations the 16km area of search (as illustrated in Figures 4 and 6) provides the basis on which to develop preferred options for identifying suitable broad locations.

125. The County's main municipal waste arisings (see Figure 5), transport infrastructure, future housing allocations, and the topographic split of the County further support the use of a Gloucester-Cheltenham centric area of search.

126. The 16km delineation represents land that the draft RSS Policy W2 considers to be *'in close proximity'* to the urban area primarily served by the facility. This appears to be an arbitrary distance and to the best knowledge of the Waste Planning Authority is not substantiated by evidence within the RSS.

Figure 4

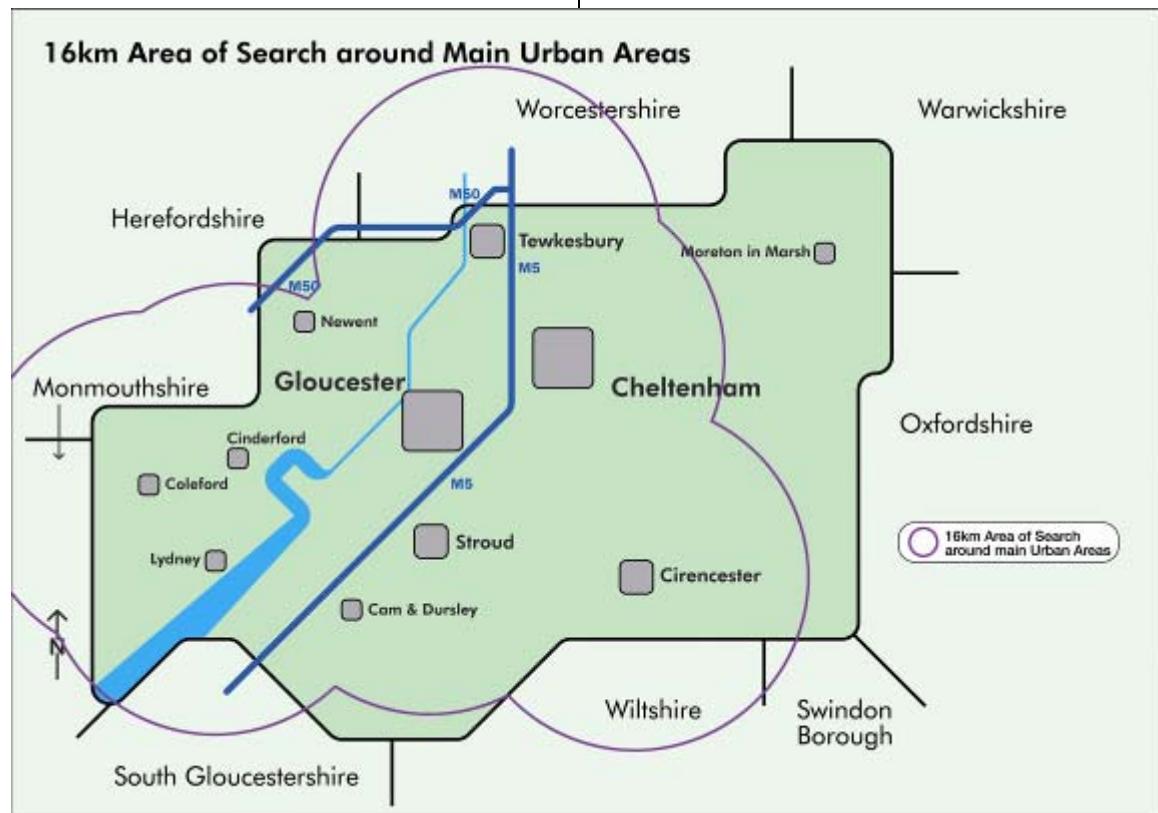


Figure 5

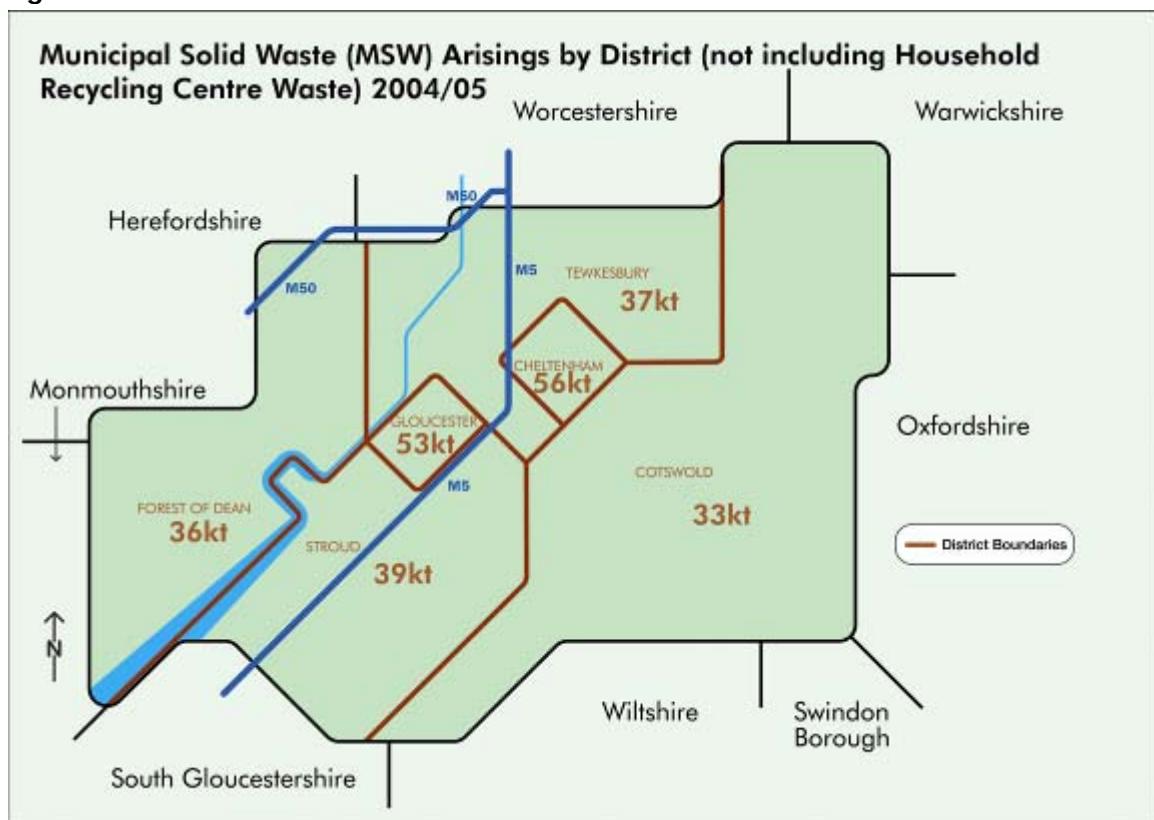
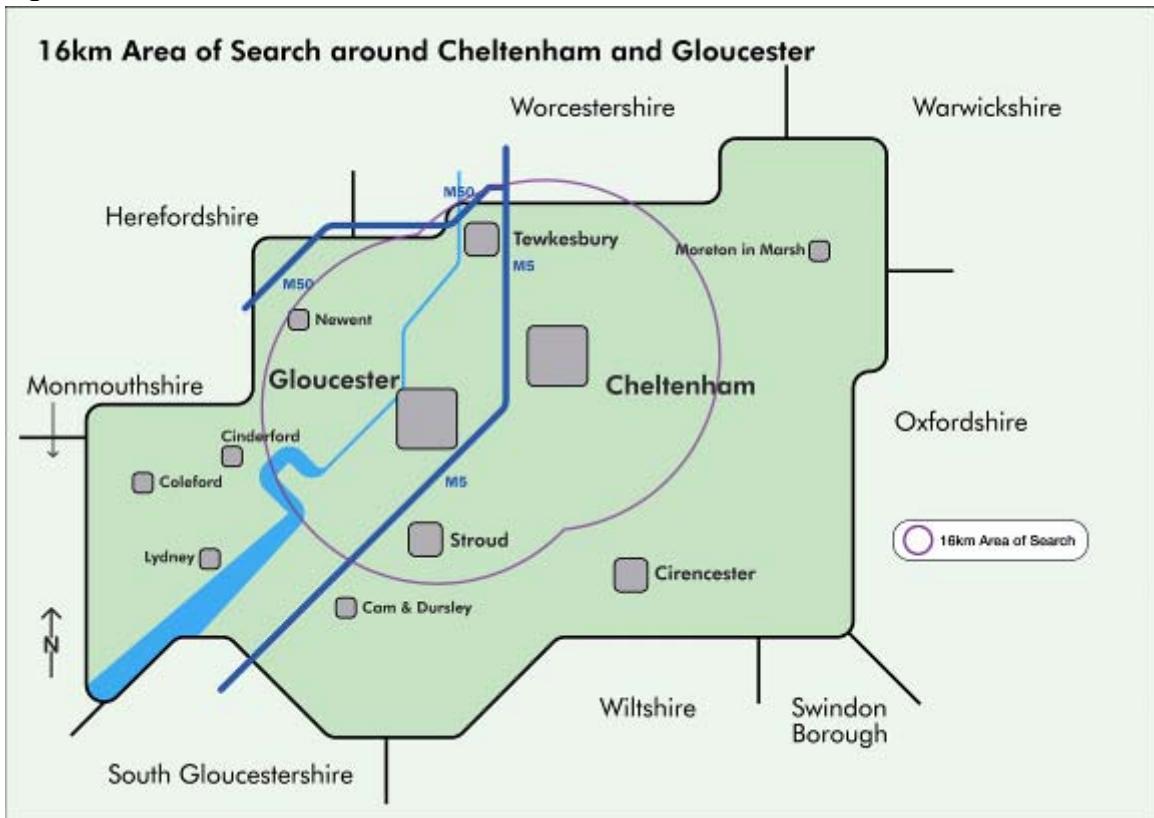


Figure 6

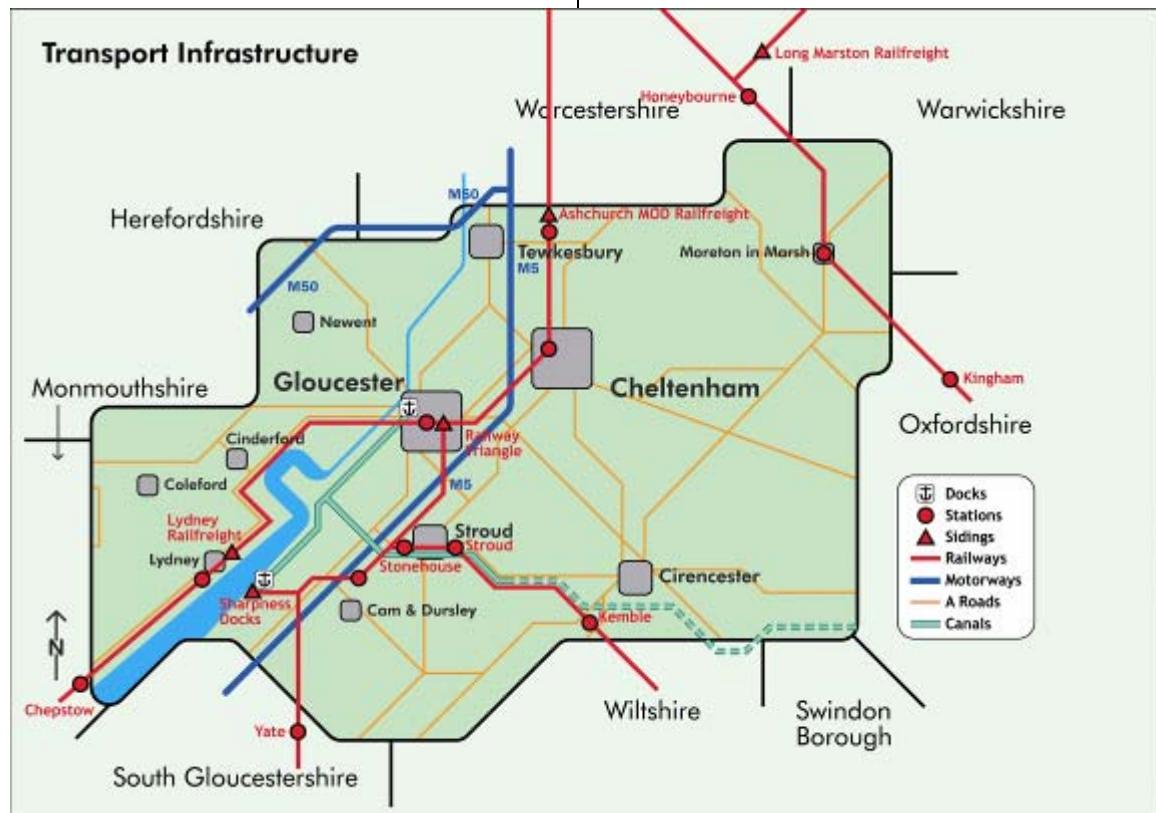


Options for Broad Locations

127. Broad locations for strategic waste management facilities to serve the main sources of arisings (MSW arisings are illustrated in Figure 5) are based on a search area in the centre of the County (as illustrated in Figure 6).

128. In accordance with a sustainable waste management system it is envisaged that a network of smaller sites outside of this area of search would be needed, either to support the larger facilities (for example by providing spatially distributed transfer/bulking-up facilities) or to directly serve the needs of particular local communities.

Figure 7



129. The 16km search area can be further subdivided by land-use constraints to reflect the outcomes of stakeholder consultation events (set out in Section 1).

Locational Criteria for Gloucestershire

130. The following criteria were broadly endorsed by participants at the forum events:

- proximity to primary roads
- locating with complementary existing activities
- locating facilities near to arisings
- preventing environmental pollution

- Using brownfield/derelict land
- Away from sensitive land uses (including homes, schools, healthcare etc.) to protect human health and amenity
- Allowing use of sustainable modes of transport (e.g. rail or water rather than road)
- Protecting nature conservation and built heritage sites
- Recognising that different technologies will affect site suitability
- Supporting innovative technologies
- Potential for community benefits derived from waste facilities (e.g. energy generation)
- Avoidance of flood risk areas (including locations that will contribute to higher flood risk)

131. Other suggestions by stakeholders (as set out in Table 5.3 of the Land Use Consultants' Report, November 2007) for criteria for waste facility locations were:

- Sites which have the potential for the achievement of high quality and sensitive designs
- Sites which have suitable geology
- Sites with potential for appropriate buffer zones/stand-off distances to be maintained
- Former airstrip sites may make suitable locations for waste management facilities

- Sites where the potential for using combined heat and power could be maximised
- For household waste recycling centres – sites which are well located and accessible to the communities that they are intended to serve
- Sites that are in close proximity to 'end users' of waste products/resources
- Recognising that in some places there is pressure for housing growth

132. The avoidance of flood risk areas, as a key criterion for identifying search locations, has taken on increased importance since the major flooding events in Gloucestershire during July 2007

133. The main messages that emerged from the stakeholder events regarding waste facility locational issues were:

- 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;
- The environmental impacts of waste management are very important. Issues such as pollution control of waste disposal facilities and the potential impacts of sites on human health are important considerations.

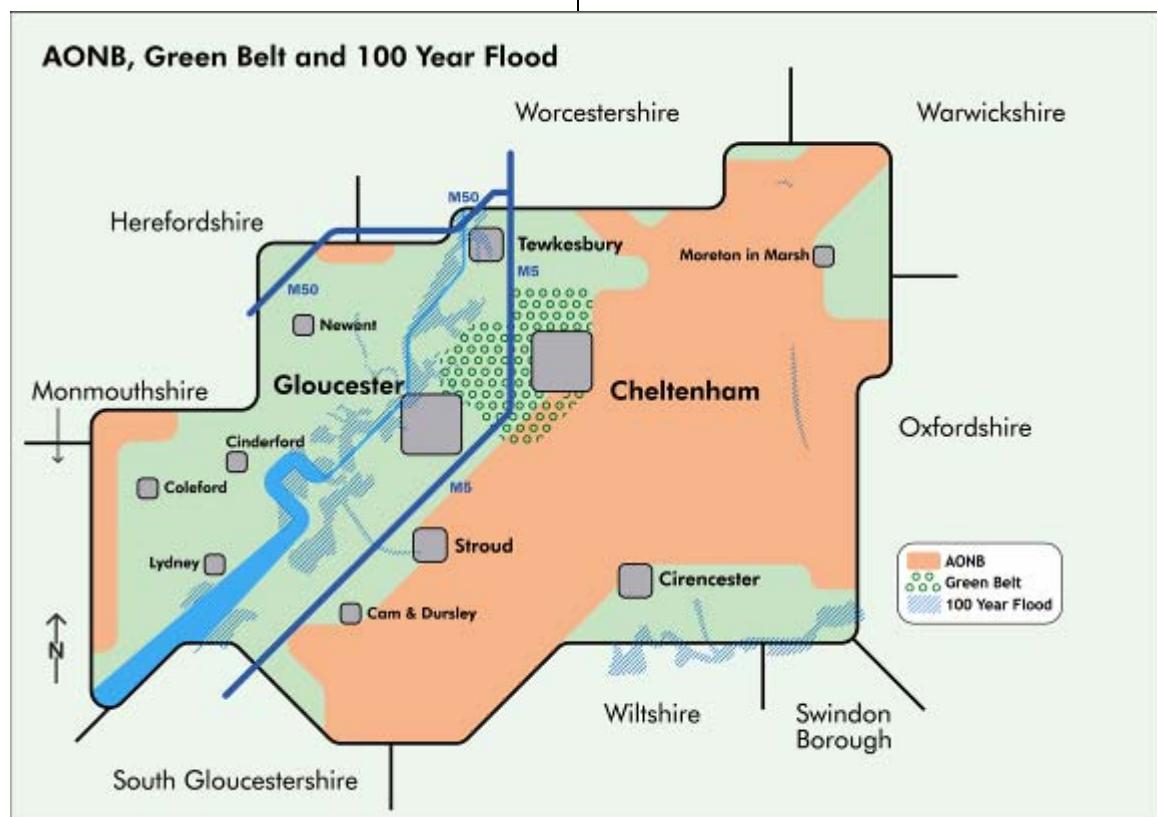
134. Taking into account stakeholder responses (set out in Section 1 of this Evidence Paper), and national/regional planning policy requirements (set out in Section 3 of this Evidence Paper), the following search criteria for broad locations for major waste management facilities was derived:

Table 3: Search Criteria for Broad Locations

Criteria	Gloucestershire Issue
1. Locating facilities near to the source of waste arising	Proximate to Gloucester and Cheltenham
2. Good transport access	Along the M5 corridor or adjacent to rail or water facilities
3. Preventing environmental pollution	Avoid flood plain, nature conservation designations and sensitive land uses
4. Visual impact of the facility	Avoid Area of Outstanding Natural Beauty.

135. The first criterion is reflected by adopting the RSS 16km area of search around the two principal sources of waste arising in the County (see Figures 5 & 6). This is an area that the RSS considers to be in 'close proximity' to arisings. The WPA approach has been to focus on SSCTs as the basis for seeking suitable locations for strategic waste management facilities. In Gloucestershire the two 'named settlements' of Tewkesbury and Stroud also fall within this search area, encompassing a significant majority of the County's MSW arisings.

Figure 8



136. The second criteria steers broad locations towards the M5 corridor, 'A' roads, rail lines and navigable canals/rivers. Again, this places the focus of attention on the Gloucester / Cheltenham / Tewkesbury / Stroud axis (these are shown on Figure 7).

137. The third criteria seeks to avoid areas of flood plain (these are shown on Figure 8) and areas close to designated nature conservation sites (in the 16km area of search these are mainly found alongside the River Severn, although other areas of the County are potentially affected). Once again this focuses the search to a relatively narrow corridor running north – south in the centre of the County.

138. The main landscape (visual) designation within the 16km area of search is the Cotswolds Area of Outstanding Natural Beauty. Criteria four therefore excludes land in the AONB and further supports a central area search.

139. Patterns of waste movements, dictated by existing locations of waste facilities (as indicated in Figure 9) would seem to provide additional evidence that waste in Gloucestershire gravitates towards the centre of the county.

140. In terms of site size the draft RSS (paragraph 7.4.9) directs waste planning authorities to the Key Planning Criteria Matrix (set out in the Regional Waste Management Strategy, Appendix D). The implications of different processes in terms of site size and characteristics is set out in Technical Evidence Paper WCS-G 'Waste Facility Types'). This issue however is too detailed in respect of identifying broad

locations in the WCS, which could be for potentially a wide range of waste management uses

141. Notwithstanding this sequential and logical approach, there may be other matters which influence the specific location for particular waste management processes. However these fall outside of the scope of this broad analysis.

142. An area of search around the three Forest Towns has not been shown as this effectively covers the whole of the Forest of Dean District. This area is considered in more detail in the next section.

Employment Land in 16km Area of Search around Cheltenham and Gloucester

143. Employment sites (suitable for B2 general industrial uses, potentially including some waste management uses) identified in district local plans / emerging LDFs that coincide with the Figure 10 area of search include the following allocations (please note that the boundaries shown on this diagram are schematic and should therefore only be taken as indicative):

Gloucester City Site Allocations DPD (preferred options published Aug 2006):

The documentation (page 63) only identifies one site suitable for B2 uses –

- an existing employment land commitment at land rear of 2-28 Hempsted Lane (8.7 ha).

Cheltenham Borough Local Plan (2nd Review adopted June 2006)

The plan states that there are three sites suitable for employment use (B1, B2 and

B8) within a mixed use development (policy PR 2) and no greenfield sites in the urban area that are considered appropriate for B2 use (para 9.12). Table 6 of the CBC local plan indicates that the mixed use allocations are predominantly for residential/leisure uses and do not lend themselves to a waste management use.

Stroud District Local Plan (adopted 10 Nov 2005)

Sites with Planning Permission for B2 Employment Use at 1 April 2004:

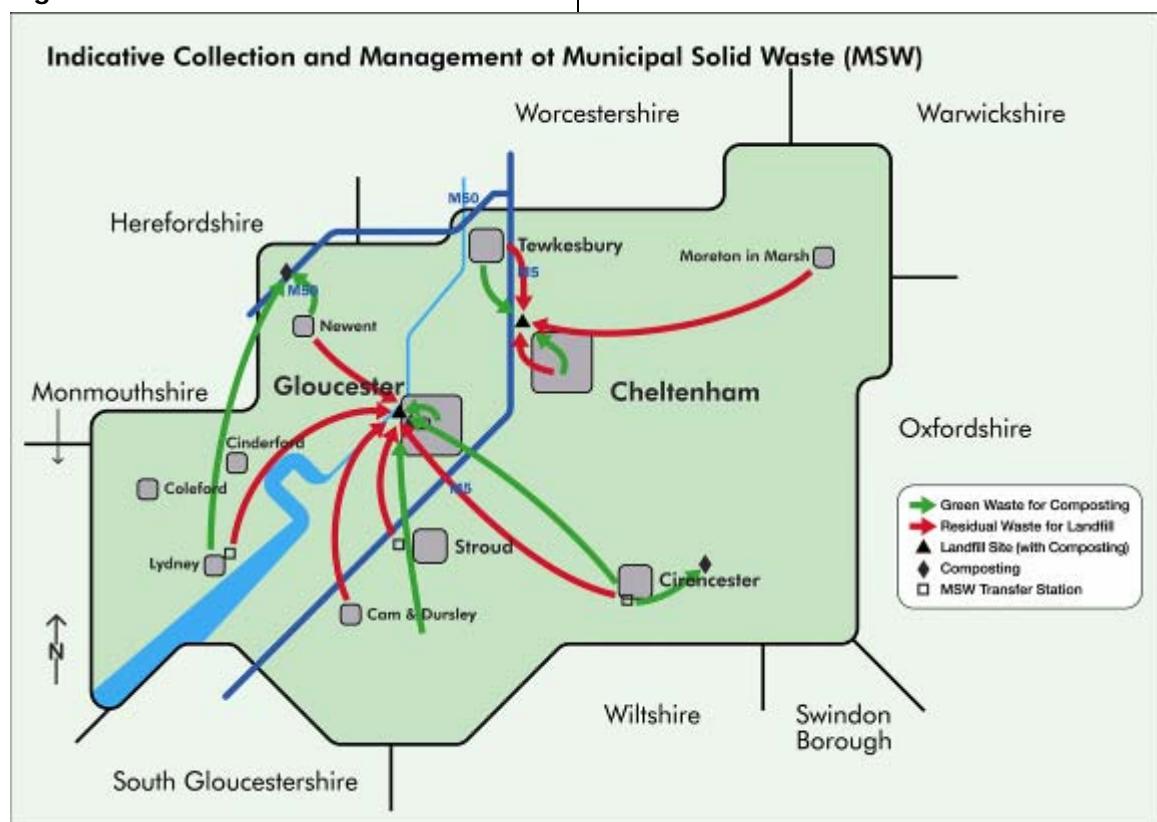
- Merrett's Mills, Minchinhampton (0.25ha)
- Coaley Junction, Cam (1.44ha)
- Whiteway Hill Garage, Dursley (0.27ha)

- Land at Old Airfield Site, Moreton Valence (0.61ha)
- Station Road Industrial Estate, Woodchester (0.02ha)

Site Allocations:

- EA1 Land East of Draycott Mills Industrial Estate, Cam (11.6ha)
- EA2 Meadow Mill, Eastington (2.2ha)
- MU1 Hunt's Grove, Colethrop Farm (5.2ha)
- EA9 North of Stroudwater Ind Est, Stonehouse (15.7ha)
- EA10 Stroudwater Business Park, Phase 1, Stonehouse (15.7ha)
- EA11 Land adj ABB/Kent, Oldends Lane Stonehouse (1.4ha)
- EA12 Adj Ham Mills, Thrupp (0.6ha)

Figure 9



Tewkesbury Local Plan to 2011 (adopted March 2006)

There are existing employment areas at Bishops Cleeve / Southam, Staverton / Churchdown, Brockworth Industrial Estate, Innsworth, Uckington, Tewkesbury / Ashchurch and Toddington. Policy EMP1 seeks to retain the attractiveness of these areas as the prime locations for industrial development within the Borough (page 47).

144. The allocations in these local plans fall largely outside of the main urban areas. Some however are adjacent to urban areas or fall within the 16km area of search. At this stage detailed site specific work has not been undertaken by the waste planning authority in respect of each of these existing site allocations. This will follow adoption of the WCS as part of preparation of the Waste Site Allocations DPD.

145. Whilst land within SSCTs and named settlements meets the criteria of being proximate to arisings it potentially fails in respect of impact on sensitive land uses (namely residential areas). This was a particular issue that Gloucestershire stakeholders raised as part of evidence gathering events (see section 4).

Sub-Division of Figure 6 Search Area

146. The 16km search area around Cheltenham and Gloucester can be subdivided into four 'zones' (A-D west to east, Figure 10) by following the search criteria from Table 3.

147. Following advice from GOSW the zones are shown with blurred boundaries to reflect that they are only indicative areas of search, as a precursor to more detailed work to be undertaken. This also acknowledges that impacts can occur beyond particular areas. For example the setting of an AONB can be affected by development adjacent to it as well as within it, and similarly for developments outside of flood plains.

148. Within the main urban areas of Gloucester, Cheltenham, Stroud and Tewkesbury there are a limited number of potential sites that meet the PPS10/RSS criteria for locating waste facilities. Examples include land that was previously allocated in the WLP: the railway triangle Gloucester (Inset Map 11); land adjacent to Hempsted landfill site (Inset Map 12); and land adjacent to the gasworks, Bristol Road (Inset Map 20). However, all of these sites lie within Gloucester and there is very limited potential within the built-up parts of the other three areas, especially when balanced against the safeguarding of residential amenity from the adverse impacts of waste operations.

149. PPS22 companion guide (para 6.21) notes that local planning authorities should encourage the installation of renewable energy schemes in urban areas, but should be realistic in their expectations. There are a number of practical considerations limiting the suitability of various renewable technologies for urban settings. Among these may be issues of noise, odour, traffic or visual impacts. In particular, para 6.16 states that "*due to the nature of these technologies, they are not generally well suited to integration in urban environments*".

150. More information in respect of the planning requirements for different types of waste management technologies is set out in Technical Evidence Paper WCS-G 'Waste Facility Types'.

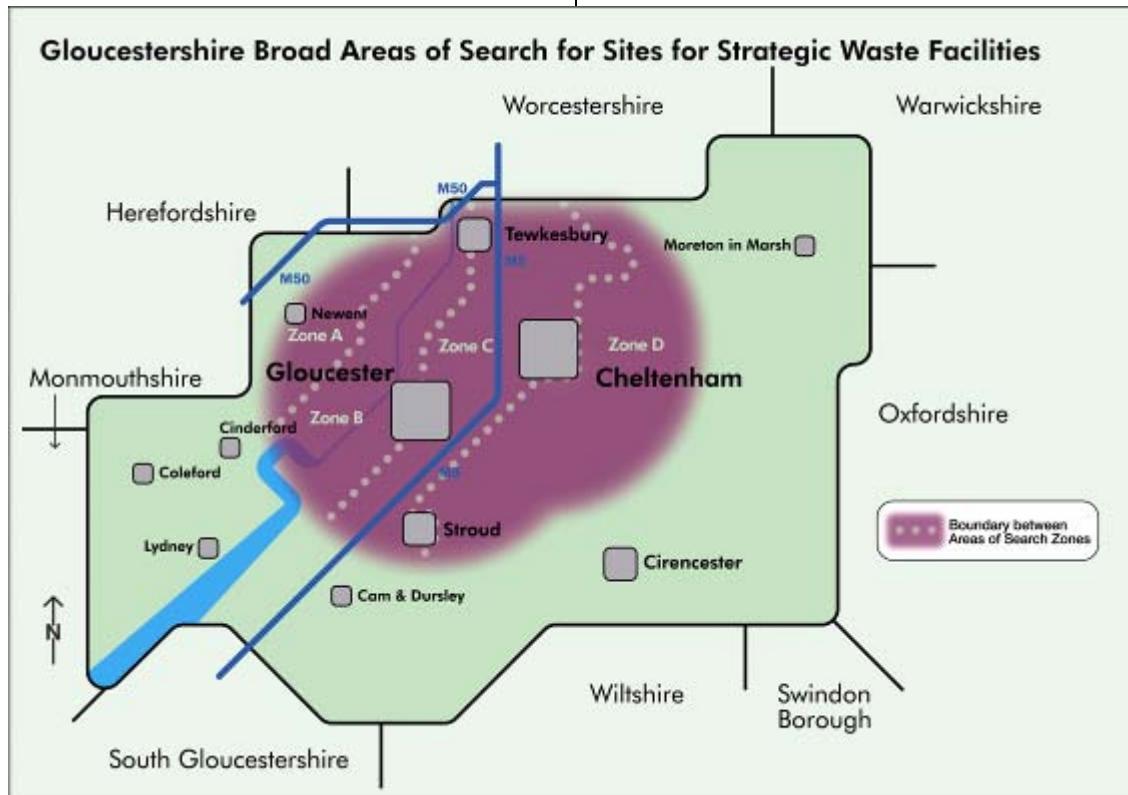
151. Consequently, whilst these main urban areas are effectively zones in their own right (to accord with the first search requirement of the draft RSS Policy W2 sequential approach i.e. future facilities being **within** the urban area which the facility is to service), these SSCTs and named settlements have not been specifically singled out as zones and have instead been subsumed within Zone C.

Zone descriptors

152. **Zone A 'Newent Area'** – This zone is at the extremity of the search area in terms of proximity to Cheltenham and Gloucester. The area is predominantly rural with flat and gently undulating agricultural land. It includes the town of Newent and comprises land entirely within the Forest of Dean District.

153. **Zone B 'River Severn'** - This zone includes land in the River Severn flood plain. Its eastern and western boundaries approximately follow the A38 and A48 respectively. The area is predominantly rural with flat agricultural land. It comprises land in the Forest of Dean, Tewkesbury and Gloucester City administrative areas.

Figure 10



154. Zone C 'M5 Corridor' - The land including, adjacent to, and immediately surrounding the principal urban areas of Cheltenham and Gloucester (but also incorporating Stroud and Tewkesbury to its southern and northern extremes). It excludes land within the AONB and flood plain, aligning along the A38 to the west and the AONB to the east. The M5 traverses the zone north-south. Zone C includes existing strategic waste management facilities, WLP proposed strategic site allocations and encompasses the areas of search for new housing identified in draft RSS Policies SR12 / SR13 along with significant new development to the south and east of Gloucester. This area includes the Gloucester/Cheltenham green belt and is also identified for possible green belt designation in the emerging RSS (Policy SR11), although it would require district council adoption through the LDF process.

155. Zone D 'Cotswold AONB' – Its western edge follows the line of the Cotswolds AONB designation. Characterised by the Cotswold escarpment and small villages in wooded valleys. It comprises land in the Cotswolds, Tewkesbury and Stroud administrative areas.

Comparison of Zones

156.On the basis of the search criteria in Table 3, Zones B and D can effectively be discounted i.e. they comprise environmentally sensitive areas because of flood plain / international nature conservation or national landscape designations.

157.The land shown in Zone B is related to the 100 year Flooding map, as provided by the

EA. However, following the flooding events during July 2007 this Zone may need to be expanded to cover additional land. The WPA will be advised by the EA on which areas would fall into this category. The Strategic Flood Risk Assessment being carried out for the County Council will assist in determining the appropriateness of any particular land for development within this area.

158.Zone A does not have particularly good transport access to Cheltenham/Gloucester urban areas in comparison with Zone C. However, the A40 and A417 roads do provide arterial routes into the area. Zone A is also proximate to the three Forest towns, but as stated in the previous section these produce only around 15% of the County's MSW.

159.Additionally there is an employment allocation in the FoD local plan (adopted 2005) for a southern extension to the Newent Business Park, lying to the east of the town. The FoD local plan (policy (R)F.Newent 5) considers that there is potential for B2 industrial uses within this 4.2 ha extension provided that they are not adjacent to residential areas⁹.

160.As already noted, Zone C currently contains a number of the County's existing strategic waste facilities, including landfill sites, and WLP allocations (see Figure 3). Some of these are within the designated green belt (see Figure 9), or proposed green belt (as

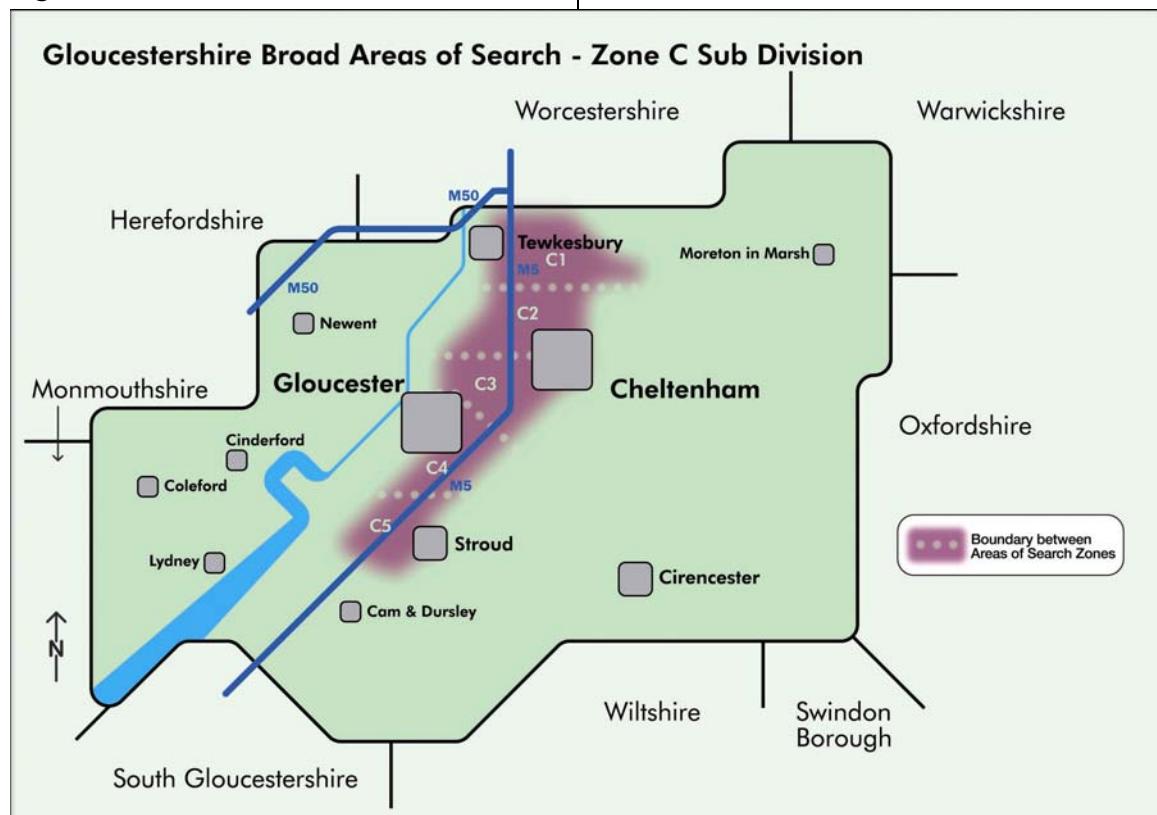
⁹ The local plan states in para 4.40 that a development brief [adopted as supplementary planning guidance] has been prepared by FoD DC for this site, but this could not be found on the FoD website.

in the emerging RSS policy SR11). The designation of green belt around Cheltenham and to the north/east of Gloucester is to prevent urban sprawl and the coalescence of urban areas.

161. The objective of locating waste facilities on the edge of, or in close proximity to, urban areas, is potentially contradicted by green belt restrictions. This makes some of the land in Zone C less preferable on policy grounds. However, PPS10 (paragraph 3) recognises that there are locational needs, which should be given 'significant weight' in determining waste planning applications.

162. Additionally, evidence from the October 2007 Waste Forum indicated that "green belt should not generate a fundamental objection to the development of waste facilities" (Forum Report, para 5.6). More detailed consideration of green belt issues in Gloucestershire can be found in Technical Evidence Paper WCS-I 'Waste Facilities in the Green Belt'.

Figure 11



'Zone C' Analysis

163. The RSS Policy W2 approach identifies the main urban areas in Gloucestershire as being the first places in which to search for suitable locations for waste facilities. However, an initial search has indicated that such opportunities are very limited. Consequently the five zones described below represent search options that are 'on the edge of' and 'in close proximity to' the main urban areas.

164. Zone C has been subdivided into five areas of land, running north south (indicated in Figure 11), which are described in turn below:

165. Area C1 - Land to the east of Tewkesbury. The southern limit of C1 follows the green belt boundary, the eastern extremity is the Cotswold AONB, and the western boundary is defined by flood risk areas. The northern limit is the County boundary. Where land is liable to flooding the WPA will be advised by the EA (and the Strategic Flood Risk Assessment). There was one WLP site allocation in this area (Inset Map 9). This area includes the rail freight depot at Ashchurch and M5 junction 9.

166. Area C2 - Land to the north and west of Cheltenham. It is almost exclusively allocated as green belt. The northern boundary of C2 is the green belt boundary, the eastern boundary is the Cotswold AONB, the southern boundary¹⁰ follows the

line of the A40 (Golden Valley by-pass) and the western boundary is defined by flood risk areas. There are currently two major non-hazardous landfill sites and a hazardous waste landfill site located in this area along with associated ancillary waste development. There were corresponding WLP strategic site allocations / areas of search and preferred sites within Area C2 (Inset Maps 1, 2, 10, and 17). The RSS identifies additional housing in this area, which is linked to potential amendments to the green belt to accommodate the growth. M5 junctions 10 and 11 are within this area.

167. Area C3 - Land to the north and east of Gloucester. As with C2 this is comprised almost exclusively green belt allocated land. The northern boundary is the A40, the eastern boundary is the Cotswold AONB, the southern boundary is the limit of the green belt and the western boundary¹¹ is defined by flood risk areas. There were no WLP site allocations in this area, however the adjoining Gloucester urban area, which would be a preferential search area under RSS Policy W2, contained four WLP sites (Inset Maps 3, 11, 12 and 20). There is currently a significant amount of housing being constructed to the east of Gloucester (at Brockworth) and the RSS identifies additional housing growth to the north of Gloucester in this area. M5 junctions 11 and 11a are within this area.

168. Area C4 - Land immediately to the south and east of Gloucester. The boundary

¹⁰ This assumes that no suitable land is available within the Cheltenham urban area. If such land were available then the RSS Policy W2 criteria would seek to utilise that in the first instance.

¹¹ This assumes that no suitable land is available within the Gloucester urban area. If such land were available then the RSS Policy W2 criteria would seek to utilise that in the first instance.

between C3 and C4 follows the green belt boundary, the eastern boundary is the Cotswold AONB, the western boundary¹² is defined by flood risk areas, and the southern boundary follows the minor road crossing the M5 linking Moreton Valence with Standish. There is currently a strategic waste facility handling C&I and C&D wastes in Area C4 and there were WLP site allocations for 'local' and 'strategic' sites (Inset Maps 4, 7 and 19). The adjoining Gloucester urban area, which would be a preferential search area under RSS Policy W2, contained four WLP sites (Inset Maps 3, 11, 12 and 20). There is currently a significant amount of housing being constructed to the south of Gloucester. Although none of this land is within the designated green belt the draft RSS proposes a potential green belt designation in part of Area C4. M5 junction 12 is within this area.

169. Area C5 - Land to the west of Stroud. The northern extent of this area is the minor road crossing the M5 linking Moreton Valence with Standish, the eastern boundary is the Cotswold AONB, the western boundary is defined by flood risk areas and the southern extent is to the south of M5 junction 13. There were a number of WLP 'local' sites allocated in this area adjacent to the road known as Perry Way (Inset Map 21). A non-hazardous landfill site is currently located in this area but its closure is imminent.

¹² This assumes that no suitable land is available within the Gloucester urban area. If such land were available then the RSS Policy W2 criteria would seek to utilise that in the first instance.

Comparison of Areas in Zone C

170. As already stated, to accord with the RSS Policy W2 search hierarchy the preferred location for waste facilities is within urban areas. Notwithstanding this, following the broad consideration of the potential for such locations a wider search is being explored.

171. To accord with the RSS proximity requirements, and acknowledging that the majority of the arisings in the County come from the Cheltenham and Gloucester axis (including Tewkesbury to the north and Stroud to the south), one approach could be for a broad location comprising urban areas and all of the land in area labelled 'Zone C'.

172. An alternative more specific approach could be for a broad location comprising urban areas and land in areas C2, C3 and C4 – i.e. those areas most central in the County and nearest to the two main centres of population. However, in doing this the green belt potentially creates a hierarchy of preference, making C2 and C3 less favourable than the non-green belt land in area C4 (although the draft RSS suggests that some of the land in the C4 area could in future be designated as green belt).

173. Whilst on balance Zone C appears to comprise the most suitable area in which the main waste management facilities serving Gloucester and Cheltenham should be located¹³, it is important that there is contingency built into the WCS to allow for

¹³ The positioning of Tewkesbury and Stroud on the edge of this zone (to the north and south respectively) means that any broad location would equally well serve those urban areas also.

the search to be widened beyond this area should a more detailed search for sites within Zone C prove to be unsuccessful. An initial search of district local plans and discussions with district planners in respect of potential industrial site allocations drew limited success, particularly for sites actually within urban areas (see evidence gathering discussions in Appendix D).

Areas outside the Gloucester/Cheltenham 16km Area of Search

174.Other 'named' settlements in the County that don't fall within this central area of search are the three Forest towns (Coleford, Lydney and Cinderford) and Cirencester. For the purposes of sustainable waste management in Gloucestershire these 'named settlements' are peripheral to the main sources of arisings at the heart of the County and therefore do not lend themselves to a spatially desirable location for strategic waste facilities to manage Gloucester, Cheltenham, Stroud and Tewkesbury waste arisings. However, strategic sites that are remote from arisings could be appropriate if they are able to demonstrate sustainable transport linkages, which was one of the locational criteria identified through the waste forum events.

175.The approach for other 'named' settlements in the County, following the draft regional policy, is to identify them as comprising search areas in their own right, but for facilities to serve arisings proximate to them rather than for locating strategic facilities to serve the whole County. It may transpire that another transport solution presents itself, for example rail linkage from Lydney or barging across the Severn. Or it could be

that the central area of search in the County offers economies of scale such that municipal waste arisings from the Forest are managed centrally in the County.

Section 5 Preferred Options for Broad Locations

176.This section sets out the Preferred Options for identifying broad locational areas for future strategic waste management facilities in Gloucestershire.

177.Whilst the search process undertaken to date indicates that future strategic waste facilities serving the main urban areas in the County should be located in the area shown in Figure 10, the limited availability of suitable land combined with amenity considerations within urban areas means that it is prudent to consider land on the edge of and proximate to those urban areas, as well as a wider search beyond.

178.Consequently, Preferred Options for a 'broad location' for strategic waste management facilities in Gloucestershire relate to the implementation of RSS Policy W2 criteria. There are four options presented below that reflect different levels of detail, ranging from the most broad (a literal implementation of the RSS) down to the most specific (showing a narrowly defined area within the central Severn Vale M5 corridor, indicated as Zone C4 on Figure 10). This Zone avoids any areas that the Strategic Flood Risk Assessment advises are liable to flooding, or would increase the flood risk as a direct consequence.

179.In order to meet the RSS Policy W2 sequential search criteria, locations within urban areas should be considered first i.e. within Gloucester, Cheltenham, Stroud, Tewkesbury etc. However, as noted in the previous section there is limited opportunity for allocating brownfield or industrial type land within these urban areas beyond that which has already been allocated in the adopted WLP. Consequently, whilst urban areas are by default (through RSS Policy W2) the first 'broad location' that should be considered, it is more likely to be the land surrounding them (i.e. the RSS second and third hierarchical criteria) that will offer the best opportunity for locating waste management facilities.

180.The four preferred options that the Waste Planning Authority consider to be deliverable in terms of broad locational search areas are:

Option A

A broad search area based on the full 16km Regional Policy W2 (using the search criteria outlined for Options B, C & D). Under this approach, strategic sites that are remote from arisings could be appropriate if they are able to demonstrate sustainable transport linkages. (See Figure 4)

Option B

Use urban locations and the area labelled Zone C as the broad locational area in which strategic waste management facilities should be sited. (See Figure 10)

Option C

Use urban locations and areas labelled C2, C3 and C4 as the broad locational area in

which strategic waste management facilities should be sited. (See Figure 11)

Option D

Use area C4 as the broad locational area for strategic waste management facilities. If land is not forthcoming then the fall-back position is to search in areas C2 and C3 and then the wider Zone C. (See Figure 11)

181. Whichever preferred option is selected a set of criteria, using positive/negative locational criteria/constraints, would need to be developed to assist in any search for strategic waste management facilities. PPS10 and the Regional Spatial Strategy search criteria focus on industrial areas (those areas either allocated in development plans, or with permission for, B2 uses) and previously developed land. Regional Policy W2 additionally encourages waste planning authorities to consider mineral extraction sites and landfill sites. This ties in with the national policy objective of co-locating complementary activities.

182. It should also be borne in mind that whichever preferred option is adopted it is principally an indicative area from within which detailed boundaries can be made – ideally through the preparation of a Site Allocations DPD. In that sense some flexibility and contingency will need to be in-built in order that strategic facilities can ultimately be delivered through the WCS and any further DPDs.

Reasons for Discounting Other Options

183. Option A is a fairly broad option which in itself doesn't discount any options (other thanb the very extreme parts of the County). However, if this option were adopted, more detailed application of the criteria applied to options B-D would need to be used, and in particular the potential for any use of sustainable modes of transport. Options B-D involve a more focussed area therefore option A could be taken as a fall-back position if strategic sites cannot be identified in Zone C, i.e. through applying options B-D.

184. Issues in relation to flooding are material planning considerations (PPS25 para 3). Positive planning can direct development away from the areas of highest risk. PPS25 (para 6) states that key planning objective is to only permit development in areas of flood risk where there are no reasonably available sites in areas of lower [or zero] flood risk, and that the benefits of the development outweigh the flood risk.

185. Draft RSS Policy F1 expands on the national policy. It states:

F1 Flood Risk

Taking account of climate change and the increasing risk of coastal and river flooding, the priority is to:

- *Defend existing properties and, where possible, locate new development in places with little or no risk of flooding*
- *Protect flood plains and land liable to tidal or coastal flooding from development*
- *Follow a sequential approach to development in flood risk areas*

- *Use development to reduce the risk of flooding through location, layout and design*
- *Relocate existing development from areas of the coast at risk, which cannot be realistically defended, and*
- *Identify areas of opportunity for managed realignment to reduce the risk of flooding and create new wildlife areas*

186.Consequently it is considered inappropriate, at least in the first instance, to include areas liable to flooding within the broad locational areas of search. Flood plain areas have consequently been discounted from the broad areas of search.

187.The land with the designated AONB was discounted because national policy in PPS7 directs significant development away from such areas. Additionally, draft RSS policy ENV3 states that the conservation and enhancement of their natural beauty, wildlife and cultural heritage will be given priority of other considerations in the determination of development proposals.

188.Land in Zone A was discounted in the first instance because it is predominantly agricultural land with very little previously developed brownfield sites, thus limiting potential opportunities. When compared with Zone C it does not contain any allocated WLP sites or existing waste facilities and is more distant from the main source of arisings, particularly when considered alongside the transport infrastructure that serves it.

189.Notwithstanding this, the Forest of Dean local plan allocates a parcel of land on the edge of Newent for employment use (of which B2 is an option). This could provide

potential for a local site to serve the Newent/Forest of Dean area.

190.The three Forest towns (Lydney, Cinderford and Coleford) have not been included as part of the preferred search area for strategic waste facilities because they are not proximate to the main sources of arisings in the central area of the County. This does not mean that an area of search incorporating these 'named settlements' is inappropriate for local waste facilities serving that part of the County. To the contrary, there are a number of WLP allocations in the Forest for local facilities and it is expected that proposals for waste facilities will come forward to meet local needs within these areas.

191.Any such application is likely to be for facilities that seek to move waste management up the waste hierarchy (for example composting, waste transfer/bulking). These such proposals would be determined in accordance with specific criteria set out as part of the strategy for implementing the waste hierarchy (this is considered in more detail in the two Technical Evidence Papers WCS-D '*Implementing the Waste Hierarchy*' and WCS-F '*Making Provision*'.

Appendix A

LDF Preparation in Gloucestershire

Gloucestershire: Local Development Frameworks, District Housing Strategies, Community Strategies – Timetable as at March 2007.

District	Adopted Local Plan	LDF – Core Strategy	Housing Strategy	Community Strategy
Cheltenham Borough	1991 to 2011 (adopted June 2006)	LDS currently under review with GOSW. Core Strategy Preferred Options for consultation expected early 2008	Existing covers period 2001 – 2010 (adopted 2005)	Community Plan October 2003 – March 2007 Sustainable Community Plan 2007 - 2010 currently being drafted
Cotswold	2001-2011 (adopted April 2006)	Issues/options for consultation (Reg 25) – Sept 2007 Preferred options for consultation (Reg 26) – March 2008	2005-2008 (Adopted 2005)	Community Strategy Action Plan 2006-2007 Sustainable Community Strategy 2007-2010 (Nov 2007)
Forest of Dean	November 2005	Preferred Options due OCT 2007	2005-08	Under Review, previous version 2004-09
Gloucester City		Preferred Options May 2007 Submission 2008	2005-2010 (Actions updated each year)	Community Strategy Currently under review. Completion Sept 2007
Stroud	Adopted 10 November 2005	Issues and Options (I/O) consultation May 2008. Preferred Option consultation January 2009	Existing covers period 2005 – 2009. To be replaced by Regional Housing Strategy.	Currently under review. To discuss joint LDF/LSP work on community involvement prior to Core Strategy I/O consultation.
Tewkesbury Borough	TBLP to 2011 adopted March 2006	Currently at evidence gathering and frontloading stage, Preferred option stage programmed for June 2008	2005-2010	2005-2008 Review Jul – Dec 07. New Sustainable Community Strategy Apr 2008
County	Minerals Local Plan 1997 – 2006. Adopted April 2003	Minerals DF MCS Preferred Options for consultation January 2008		Community Strategy Currently under review. Competition Sept 2007
	Waste Local Plan 2002 – 2012 Adopted Oct 2004	Waste DF WCS Preferred Options for consultation January 2008.		

Appendix B

PPS10 (Annex E)

Physical and Environmental Constraints

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 1/2003¹⁴) 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.

¹⁴ Safeguarding aerodromes, technical sites and military explosives storage areas and on the application of The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction 2002

Appendix C

Six Options for Making the WCS Site Specific

The options set out in this Appendix have been derived following consideration of the Secretary of State's Direction relating to the WLP Site Allocations and the initial response from GOSW/DCLG

Option 1 – Prepare Waste Core Strategy (WCS) on same timeframe and content as we are currently. Waste Site Allocations DPD to commence in 2009 (Business as usual)

Advantages

- The strategic planning framework is following a logical and consistent pathway
- In particular the locational framework follows a logical strategic approach
- Provides an opportunity to see whether the emerging site framework has agreement with stakeholders in principle
- Hopefully this follows a consistent approach from reg 25 (Issues and Options) to reg 26 (Preferred Options) engagement and consultation.
- Broadly speaking the resources available to prepare the DPDs is there and we are likely to deliver to milestones (subject to Preferred

Options response). Therefore the process is likely to be manageable with the current approach.

- Likely to be able to proceed without undue concern regarding the decisions on the residual waste management strategy
- If GCC pursue the JR on the WLP direction and prove successful the transitional planning framework (providing that a new favourable direction was issued by SoS) would be in place to 2012 as we originally envisaged.

Disadvantages

- We may get objections from GOSW that the WCS should have some specific strategic sites within it
- There is a risk that PINS might not find WCS sound if they give high weight to GOSW or any other objections that the WCS should contain specific strategic sites.
- As there are now no formal preferred site(s) contained within a development plan it might be up to 2012 before any formal development plan sites are in place (from a WDA perspective this might be an advantage). This is really an issue as to whether the degree of development plan certainty proves to be a problem or not. On a case-by-case basis this might lead to more appeals/inconsistent decisions (more an implementation issue). This would also occur if a JR was pursued and was unsuccessful

If we pursue option 1 – we can stick with the short-term timetable of proceeding with the

WCS as outlined. Also should be able to obtain Cabinet approval on 28th November and go ahead with consultation and Preferred Options milestones in January 2008. There might prove to be issues with continuing with the longer-term milestones if any of the disadvantages came to fruition.

Option 2 – Prepare the WCS but include a strategic site or sites in the Preferred Options papers – largely on the basis that these are for purposes of meeting LATS. Try and stick to current timetable. The WCS is a hybrid of some broad framework mixed with some specificity.

Advantages

- This may satisfy any potential GOSW objection
- If the WCS is adopted it might give certainty to a strategic LATS site (provided that such a site is the one favoured by the WDA)

Disadvantages

- This moves the goal post in terms of WCS preparation. So far through Issues and Options we have stressed that the WCS is not about detailed site locations. WCS could be found to be unsound because this approach is not consistent with everything we have done so far in terms of forums / newsletters / issues and options - not to mention PPS12 and PPS10.
- Serious publicity/communications issues/problems –particularly regarding around the areas near to the strategic site.

- Therefore could be perceived to be a 'done deal'.
- Looks like a 'rabbit out of a hat'.
- Any such specific site can only be based on the work carried out to-date – i.e. in the WLP process or through the residual waste management process procurement
- Can we be certain that the site identified is deliverable for the purposes of LATS. CPO of Javelin Park is a major uncertainty/risk - so how does this accord with PPS10's requirement for landowner consent/support etc. its not conclusive that we can have the certainty regarding deliverability at this stage. Therefore the preferred site might fall down on PPS 10 ownership/availability test.
- At this point in time the WDA have not formally made up their mind on JP or any other site for that matter - so how can it be included in the WCS at the present.
- This raises issues of due process and concerns as to whether the public has had an input.
- No systematic work or comparable site work will have been undertaken in line with the emerging locational strategy.
- Despite potentially satisfying GOSW – a serious risk of WCS being found unsound through both process and content.
- Could be disastrous for the WDA service if either the preferred site/sites or WCS is found unsound. May provide ammunition against any site pursued under CPO.
- What If WCS is unsound for other reasons - which could happen, even on

something like SFRA. This could then have implications for the WDA.

- May cause confusion with sites to manage other waste streams – particularly strategic sites. If you put Javelin Park in - what about other strategic sites. GCC (and even GOSW) may argue that JP is a special case to meet LATS etc - but Grundon/Cory and others might argue that their sites at Wingmoor or other places should also be identified in the WCS. What about Haz waste site - RSS says it should be safeguarded, provided that it is environmentally acceptable (the criteria for determining this is currently under discussion through the WCS process). Should these sites also be included?
- That may cause serious confusion and difficulties regarding the determination of other planning applications.
- The amount of potential disadvantages may well require amendments to the future submission and public examination timetable milestones in any event.
- If a JR was successful option 2 might prove to be a wasteful and unnecessary course of action.
- All the disadvantages suggest that there would be likely additional resources on already stretched services.

Option 2 raises the question as to whether the Cabinet decision could be made at the same time as the residual strategy on 28th November. I think that this would open up the WCS to serious challenge.

Option 3 – Like option 2 except the time timetable is extended to provide due process to demonstrate that the LATS site is deliverable

Advantages

- This may satisfy any potential GOSW objection.
- If the WCS is adopted it might give certainty to a strategic LATS site (provided that such a site is the one favoured by the WDA).
- The basic advantage is that option 3 lessens the prospect of challenge in comparison to option 2. It allows due process, however the WCS timetable would have to fit in with whatever processes are used for the residual waste strategy process. In other words a decision is made on 28th November (along with the stakeholder approach) and the position with regards to whether the WDA can secure JP or an alternative site is made.
- Although at this point in time the WDA have not formally made up their mind on JP or any other site for that matter – the main premise of option 3 would be to get a level of certainty (i.e. the Cabinet approval in November and the following engagement) that a LATS site can be included in the WCS at the present. This could be a disadvantage if the LATS site doesn't get the right level of certainty or public engagement.

Disadvantages

- Biggest disadvantage is that the MWDS Preferred Options milestone would be missed. This has disadvantages in terms of BVPI, internal performance etc. The actual timetable for the remainder of WCS would be difficult to be certain over and might be very difficult to firm up – especially if the LATS site proves difficult to deliver.
- Again option 3 still moves the goal post in terms of WCS preparation. So far through Issues and Options we have stressed that the WCS is not about detailed site locations. WCS could be found to be unsound because this approach is not consistent with everything we have done so far in terms of forums / newsletters / issues and options - not to mention PPS12 and PPS10.
- Serious publicity/communications issues/problems –particularly regarding around the areas near to the strategic site. Hopefully these would not be as marked as in option 2 subject to how the WDA service manages the residual strategy engagement/communication.
- Therefore could be perceived to be a 'done deal' (but less so than option 2).
- Looks like a 'rabbit out of a hat' (but less so than option 2).
- Any such specific site can only be based on the work carried out to-date – i.e. in the WLP process or through the residual waste management process procurement (even this approach would need some extra time and resources built in as to how it would be assembled and presented).
- Can we be certain that the site identified is deliverable for the purposes of LATS. CPO of Javelin Park is a

major uncertainty/risk - so how does this accord with PPS10's requirement for landowner consent/support etc. its not conclusive that we can have the certainty regarding deliverability at this stage. Therefore the preferred site might fall down on PPS 10 ownership/availability test.

- This raises issues of due process and concerns as to whether the public has had an input.
- No systematic work or comparable site work will have been undertaken in line with the emerging locational strategy (if any work was undertaken it would require extra time and resources to be built-in).
- Despite potentially satisfying GOSW – a serious risk of WCS being found unsound through both process and content
- Could be disastrous for the WDA service if either the preferred site/sites or WCS is found unsound. May provide ammunition against any site pursued under CPO.
- What if WCS is unsound for other reasons? - which could happen, even on something like SFRA. This could then have implications for the WDA.
- May cause confusion with sites to manage other waste streams – particularly strategic sites. If you put Javelin Park in - what about other strategic sites. GCC (and even GOSW) may argue that JP is a special case to meet LATS etc - but Grundon/Cory and others might argue that their sites at Wingmoor or other places should also be identified in the WCS. What about Haz waste site – RSS says it should be safeguarded, provided that it is

environmentally acceptable (the criteria for determining this is currently under discussion through the WCS process). Should these sites also be included?

- That may cause serious confusion and difficulties regarding the determination of other planning applications.
- If a JR was successful option 3 might prove to be a wasteful and unnecessary course of action
- All the disadvantages suggest that there would be likely additional resources on already stretched services.

Option 3 still raises issues regarding when the Preferred Options could take place – should it slip 2 or 3 months (or longer) to allow the residual waste strategy to take the flak. There are sufficient disadvantages that could open up the WCS to serious challenge.

Option 4 – As for option 1 in terms of preparing the WCS. However the Council would commit to bring a Waste (Strategic) Sites DPD forward in the timetable. The sites DPD would commence work in 2008. It could be taken as a related DPD to the WCS (particularly if related only to strategic sites). It would require some additions to the WCS to identify that this was the approach

Advantages

- This may satisfy any potential GOSW objection. However that would only be if they agreed to this approach.
- The WCS main framework could still proceed and the milestones (certainly for Preferred Options) would still be met.

- The strategic planning framework is following a logical and consistent pathway.
- In particular the locational framework follows a logical strategic approach.
- Provides an opportunity to see whether the emerging site framework has agreement with stakeholders in principle.
- Hopefully this follows a consistent approach from reg 25 (Issues and Options) to reg 26 (Preferred Options) engagement and consultation.
- Likely to be able to proceed without undue concern regarding the decisions on the residual waste management strategy.
- The certainty of a new and up to date site framework would be in place potentially earlier than envisaged – maybe by 2010.
- If GCC pursue the JR on the WLP direction and prove successful the transitional planning framework (providing that a new favourable direction was issued by SoS) would be in place to 2012 or replaced by new DPDs as we originally envisaged. Might also be a disadvantage depending on timing.
- Broadly speaking the resources available to prepare the WCS itself, is there and we are likely to deliver to milestone targets (subject to Preferred Options response). Therefore the process is likely to be manageable with the current approach.

Disadvantages

- The main disadvantage is that significant additional resources would need to be bought in to deliver the site DPD work, particularly with a 2008 rather than 2009 commencement. Unless the commitment could be made this option cannot proceed, as there is not sufficient capacity through current staff resources. This may require new additional staff, secondment (up to 2 - 3 years) or buy-in of resources (maybe consultants).
- It would require an adjustment to the MWDS (March 2007) if supported by GOSW.
- The programme between the WCS and sites DPD would require careful timetabling.
- If the emerging sites framework was not favourable amongst stakeholders it might cause difficulties in developing the sites DPD.
- Stakeholders may be caught out through this process.
- Site allocation plans tend to be contentious therefore satisfactory PR/communication systems need to be in place.
- Problems for the sites DPD if the WCS are found unsound.

If we pursue option 1 – we should be able to obtain Cabinet approval on 28th November and go ahead with consultation and Preferred Options milestones in January 2008. There might prove to be issues with continuing with the longer-term milestones if any of the disadvantages came to fruition. Also need to get member approval of resources to proceed with the waste sites work

Option 5 – Like option 4 except that the Strategic waste sites DPD is incorporated into the WCS – but with extended period for WCS preparation and adoption

Advantages

- This may satisfy any potential GOSW objection. However that would only be if they agreed to this approach.
- The strategic planning framework is following a logical and consistent pathway.
- In particular the locational framework follows a logical strategic approach.
- Provides an opportunity to see whether the emerging site framework has agreement with stakeholders in principle.
- Likely to be able to proceed without undue concern regarding the decisions on the residual waste management strategy.
- The certainty of a new and up to date site framework would possibly be in place potentially earlier than envisaged-maybe by 2010.

Disadvantages

- The main disadvantage is that significant additional resources would need to be bought in to deliver the site DPD work, particularly with a 2008 rather than 2009 commencement. Unless the commitment could be made this option cannot proceed, as there is not sufficient capacity through current staff resources. This may

- require new additional staff, secondment (up to 2 - 3 years) or buy-in of resources (maybe consultants).**
- The WCS main framework could not proceed and the WCS milestones for Preferred Options would not be met
- The reg 25 (Issues and Options) to reg 26 (Preferred Options) engagement and consultation stages would need to be repeated. This requires a major change to the timetable and the MWDS
- It would require an adjustment to the MWDS (March 2007) if supported by GOSW.
- If GCC pursue the JR on the WLP direction and prove successful the transitional planning framework (providing that a new favourable direction was issued by SoS) would be in place to 2012 or replaced by new DPDs as we originally envisaged. This approach could therefore prove a little wasteful and unnecessary at this point in time.

Option 5 would require that further consultation/engagement to take place before Preferred Options.

Option 6 - Similar to Option 2 except that the WCS has all the WLP strategic sites contained within it – (generally stick with MWDS timetable)

Advantages

- This may satisfy any potential GOSW objection

- If the WCS is adopted it might give certainty and flexibility to a strategic LATS site (provided that such a sites is the one favoured by the WDA)
- May provide some locus for other strategic waste operations in the absence of the WLP allocations forming part of the Development Plan

Disadvantages

- This moves the goal post in terms of WCS preparation. So far through Issues and Options we have stressed that the WCS is not about detailed site locations. WCS could be found to be unsound because this approach is not consistent with everything we have done so far in terms of forums / newsletters / issues and options - not to mention PPS12 and PPS10.
- Serious publicity/communications issues/problems –particularly regarding around the areas near to the strategic sites
- Looks like a ‘rabbit out of a hat’ (although the argument is that these were always WLP site allocations)
- Any such specific sites can only be based on the work carried out to-date – i.e. in the WLP process or through the residual waste management process procurement
- Can we be certain that the site identified is deliverable for the purposes of LATS. CPO of Javelin Park is a major uncertainty/risk - so how does this accord with PPS10's requirement for landowner consent/support etc. its not conclusive that we can have the certainty regarding deliverability at this stage. Therefore the preferred site

might fall down on PPS 10 ownership/availability test. However this approach gives some flexibility as there are other sites also identified at least at Preferred Options stages

- At this point in time the WDA have not formally made up their mind on JP or any other site for that matter – The WLP sites might not be those which the WDA pursues
- This raises issues of due process and concerns as to whether the public has had an input.
- No systematic work or comparable site work will have been undertaken in line with the emerging locational strategy. One WLP site is not even consistent with that approach. WLP sites were adopted in Oct 2004. These would all require some kind of review to ensure that the best sites in the county are identified for waste management facilities. Since 2004 some have been developed and others have ownership issues. Where do other potential sites (perhaps those looked at by the WDA) fit into the process?
- Despite potentially satisfying GOSW – a serious risk of WCS being found unsound through both process and content
- Could be disastrous for the WDA service if either the preferred site/sites or WCS is found unsound. May provide ammunition against any site pursued under CPO.
- What If WCS is unsound for other reasons - which could happen, even on something like SFRA. This could then have implications for the WDA.

- That may cause serious confusion and difficulties regarding the determination of other planning applications.
- The amount of potential disadvantages may well require amendments to the future submission and public examination timetable milestones in any event
- If a JR was successful option 6 might prove to be a wasteful and unnecessary course of action
- All the disadvantages suggest that there would be likely additional resources on already stretched services.

Option 6 would raise the question as to whether the Cabinet decision could be made at the same time as the residual strategy on 28th November. I think that this would open up the WCS to serious challenge

Appendix D

Summary of

Discussions with

District Planning

Authorities

Cheltenham Borough Council (CBC)

192. CBC will shortly be undertaking a Green Belt review, which is necessary in order to provide a good evidence base for Employment and Housing DPDs. Employment land review DPD cannot be prepared until Green Belt review completed.

193. Discussions have taken place between Tewkesbury Borough Council and CBC concerning a joint Area Action Plan (AAP) for planned urban extension at North West Cheltenham, as proposed in the draft RSS. Agreement has been reached that commencement on this DPD is not realistic in 2006. This will be re-addressed in the review of Cheltenham's and Tewkesbury's LDS in 2007.

194. Co-locating waste facilities on industrial estates should be explored/promoted, however market fluctuations do prevent proper predictions on the size or throughput of facilities. Co-location of waste recycling facilities with businesses that use the materials is a key issue that we can

progress jointly. Those using B2 employment land have the most potential.

195. The identification of employment sites needs to be in a wider context, not just B2 Uses, in order to promote/maintain the development of sustainable communities. The main growth sector, as identified in the DTZ report, within Cheltenham is manufacturing. It was agreed that greater recognition must be given towards waste management facilities as employers.

196. A gas works site located on Tewkesbury Rd to the north-west of Cheltenham was highlighted as a potential site for development due to good linkages with a rail line nearby. This is a brownfield site and it is estimated that £20 million would need to be invested to decontaminate the site, consequently the financial viability for potential developers is unlikely to attract a scheme for purely employment use (or waste). It is possible to explore a mixed-use site (i.e. with housing) in order to attract potential developers.

197. Renewable energy is high on CBC agenda and they are keen to look at opportunities to integrate schemes. Combined heat and power has been investigated on the Midwinter site in the adopted local plan but urban extensions will provide further opportunities. Cheltenham's Members are keen to develop an "exemplar site" in the Borough.

Cotswold District Council (CDC)

198. Cotswold Waste Collection team are currently investigating future collection

strategies particularly in terms of kitchen waste. However, the costs are very prohibitive. At present the estimated cost is over £300k per annum to collect around 4,000 tonnes of waste from 36,000 homes across the district.

199. CDC is also considering the introduction of the '*Y Waste Proposal*'. This is a project run through the Federation of Small Businesses in partnership with CDC, to facilitate the collection of recyclables from commercial businesses. It involves a collection services with recycling and general waste bags. At present this project is being run in Stroud. However, CDC is in negotiations with local waste operator, Smiths, to roll this out in the Cotswold area.

200. In terms of the general acceptance of waste uses on allocated B2 Industrial sites CDC expressed no fundamental policy objection to this. However, stressed that the acceptability of waste will need to be assessed on a site-by-site basis.

201. With regards sewage treatment facility issues the only areas of note were the Cirencester extension at Kingshill and the Cotswold Water Park. The Water Park in particular is experiencing infrastructure pressures such as sewage management, which may need to be looked at. Also raised was the issue of inert waste and infill of worked out mineral sites.

Gloucester City Council

202. Gloucester City's opinion is that waste uses are unlikely to be compatible with docks regeneration, therefore limited potential for integrating such uses as part of current

scheme. Some waste uses will have impacts similar to B2 uses and could be integrated along canal corridor, especially the southern end of the bypass past Hempsted bridge and down Bristol Road (e.g. old gas works site and land adjacent to RMC plant – WLP allocations).

203. Land north of Hempsted bridge to Monk Meadow is being progressed for mixed use (housing and employment) and may be able to accommodate particular compatible waste operations.

204. Railway Triangle – visually a key site in City. Used to be peripheral but following growth of City is now a central site. Issues with vehicular access if a link off Metz Way isn't available. GUHRC proposals potentially conflict with existing waste operations and WLP site allocation. Aim to safeguard sustainable transport links (i.e. potential for rail linkage for minerals and waste uses). Local Transport Plan aims to pursue sustainable transport of freight and this site is linked to that objective. Southern part of triangle required by network rail for operational purposes. Northern part options for redevelopment need to be considered in light of potential for rail based use to come forward. Need to consider likelihood of using rail linked waste development as part of site specific DPD. Existing waste sites in County comprise part of current waste management provision – relocation issue if other uses are to supersede existing ones. Gloucester City site allocations DPD will look at trying to resolve some of the competing interests on this site.

205. Bristol Road (Gas Site) – land contamination issue (English Partnerships

yet to agree to contributing to clearing up land contamination issues as a mechanism for assisting uses to relocate and therefore free up other sites for redevelopment). Gloucester City are seeking to locate uses that generate significant traffic, or are potentially bad neighbour developments, towards the southern end of Bristol Road.

206. Likely need for new waste management facilities surrounding the City (eg. Waterwells, Brockworth, Longford). The RSS sets the context urban extensions and there is potential for integrating combined heat and power uses, which is an issue that the LDF could identify as an issue to progress thereby raising as an issue for future developers to consider as part of their proposals

207. There is likely to be need for capacity for residual waste treatment to avoid significant fines for landfilling biodegradable waste. The JMWMS should advise on the type and number of facilities required. Opportunities include proposals to north of Glos for 2000+ houses by Hitchens (Tewkesbury application).

208. Former RAF sites south of the City are largely being redeveloped. Additionally there is a potential LDF site allocation off Naas Lane adjacent to the railway for employment, and potentially a new site for the showmen's guild. But there are problems of rail linkage due to ground levels. Gloucester City noted that Javelin Park would have good potential for waste management, particularly as it is a site identified in the WLP.

209. Sharpness site allocation still in the WLP, which was linked to Gloucester City via the canal with a transfer station allocation at Netheridge. There is a current application¹⁵ for an in-vessel composting (IVC) facility adjacent to WLP allocated site.

210. Green Belt proposals to the south of the City around Robinswood Hill, Wineycroft 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 relocated from central Gloucester due to regeneration, and are then pushed to edge of town sites, but if 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 in rural areas, but subject to amenity issues and tight impact conditions.

211. Use of employment sites for waste management uses – possibility for integrating B2 and waste management on same sites – both are employment uses and can have similar impacts.

212. Parkway station is being considered as a passenger terminus and not as one that is freight based. Bus link with park and ride to be provided to City. Site would be in

¹⁵ This planning application has since been approved.

Tewkesbury area to the north of the bypass (Elmbridge).

Forest of Dean District Council

213. In terms of these growth areas there are likely to be major changes in Lydney, Cinderford and also Coleford. Work is progressing with the Cinderford Business Plan. Plans for Lydney are focused on the harbour site. An Area Action Plan (AAP) is underway for Cinderford.

214. One of the main issues in Lydney from FoD perspective is the site on Harbour Road. We need to look at the waste sites on the approach to the harbour regeneration area.

215. The FoD has capacity for its compostable garden and kitchen waste, but there may be a need for more. Need for facilities to handle residual waste in Gloucestershire – 200,000 tpa but it is perhaps unlikely that this full amount will be in the FoD – more likely to be in the central Severn Vale.

216. Lydney & Cinderford are the main growth / change areas. There may be scope for waste management in Coleford e.g. at the Saw Mills. But no scope at Rank Xerox. Increasingly the case that there is a lack of distinction between certain waste operations and B2 use.

Stroud District Council (SDC)

217. Stroud need to look at previous local plan employment allocations for mixed uses not just employment. Difficulty in preparing the Stroudwater/Brimscombe Canal DPD ahead of the core strategy – need to agree approach with GoSW. Support use of

Sharpness for inter-modal freight uses. Much promise at the docks for sustainable transport usage

218. PPS10 makes specific reference to Green Belts as potentially justifiable locations for waste – proximate to arisings. Javelin Park (non green belt) and Bishops Cleeve (in green belt) are sites already in WLP.

219. Gloucester City regeneration is pushing waste uses out to periphery to urban area onto Stroud boundary. Possibility for combined heat and power too late at Kingsway but Hunts Grove may be a possibility. Stroud environmental strategy - drive to recycle, energy efficiency etc. commitment to set demanding recycling and renewable energy (RE) targets at Hunts Grove similar to or better than Merton (London Authority) regarding RE.

220. Javelin Park – GCC resolved to negotiate to purchase site for in-vessel composting (IVC) and residual treatment which could link to energy for new development at Hunts Grove. Stroud recently granted planning permission for new road into RAF site North of J12 (S.05/2140/FUL permitted on 6 Jan 2006)

221. 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 – north of Gloucester and west of Cheltenham
- not linked to other GB parcels

222. Employment land study over recent 10-20 years looking at widening definition of employment. SDC are not adverse to B2 waste use on sites allocated for employment – it's an issue of impact.

Tewkesbury Borough Council (TBC)

223. There are three Area Action Plans proposed. The Stoke Orchard Regeneration AAP is favoured by the community but GOSW would like it reined back until adoption of the Core Strategy. The North Gloucester AAP and North West Cheltenham AAP are linked to growth areas in the RSS but as yet there aren't the resources to pursue them. Tewkesbury are working in partnership with Cheltenham on the best way of progressing the latter.

224. The RSS identifies that there is a need for around 10k houses on top of earlier requirements. This is likely to be found through significant urban extensions to Cheltenham and Gloucester, but within the Tewkesbury and Stroud administrative areas. As a consequence there may be a need for new waste management facilities around the urban areas to service these developments.

225. The use of employment sites for waste management is a matter that in the past GCC and TBC have not always agreed upon. The new spatial planning system offers a good opportunity to move forward in a common direction on this issue, particularly where new sites are identified as opposed to historic allocations. There was agreement that employment sites for B2 uses could be appropriate for certain waste management uses, but TBC

highlighted that government guidance requires LPAs to clearly state what types of employment are envisaged on a given site.

226. There was also agreement that the two authorities need to work closely on integrating waste uses with new development and 'closing the loop' between the collection/bulking-up and processing of recyclates (the role of the WPA) and the manufacturing processes required to transform the materials into saleable goods (the remit of TBC). The two operations could, and possibly should, be co-located to maximise synergies between uses.

227. There was a discussion about the options for making site provision. One such option is to identify a significant number of sites, as is the case currently in the adopted WLP. This approach has not necessarily worked out as envisaged due to a large number of proposals coming forward outside of plan allocations. Another option, which potentially overcomes this, would be to identify larger sites in a site specific DPD with smaller sites coming forward on a criteria based approach. In such circumstances it was agreed that provision for waste uses could appropriately be made for smaller operations using locational criteria such as brownfield/Previously used land, industrial/employment land (as distinct from office style employment) and farm diversification.

228. 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) and in adjoining LPA areas. 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.

229. Sustainable transport opportunities. **Water** Currently the only wharf in the Borough is at the old flour mill in Tewkesbury, however this is likely to be redeveloped for a mixed use scheme. It was agreed that if additional wharfage facilities were required for either minerals or waste transport in the future these would not necessarily need to be located at locations where there was a past history of such activity. **Rail** There is a rail head at Ashchurch, for which there is currently interest in its commercial viability.

230. There is no clear Government guidance on how to plan for hazardous waste management. The RSS requires a policy approach to be set out for managing hazardous waste. Although site provision does not have to be identified, existing sites should be safeguarded provided they are "environmentally acceptable". There was a discussion about what this means in practice and TBC were invited to give us their thoughts on what this means in the context of stakeholders in the Tewkesbury area. This is particularly important as Grundons' planning permission runs out in 2009. The issue was raised that there are currently significant voidspace remaining at the site and to leave the site in its current state is not desirable.

231. Cumulative impact is a matter that PPS10 requires the WPA to consider when locating waste management facilities in areas that have a history of such uses. The

companion guide to PPS10 states that asking the local community what they think is a good way to flesh out what cumulative impact entails. Consequently the WCS includes an issue on this matter and TBC were asked to consider in their response to the WCS how cumulative impact could be measured in respect of Tewkesbury's communities.

