Gloucestershire Waste Core Strategy (WCS)

Statement of Publication Representations & Key Issues

Prepared in accordance with Regulation 30(e) of the Town & Country Planning (Local Development) (England) (Amendment) Regulations 2008

September 2011

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Appendices

1. Introduction

1.1 This statement has been prepared in support of the submission Gloucestershire Waste Core Strategy (WCS) in accordance with Regulation 30(e) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

1.2 The purpose of the statement is to set out the number of representations made in response to the publication WCS in accordance with Regulation 28(2) and to summarise the main issues raised by respondents.

1.3 The statement should be read in conjunction with the other WCS submission documents available online at www.gloucestershire.gov.uk/wcs/submission at the Council's main offices, all local libraries and District Council offices.

2. Number of Representations

2.1 Following an extensive process of stakeholder engagement, the Gloucestershire WCS was formally published on 13th December 2010 with representations invited over a 6-week period until 7th February 2011.

2.2 Copies of the publication documents were made available online, at all local libraries, at the County Council's main offices and in all Gloucestershire District Council offices.

2.3 A broad range of organisations and individuals were invited to comment. Appendix 1 sets out a list of the 'specific' and 'general' consultation bodies that were notified.

2.4 In addition, over 1,000 'other' individuals and organisations held on the Council's in-house database were contacted. The database has been developed over several years and consists of a range of different people and organisations that have previously expressed an interest in the WCS process. The complete list is too long to include in this statement but can be made available on request.

2.5 Residential and business properties located in close proximity to the four strategic sites allocated in the publication WCS were also notified in writing and invited to comment.

2.6 In response to the publication a total of **191 representations** were received from **41 individuals and organisations** in accordance with Regulation 28(2) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

2.7 In addition, a further **25 representations** were received from **7 individuals and organisations** after the deadline for submitting representations had expired.

2.8 Although some were submitted late, the Council has taken all representations into account. The key issues raised by respondents and the Council's response to these, is set out in Section 3.0 below.

2.9 A list of all those who responded at the publication stage is attached at Appendix 2.

2.10 Whilst it is the Council's view that none of these representations raise fundamental issues of soundness, the Council decided it would be beneficial to publish a revised version of the WCS incorporating a number of 'focused changes'.

2.11 Further comments on the 'focused changes' were invited over the 6-week period 27th June – 8th August 2011. The same notification procedures outlined above were repeated.

2.12 In response to the 'focused change' consultation, a total of **222 representations** were received from **50 individuals and organisations** in accordance with Regulation 28(2) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.

2.13 In addition, a further **5 representations** were received from **5 individuals and organisations** after the deadline for submitting representations had expired.

2.14 Although some were submitted late, the Council has taken all representations into account. The key issues raised and the Council's response is set out in Section 4.0 below.

2.15 A list of all those who responded to the focused change consultation is attached at Appendix 3.

3. Key Issues Raised at Publication

3.1 The key issues raised by stakeholders in response to the publication WCS (December 2010) were as follows:

- Landfill capacity
- Commercial and Industrial (C&I) waste arisings
- Municipal waste arisings
- Zero-growth target
- Recycling/composting target
- Anaerobic digestion (AD)
- Bulking and transfer
- Current planning application at Wingmoor Farm (East)
- Combined heat and power (CHP)
- Sustainable transport
- The promotion of small-scale dispersed facilities
- Integration of municipal and commercial and industrial waste
- Habitat Regulations Assessment (HRA)
- Composting requirements

3.2 These issues are explained below together with the Council's response.

Landfill Capacity

3.3 The publication WCS sets out the situation in relation to current landfill capacity in Gloucestershire. For non-hazardous landfill it states that there is *'at least 10-13 years remaining capacity although this is a conservative estimate and could be significantly longer'*. For hazardous waste it is estimated that there is around 22 years of remaining capacity. The footnotes to these estimates explain that they depend on whether planning permission is granted in relation to the current planning application at Wingmoor Farm (East). If permission is refused there will be less non-hazardous and hazardous landfill capacity available.

3.4 The WCS also explains that there is significant available capacity for inert waste material both at landfill operations and through other permissions including mineral restoration and engineering.

3.5 Relevant background information is set out in Section 11 of the Technical Paper WCS – A Waste Data Update (2010) which provides the most up to date position on landfill at the time of publication of the WCS. It provides a discussion of the waste data in relation to landfill and any assumptions made by the WPA.

3.6 Given the level of landfill capacity which is currently available, the WCS does not make specific provision for additional landfill but acknowledges that the situation will need to be reviewed regularly, with preparation of a landfill development plan document (DPD) to commence by 2017/18.

3.7 The Environment Agency (EA) in responding to the publication WCS has confirmed that it is happy with the Council's approach towards landfill capacity and provision. However, objections have been received from the landfill operators themselves.

3.8 Cory Environmental who operate the non-hazardous landfill sites at Hempsted (Gloucester) and Wingmoor Farm (West) suggest that the non-hazardous estimate of 10-13 years is an underestimate because the Council has under-estimated the amount of remaining landfill voidspace available and have over-estimated the likely annual waste input to these sites by not taking into account potential future reductions to landfill e.g. as a result of landfill tax.

3.9 Conversely, Grundon Waste Management Ltd. who operate the non-hazardous and hazardous landfills at Wingmoor Farm (East) argue that there is less than 10-13 years capacity remaining because the Council has under-estimated the amount of commercial and industrial (C&I) waste in Gloucestershire and has made the presumption that landfill capacity will continue to remain available at Wingmoor Farm (East) despite the fact that the current planning application at the site has yet to be determined.

3.10 In light of this, Grundon argue that at the present time, permitted non-hazardous landfill voidspace is less than 5 years and as such the WCS should include a policy on landfill or an earlier commitment to prepare a landfill DPD.

Council's Response

3.11 Section 11 of the WCS-A Waste Data Update (2010) sets out the latest data sources for landfill at November 2010 and assumptions that lead to an overall conclusion that there is sufficient landfill void for the time being and that there is no requirement for the WCS to have a specific policy at the present, based on the evidence. However it acknowledged that landfill still plays a role for integrated waste management in the future and that this issue will need to be kept under review. Hence the WCS suggest that such a review could potentially begin in 2017/18. This could commence earlier or later subject to ongoing monitoring.

3.12 As the main respondents to this matter are the two main landfill companies who have landfill operations in Gloucestershire they are both effectively suggesting a different outcome to that suggested in the WCS. Grundon are suggesting that landfill will have run out in five years and Cory Environmental suggest that landfill will last considerably longer than the 10-13 year range indicated by the WPA. The WPA has since had discussions with these operators concerning their representations. The WPA considers that the concerns that have been raised stem from making alternative assumptions as to what the outcome for future landfill might be. There are if you like alternative ‘what ifs’. In fairness to the respondents the WPA has returned to this issue because clearly it is in everyone’s interests to have a robust position on landfill data and what that means for future landfill provision and policy.

Below we explore some alternative scenarios in line with the issues raised by the respondents and then come to a conclusion as to whether any amendments are required within the WCS.

3.13 It should be noted that future landfill capacity isn't a new issue. The WPA explored six potential alternative scenarios in the Technical Evidence Paper WCS-A Waste Data (2007). The baseline at that point in time was that the 2005 managed figure indicated a throughput of around 500,000 tpa of non-hazardous biodegradable waste being sent to landfill (residual MSW & C&I) and around 220,000 tpa of inert material going to licensed landfill. The permitted void as of Feb 2007 was 8,985,000 m^3 as advised by the EA. That represented 20 years landfill life according to the EA which would last the life of the WCS to 2027. The data paper then went on to explore 6 potential scenarios for future landfill capacity. In summary these were:

1. Landfill lasts until 2020. Assumes all landfill is available, LATS targets are met and Wingmoor Farm East (Grundon) receives planning permission.
2. Landfill lasts well beyond 2020 and assumes that as landfills close the waste from them is sent somewhere else other than the remaining landfills. (*The closure of Frampton since 2007 suggests that this has happened from that particular landfill*).
3. 2019/20. Once a landfill closes the waste would transfer to another Gloucestershire unit.
4. 2013/14. Wingmoor Farm East is refused and closes.
5. 2030. Combination of waste reduction and diversion.
6. Beyond 2030 due to maximum recycling targets.

3.14 The compound void space required ranges from 6.5 million m^3 – 8.8 million m^3 depending on assumptions made. There are then current throughputs around 12.8 years but increasing to 17.5 years with diversion/improved recycling etc. The conclusions from this were that scenarios 1 – 3 were the most likely but scenario 4 was the likeliest option if Wingmoor Farm East was refused. This demonstrates that the WPA has been assessing this matter both through the Preferred Options stage and now at the publication stage.

Grundon Waste Management Issues

3.15 Taking the Grundon concerns regarding non-hazardous landfill first, the main concern is that the C&I waste figure used in the WCS is a managed figure and is less than that identified in the recently published DEFRA C&I study. Subsequent discussion with the operator regarding their objection has also clarified concern regarding the assumption that Wingmoor Farm East might be refused therefore a significant amount of landfill would be lost and that the review of landfill would need to begin immediately to allow lead-in time for new landfill to be sought and obtain planning permission. The conclusion of the operator is that waste will run out sooner than expected, potentially in less than five years time.

3.16 In relation to the DEFRA waste arisings study, the WPA response is outlined in this paper below. In summary the WPA consider that the DEFRA study provides some additional information but is not necessarily any more authoritative than using the data contained in the WCS-A (2010) Update. Although it provides arisings data rather than a managed figure, this has been obtained from a sample survey with sample audit. In addition care needs to be taken with the different categories of waste management methods.

3.17 In the case of the Grundon argument the assumption is that if the whole arising figure of 526,188 tonnes went to landfill then only 5 years landfill capacity remains. However the landfill breakdown appears substantially less (c. 114,000 tonnes). Confirmation with the EA and the consultants who undertook the study suggest that caution is required when using this data as more waste will have gone to landfill following other processes such as transfer but which is not captured in this study. Also metals are included (which GCC specifically take out of the C&I waste) and in addition the DEFRA study doesn't indicate where waste is managed therefore does not inform on cross boundary movements.

Scenario of Wingmoor Farm (East) being refused planning permission.

3.18 The concern regarding Wingmoor Farm East being refused planning permission in 2011/12 is an option which could be considered in this process. WCS-A Waste Data Update (2010) paragraph 11.1.4 and 11.1.5 outlines the situation and that the WPA had considered that the 2,824,500 m^3 at Wingmoor Farm East was available landfill capacity. Therefore if this landfill capacity is available, it is likely that landfilling will continue at Wingmoor Farm East to the WCS end date of 2027 and potentially beyond. Grundon's own planning application submitted in 2009 envisages non-hazardous landfill lasting until 2029 and current throughputs might indicate that picture lasting longer still.

3.19 However if the capacity at Wingmoor Farm East was taken out of the equation, the landfill available would be 3,205,000 m^3 (effectively the capacity remaining at Wingmoor Farm West and Hempsted). Therefore if this scenario were to occur the following outcomes might result:-

Outcome 1. If the 2010 current baseline data based on 437,122 tonnes landfill throughput was used, overall landfill capacity would last for about 7 years. As the baseline year is 2008 this would mean landfill lasting to 2015. Cory Environmental suggest that it should not be assumed that the C&I waste they currently do not receive, would automatically come to their sites for disposal. However the WPA view is that this waste would need to be managed somehow either through recycling, treatment and some disposal as it is assumed that a reasonable percentage of this waste would arise in Gloucestershire.

Outcome 2. If the 2010 baseline data was used but only the existing throughputs to the remaining Cory landfill sites were landfilled, this would be 344,189 tonnes. This

assumes that the Wingmoor Farm East waste is diverted away from landfill. This would mean that landfill would last around 9 years to 2017.

Outcome 3. That the throughput of 344,189 tonnes remains broadly the same for around 5 years to 2013/14 but at that point major diversion would kick in. For example the diversion of MSW through recovery treatment would mean a huge diversion of most of that waste stream (assume year on year c.8,000 tpa WCS –A Waste Data (Update) 2010 MSW Table 3l, current C&I c.40,000 tpa to Cory sites, and c.95,000 m^3 of C&D continues).

344,189 x 5 years = 1,720,945 void. If it is assumed 1,485,055 m^3 void remains after 5 years, this would last a further 10 years to 2025. (143,000 m^3 x 10.4 years = 1,485,055).

Outcome 4 is to factor in potential for further C&I and in particular C&D diversion this could last longer still perhaps to 2029.

3.20 It should be noted that assumptions are made using the baseline as known from 2010 (actual data for 2008 – 2009) therefore some account would assume that some of the landfill from Wingmoor Farm West would have already been used for landfill.

3.21 This demonstrates that in a scenario where Wingmoor Farm East ceases to be available from 2011/12 that a number of outcomes could result such as landfill lasting anything between 2015 in the shortest scenario to up to 2029 in the longest.

Cory Environmental Ltd Issues.

3.22 The main concern from Cory with regards this issue is that the reference in the WCS to between 10-13 years life at the non-hazardous landfill sites in Gloucestershire is considered inaccurate due to a combination of an underestimation of available landfill void and an overestimation of residual MSW, C&I and C&D to landfill. Cory argues that this has a knock-on to other aspects of the WCS. In relation to Commercial and Industrial waste concerns these are highlighted mainly under the sub-section concerning C&I below.

3.23 In relation to landfill void Cory state that the landfill void at their two sites amount to 3,205,000 m^3 as at 31st December 2009 as opposed to 31st March 2009. In effect a nine month difference. This would provide around 5.5 years at Hempsted and around 17 years at Wingmoor Farm West from 1st January 2010. The WPA has looked at the potential impact on the life of landfill in the WCS and considered that the need to alter the overall lifetime of landfill capacity seems rather marginal. This doesn't alter the fact that Cory consider that Hempsted will be complete in 5 – 6 years and Wingmoor Farm West in around 17 years. In subsequent discussions with Cory post-publication regarding their representations, they are firmly of the belief that Wingmoor Farm West will last through the period of the Waste Core Strategy

even taking into account the impact of Hempsted being completed around 2016 and of Wingmoor Farm East not receiving planning permission.

3.24 In relation to an overestimation of future residual MSW to landfill the WPA is advised by the WDA as to what future requirements are for MSW.

3.25 In addition Table 3m of the WCS – A Waste Data Update (2010) clearly identifies that there is 3,205,000 m^3 of landfill void remaining at the Cory landfill site sufficient to meet the potential future requirements of residual MSW for over 20 years including the amount of both C&I and C&D which is also tipped. In Table 3n the MSW requirement at 2009/10 – 2020/21 is 2,107,264 m^3 which again is sufficient to meet the requirements well beyond the MSW LATS target date. Further the MSW requirement over the WCS timeframe is identified in Table 3o of 2,894,479 m^3. Therefore there is also sufficient capacity to meet those requirements.

3.26 The WPA has met with Cory Environmental to try and clarify the response and if possible to reach some consensus. The WPA has suggested Cory presents some alternative data if they consider that WCS – A Update (2010) to be incorrect. However Cory still reiterate that they consider the use of the data regarding MSW in its current form is wrong along with the advice of the WDA to the WPA. The fundamental plank appears that they wish the WDA to provide some alternative advice. The WDA have provided a revised projection for residual waste (see municipal waste arisings below) but it doesn't have a significant overall effect on the provision required in the WCS in relation to landfill. The WPA suggests that some of the concern might stem from the final column of Table 3l of WCS –A (Update) 2010.

3.27 These totals do provide the basis of the possible landfill capacity requirements given in Table 3n and 3o as referred to above. For example in Table 3l year 2006/07. MSW arisings are 324,143 tonnes, 32% of the arising is 103,726 tonnes. That is the maximum inert which can be landfilled on top of the LATS allowance. Therefore the possible landfill capacity allowing for both the Government set allowance (LATS) and inert waste is 262,360. However actual landfill for that year was 214,969 tonnes. Following a further audit of these figures a confusion may have occurred as for years 2007/08 and 2008/09 a calculation error has occurred and the capacity should be 253,935 rather than 256,340 in 2007/08 and 237,047 rather than 246, 661 tonnes for 2008/09. The remaining years are correct. However around 12,000 tonnes error over the total landfill capacity of the WCS isn't profound.

3.28 However there are alternative scenarios which could be derived using the residual waste totals after treatment rather than possible capacity required. This would result in a projection of 792,994 tonnes of MSW waste to landfill between 2009-2014. From 2015 this is around 7,000 – 8,000 tpa following treatment assuming MSW recovery capacity comes on line. This would mean that the requirement for landfill of MSW would be 845,953 tonnes to 2020/21 and 901,814 tonnes to 2027/28. There would still be requirements for landfill of some C&I and C&D waste on top of that. Broadly speaking this is similar to the *outcome 3* identified under the

Grundon issues raised above. Clearly in this eventuality this could also result in current landfill void lasting much longer than the conservative 10- 13 years range.

3.29 In relation to Commercial & Industrial waste Cory Environmental have, following the clarification meeting, highlighted a range of matters which they consider provide that the evidence base is unsound. Again much of this seems to be related to the WPA use of different datasets in WCS-A Update 2010. For example the difference between operator and EA returns regarding C&I inputs. The margin between the two different data sets directly relates to the 13 – 10 years landfill life range used by the WPA (para 11.4.15 and 11.4.16)**.** It should be emphasised that the dataset 2 (landfill input figures from operators) directly feed in to the 13 year landfill life projection therefore the WPA strongly refutes that the WCS is underpinned by an unsound evidence base.

3.30 Cory Environmental also point to projections made for C&I in other parts of the country and argue that the projections all show a downward trend. As demonstrated above there are any number of possibilities that could be made and if the WPA possessed a 'crystal ball' which could pick the right outcomes. However the WPA would maintain it has used the evidence base correctly in terms of current baseline data and the future capacity requirement ranges from the SW RSS to provide a guide to future C&I capacity waste management and hence landfill requirements. These all show a much lower future landfill requirement for C&I landfill than Cory claims the paper is identifying. Whilst the overall growth in C&I waste in WCS- A Waste Data Update (2010) is 0% the potential scenarios for landfill of this waste stream is declining. This is recognised in para 11.4.20 that landfill will last longer if inputs decline further.

3.31 This theme from Cory is continued with regards Construction and Demolition waste. The WPA assume again 0% growth in arisings but that the target to landfill should reduce by 50% and what will potentially be sent to landfill. Therefore there is a clear projection of declining inputs. However it should be remembered that some other operators specialising in the management of this waste stream consider that greater provision needs to be identified for future disposal requirements.

3.32 In relation to criticism regarding the different datasets used the differences and the issues or assumptions are all listed in the paper WCS – A Waste Data (Update) 2010. However the following discussion might assist in clarifying matters. With regards dataset 1 this uses a combination of WDI data information (the main data discs provided to the WPA from the EA) and the assumptions made by the WDA for MSW. The conclusion contained in the paragraph 11.4.15 of WCS-A Waste Data (Update) 2010 is that this would provide for around 10 years (2019/20) although the caveat is that this is a conservative figure. As indicated elsewhere above in this report, there are any number of scenarios with alternative assumptions which can be made. Quite clearly if the majority of residual MSW is recovered from 2015 and diversion of other waste streams occurs the landfill will last much longer. Dataset two is provided directly from the operators and would indicate that landfill would last around 13

years (2022/23) based on current throughputs WCS-A Waste Data (Update) 2010. Clearly this could again be much longer assuming greater recycling and diversion from landfill.

3.33 What should be remembered in this is that the WPA has presented both datasets which influence the range of landfill capacities required. Overall it should be stressed the range is broadly accurate to the satisfaction of the EA and the Companion Guide to PPS 10 warns against 'spurious precision'.

WPA Conclusion

3.34 The responses raised by both Grundon and Cory are arguing that the current landfill may last shorter or longer than indicated within the WCS depending on alterative assumptions and viewpoints. Therefore the picture of how long the current landfill will last is not entirely clear. As demonstrated elsewhere above there are a number of alternative scenarios that can be projected, some suggesting the 10 – 13 year range for landfill to be a starting point but with caveats that this could be conservative. Void space should last until the 2020 LATS allowance milestone and there is a good chance that it is more likely that there is sufficient void space to last the WCS end date of 2027.

3.35 There is one possible scenario with the refusal of Grundon that void space could last only until 2015 although even in this scenario there are numerous other potential outcomes. On review of the position the WPA considers that the 10 – 13 years range can be justified although it is acknowledged that it is very conservative and could last longer.

3.36 However in considering these alternative scenarios the WPA does acknowledge that in line with concerns from Grundon that should Wingmoor Farm East be refused and subsequently dismissed on appeal and therefore ceases to operate that the WPA will need to potentially bring the review of the landfill position forward.

3.37 Rather than this potentially beginning in 2017/18 the review process would need to follow the likely WCS adoption in early 2012. The progress of the Wingmoor Farm East planning application would also be clearer at that stage. It would not be practical to delay progress of the WCS now to await the outcome of that process which could take some time. Rather a further landfill DPD could be produced incorporating a partial review of the WCS regarding landfill policy if need be.

3.38 The main issue is to acknowledge this possibility and a change is therefore proposed to paragraph 4.129 of the publication WCS to reflect this.

See Focused Change 26.

3.39 In addition the WPA will include additional caveats in line with the concerns from Cory that landfill may last longer due to alternative scenarios whereby potential future diversion rates from landfill across all waste streams mean landfill lasts to the end of the WCS timeframe (2027) and potentially beyond. It is therefore proposed to amend paragraph 4.125 to reflect this possibility.

See Focused Change 25.

3.40 However the situation will still need to be monitored carefully as outlined in paragraph 4.126 of the WCS and notwithstanding the concerns raised by Grundon.

Commercial and Industrial (C&I) Waste Arisings

3.41 Commercial and Industrial (C&I) waste is that which is generated by shops and businesses. It is similar to municipal waste but is generally collected and managed by private companies rather than local authorities.

3.42 The publication WCS identifies that in 2008 the total amount of C&I managed in Gloucestershire was 375,000 tonnes. This is taken from data provided by the Environment Agency (EA) and is the amount of C&I waste managed at licensed waste management facilities in Gloucestershire. This is considered to be a reasonable proxy of how much should be planned for in the future.

3.43 However, shortly after the WCS was published in December 2010, DEFRA published a study on C&I waste 'arisings' in 2009 i.e. the amount of waste produced not just how much is managed. Notably, the 'arisings' figure for Gloucestershire was 526,188 tonnes, significantly higher than the managed figure of 375,000 tonnes.

Council's Response

3.44 The DEFRA study was published after the WCS and could therefore not be taken into account. In any case there are a number of reasons why it is considered appropriate to use the managed figure of 375,000 tonnes per year.

3.45 First it is a known quantity rather than an estimate as it is taken from data provided by the Environment Agency (EA) and waste operators.

3.46 Second, the figure of 375,000 tonnes does not include metal waste as it tends to skew the data. However, metal forms a significant proportion of the C&I waste stream and when it is included, the managed C&I figure is closer to the DEFRA arisings estimate.

3.47 Third, not all of the 526,188 tonne arising figure will be managed in Gloucestershire, some will be exported and dealt with at facilities outside the county.

3.48 Fourth, the DEFRA study itself has a number of limitations including the fact that the survey was voluntary which means it is likely to have captured data from companies that are progressive in their approach to managing waste, the fact that the survey is for 2009 only, a year within a significant recession, the data provided may be inaccurate or have failed to capture all material streams, the survey only gives a 'one-day' picture of overall arisings and composition of mixed-waste streams and there may be overlap with MSW data.

3.49 For these reasons, it is considered appropriate to continue using the managed figure of 375,000 tonnes per year. However the DEFRA study does provide the latest and best position with regards what level of C&I waste might be arising within Gloucestershire. Therefore the publication WCS has been revised to include reference to the DEFRA study. **See Focused Change 3.**

Municipal Waste Arisings

3.50 In relation to municipal waste (MSW) the publication WCS identifies the need to provide approximately 150,000 tonnes per year capacity of residual waste treatment. 'Residual' waste is that which is leftover after recycling and composting and typically consists of 'black-bin' waste from households.

3.51 The 150,000 tonne/year requirement is based on information provided by the Waste Disposal Authority (WDA) in 2010 which shows that by 2014/15 the amount of municipal waste arising will be 311,753 tonnes which, after recycling and composting, leaves 148,000 tonnes of residual waste, which has been rounded up to 150,000 tonnes.

3.52 A number of respondents believe that 150,000 tonnes is too high and does not take account of the recent downward trend in MSW arisings. Several respondents have suggested that the residual capacity requirement should be reduced and some have suggested using a range (e.g. 60,000 – 134,000 tonnes).

Council's Response

3.53 It is acknowledged that waste arisings have fallen in recent years. In 2006/7 the amount of MSW arising in Gloucestershire was 324,143 tonnes and by 2009/10 this had fallen to 293,815 tonnes. There are several reasons for this.

3.54 The local authorities in Gloucestershire have been implementing the Joint Municipal Waste Management Strategy (JMWMS). In particular, Cotswold District Council, Gloucester City Council and Tewkesbury Borough Council have all introduced changes to their services which have reduced municipal waste arisings. The service changes were expected to have this overall effect and the WDA tonnage modelling took this into account. In addition, the recent recession has undoubtedly had an effect on arisings.

3.55 It is however wrong to assume that service changes lead to year on year waste reduction. The WDA has carried out modelling to forecast residual waste tonnages many times and have considered many factors in that modelling including population growth, District service changes, policy, Government forecasts and existing waste arisings.

3.56 Table 3l of the Waste Data Paper Update (2010) is based on information provided by the WDA at that time and forecasts that MSW arisings will increase to 359,612 tonnes/year by 2027/28. On this basis the WCS identifies a residual MSW requirement of 150,000 tonnes/year.

3.57 More recent modelling carried out by the WDA for the review of the residual project, based on 60% recycling by 2020 and 70% recycling by 2030, showed an annual forecast of approximately 155,000 tonnes of residual waste by 2040. A number of scenarios combining varying growth and recycling rates were also modelled. These show the projected levels of residual waste in 2030 to be between 125,000 tonnes (70% recycling and composting) and 165,000 (60% recycling and composting).

3.58 The WDA has also reviewed the Swedish Sustainable Waste Management Programme, which predicts that waste will grow at 2.2% per annum over the next 25 years. This aligns very closely with DEFRA growth scenarios[1] and the WDA's own modelling. The WDA has also had discussions on the latest national waste growth trends with DEFRA.

3.59 On the basis of the above, the residual MSW requirement of 150,000 tonnes/year identified in the WCS is considered to be robust and therefore no change is proposed.

Zero-Growth Target

3.60 The WCS spatial vision includes reference to achieving 'zero-growth' in waste production by 2020. This aspiration is taken from the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS) which aims to reduce the growth of Gloucestershire's municipal waste arisings to zero by 2020. It was included as part of the proposed spatial vision at the 'preferred options' stage in 2008 and taken forward into the publication WCS.

3.61 A number of respondents argue that the aim of zero-growth by 2020 conflicts with the waste data underpinning the WCS, which shows growth of around 0.8% in the period 2020/21 to 2027/28.

[1] http://archive.defra.gov.uk/environment/waste/localauth/funding/pfi/documents/pfi-supporting-analysis-waste101206.pdf

Council's Response

3.62 There are several issues to raise in response. First, it is important to note that the zero-growth objective set out in the WCS is derived from the Joint Municipal Waste Management Strategy (JMWMS) which was adopted in 2008. In line with national policy and best practice, the WCS must help to deliver the JMWMS and on this basis it is entirely appropriate for the WCS to include the zero-growth target.

3.63 Secondly, notwithstanding the aspiration for zero-growth by 2020, forecast data provided by the WDA for publication of the WCS suggested that MSW arisings will increase by around 0.8% per year between 2020/21 and 2027/28. It is essential that adequate capacity is made available to deal with this forecast growth.

3.64 Thirdly, it is important to note that the target of zero-growth from 2020 is assumed to be at a household level. Therefore even if the aspiration for zero-growth were to be achieved, the anticipated growth in population and the number of households would still mean an overall increase in waste arisings.

3.65 For improved clarity it is proposed to amend paragraph 3.23 of the WCS to state that 'notwithstanding the aspiration for zero-growth, forecasts suggest that the amount of municipal waste will increase to 359,612 tonnes in 2027/8'.

See Focused Change 8.

Recycling/Composting Target

3.66 The publication WCS seeks to ensure that at least 60% of household waste is recycled or composted by 2020 with an aspiration for 70%. The target is derived from the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS).

3.67 A number of respondents argue that 60% is not high enough and that a more ambitious target should be used e.g. 80%. This is because some authorities such as Cotswold District are already achieving high rates of recycling (60% in 2009/10) and there are specific examples from elsewhere such as the Cwm Harry Land Trust where very high rates of recycling and composting have been achieved.

Council's Response

3.68 The national target set out in the Waste Strategy for England (2007) is to achieve 50% recycling/composting by 2020. The Council's target of at least 60% by 2020 with an aspiration for 70% is therefore well above the national target and cannot be described as unambitious.

3.69 Whilst it is correct to state that higher than 60% levels of recycling and composting have been achieved in Cotswolds and at the Household Recycling Centres (HRCs) it is not correct to extrapolate this to mean that a much higher rate than 60% is achievable across Gloucestershire.

3.70 In reality, the Cotswolds achieved 60.85% in 2008/09 and have since dropped back to 60.23%. The HRCs have consistently achieved a much higher rate of recycling for many years but this is because it is easier to engage with the public at these sites and they can be encouraged to recycle at the point of disposal. This operation is very different to collecting waste door to door where the opportunities to engage are much more limited.

3.71 Using Table 3.6 of the Gloucestershire Baseline Report for the Joint Municipal Waste Management Strategy (JMWMS) to extrapolate that 90% of the waste stream is recyclable is an error. The table does not give sufficient information to make this calculation as the waste categories are too broad.

3.72 Using the categories of waste in the table below taken from "The Composition of Kerbside Collected Household Waste in Gloucestershire - Final Report - October 2008" study demonstrates that in fact about 77% of the waste stream is recyclable.

Gloucestershire - Study Average								
Material sub-category	Arisings, kg/hh/wk				Assay, %			
	DR	GW	RW	Combined	DR	GW	RW	Combined
Newspapers	0.78	0.00	0.33	1.11	29.1	0.0	3.1	7.5
Magazines	0.47	0.00	0.38	0.85	17.7	0.0	3.5	5.7
Yellow pages	0.01	0.00	0.01	0.03	0.4	0.0	0.1	0.2
Other recyclable paper	0.09	0.00	0.21	0.30	3.5	0.0	2.0	2.0
Paper packaging	0.01	0.00	0.06	0.08	0.5	0.0	0.6	0.5
Non-recyclable paper	0.01	0.00	0.58	0.59	0.2	0.0	5.4	4.0
Liquid cartons	0.00	0.00	0.04	0.04	0.0	0.0	0.4	0.3
Board packaging	0.01	0.00	0.30	0.32	0.5	0.0	2.8	2.1
Card packaging	0.02	0.00	0.48	0.50	0.6	0.0	4.5	3.4
Other card	0.01	0.00	0.05	0.06	0.4	0.0	0.4	0.4
Plastic Bottles: PET	0.02	0.00	0.18	0.20	0.8	0.0	1.7	1.4
HDPE	0.04	0.00	0.14	0.18	1.4	0.0	1.3	1.2
LDPE	0.00	0.00	0.00	0.00	0.0	0.0	0.0	0.0
PVC	0.00	0.00	0.00	0.00	0.0	0.0	0.0	0.0
PP	0.00	0.00	0.00	0.00	0.0	0.0	0.0	0.0
Dense plastic packaging	0.00	0.00	0.46	0.46	0.1	0.0	4.3	3.1
Other dense plastic	0.00	0.00	0.35	0.35	0.1	0.0	3.3	2.4
Other plastic film	0.00	0.00	0.36	0.36	0.0	0.0	3.4	2.4
Packaging film	0.00	0.00	0.43	0.44	0.1	0.0	4.0	2.9
Textiles	0.01	0.00	0.37	0.39	0.5	0.0	3.5	2.6
Shoes	0.00	0.00	0.05	0.05	0.1	0.0	0.5	0.3
Treated wood	0.00	0.00	0.07	0.07	0.1	0.0	0.7	0.5
Untreated wood	0.00	0.00	0.00	0.00	0.0	0.0	0.0	0.0
Furniture	0.00	0.00	0.04	0.04	0.0	0.0	0.4	0.3
Nappies/ Sanitary	0.00	0.00	0.43	0.43	0.0	0.0	4.0	2.9
Other misc. comb.	0.00	0.00	0.11	0.11	0.0	0.0	1.0	0.7
Carpet and underlay	0.00	0.00	0.02	0.02	0.1	0.0	0.2	0.2
Glass bottles: Brown	0.18	0.00	0.07	0.25	6.7	0.0	0.6	1.7
Green	0.39	0.00	0.10	0.49	14.7	0.0	0.9	3.3
Clear	0.31	0.00	0.12	0.43	11.5	0.0	1.1	2.9
Other	0.00	0.00	0.00	0.00	0.1	0.0	0.0	0.0
Glass jars	0.12	0.00	0.21	0.33	4.4	0.0	2.0	2.2
Other glass	0.01	0.00	0.03	0.04	0.3	0.0	0.3	0.3
Construction and demolition	0.00	0.00	0.06	0.06	0.0	0.0	0.6	0.4
Other misc.non.comb	0.00	0.00	0.10	0.10	0.0	0.0	0.9	0.7
Ferrous food cans	0.09	0.00	0.12	0.21	3.3	0.0	1.2	1.4
Ferrous beverage cans	0.02	0.00	0.01	0.04	0.8	0.0	0.1	0.2
Other ferrous metal	0.01	0.00	0.10	0.12	0.5	0.0	1.0	0.8
Non-ferrous food cans	0.00	0.00	0.03	0.03	0.0	0.0	0.3	0.2
Non-ferrous beverage cans	0.03	0.00	0.04	0.07	1.2	0.0	0.4	0.5
Other non-ferrous metal	0.00	0.00	0.04	0.04	0.1	0.0	0.3	0.3
Fridges, Freezers	0.00	0.00	0.00	0.00	0.0	0.0	0.0	0.0
Large hh Appliances	0.00	0.00	0.01	0.01	0.0	0.0	0.1	0.1
Small hh Appliances	0.00	0.00	0.02	0.03	0.2	0.0	0.2	0.2
IT & Telecoms Equip.	0.00	0.00	0.02	0.02	0.0	0.0	0.2	0.1
Consumer Equip.	0.00	0.00	0.03	0.03	0.0	0.0	0.3	0.2
Elec. & Electonic Tools	0.00	0.00	0.02	0.02	0.0	0.0	0.2	0.1
Toys,Leisure & Sports Equip.	0.00	0.00	0.00	0.00	0.0	0.0	0.0	0.0
Lighting	0.00	0.00	0.01	0.01	0.0	0.0	0.1	0.1
Monitoring & Ctl. Inst.	0.00	0.00	0.00	0.00	0.0	0.0	0.0	0.0
Other WEEE	0.00	0.00	0.01	0.01	0.0	0.0	0.1	0.1
Household batteries	0.00	0.00	0.01	0.01	0.0	0.0	0.1	0.0
Car batteries	0.00	0.00	0.00	0.00	0.0	0.0	0.0	0.0
Engine Oil	0.00	0.00	0.00	0.00	0.0	0.0	0.0	0.0
Other hazardous materials	0.00	0.00	0.00	0.00	0.0	0.0	0.0	0.0
Identifiable clinical waste	0.00	0.00	0.02	0.02	0.0	0.0	0.2	0.1
Home Compostable food	0.00	0.02	1.43	1.44	0.0	1.2	13.3	9.7
Non-home compostable food	0.00	0.00	1.57	1.57	0.0	0.0	14.7	10.6
Garden	0.00	1.25	0.25	1.50	0.0	85.6	2.3	10.1
Soil	0.00	0.11	0.04	0.15	0.0	7.7	0.3	1.0
Other organic	0.00	0.08	0.17	0.24	0.0	5.4	1.5	1.6
Material less than 10mm	0.00	0.00	0.59	0.60	0.1	0.0	5.5	4.0
Totals	2.68	1.46	10.72	14.86	100.00	100.00	100.00	100.00

3.73 It is estimated that to achieve a countywide recycling rate of 60% the collection authorities would need to capture 75% of the available recyclable waste at the kerbside which is significantly better than is currently being achieved (about 50% on average). The WDA has also modelled achieving a 70% recycling and composting rate across the County and this would mean capturing 92% of the available recyclables from the kerbside collected residual waste.

3.74 Clearly there will be some communities which will achieve higher recycling rates whilst others will achieve lower rates. It is anticipated for example that for 2010/11, Tewkesbury Borough Council will achieve a recycling and composting rate of 54% and Gloucester City 46%. This demonstrates that despite broadly the same system being introduced in all three areas; Cotswold, Gloucester and Tewkesbury, the overall performance is variable.

3.75 Taking the three areas of the County which have changed their services; Cotswold, Gloucester and Tewkesbury, gives an average recycling and composting performance of 53% which is 7% short of the 60% target.

3.76 For these reasons the WCS target of at least 60% recycling/composting by 2020 is considered to be both appropriate and challenging.

3.77 No change to the recycling target is therefore proposed, however the text of the WCS has been amended to clarify that the aspiration for 70% recycling/composting is to be achieved by the year 2030. This has arisen through the Council's review of its residual waste project.

See Focused Change 11.

3.78 With specific regard to the example of the Cwm Harry Land Trust, notably this has not reported on its findings yet so the assertions being made that it is a very cost-effective and efficient approach have not been demonstrated.

Anaerobic Digestion (AD)

3.79 The publication WCS highlights the potential role that could be played by AD in managing source-segregated organic waste such as food and garden waste. Due to the similarities between AD and in-vessel composting (IVC) the two processes are considered alongside each other and addressed through a single core policy WCS2 (which also incorporates bulking and transfer).

3.80 A number of respondents argue that given the Government's recent support for AD it should be considered in its own right with greater recognition being given to the potential it offers for generating renewable energy.

Council's Response

3.81 AD and IVC processes are reasonably similar and both require a segregated supply of organic waste such as food. It was therefore considered appropriate to address the two processes alongside each other in the publication WCS.

3.82 However, there is a key difference between the two processes insofar as AD produces biogas which can be used to generate heat and power or converted into bio-methane and used as transport fuel or exported to the national grid.

3.83 Due to the potential renewable energy benefits associated with AD it is accepted that it should be considered separately from recycling and composting with the potential benefits (e.g. renewable energy generation) able to be more clearly explained.

3.84 For this reason a new Core Policy and supporting text relating to AD have been drafted and included in the revised publication WCS after the section on recycling and composting. These clearly explain the potential benefits associated with AD such as renewable energy and combined heat and power (CHP) as well as setting out current Government policy.

3.85 The Council accepts that AD can also be classed as 'other recovery' and as such could be considered within the 'other recovery' section of the WCS. This is explained in the revised supporting text.

3.86 However, because AD is not generally suitable for managing mixed residual waste, we have put it alongside recycling and composting, thereby helping to avoid any confusion with Core Policy WCS4 which focuses on the provision of residual waste facilities.

See Focused Change 13.

Bulking and Transfer

3.87 Bulking and transfer facilities play an 'intermediate' role between the collection and disposal of waste, allowing for relatively small amounts of waste to be taken, sorted and stored until there is enough to transfer onwards to other waste facilities for further management or disposal.

3.88 The publication WCS considers bulking and transfer alongside recycling and composting because materials passing through both types of facility are generally destined for further processing operations.

3.89 A number of respondents argue however that the future requirements for bulking and transfer set out in the WCS are unclear and that bulking and transfer should be addressed separately as an issue in its own right, rather than alongside recycling and composting.

Council's Response

3.90 Notwithstanding the fact that there are some similarities between bulking and transfer and recycling/composting operations, it is acknowledged that the two processes could usefully be considered separately within the WCS. This provides the opportunity not only to more clearly articulate future bulking and transfer requirements but also to simplify Core Policy WCS2.

3.91 For this reason, additional supporting text and a new Core Policy dealing with bulking and transfer have been included in the 'minimising impact' section of the revised publication WCS.

See Focused Change 13.

Current Planning Application at Wingmoor Farm (East)

3.92 One of the largest existing waste management facilities in Gloucestershire is the Grundon site at Wingmoor Farm (East) near Bishop's Cleeve. The facility comprises a hazardous and non-hazardous landfill and other associated activities. Although planning permission expired at the site in 2009, because a planning application has been submitted, the current operation is being allowed to continue.

3.93 The planning application has not yet been determined and a number of respondents argue that not only does the WCS prejudice the application by assuming that planning permission will be granted but it is also unclear what will happen if planning permission is refused i.e. there is no 'Plan B'.

Council's Response

3.94 The WCS does not in any way presume that planning permission will be granted at Wingmoor Farm (East) nor does it prejudice the current planning application. The WCS simply reflects the fact that the Grundon operation at Wingmoor is continuing whilst the application is being determined and identifies the amount of landfill capacity which is currently available. It explains that this capacity is subject to the outcome of the current Grundon planning application.

3.95 It is acknowledged however that it could be made clearer what will happen if the application is refused i.e. an early partial review of the WCS or preparation of a separate landfill development plan document.

3.96 The supporting text at paragraph 4.129 has therefore been amended accordingly.

See Focused Change 26.

Combined Heat and Power (CHP)

3.97 CHP is a complementary technology that can work in conjunction with waste recovery facilities. It involves the use of a heat engine or power station to simultaneously generate both electricity and heat. It is a highly efficient form of power generation which prevents the usual escape of heat as a by-product. With CHP, both heat and power are able to be captured and used on-site or locally off-site.

3.98 The potential benefits of CHP are highlighted in Section 4.0 of the WCS however a number of respondents have called into question the extent to which the four strategic site allocations identified in Core Policy WCS4 will be able to utilise CHP due to the lack of nearby heat 'clients'.

Council's Response

3.99 Firstly, it is important to emphasise that the four strategic site allocations have been identified having regard to a broad range of factors including; availability, size, location, flood risk, transport etc. CHP potential is just one of a number of factors that have been taken into account by the WPA in deciding which sites to allocate. The chances of finding a site that ticks all boxes i.e. available, central location, outside the floodplain, plentiful nearby heat users etc. are remote. The Council has therefore had to balance all of these different factors in deciding which sites to take forward.

3.100 Secondly, it is not accepted that the strategic site allocations have limited potential for use of CHP. The potential scope for CHP at each site is clearly set out in the site schedules attached at Appendix 5. In addition, a separate supporting evidence paper on CHP has been prepared.

3.101 At Wingmoor Farm (East) for example there are over 35 businesses, 65 residential properties and two sporting clubs within 1km of the site. Within 2km there is a local plan allocation for new development and two potential housing sites identified in the District Council's Strategic Housing Land Availability Assessment (SHLAA) totalling around 7,300 properties.

3.102 Similarly, at Javelin Park there are over 30 businesses, 40 residential properties and one church within 1km and within 2km there are two local plan allocations and eight SHLAA sites totalling around 4,400 properties plus an existing planning permission for 1,775 properties at Hunt's Grove nearby.

3.103 It is therefore not accepted that the strategic allocations have limited CHP potential.

3.104 Thirdly, the WCS is technology neutral. The strategic site allocations that have been identified are capable of accommodating a range of different waste recovery technologies not all of which would necessarily generate a large amount of surplus heat (e.g. MBT).

Sustainable Transport

3.105 A number of respondents argue that notwithstanding the objectives of Core Policy WCS13 in relation to the promotion of sustainable transport, the four strategic site allocations are poorly located for utilising alternatives to road transport such as water and rail.

Council's Response

3.106 As explained above, the four strategic site allocations have been identified having regard to a broad range of factors including; availability, size, location, flood risk, transport etc.

3.107 The potential for utilising sustainable modes of transport is one of a number of factors that have been taken into account by the WPA in deciding which sites to allocate. The chances of finding a site that ticks all boxes i.e. available, central location, outside the floodplain and with excellent opportunities to use rail and water etc. are remote. The Council has therefore had to balance all of these different factors in deciding which sites to take forward.

3.108 Secondly, the sites do present some opportunity to utilise non-road modes of transport. The Wingmoor Farm sites for example have some potential to utilise the rail network subject to issues of viability and practicality.

3.109 Thirdly, the location of the strategic site allocations within Zone C will in general terms help to reduce the distance that Gloucestershire's waste travels by road by ensuring that the majority of the county's waste (which is generated in the central area at Gloucester, Cheltenham and other urban areas) is able to be managed close to source.

The Promotion of Small-Scale Dispersed Facilities

3.110 The WCS identifies four strategic site allocations. Each site is more than 2 hectares in size and capable of accommodating a facility managing at least 50,000 tonnes of waste per year. The four allocations are all located within the central area of the county defined as 'Zone C'. It is anticipated that they will manage the residual municipal and commercial and industrial waste that cannot reasonably be recycled or composted.

3.111 A number of respondents argue that because the amount of municipal waste is falling, strategic-scale facilities (>50,000 tonnes/year) are not needed and that provision should instead be made through a series of small-scale sites dispersed across the whole county. It is argued that this would encourage greater flexibility and community involvement and allow waste to be managed close to source.

Council's Response

3.112 The decision was taken to allocate sites within the WCS in order to provide certainty and to increase the likelihood of delivering an effective alternative to landfill. To ensure the site selection process was manageable, the Council decided to use a site-size threshold of 2 hectares/50,000 tonnes.

3.113 This threshold was based on other planned and existing waste facilities in the UK and also reflects the definition of 'strategic' in the adopted Waste Local Plan (2004) as well as a number of studies on potential facilities requirements for different types of waste technologies.

3.114 To have adopted a smaller site-size threshold would have potentially meant tens of thousands of sites across Gloucestershire having to be assessed which would clearly have been impractical.

3.115 Based on the 50,000 tonnes/year threshold, following a rigorous and extensive site selection process, four sites were allocated under Core Policy WCS4: Wingmoor Farm (West) Wingmoor Farm (East) Javelin Park and Moreton Valence.

3.116 Importantly, however whilst Core Policy WCS4 allocates the four strategic sites, it also allows for smaller-scale proposals to come forward speculatively subject to compliance with relevant criteria. Core Policy WCS4 therefore offers both certainty and flexibility and no change is proposed.

3.117 In relation to the issue of greater community involvement, the supporting text at paragraph 4.89 has been amended to acknowledge the fact that there may be interest in developing small-scale facilities from not only the waste industry, but also the development industry more generally as well as the local community and other stakeholders.

See Focused Change 19.

Integration of Municipal and Commercial and Industrial Waste

3.118 The publication WCS focuses on the four main waste streams; municipal waste, commercial and industrial waste, construction and demolition waste and hazardous waste. It explains in broad terms, the nature of each waste stream and the amount that is produced and/or managed within the county.

3.119 Municipal waste is the waste which is collected by or on behalf of local authorities. Most of it comes from households with a small proportion from local businesses and street cleansing etc. Commercial and industrial waste comes from shops, offices and factories. The biodegradable element of commercial waste is similar to municipal waste. The main difference is the fact that it is collected and disposed of by private waste management companies rather than the local authority.

3.120 A number of respondents argue that because of the similarities between municipal and commercial waste there should be closer integration of these two waste streams within the WCS.

Council's Response

3.121 The similarities between municipal waste and commercial and industrial waste are clearly acknowledged and reflected in the WCS.

3.122 The strategic site allocations for example are intended to provide recovery capacity for both municipal and commercial waste. This is explained in Core Policy WCS4 and the supporting text.

3.123 It is acknowledged however that the spatial vision could be clarified to emphasise that the strategic site allocations are intended to deal with both commercial and municipal waste and it has therefore been amended to refer to the recovery of residual waste from both of these waste streams.

See Focused Change 10.

Habitat Regulations Assessment (HRA)

3.124 European legislation requires the County Council to undertake a Habitat Regulations Assessment (HRA) of the WCS in order to determine whether the policies and proposals are likely to have a significant effect on the integrity of any 'Natura 2000' sites. These are sites which are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within the European Union. There are several Natura 2000 sites in and near Gloucestershire including Rodborough Common, the Cotswold Beechwoods and the Severn Estuary.

3.125 The first stage in the HRA process is to carry out a 'screening' exercise. This helps determine whether policies or proposals are likely to have a significant impact. If there will definitely be no significant impact it is safe to proceed, however if it is uncertain or it is likely that there would be a significant impact, a further more detailed assessment is required known as an 'appropriate assessment' (AA).

3.126 In accordance with legislative requirements, the Council has subjected the WCS to HRA throughout its preparation. The early site options and preferred options stages showed largely no significant effects but identified a number of uncertainties. At site options, a number of likely significant effects and uncertainties were identified necessitating further assessment. The Council therefore appointed independent consultants to prepare a Habitat Regulations Assessment report of the publication WCS.

3.127 The HRA report was published alongside the WCS and assesses the 13 sites considered at site options in order to determine whether they are likely to have a significant effect on any Natura 2000 site having regard to air pollution, water pollution and bird disturbance. The assessment concludes that for non-thermal waste recovery (e.g. MBT) there would be no likely significant effect from any of the 13 site options. For thermal facilities (e.g. incineration) it concludes that at certain parameters (e.g. at a certain facility size or stack height) for some sites it cannot be concluded that there would be no likely significant impact. This means that for those sites, if a detailed planning proposal comes forward, a detailed assessment of potential impact would be required before planning permission could be granted.

3.128 Comments on the HRA report were received from a number of respondents including the Environment Agency (EA) and Natural England who are the statutory agencies in relation to such matters. In their initial response the EA stated that they had no objections to the HRA report. The response from the EA air quality unit raised a number of technical issues but concluded in broad terms that the HRA report is acceptable as a high-level instrument to guide the preparation of the WCS. Should a detailed proposal come forward the EA advises that a more detailed site-specific assessment will be required.

3.129 Natural England has also raised a number of technical issues although like the EA recognise that the HRA report is a high-level assessment only and that such issues can be addressed through a more detailed assessment at the planning application stage.

Council's Response

3.130 In line with legislative requirements the Council has subjected the WCS to HRA throughout its preparation including issues and options, preferred options, site options and publication.

3.131 These various assessments recognise that whilst there could potentially be a significant impact on a Natura 2000 site, this is highly uncertain because we do not know at this stage what type or scale of waste facility will come forward. If for example a non-thermal process came forward e.g. MBT, there would probably be no impact. If however a thermal process came forward e.g. incineration, gasification there may be an impact if the proposal was of a certain size and scale.

3.132 It is however only at the planning application stage when the details of a proposal are known that the potential impact on European sites can be accurately assessed and mitigated if necessary. The Council will therefore expect any planning application for the strategic site allocations to address the issue of HRA. This is clearly identified as a requirement in the general development criteria attached at Appendix 5 of the WCS.

3.133 In light of the above, no changes to the WCS are proposed.

3.134 However, there is one area of the HRA report where it is acknowledged that further clarification is required. In particular, Natural England has highlighted a potential weakness in the HRA report where the same stack diameter had been assumed for plants of different capacities. The Council acknowledges that this approach is incorrect and may have led to impacts at sensitive habitats being underestimated.

3.135 Consequently, the consultants responsible for preparing the HRA report were asked to undertake additional modelling with a different stack dimension to confirm the likely influence of changing this parameter.

3.136 This additional modelling run has now been undertaken and the consultants have concluded that at most there would be a variation in the order of 2% of the annual mean impact which will have no material bearing on the findings of the assessment. As such, no amendment to the HRA report is considered necessary. A further explanatory statement has however been made available as part of the focused changes documentation for information.

3.137 Detailed responses to the issues raised by Natural England and the Environment Agency are set out in the response schedule available separately. In general terms, the Council welcomes the recognition from both Natural England and the Environment Agency that the HRA report is a high-level assessment with limitations that will need to be addressed should a detailed proposal come forward.

Composting Requirements

3.138 The publication WCS sets out the position in relation to composting in Gloucestershire. It explains in paragraph 2.46 that there is already a good level of composting capacity available (113,000 tonnes/year) and that as such there is a modest additional requirement of around 9,000 tonnes/year.

3.139 In light of this requirement and taking account of previous stakeholder comments, Core Policy WCS2 adopts a criteria-based approach allowing for new or expanded composting facilities to come forward in appropriate locations.

3.140 A number of responses have been raised in relation to the issue of composting. We have already discussed the 60% recycling/composting target (see above). Other issues raised include the fact that paragraph 2.46 is factually incorrect in identifying the total amount of composting capacity at 113,000 tonnes/year.

3.141 Some respondents have asked for greater clarity in relation to the different types of composting capacity available (i.e. IVC or windrow) and also how much of this capacity is available to manage the different waste streams (i.e. municipal and commercial).

3.142 It has also been argued that the WCS should separate future composting and Anaerobic Digestion (AD) requirements on the basis that whilst AD and IVC can manage food waste and green waste either mixed together or separately, windrow composting is only suitable for green waste. It would therefore be inaccurate to assume existing windrow composting capacity is available for managing food waste.

Council's Response

3.143 It is acknowledged that paragraph 2.46 is factually incorrect. It is also acknowledged that the WCS could usefully provide some additional detail in relation to the type of existing composting capacity available and what proportion of that capacity is available to manage the municipal and commercial waste streams (although this information is already set out in the Waste Data Paper Update 2010).

3.144 Paragraph 2.46 has therefore been amended to correct the total composting capacity figure, to breakdown how much capacity is IVC and how much is windrow and to explain what proportion is used for municipal and commercial waste. It also reflects the planning permission issued in May 2011 for IVC at the Park (35,000 tonnes/year).

See Focused Change 5.

3.145 In relation to the separation of composting and AD, the differences between the two processes are acknowledged and Core Policy WCS2 has been amended to exclude AD which is now dealt with through a new core policy and supporting text.

See Focused Change 13.

3.146 For information the following tables have been made available in support of the Waste Data Paper Update (2010).

C&I Composting / Biowaste Capacity			
Green Waste - Windrow		IVC / AD	
Facility	Capacity	Facility	Capacity
Sunhill	10,000 tpa	New Earth Solutions*	24,000 tpa
Bradley farm	1,100 tpa	The Park (Permitted by not operational)	35,000
	TOTAL = 11,100 tpa		TOTAL = 59,000 tpa
* The total capacity of this IVC facility is 48,000 tpa. Split 50/50 with MSW & C&I.			

MSW Composting / Biowaste Capacity			
Green Waste - Windrow		IVC / AD	
Facility	Capacity	Facility	Capacity
Wingmoor Farm West	c. 20,000 plus tpa [it is noted that this is an estimate and the capacity could be greater]	New Earth Solutions*	24,000
		Rosehill farm**	30,000
	TOTAL = minimum 20,000 tpa		TOTAL = 54,000 tpa

* The total capacity of this IVC facility is 48,000 tpa. Split 50/50 with MSW & C&I.

**it should be noted that the planning permission at Rose Hill Farm also allows for 10,000 tpa of AD (currently unimplemented) but only within the current capacity which is currently limited through waste licence to 30,000 tpa. In addition the WDA advise that through service level collection arrangements some of the district council green wastes also go direct for windrow at Rosehill farm.

3.147 There is also 5,000 tonnes of capacity for the transfer of MSW food waste from Wingmoor Farm West to IVC and/or AD facilities. Adding this to the MSW composting/biowaste above provides for the current capacity of 79,000 tpa. There is also temporary permission at Hempsted, Gloucester which was not included in the total.

3.148 The WDA have also advised that over the last two years around 28,000 tonnes of garden waste has been taken to Wingmoor Farm West which confirms that capacity at that site while difficult to estimate is probably greater than 20,000 tpa estimate.

3.149 Overall the current existing capacity is sufficient to meet both green waste and for food waste. Depending on composting performance and service collection arrangements will dictate whether the current capacity will be sufficient and in the right location or whether some new facilities might be required.

3.150 The projections suggest that the capacity gap might not be that great in any event, overall there might only be a small capacity gap towards the end of the WCS of around 9,000 tonnes. The table above suggests that the 54,000 tpa of IVC/AD capacity is likely to be sufficient. In relation to meet projected requirements of the WDA for MSW garden waste, from the advice of the operator the current capacity at Wingmoor Farm West should also be more than adequate.

3.151 In addition there is also C&I composting/biowaste capacity that could be potentially used for MSW waste requirements subject to contract arrangements. Should any additional capacity required for either windrow/IVC or AD, the criteria based approach in Core Policies WCS2 and WCS3a provide a context and framework for such proposals to be considered.

4. Key Issues at Focused Changes

4.1 As stated previously, in response to the focused change consultation a total of **227 representations** were received from **55 individuals and organisations** (including those that were submitted late).

4.2 Notably, a significant proportion of these did not relate to a specific focused change and either repeated comments submitted previously at the publication stage or related to more general matters such as forecast waste growth. This is unfortunate as stakeholders were asked to comment on the focused changes only.

4.3 It should also be noted that a significant proportion of the representations related to the proposed allocation of Javelin Park despite there being no focused change. This is likely to be because during the focused change consultation period, a separate public exhibition was held at Javelin Park as part of the Council's residual waste project, as on the whole these were new respondents who didn't raise any matters at the publication stage. The event was well-attended and despite being a separate process to the WCS, appears to have prompted a number of individuals mainly from the local community to submit objections to the focused change consultation as to why Javelin Park is unsuitable.

4.4 Notwithstanding the above, the Council has taken all representations into account. The key issues raised are set out below. It should be noted that some of these were raised previously at publication and have already been discussed above.

- Suitability of Javelin Park
- Boundary of Javelin Park
- The promotion of small-scale dispersed facilities
- Importation of waste from outside Gloucestershire
- 'Zero-growth' versus 'zero waste'
- Impact of different technologies
- Recycling/composting target
- Anaerobic Digestion (AD)
- Regional Spatial Strategy (RSS)
- Municipal waste arisings
- Validity of the consultation process
- Flexibility/monitoring
- Withdrawal of PFI funding
- Community Involvement
- Landfill
- Joint Working
- Wingmoor Farm (East)

4.5 These issues are explained below together with the Council's response.

Suitability of Javelin Park

4.6 Despite there being no focused change of direct relevance, a large proportion of the comments received during the consultation related to the suitability of Javelin Park for waste use. The site is proposed to be allocated as one of four strategic sites within the WCS.

4.7 A number of arguments have been put forward as to why the site is not suitable. Many respondents have focused on the issue of technology in particular incineration. This is because the Council is at the present time working with two bidders through the residual waste project, both of whom are proposing incineration at Javelin Park.

4.8 The main issues raised by respondents in relation to the site are briefly summarised below together with the Council's response.

Visual Impact

4.9 A number of respondents consider that a strategic waste facility at Javelin Park, particularly a facility that incorporates a large 'chimney stack' would have a significant visual impact on the local area. In particular because the site is located in a flat, open landscape and is visible from the Cotswold Area of Outstanding Natural Beauty (AONB) and Haresfield Beacon located to the east of the site.

Council's Response

4.10 There are a number of key points to note. First, Javelin Park was allocated in the Waste Local Plan (2004). The relative merits of the site and its suitability for waste management have therefore been previously debated and in approving the plan, an independently appointed Planning Inspector has already concluded that the site is suitable for waste management. There are no changing circumstances since the adoption of the Waste Local Plan which serve to make the site any less suitable for waste management now than it was then.

4.11 Secondly it is important to emphasise that the WCS is technology neutral. Whilst the Council's residual waste project has now focused in on energy recovery from waste as the preferred solution, the WCS is seeking to allocate Javelin Park (alongside three other sites) for 'waste recovery' in a more generic sense and covering a wide range of possible technologies.

4.12 Because the details of what might be built at the site are not yet known, it has only been possible to undertake at this stage a broad landscape assessment in support of the WCS. This assessment, whilst highlighting the potential for visual impact, also highlights the potential to create a 'landmark' facility as a gateway to Gloucester and that the visual impact of any facility could be reduced through appropriate mitigation (use of materials, screening etc.)

4.13 It is acknowledged that a more detailed assessment of visual impact will be needed should a detailed proposal come forward at the planning application stage for Javelin Park or any of the other strategic site allocations.

Proximity to Residential Areas

4.14 A number of respondents argue that Javelin Park is too close to existing and proposed housing nearby and as such is unsuitable for waste management.

Council's Response

4.15 It is pertinent to repeat that the principle of waste management at Javelin Park has previously been accepted by an independent Planning Inspector. Whilst there has been additional residential and employment development built and permitted in the local area since the adoption of the Waste Local Plan (e.g. Kingsway and Hunt's Grove) these developments do not mean Javelin Park is now unsuitable for waste use. National planning policy emphasises that modern, well-managed waste facilities can co-exist with other forms of development.

4.16 Secondly, in being located relatively close to Gloucester, Javelin Park complies with national and regional policy in that it will allow waste from a large urban area (and the surrounding environs) to be managed close to where it was generated, thereby reducing the number of 'waste miles' travelled by waste collection vehicles.

4.17 Thirdly, the proximity of residential and employment development represents an opportunity to utilise any power and surplus heat that may be generated by a waste management facility at Javelin Park for example through the use of combined heat and power (CHP) linked to a local district heating network.

4.18 Indeed it appears contradictory for respondents to argue that the site is too close to housing yet provides little opportunity for CHP. This issue is discussed in more detail below.

Impact on the Cotswold AONB

4.19 A number of respondents argue that a waste facility at Javelin Park will have a detrimental impact on the Cotswold AONB.

Council's Response

4.20 Javelin Park is located approximately 1km from the edge of the Cotswold AONB. It is not located within the AONB. The main issue is therefore whether a waste facility at Javelin Park would affect the 'setting' of the AONB – essentially the views in or out.

4.21 The importance of safeguarding the setting of the AONB is reflected in the Cotswold AONB Management Plan (2008) which states that *'development proposals that affect views into and out of the AONB need to be carefully assessed to ensure that they conserve and enhance the natural beauty and landscape character of the AONB'.*

4.22 The Council considers that whilst Javelin Park can be seen from the AONB it is far enough away so as to mean that a waste facility at Javelin Park would not have a detrimental impact. Significantly, there is already large-scale built development in the local area including a large-scale garden centre adjacent to the site. A well-designed development at Javelin Park would be unlikely to further impact on the natural beauty or character of the AONB.

4.23 Simply because the site can be seen from the AONB does not make it unsuitable for development. If this principle were to be applied, no major development would be allowed within 10-20 miles of Haresfield Beacon which is clearly nonsensical.

4.24 It is also pertinent to repeat the fact that Javelin Park already benefits from planning permission for employment use (B8 - storage and warehousing) which could be implemented without delay. Clearly when planning permission for that scheme was granted it was determined that there would be no harmful impact on the setting of the AONB. There is nothing to suggest that the same principle would not apply to a waste facility.

Air Quality

4.25 A number of respondents have stated that *'no air quality modelling has been carried out'* and that they are therefore concerned about the potential emissions that could be generated by a thermal waste facility at Javelin Park.

Council's Response

4.26 It is not true that no air modelling has been carried out. In support of the WCS the Council appointed independent specialists to prepare a Habitat Regulations Assessment (HRA) report in line with national and international requirements.

4.27 The HRA report was made available at publication in December 2010 and assesses the 13 sites considered at the site options stage in 2009 in order to determine whether they are likely to have a significant effect on any 'Natura 2000' site having regard to air pollution, water pollution and bird disturbance.

4.28 The assessment concludes that for non-thermal waste recovery (e.g. MBT) there would be no likely significant effect from any of the 13 site options. For thermal facilities (e.g. incineration) it concludes that at certain parameters (e.g. at a certain facility size or stack height) for some sites it cannot be concluded that there would be no likely significant impact.

4.29 This means that for those sites, if a scheme comes forward involving thermal treatment, a detailed assessment would be required before planning permission could be granted.

4.30 It is also pertinent to note in general terms that modern waste management facilities must adhere to very strict emissions requirements in order to secure the relevant operating permit from the Environment Agency and in order to comply with national and international legislation.

Health Impacts

4.31 A number of respondents have expressed concerns that a thermal treatment facility at Javelin Park would be harmful to the health of the local population. An article appears to have been circulated to the local community linking incineration with infant mortality.

Council's Response

4.32 The health implications of waste management facilities tend to be an area of significant debate and controversy with various studies being published periodically, arguing that waste facilities either do or do not have a detrimental impact on health.

4.33 In relation to this issue, regard must be had to national planning policy set out in Planning Policy Statement 10 – Planning for Sustainable Waste Management (2011) which states that *'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'.*

4.34 PPS10 also states that whilst the planning system should deal with whether development represents an acceptable use of land, it is for the pollution control regime (enforced by the Environment Agency) to ensure that ambient air and water quality meet standards that guard against impacts to the environment and human health. Waste planning authorities are encouraged to work on the assumption that the relevant pollution control regime will be properly applied and enforced.

4.35 Simply put, a permit will not be granted by the EA if a waste facility would have a harmful impact on the environment and human health.

Devaluation of Property Prices

4.36 A number of respondents have objected to the development of Javelin Park on the basis that it will have a detrimental impact on property prices in the local area.

Council's Response

4.37 There are two points to note in response here. First, the potential impact on property values as a result of new development, either positive or negative, is not a valid material planning consideration.

4.38 Secondly, Javelin Park already has planning permission for storage and warehousing. There is nothing to suggest that the development of a waste management facility (which in many respects is similar to an employment use) would have any more of an impact on property prices than the permitted scheme which could be built without delay.

Traffic Impact

4.39 A number of respondents have raised the issue of additional traffic generated by development at Javelin Park and the impact this will have on the local highway network including Junction 12 of the M5.

Council's Response

4.40 Each of the four strategic allocations have been subjected to an initial highway assessment by the Council in its role as highway authority and all are considered suitable in principle for accommodating a strategic-scale waste management facility.

4.41 The strategic site schedules attached at Appendix 5 of the WCS emphasise that if a detailed proposal comes forward, it would need to be supported by a more detailed transport assessment (TA). This assessment would explore in detail the highway implications of the proposed scheme and if there were to be an unacceptable impact, consideration would need to be given to potential mitigation (e.g. highway improvements) or revisions to the scale or nature of the proposed operation, or even refusal of the planning application if the concerns could not be met.

4.42 With specific regard to Javelin Park it should be noted that the development of a waste management facility is actually considered likely to generate <u>less</u> traffic than if the current planning permission for B8 storage and warehousing were to be implemented. This is a key consideration.

4.43 It should also be noted that the Highways Agency, whilst emphasising in their representations at publication, that any potential impact on Junction 12 of the M5 would need to be carefully considered, have not objected in principle to the allocation of Javelin Park. They simply state that a more detailed assessment would be required and as stated above, this is already specified as a requirement in the WCS.

Opportunities for Sustainable Transport

4.44 A number of respondents have questioned the allocation of Javelin Park on the basis that it presents limited opportunities for the use of more sustainable alternatives to the road network such as rail and water.

Council's Response

4.45 It is acknowledged that Javelin Park presents little potential for the use of water due to its location and lack of proximity to a water body. It does however present some opportunity for using the rail line which runs adjacent to the site. Whilst no detailed feasibility study has been carried out, the Council would argue that there is some potential nonetheless. It would be for the waste operator to come forward with any such proposal and it would be unreasonable for the Council to stipulate that rail access should be a condition of any development on the site.

4.46 In addition, any large-scale development at Javelin Park would need to be supported by a Travel Plan. These are schemes set up to identify possible measures that would help reduce traffic impact such as car-sharing amongst employees, the provision of changing facilities to promote walking and cycling and interest free loans to employees for cycles and powered two wheelers.

4.47 It should also be noted that sustainable transport is just one of a number of factors to take into account in determining the suitability of a site for waste management or indeed any other form of development. Whilst there may be other sites in Gloucestershire that offer better opportunities for using rail or water, they may be unsuitable for other reasons such as deliverability, or distance from the main sources of waste.

4.48 The Council has undertaken an exhaustive search for suitable sites in preparing the WCS and the four strategic allocations identified represent the best available options within the county, when assessed against a range of criteria.

Suitability for Combined Heat and Power (CHP)

4.49 As outlined above, a number of respondents have stated in their representations that Javelin Park offers limited potential for utilising any surplus heat and power that may be generated through the waste treatment process and is therefore unsuitable for waste use.

Council's Response

4.50 This was an issue raised previously by a number of respondents at the publication stage. A response has already been set out in this statement (see above). To summarise, CHP potential is one of a number of factors that has been taken into account in determining which sites should be allocated. The chances of finding the perfect site which is available, in the right location, outside the floodplain and AONB, has good access and presents maximum opportunities for using CHP are slim. It is a question of balancing all of these considerations and selecting those sites which meet as many relevant planning objectives as possible.

4.51 Secondly and most importantly, it is not accepted that Javelin Park has limited CHP potential. The technical evidence paper prepared in support of the WCS demonstrates that there are a number of existing and proposed areas of residential and commercial development within close proximity of the site that could potentially benefit from the use of any surplus heat and power. Indeed a number of respondents have objected to the site on the basis that there are existing and planned houses nearby.

4.52 There is also the possibility of further development coming forward in this area, an issue that will be explored through the preparation of the core strategies for Gloucester and Stroud. The Council therefore strongly refutes that Javelin Park has no potential for CHP.

Lifetime Cost Analysis

4.53 A number of respondents have objected on the following basis: 'The whole lifetime costs of the proposed options have not been estimated. Whilst a single site option might appear relatively cheap compared to alternatives it may prove more expensive to operate, service and remove during the whole lifetime of the facility. Costings must include discounted cash flow analysis to estimate current net present value of the total cost of providing and operating each and every alternative for the whole of the potential lifetime of the facilities required. This must include the total cost of acquiring the site, providing all necessary facilities and means of access, transport to and from the site of all waste in and all waste out, operating costs, demolishing and removal of the facilities plus the cost of financing the provision. The minimum period for lifetime cost analysis must be the 25 year period of the contract being offered by the County Council and the likely timeframe for which the plant may operate'.

Council's Response

4.54 As stated elsewhere in this paper, contractual matters fall outside the scope of the WCS and in relation to municipal waste, fall within the remit of the County Council in its role as Waste Disposal Authority (WDA).

4.55 In terms of assessing different locational options, the WCS has through the site options consultation process assessed the merits of individual sites as well as a number of different spatial strategies e.g. sites focused on Zone C, outside Zone C or a combination of both. Having regard to a number of factors such as site size, location, availability etc. as well as consultation responses, four strategic site allocations were identified and allocated in the publication WCS.

4.56 It is considered that undertaking a 'lifetime cost analysis' of the different options as has been suggested by a number of respondents goes beyond the reasonable scope of the WCS and its supporting evidence base. Officers are unaware of any such analysis being undertaken in support of other, adopted strategies elsewhere.

Boundary of Javelin Park

4.57 The strategic allocation of Javelin Park identified in the publication WCS covers a total of 11.2 hectares, of which around 5 hectares is owned by Gloucestershire County Council with the remaining area owned by a private company Consi Investments Ltd (CIL) and their development manager Graftongate Investments Ltd (GIL).

4.58 In response to the focused change consultation, CIL/GIL have through their agents, objected to the WCS on the basis that they no longer wish to have their part of the Javelin Park site allocated for waste use in the plan under Core Policy WCS4.

4.59 Although they do not object in principle to the development of a waste facility on their site they are concerned that allocating the site for waste use could conflict with the site's existing planning permission for employment with the land being unduly safeguarded for waste use. As such, they would prefer it if the site were to remain unallocated and if a waste proposal were to come forward, it could be considered against the criteria-based policies of the WCS.

Council's Response

4.60 It is extremely disappointing to receive this representation at such a late stage in the plan preparation process. It represents a complete turnaround as the Council has previously received correspondence from CIL/GIL confirming that they were happy for their part of the Javelin Park site to be included in the WCS.

4.61 However, one of the key criteria that the Council has used in selecting the four strategic sites is deliverability and because the representation from CIL/GIL raises significant doubts over the deliverability of their part of the site, it is considered appropriate to 'de-allocate' their land from the WCS.

4.62 This necessitates a number of amendments being made throughout the WCS including the supporting text at paragraph 4.97, Inset Map 3 and the Site Schedule for Javelin Park attached at Appendix 5. These amendments are therefore being put forward by the Council as Focused Change 44 (FC44) for consideration as part of the examination process.

4.63 FC44 has not been subject to stakeholder consultation as it is not considered to materially affect the plan or to prejudice any representations made previously in relation to Javelin Park or other aspects of the WCS. In making this change, it is important to note that 5 hectares of land will still remain at Javelin Park on land owned by the Council which is emerging as a likely solution for the MSW residual waste contract process. In addition, a further 19.2 hectares of land is allocated on other strategic sites which could meet the MSW and C&I waste capacity requirements as set out in paragraph 3.26 of the WCS. The proposed amendments are set out below.

Focused Change 44

Paragraph 4.97

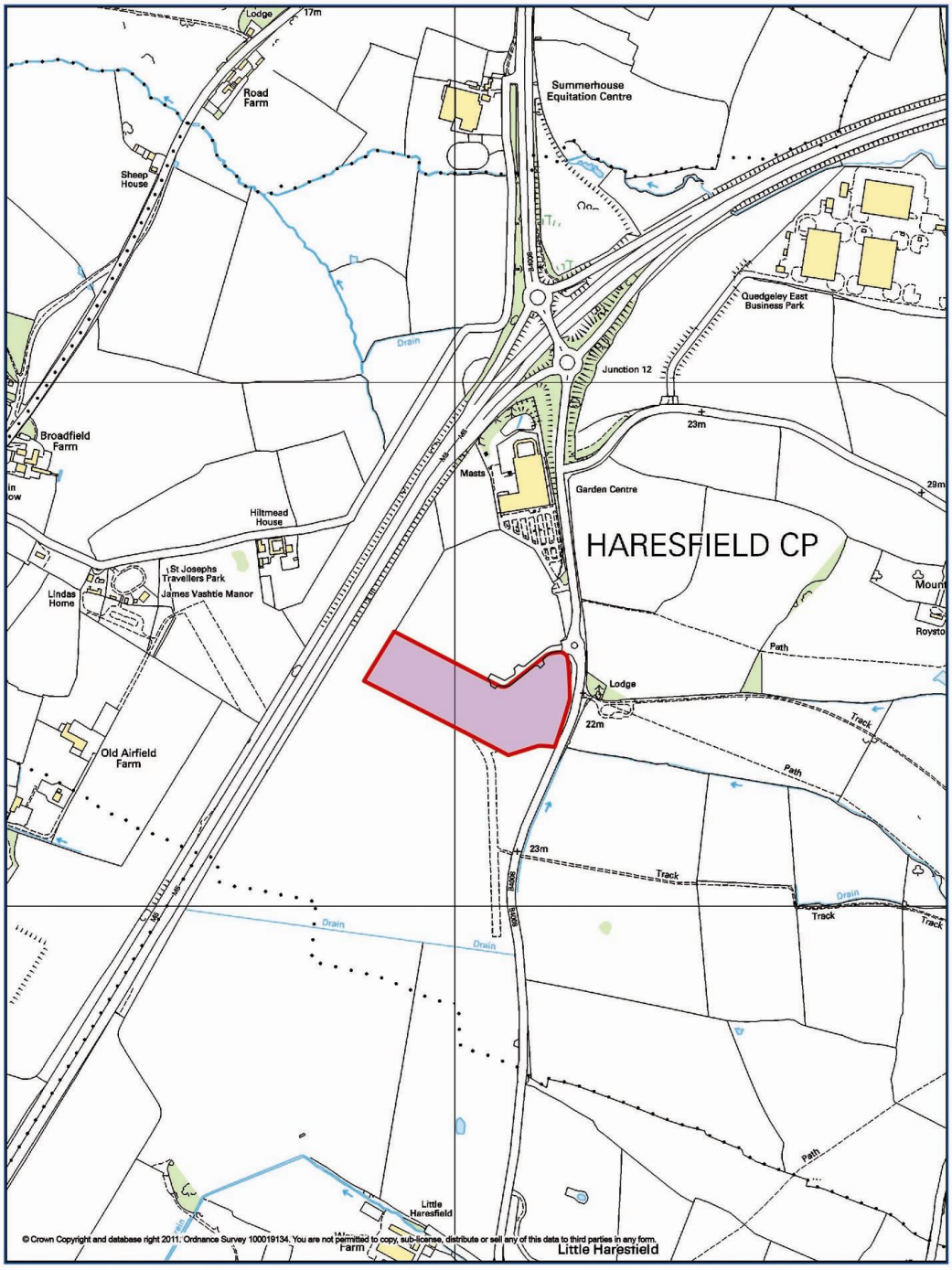
Amend the supporting text as follows:

Javelin Park (~~11.2~~ c.5 hectares)

This ~~11.2~~ c.5 hectare vacant site comprises part of the former Moreton Valence Airfield and is located immediately to the south of Junction 12 of the M5 between the M5 and the B4008. ~~The site is vacant apart from large piles of crushed recycled aggregate~~. Gloucestershire County Council owns just under 5 hectares of the southern part of the site known as Javelin Park ~~and the owner of the remaining 6 hectares has confirmed it is available for waste use thus there is potential for the whole site to be used~~. It is anticipated that any strategic residual waste recovery facility developed at this sites would primarily be for MSW, with some scope for a proportion of C&I waste.

Inset Map 3

Amend to reflect the revised site boundary as set out overleaf.



Site Boundary	Javelin Park
500 yards 500 metres	Gloucestershire COUNTY COUNCIL N MW016_01

Site Schedule 3 – Javelin Park

Amend text as follows:

FC44

Site Name	**Javelin Park**		
Site No	3		
Policy	Core Policy WCS4		
Suitable Uses	Primarily MSW, but potentially also C&I waste. The County Council owns just under 5 hectares of the southern part of Javelin Park which is large enough to deliver a one site solution and has been identified in the procurement process as a reference site for MSW residual waste management. ~~The southern part of the site owned by the County Council has been identified in the procurement process as a reference site for MSW residual waste management.~~ ~~The owners of the rest of the site have indicated that their land is available, and thus there is the potential for the entire site to be utilised.~~		
Locational Information			
District	Stroud	Parish	Haresfield
Easting	3800~~54~~64	Northing	210~~496~~388
Site Area (hectares)	c. ~~11.2~~ 5 hectares		
Site Location	The site is the former Moreton Valence Airfield, located off J12 of M5 Motorway, Stroud. It is just south of an out-of-town shopping development and garden centre, the M5 runs to the west of the site.		
Site Description	Large area of previously developed airfield land, which once contained buildings associated with a military airfield. The site is currently vacant. ~~apart from large piles of crushed recycled aggregate.~~		
Neighbouring Uses	There is 6ha of land committed for B8 employment use adjacent to the north of the site. There are also 2 residential properties within 250 metres and the site is adjacent to Blooms Garden Centre and some smaller retail units to the north. A large area c. 2 km to the north (known as Hunts Grove) has been permitted for residential development and work on this is currently underway.		
Planning Status	A number of planning permissions and applications relating to storage and distribution exist covering the whole site.		

	Environmental Considerations	
FC44	Access/Highways	The site has ~~52,000m²~~ B8 (storage/distribution) permission although this is not currently operational. The predicted effect of a new strategic waste facility is a likely net decrease in traffic, when balanced against the existing consents. The site is in very close proximity to Junction 12 of the M5 and thus enjoys very good trunk road accessibility; there should be limited demand for movements on the B road south to Standish. There are known congestion problems at peak times at Junction 12. The site is over a kilometre west of the existing mainline railway. The construction of a new line is likely to need to be around 1.5km length to avoid Haresfield village, and this is likely to be prohibitively expensive and could have land ownership issues.
	Airport Safeguarding	The site lies outside all safeguarding zones for Gloucestershire Airport and MOD aerodromes.
FC44	CHP Potential	There over 30 businesses, 40 residential properties and 1 church within 1km. Potential development within 2km includes 2 local plan allocations and 8 SHLAA sites (c.4400 properties). There is also existing permission at Hunts Grove for c.1775 properties, a school and 5.75ha of land for employment uses. The neighbouring 6 hectares of Javelin Park has permission for B8 (storage/distribution), which has not yet been implemented. The initial assessment work indicates that there would be a limited demand for a retrofitted heat network within the existing development. There is potential for a heat network to be incorporated within any future development.
FC41	Archaeology	Within Moreton Valance WWII airfield, later used for aircraft assembly/testing. The archaeological potential of the site is uncertain; some disturbance of the site has taken place recently. There are eight Grade II Listed buildings within 1km of the site boundary and one Scheduled Monument.
	Contaminated Land	The site or adjoining land is not classified as 'contaminated land' under the Environment Act 1995.
FC44	Ecology/HRA	The nearest European site is the Severn Estuary SAC, SPA, Ramsar at a distance of ~~6.3~~ c.6 km. Other nearby European sites include Walmore Common SPA, Ramsar (c.6.5 ~~6.7~~ km), Cotswold Beechwoods SAC (c.7 ~~7.1~~ km) and Rodborough Common SAC (c.7.5 ~~7.6~~ km). Barn Owls (*Tyto alba*) and Badgers (*Meles meles*) have been recorded within 10m of the site. Polecats *(Mustela putorius)* and Bat Species: Noctule *(Nyctalus noctula)*; Brown Long-Eared Bat (*Plecotus auritus*) and 55kHz Pipistrelle (*Pipistrellus pipistrellus 55kHz)* have been recorded within 1km of the site. There are no designated sites within 1km of the site.

FC42

Flood Risk/Water Protection	The EA identified the site as overlying a secondary (undifferentiated) aquifer with the groundwater risks associated with the location as low for the geological setting. ~~The site is within 250m of a Minor Aquifer Intermediate 1 and Minor Aquifer High (H3) although the EA identified the site as a non-aquifer with un productive strate and low risk to groundwater.~~ The site is not within a Source Protection Zone. The site lies fully in Flood Zone 1. The SFRA identified that a small unnamed drain flows along the southern boundary of the site and may be culverted through part of the site.
Geodiversity	There were no recorded geological features on the site or within 250m of its boundary.
Green Belt	The site is outside the Cheltenham/Gloucester Green Belt.
Landscape/Visual Impact	A waste facility could cause permanent alteration of the site in terms of scale, height and intensity of development resulting from a facility both taller and larger than the existing surrounding units. This would lead to further encroachment of urban fringe light industrial / distribution style development into the surrounding agricultural landscape. However, the extant outline permission for the currently undeveloped area permits a maximum ridge line height of 15.7m for the two units. The erection of an emissions stack (40 – 80m in height) would create a significant vertical landmark out of keeping with the surrounding landscape character.
PRoW	There are no public paths within or near the suggested site.
Key Development Criteria	
Access/Highways	The TA should include a full assessment of the site access and routes to connect to the M5, and beyond to the wider principal road network. Any material increase in HGV traffic along the Standish road via Stonehouse would need to be prevented. Contributions towards both maintenance and junction improvements along the transport routes to and from the site may be required. The Highways Agency consider that the M5 should be used for strategic journeys therefore this will require careful consideration in any proposals. In particular improvements are likely to be required to junction 12 of the M5 and on the more immediate principal road network such as the A38. Congestion problems are noted at peak times at the Junction 12 to the M5, therefore consideration to traffic flows at these times may need to be assessed. It should be noted that the Highways Agency has programmed an improvement scheme for Junction 12 in 2010/11, but this does not preclude the requirement for the assessment of the impact of any development traffic upon the operation of the Junction.
Ecology/HRA	In respect of the General Development Criteria, the presence of protected species has been confirmed in the surrounding area (e.g. badger and barn owl) but reptiles, nesting birds and bats may also occur on the land itself. There is some probability but not high that water voles and great crested newts may use land around the margins of the land. On site habitat features include scrub and regenerating 'brownfield' land and

	there are boundary features including hedgerows and a watercourse which could be affected by new development. Any proposal for waste management at Javelin Park will need to demonstrate that there will be no significant effect on European Sites either alone or in combination with other plans or projects. Severn Estuary SAC, SPA, Ramsar, Walmore Common SPA, Ramsar, Cotswold Beechwoods SAC and Rodborough Common SAC will require specific consideration.
Landscape/Visual Impact	There is the potential to create a landmark facility as a gateway to Gloucester to present a high quality architectural statement.Alternatively consideration should be given to on-site buildings, materials and infrastructure that should either reflect the local agricultural style of the surrounding area, designed to sit as low in the landscape as possible using neutral, matt colours and avoiding the introduction of shiny or reflective materials. Where possible, large roof and hardstanding expanses should be avoided or broken up to reduce the perceived scale of the facility with particular consideration to the Cotswold AONB. Significant boundary enhancements to all sides including the advanced planting of a native woodland mix of primarily deciduous trees and shrub understory planting to enhance the screening works already undertaken to the western boundary.

The Promotion of Small-Scale Dispersed Facilities

4.64 Although there is no focused change of direct relevance, a number of respondents have taken the opportunity to restate earlier concerns that the WCS should not be promoting large-scale facilities close to the main urban areas, but should instead be promoting small-scale facilities dispersed around the whole county.

Council's Response

4.65 The WCS sets out a clear spatial strategy which is based on locating strategic-scale waste facilities within the area defined as 'Zone C'. The WCS clearly sets out a number of reasons why this is considered to be the most appropriate strategy including the fact that Zone C avoids the AONB and the areas of greatest flood risk.

4.66 The four strategic sites allocated in Zone C will help to ensure the deliverability of the residual waste recovery capacity that is needed in Gloucestershire to divert waste from landfill. These are allocated through Core Policy WCS4.

4.67 To provide maximum flexibility, Core Policy WCS4 allows for smaller-scale facilities to come forward within and outside Zone C subject to certain criteria being met. Therefore, if a waste company, developer or local community wanted to come forward with a small-scale waste recovery proposal this would be considered on its merits based on the criteria set out in the policy (although it should be noted that there has been no interest from the waste industry in promoting small-scale facilities throughout the preparation of the WCS).

4.68 The proposed approach therefore provides both certainty and flexibility and is considered entirely appropriate.

Importation of Waste from Outside Gloucestershire

4.69 At publication, a number of respondents raised concerns about waste being imported into Gloucestershire from elsewhere. In other words, Gloucestershire should not be a 'dumping ground' for waste from other areas.

4.70 To reflect these concerns, a focused change was made to the spatial vision (FC10) to emphasise the importance of providing enough capacity to *'meet Gloucestershire's needs'.*

4.71 Notwithstanding this, a number of respondents to the focused change consultation continue to express concerns that that waste will be imported into Gloucestershire in order to 'feed' whatever facility is built at Javelin Park. In particular, respondents are concerned that the Council will enter into a contract with a private company to build a facility at Javelin Park and will then be unable to provide enough waste locally meaning waste has to be imported from elsewhere to avoid contractual penalties.

Council's Response

4.72 There are a number of important factors to note in response to this issue. First it must be emphasised that certain types of waste do move across local authority boundaries and there is nothing the County Council can do to prevent this.

4.73 The movement of commercial and industrial waste or construction and demolition waste for example is purely a commercial matter. If a private waste management company has a contract to collect waste from office premises in Gloucestershire and then decides to take it out of the county to be managed elsewhere, there is nothing the Council can do to prevent this happening. The converse is also true and commercial wastes may be freely imported into Gloucestershire.

4.74 The only type of waste that the Council does have direct control over is municipal waste through its role as Waste Disposal Authority (WDA). In this regard, the WCS vision now emphasises the importance of providing sufficient capacity so that Gloucestershire's needs are met (FC10).

4.75 Contractual matters relating to the development of a waste management facility at Javelin Park or any of the other strategic site allocations are outside the scope of the WCS and in relation to municipal waste, fall within the remit of the County Council in its role as Waste Disposal Authority (WDA). The WPA is advised by the WDA on the level of capacity that should be made available for managing Gloucestershire's municipal waste and the primary role of the WCS is to ensure sufficient, suitable sites are made available.

'Zero-growth' versus 'Zero-Waste'

4.76 At publication, a number of respondents objected to the aim of achieving zero-growth in waste arisings by 2020. This was considered to be unambitious compared to the pursuit of 'zero-waste' and was also considered by some respondents to be contradictory to the level of growth expected to occur in the period 2020 – 2027 and used to calculate future waste capacity requirements.

4.77 To reflect these concerns a focused change was made to the supporting text of the WCS (FC8) to state that *'notwithstanding the aspiration for zero-growth, forecasts suggest there will be an increase in municipal waste arisings beyond 2020'.*

4.78 In response to this change a number of respondents have repeated their earlier concerns that aiming for zero-growth is not ambitious enough and that in light of the current downward trend in municipal waste arisings represents a negative target. Some have also argued that there is no point in aspiring to achieve something, only to then assume it won't be achieved.

Council's Response

4.79 The aspiration for achieving zero-growth in waste arisings by 2020 is derived from the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS). The WCS is required to reflect and help deliver the JMWMS and hence it is considered entirely reasonable to include the zero-growth aspiration within the WCS.

4.80 The Council does not accept that the target is retrograde. Whilst MSW arisings have fallen in the last few years prior to that they were increasing and forecasts provided by the WDA suggest that arisings will begin to increase again within the next few years.

4.81 Neither does the Council accept that there is a conflict between the aspiration for zero-growth by 2020 and the assumptions that some growth will occur after this point. Whilst it might seem frustrating to have an aim and then plan for it not being achieved, the Council is adopting an understandably cautious approach.

4.82 Simply having a target in place does not mean contingencies shouldn't be planned for. This principle applies to a number of issues. For example, whilst an admirable aim would be to prevent climate change this doesn't make it inappropriate to put in place measures to cater for a situation where the aim is not achieved.

4.83 Similarly for waste growth, whilst we can aim for zero-growth by 2020 it would be foolish not to take account of current waste forecasts from the WDA which suggest a relatively modest increase in municipal waste arisings in the period 2020 – 2027.

Impact of Different Technologies

4.84 The publication WCS (December 2010) adopts a 'technology neutral' approach. In other words, whilst it seeks to allocate four strategic sites, it does not stipulate what should be built on each. Rather it outlines a range of different waste 'recovery' technologies that would all be suitable in principle.

4.85 A number of respondents at the publication stage argued that this approach is flawed and that the Council has a 'duty of care' to assess all technologies and specify which is the most appropriate for Gloucestershire. Although there is no focused change of direct relevance, a number of respondents have repeated these concerns in response to the focused change consultation.

Council's Response

4.86 It is understandable that respondents would like more certainty about what will be built on the strategic site allocations. In particular most have expressed a clear preference for non-thermal treatment processes such as MBT and AD.

4.87 However, to make the WCS more specific and explicitly state what should be built on each site would be inflexible and would be contrary to national policy which suggests that local authorities should not be overly prescriptive in relation to technology.

4.88 In terms of assessing in detail the impacts of different technologies, the Council would argue that such an analysis would go beyond the reasonable scope of the WCS evidence base which should be proportionate to the issues at hand. It would also be excessively prescriptive contrary to national policy as outlined above. Furthermore, assessments regarding the suitability of a particular technology over another are matters that the WDA could consider as part of contract processes. These are outside the scope of the WCS.

Recycling/Composting Target

4.89 The publication WCS includes within it a target of 60% recycling and composting by 2020 with an aspiration for 70%. A focused change was introduced (FC11) to clarify that the 70% aspiration is to be achieved by 2030.

4.90 Whilst welcoming the inclusion of a clear target date, a number of respondents continue to argue that the target remains too low and that it should be brought forward for example to achieve 70% by 2015 and 80% by 2020.

Council's Response

4.91 As stated previously, the Council's target of 60% recycling and composting by 2020 is 10% higher than the national target over the same period. The aspiration for 70% is 20% higher than the national target, albeit over a longer timeframe. These local targets cannot therefore be described as unambitious or unchallenging.

4.92 Whilst there may be individual examples of higher rates being achieved, the Council has set what it considers to be a reasonable target having regard to the national target, current levels of recycling/composting and what is being achieved in other local authorities elsewhere.

4.93 It should also be noted that 60% is not a 'ceiling' target and if it can be exceeded by 2020 this would clearly be welcomed. The same principle applies to the 70% aspiration by 2030.

Anaerobic Digestion (AD)

4.94 In response to representations received at publication in December 2010 a focused change (FC13) was made to the WCS to include more explicit reference to Anaerobic Digestion (AD). A new criteria-based policy was drafted (Policy WCS3a) setting out the Council's approach towards new or expanded AD facilities and additional supporting text was included to clarify central Government policy as set out in the March 2010 publication 'Accelerating the Uptake of Anaerobic Digestion in England: an Implementation Plan'.

4.95 A number of further representations have been received on this issue in response to the focused change consultation. Whilst there is general support for the inclusion of a separate policy and text dealing with AD, a number of respondents believe the policy is too 'reactive' and that the WCS should be more pro-active in its approach. Other respondents feel that the supporting text provided unfairly highlights the limitations of AD and does not do this for the other technologies outlined in the strategy. Some respondents have also suggested that the AD policy should exclude 'strategic-scale' facilities i.e. those managing more than 50,000 tonnes/year.

4.96 One respondent has also suggested that the issue of AD should be linked with the sustainable transport section of the WCS including the use of organic waste to generate fuel for the implementation of a carbon-free local public transport system.

Council's Response

4.97 Dealing with each point in turn. In terms of the AD policy being 'reactive' whilst the WCS adopts a criteria-based approach towards AD proposals rather than allocating specific sites, it is not considered to be overly 'reactive'. The supporting text clearly explains the benefits of AD and the Government's policy on this area of waste management. One option would have been to include AD within Core Policy WCS4 (Other Recovery) however the fact that a separate policy and supporting text have been included demonstrates the importance placed on AD within the strategy.

4.98 In terms of the supporting text this has been drafted in a balanced fashion which whilst highlighting the potential benefits of AD such as energy recovery also informs the reader that it does have some limitations such as the need for a consistent, segregated supply of waste. This approach is considered reasonable.

4.99 In terms of 'strategic-scale' AD facilities there is nothing to suggest that facilities managing > 50,000 tonnes/year should not be allowed to come forward in Gloucestershire. Whilst AD facilities are generally by their very nature likely to be small in scale, to specify this as a requirement would be inflexible, inappropriate and contrary to the Government's aim of promoting this form of waste management.

4.100 With regard to the use of organic waste to power a carbon-free public transport system, whilst this is an admirable intention, in reality the amount of organic waste managed in Gloucestershire is unlikely to be of sufficient scale to make such a proposition economically viable or realistic. If such as scheme were to come forward it would be likely to be supported in principle however to make specific reference to it within the AD or transport sections of the WCS is considered unnecessary.

Regional Spatial Strategy (RSS)

4.101 The future requirements for commercial and industrial waste set out in the WCS are derived from the targets set out in the draft Regional Spatial Strategy for the South West (SW-RSS). A focused change was made to the WCS to clarify this (FC9).

4.102 A number of respondents have responded by suggesting that all reference to the SW-RSS should be removed from the WCS in light of the revocation of regional spatial strategies by central Government.

4.103 One respondent whilst welcoming the inclusion of the RSS targets for the recycling/re-use and recovery of commercial and industrial (C&I) waste feels that this should be better reflected in the rest of the strategy including the strategic objectives and Core Policy WCS2.

Council's Response

4.104 At the present time the SW-RSS has not been revoked and remains a valid material planning consideration. It is therefore entirely appropriate for the WCS to include reference to the regional strategy. It is pertinent to note that the RSS targets for commercial and industrial waste are themselves derived from the Regional Waste Strategy which remains in place.

4.105 With regard to the RSS targets being better reflected throughout the WCS the WPA contend that the C&I capacity requirement figure for C&I waste of 143,000-193,000 tonnes/year for recycling/re-use and recovery is both credible and robust. It is an indicative figure and not a ceiling as the WPA aim is to prevent as much waste as possible from going to landfill. To date a large proportion of C&I waste is still going to landfill and any proposals which can divert from landfill by either recycling or recovery will assist in that aim. The WCS at both paragraph 4.37 and Policy WCS4 explains that this figure could be met through both recycling and recovery. It appears unnecessary for the WCS to keep drilling down the iterations on this further, as FC9 at paragraph 3.24 provides the specific breakdown with reference to the RSS figures for recycling and recovery.

Municipal Waste Arisings

4.106 One of the key issues raised at publication is that the Council is over-estimating the amount of municipal waste that will be generated in Gloucestershire over the plan period to 2027. It is argued that this will lead to over-provision of waste treatment capacity, importation of waste from outside the county and a negative impact on recycling/composting rates.

4.107 Despite there being no focused change relating to this issue, a number of respondents have again raised this issue in response to the focused change consultation.

Council's Response

4.108 In relation to municipal waste arisings, the Waste Planning Authority (WPA) is advised by the Waste Disposal Authority (WDA). The latest information provided by the WDA suggests that despite the more recent downward trend, municipal waste arisings are likely to increase again in the next few years.

4.109 Having regard to this forecast increase and taking into account other factors such as future increases in recycling rates, the WDA has advised that provision should be made through the WCS for up to 150,000 tonnes/year of residual waste recovery capacity.

4.110 The WPA has no reason or evidence to suggest that a different level of provision should be made. Further information is set out in Section 3.0 above and the evidence base for data produced in 2007 for the preferred options stage and updated for publication in 2010.

Validity of the Consultation Process

4.111 Despite there being no focused change of direct relevance, a number of respondents have questioned the validity of the WCS consultation process on two main grounds; the complexity of the information made available to consultees and the timing of consultation in relation to the Council's residual waste project.

Council's Response

4.112 Dealing with each of the main points in turn.

4.113 In relation to the complexity of the information made available to stakeholders, it is acknowledged that some of the documentation published in support of the WCS is lengthy and complex. This is however to a large extent dictated by legal requirements and the subject matter. By their very nature for example Sustainability Appraisal (SA) reports and Habitat Regulation Assessment (HRA) reports are complex and often lengthy. However, every attempt has been made to make these documents as accessible and understandable as possible including the use of non-technical and executive summaries.

4.114 The main WCS documents themselves have purposefully been written in plain English as far as possible and have where relevant incorporated glossaries of terms to aid understanding.

4.115 Dealing with the second point raised which is the timing of consultation and how this relates to the Council's residual waste project, it should be noted that the two processes, whilst related are nonetheless distinct and separate.

4.116 The purpose of the WCS site options consultation in 2009 was to consider the relative merits of 13 different sites and to decide which should go forward into the final strategy. All comments received were carefully considered and taken into account in determining the final four site allocations.

4.117 It is certainly not the case that Javelin Park would have been allocated regardless of the responses to the WCS site options consultation. Indeed it should be noted that of the 13 site options subjected to consultation, Javelin Park received the highest level of support from respondents (39.3%).

Flexibility/Monitoring

4.118 A number of respondents have stated that there is a contradiction between the provision of large-scale waste facilities and the need for flexibility and monitoring. For example there is no point in stating within the WCS monitoring framework that policies will be reviewed or replaced if the Council is committed to the provision of a large-scale facility through a 25-30- year contract.

Council's Response

4.119 There are a number of points raise in response. Firstly and most importantly contractual matters are outside the scope of the WCS. If the WDA wishes to enter into a long-term contract with a private waste management company, that is a matter for the WDA. The role of the WCS is primarily to identify suitable sites to allow proposals to come forward whether on a short-term or a long-term contract basis or indeed 'merchant' facilities where no contract with the WDA exists.

4.120 In any case and notwithstanding contractual matters, the WCS must include a monitoring and implementation framework. This is specified clearly in paragraph 4.47 of PPS12 – Local Spatial Planning which states that *'A core strategy must have clear arrangements for monitoring and reporting results to the public and civic leaders'* and that *'Monitoring is essential for an effective strategy and will provide the basis on which the contingency plans within the strategy would be triggered'.*

4.121 It is also important to remember that the monitoring and implementation framework that has been put forward in the WCS, relates to the whole plan, not just the strategic site allocations identified under Core Policy WCS4.

Withdrawal of PFI Funding

4.122 Since the publication of the WCS in December 2010, the PFI funding previously allocated to the WDA by DEFRA for bringing forward a waste recovery facility in Gloucestershire has been withdrawn. A number of respondents have argued in response to the focused change consultation that this demonstrates a lack of need for a strategic-scale waste facility in Gloucestershire.

Council's Response

4.123 This is really a matter for the WDA and the residual waste project rather than the WCS however in summary, the Council has undertaken a review of the residual waste project, determined that it should continue in the absence of PFI funding and has now selected two bidders to come forward with detailed solutions. From these, a preferred bidder will be selected and a contract awarded in due course.

4.124 The primary role of the WCS is to ensure suitable sites are made available.

Community Involvement

4.125 Since the publication of the WCS in December 2010 the Government has published the Localism Bill which is currently working its way through the Houses of Parliament and Commons.

4.126 The Bill envisages much greater levels of community involvement than has historically been the case with power being devolved from central Government to local Government and where possible onto local communities.

4.127 A number of respondents have responded to the focused change consultation on the basis that the WCS should be promoting greater levels of community involvement and that the development of large-scale strategic waste facilities runs counter to the Government's localism bill and 'big society' objectives.

Council's Response

4.128 There are a number of points to flag in response to this issue. Firstly the Localism Bill is still working its way through the House of Commons and Parliament continually being amended as it goes. It is not due to become law until late 2011 early 2012 and until then we cannot be certain what provisions the final legislation will contain.

4.129 Secondly, the development of strategic-scale facilities arguably does contribute to communities in Gloucestershire managing their own waste collection and disposal arrangements and will provide certainty that alternatives to landfill will be made available in Gloucestershire.

4.130 Whilst it is hoped that under a criteria-based approach Gloucestershire's communities will have the potential to bring forward their own community-based consortiums, funding, building and managing small-scale AD facilities, in reality this is unlikely to happen on anything other than a very small-scale.

4.131 Such schemes are certainly unlikely to come forward in anything like the number that would be needed to divert the anticipated amount of residual waste from landfill.

4.132 Importantly, should a small-scale community based scheme come forward for recycling, composting or even recovery e.g. anaerobic digestion, there are adequate criteria-based policies within the WCS against which such proposals can be considered.

Landfill

4.133 At the publication stage (December 2010) Gloucestershire's two main landfill operators Cory and Grundon submitted representations in relation to the issue of landfill. Cory claim that the Council has underestimated remaining landfill capacity by underestimating the voidspace available and over-estimating likely annual waste inputs. Conversely, Grundon argued that the Council has over-estimated remaining landfill capacity by under-estimating the amount of C&I waste and making the assumption that planning permission will be granted for the current planning application at Wingmoor Farm (East).

4.134 In light of these concerns a detailed response on the issue of landfill provision was set out in the key issues summary paper produced alongside the focused changes in June 2011. This response is set out in Section 3.0 above.

4.135 To address the concerns raised, two focused changes were proposed. FC25 inserted some additional wording to reflect the possibility of landfill lasting to the end of the plan period or beyond depending on future landfill diversion rates whilst FC26 highlighted the potential need for an early review of the WCS or preparation of a landfill DPD should planning permission at Wingmoor Farm (East) be refused.

4.136 Despite these two focused changes Cory and Grundon have both submitted further objections. Grundon argue that it is unreasonable to base future estimates of remaining landfill capacity on data from one year (2008) whilst Cory argue that no account has been taken of residual treatment (which would reduce the amount of waste sent to landfill and thereby extend landfill capacity) that projected inputs to landfill are being double-counted and that no regard has been had to RSS targets for diverting waste from landfill.

4.137 A number of other respondents have also repeated a concern expressed at publication that the WCS does not acknowledge the dependency of incineration on landfill and that it should identify landfill as having a role to play as a temporary to medium term storage for stabilised waste.

Council's Response

4.138 With regard to the further comments submitted by Cory and Grundon, it is disappointing that the focused changes proposed have not met their concerns. The key issues have been described at length in Section 3.0 above and there is little point repeating those arguments here. Suffice to say the Council believes that it is using the best available data derived from the Environment Agency (EA) and the landfill operators themselves.

4.139 In relation to factoring in residual treatment to landfill capacity calculations, it should be noted that the Council is working with two bidders to secure the delivery of a new treatment facility. It is anticipated that this could be up and running by 2015.

4.140 However, there is no guarantee this will happen and in terms of the assumptions made with regard to inputs to landfill it is considered reasonable to exclude treatment capacity that has not yet been permitted or built.

4.141 FC25 clearly states that landfill void could last for significantly longer potentially to the end of the plan period (2027) or beyond depending on future diversion rates from landfill across all waste streams. This approach is considered appropriate and no further amendment is necessary. It also reflects the RSS targets for diverting waste from landfill.

4.142 With regard to the use of data from one year (2008) the Council does not accept that this approach is inappropriate. The latest available data is from 2008 and to project this forward on the basis of 0% growth is entirely consistent with national and regional policy. As stated in the publication WCS the position on landfill will be monitored with action taken accordingly e.g. review of the WCS or preparation of a separate landfill DPD.

4.143 In relation to the issue of 'double counting' of inputs to landfill it should be remembered that the figures provided in Dataset 1 for MSW are more complex taking account of LATS and other factors. Dataset 2 does not factor in that LATS will be met. This is consistent with the approach outlined in the Waste Data Paper in 2007. The summary of key issues paper published at focused changes (see section 3.0 above) outlines other 'possible' scenarios which might come to pass. The WPA however has no 'crystal ball' as to precisely what will happen in the future. The assessment of landfill capacity based on and following through current throughputs suggests that it could last between 10-13 years but the WPA accept that this could last considerably longer subject to a range of factors relating to residual waste diversion, improved recycling etc. This is the reason why the WCS has no policy for new landfill and the WPA feel that FC25 adequately addresses the issue.

4.144 With regard to the relationship between incineration and landfill, notwithstanding the 'technology neutral' approach adopted in the WCS, a focused change (FC15) has been introduced to clearly state that APC residues from incineration are classed as hazardous waste and must be treated and/or landfilled. This is considered adequate.

4.145 With regard to the role of landfill and its potential use as temporary to medium storage for stabilised waste, this concept is not reflected in national policy set out in Planning Policy Statement 10 – Planning for Sustainable Waste Management and the Council does therefore not consider it necessary to introduce it into the WCS.

4.146 The WCS is based on the established waste hierarchy which seeks to ensure that only the waste that cannot be re-used, recycled, composted or recovered is disposed of through landfill.

Joint Working

4.147 Despite there being no focused change of direct relevance, a number of respondents have repeated their previous concerns that the County Council should be more aggressive in working with the District Councils to secure better outcomes such as a more consistent approach towards waste collection and recycling etc.

Council's Response

4.148 The WCS clearly states in the spatial vision that *'Opportunities for re-using, recycling and composting waste are maximised across all waste streams. Effective joint working through the Gloucestershire Waste Partnership (GWP) has led to a more consistent and co-ordinated approach towards municipal waste collection across the county with everyone able to recycle and compost a broad range of materials easily and conveniently'.*

4.149 The importance of effective partnership working is also highlighted elsewhere in the WCS including the key issues, Core Policy WCS1, WCS2, Table 3 and the implementation framework. This is considered adequate.

4.150 It is important to note that waste collection arrangements fall outside the scope of the WCS and it is for the WDA through its role in the Gloucestershire Waste Partnership (GWP) to work with the Districts to ensure a more co-ordinated approach towards collection and waste management.

4.151 The primary role of the WCS is to ensure suitable sites are made available and that appropriate policies are in place against which to consider future development proposals.

Wingmoor Farm (East)

4.152 There is a current planning application to continue the waste management operation at Wingmoor Farm (East) near Bishop's Cleeve. In response to the publication WCS a number of respondents objected on the basis that the WCS appeared to assume planning permission would be granted and thereby prejudiced the application.

4.153 To meet these concerns a focused change was introduced (FC26) was introduced to clarify that the application has not yet been determined and that an early review of the WCS or preparation of a separate landfill DPD may be required depending on the outcome of the current planning application at Wingmoor Farm (East).

4.154 Notwithstanding this a number of respondents to the focused change consultation have repeated earlier concerns that the WCS should not assume planning permission will be granted.

Council's Response

4.155 It is disappointing that the focused change made to the WCS (FC26) does not appear to have satisfied previous objectors. The application at Wingmoor Farm (East) is still pending determination and it is the Council's view that the WCS does not in any way prejudice or pre-suppose the outcome of that application.

4.156 The revised wording introduced through FC26 makes it quite clear that if planning permission at Wingmoor Farm (East) is not granted an early review of the WCS will be needed to address the issue of landfill provision or alternatively a separate DPD dealing with landfill will need to be prepared.

4.157 This is considered to provide adequate explanation and justification and no further change is proposed.

APPENDIX 1

LIST OF CONSULTEES

SPECIFIC CONSULTEES

Specific consultees are those listed in The Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) and relate to organisations responsible for services and utilities and infrastructure provision.

South West Regional Assembly (SWRA)
Government Office for the South West (GOSW)
Gloucester City Council
Cheltenham Borough Council
Tewkesbury Borough Council
Forest of Dean District Council
Stroud District Council
Cotswold District Council
Wiltshire Council
Swindon Borough Council
South Gloucestershire Council
Herefordshire Council
Worcestershire County Council
Warwickshire County Council
Oxfordshire County Council
Monmouthshire County Council
Malvern Hills District Council
Wychavon District Council
West Oxfordshire District Council
Vale of White Horse District Council
Stratford-on-Avon District Council
North Wiltshire District Council
All Gloucestershire Town and Parish Councils and those that adjoin the County boundary
Gloucestershire Police Authority
Gloucestershire Constabulary
The Coal Authority
The Environment Agency
English Heritage
Natural England
Secretary of State for Transport
South West Regional Development Agency (SWRDA)
British Telecommunications (BT)
Gloucestershire Primary Care Trust (NHS Gloucestershire)
Gloucestershire Health Authority
Gloucestershire Hospitals NHS Foundation Trust

Avon, Gloucestershire and Wiltshire Strategic Health Authority
National Grid UK Ltd.
Severn Trent Water
Thames Water
Wessex Water
Welsh Water
Homes and Communities Agency

GENERAL CONSULTEES

General consultation bodies include the following: voluntary bodies some or all of whose activities benefit any part of the Council's area as well as bodies which represent the interests of different ethnic or national groups, religious groups, disabled people and people carrying on business in the Council's area.

Cheltenham Chamber of Commerce
Cheltenham First Church of Christ Scientist
Cheltenham Mosque
Cotswold Centre Voluntary Services
Diocese of Gloucester
Gloucester Association for the Disabled
Gloucester Centre Voluntary Services
Gloucester Chamber of Trade and Commerce C/O Marketing Gloucester Ltd.
Gloucester Diocesan Board of Finance
Gloucester Heritage Urban Regeneration Company Ltd.
Gloucester Partnership
Gloucestershire Chamber of Commerce and Industry
Gloucestershire Federation of Women's Institute
Gloucestershire VCS
Forest Of Dean Centre Voluntary Services
Stroud and District Centre Voluntary Services
United Synagogues – Cheltenham

OTHER CONSULTEES

This includes other relevant agencies and organisations not listed above. Note: individuals are not listed here as there are too many to mention.

A and C Coaches/Coachlink Services
Abberley and Malvern Hills Geopark
Action Against Quarrying
AEA Technology Future Energy Solutions
Aggregate Industries UK Ltd
Agricultural Lime Association
Agricultural Supplies Co (Fairford) Ltd
Al Ashraf Primary School
Alexcars Ltd
Alkington Parish Council
Alliance Environment and Planning Ltd
Allstone Sand and Gravels
Applegate Coaches
Association of Geotechnical and Geo Environmental Specialist
Astonbridge Quarry
Avening Society
B and K Dismantlers
BBC Midlands
BBC Radio Gloucestershire
BBC TV West
Balfour Beatty
Barratt Homes
Barton Residents Association
Barton Wilmore Planning Partnership
Bath and North East Somerset Council
Beaumont Travel Ltd
Beavis Coaches
Bell Cornwell Partnership
Bell Waste
Biffa Waste Services
Birch Hill Quarry
Bishops College
Bloor Homes Western
Bovis Homes
Boyer Planning
Bristol and Gloucestershire Archaeological Society
Bristol City Council
British Aggregates Association
British Ceramic Confederation

British Coal Opencast - South Wales Region
British Gas Properties
British Geological Survey
British Marine Aggregate Producers Association
British Metal Recycling Association
British Natural Stone
British Waterways
Bromford Housing Group
Burke Bros (Cheltenham)
Coleford Brick and Tile Co Ltd.
Hogarth Waste and Recycling
Wood Hardwick Planning Ltd.
Needham and James Cotswold Seeds Limited
Forest Of Dean Partnership
Pro Vision Planning and Design Federal Mogul Corporation
Robert Turley Associates Ltd
Seitani Cotswold Canal Trust
Terence O'Rourke Plc Arlington Property Developments Ltd
CBI - South West Office
CPRE (Gloucestershire Branch)
Cainscross and Ebley Community Centre
Campaign Against Gravel Extraction
Camphill Village Trust
Carillion Plc
Carter Jonas
Cemex UK Operations
Central TV
Centre for Ecology and Hydrology
Chairman - Friends of the Forest
Chartered Institute of Waste Management
Cheltenham Citizens Advice Bureau
Cheltenham Civic Society
Cheltenham and Gloucester Independent
Chequers Bridge Centre
Churchdown Community Centre
Cirencester Citizen Advice Bureau
Cirencester Civic Society
City Auto Breakers
Civil Aviation Authority
Clean Rivers Trust
Clearwell Against Quarrying
Clearwell Quarries Ltd
Cleave Motor Salvage
Cluttons

Coleford Community Centre
Colefordian (Willetts) Ltd
Colin Buchanan and Partners
Colliers CRE
Combined Heat and Power Association
Commercial Boat Operators Association
Commission for Architecture and the Built Environment (CABE)
Complete Circle
Confederation of UK Coal Producers (Coalpro)
Copes Quarry
Cory Environmental (Gloucestershire) Ltd
Cotswold AONB Partnership
Cotswold Business Supplies
Cotswold Canal Trust
Cotswold Conservation Board
Cotswold Conservative Office
Cotswold Farm Park Ltd
Cotswold Hill Stone Masonry Ltd
Cotswold Natural Stone Ltd
Cotswold Skip Hire
Cotswold Stone Quarries Ltd.
Cotswold Youth and Community Office
Cotswolds Water Park Society
Council for British Archaeology
Countryside and Community Research Institute
Gloucestershire Guide Association
Crest Nicholson (South West) Ltd
Crossways and Scowles Action Group
D A Cook (Builders) Ltd
DPDS Consulting Group
David Brooke Chartered Surveyor
David Jarvis Associates Ltd
David L Walker Chartered Surveyors
David Wilson Homes
Dean Community Compost
Defence Estates
Department for Culture Media and Sport
Department for Environment, Food and Rural Affairs Government Office For The South West
Department for Environment, Planning and Countryside Welsh Assembly
Department for Productivity, Energy and Industry Government Office For The South West
Department of Constitutional Affairs
Department of Geology - British Institute for Geology
Department of Health - South-West Regional Public Health Group
Deputy Gavellers Office

Dev Plan UK
Diocese of Clifton
Director of Sustainable and Rural Development Advantage - West Midlands
Disability Rights Commission
Dorset County Council
Down Ampney Community Action
Dowty Sports and Social Society
Drivers Jonas
Dursley Auto Dismantlers
Dursley Community Centre
Dursley and Cam Society
E-On Energy
ELG Haniel Metals Ltd
EMR (Sharpness)
Ebley Coaches Ltd
Ecotricity
EDF Energy
Elliott and Sons Ltd
Elmbridge Neighbourhood Partnership
Elmscroft Community Centre
Energy from Waste Association
Engelhard Sales Ltd
Entec UK Ltd
Environmental Services Association - Gloucestershire
Environmental Waste Controls Plc
Equality and Human Rights Commission
European Metal Recycling Ltd.
Evesham and Cotswold Journal
F R Willetts and Co (Yorkley) Ltd
FM 102 - The Bear
Forest And Wye Valley Review
Forest Auto Salvage
Forest of Dean Badger Patrol
Forest of Dean Citizens Advice Bureau
Forest of Dean Railway Ltd
Forest of Dean Small Miners Association
Forestry Commission
Forestry Enterprise
Fosse Dogotel and Cattery
Freeminers Association
Freightliner
Friends of the Earth (Forest Of Dean)
Friends of the Earth Gloucestershire Network
Friends of the Forest

Furniture Recycling Project
G and M Motors (Glos) Ltd
GVA Grimley
George Wimpey Bristol
Gill Pawson Planning
Glos Association of Primary Heads
Glos Fire and Rescue Service HQ
GlosAIN
GlosVAIN
Gloucester Civic Trust
Gloucester Heritage Urban Regeneration Company Ltd
Gloucester News Service
Gloucester Partnership
Gloucester and District Citizens Advice Bureau
Gloucestershire Airport Ltd
Gloucestershire Association of Parish and Town Councils
Gloucestershire County Scout Office
Gloucestershire Echo - Cheltenham
Gloucestershire Echo - Stow on the Wold
Gloucestershire Echo - Tewkesbury
Gloucestershire Environmental Partnership
Gloucestershire Federation of Women's Institute
Gloucestershire Fire and Rescue Service
Gloucestershire First
Gloucestershire Gazette
Gloucestershire Geology Trust
Gloucestershire Green Party
Gloucestershire NHS
Gloucestershire Rural Community Council
Gloucestershire Society for Industrial Archaeology
Gloucestershire Wildlife Trust
Good Energy Company
Gordon Wood and Co
Government Office for the South West (GOSW)
Great Western Company
Great Western Trains Co Ltd
Greenfield Associates
Grundon Waste Management
H T Waste Recycling
HM Inspectorate of Mines - Health and Safety Executive
Ministry of Defence (South West)
HTV
Halcrow
Hallam Land Management Ltd.

Hanson Aggregates UK
Hartpury College
Help the Aged - England
Hemming Group
Hemming Waste Management
Hempsted Residents Association
Hewelsfield Against Quarrying
Highways Agency
Hills Minerals and Waste Ltd
Hilton Hotels Corporation
Horton Road Depot Objectors Consortium
Howard Tenens (Associates) Ltd.
Hucclecote Community Centre
Humphrey Cook Associates
Hunter Page Planning
Huntsman's Quarries Ltd
Infrastructure Services E W S
Institute of Directors South West Office
Institute of Environmental Mgmt and Assessment
J C Autos
Jackies Coaches
Jones Day
Kemble Air Services Ltd
Keyway (Glos) Ltd
Knockdown Stone
Lafarge Aggregates Ltd
Land and Mineral Management
Tarmac Quarry Products Limited
Land Use Consultants
Lechlade and District Society
Leckhampton with Warden Hill
Local Government Chronicle
Longlevens Community Centre
Lydney Citizens Advice Bureau
Lydney Sand and Gravel
Lydney Youth and Community Centre
MLAGB - The Muzzle Loaders Association of Great Britain
Malvern Hills AONB Office
Marwalk Development Ltd
Melcourt Industries Ltd
Member of Parliament for Gloucester
Midlands and Western Region Road Haulage Association
Midlands, West and Wales Office Freight Transport Association
Mine Train Quarry

Mineral Policy Section - Health and Safety Executive
Mineral Products Association
Mitcheldean Community Centre
Mitchell Vehicle Dismantlers
Mobile Operators Association (MOA)
Monument Quarry
Moreton C Cullimore (Gravels) Ltd
Moreton-In-Marsh Charity
Municipal Journal
NASUWT
NJL Consulting LLP
NOTE UK Ltd
NUT Glos Assoc
Nathaniel Lichfield and Partner
National Council of Women - Cheltenham
National Express
National Farmers Union
National Grid
National Mining Engineer - Network Rail
National Playing Fields Association
National Stone Centre
Network Rail
Never Despair Breakers
New Earth Solutions Ltd
Newent Civic Society
Newent Community Centre
Newtown Area Community and Residents Association
Northway Area Residents and Homeowners Association
Northwick Estate - Stanleys Quarry
Office of Government Commerce
P.E. Duncliffe Limited
Packwood Estates Limited
Parklands Community Association
People Against Incineration
Persimmon Severn Valley
Planning Publications Ltd
Planning and Built Environment Glos Community Health Council - C/O Capitec, Part Of Nhs Estates
Podsmead Community Centre
Pressweld Ltd
Property Services Thames Water
Public Enquiry Team Home Office
Pulham and Sons (Coaches) Ltd
RAF Fairford
RJB Mining UK

RMC Weston
RPS Group Plc
Rail Freight Group
Ramblers Association
Regional Director for The South West British Telecommunications Plc
Department for Education and Skills
Residents Against Gravel Extraction (Rage) - Twyning
Richard Read Transport Ltd
Ringway Highway Services - Gloucester Office
Robert Gardner Ltd
Robert Hitchins Ltd
Roberts Limbrick Architects
Roberts and Lloyd Solicitors
Route Management Highways Agency
Roxburgh Youth and Community Centre
Royal Agricultural College
Royal Forest Of Dean Freeminers Association
Royal Society for The Protection Of Birds (RSPB)
Ruardean Residents Assocation
Ruardean Women's Institute
SWARD
Savills Ltd.
School Of Earth, Ocean and Planetary Sciences Severn Estuary Partnership
Scottish and Southern Energy Plc
Sea and Water
South West Councils
Severn & Avon Valley Combined Flood Group
Severn Sound
Shakemantle Quarry Action Group
Sharpness Dock Limited
Smith, Stuart and Reynolds
Smiths (Gloucester) Ltd
South East Division Welsh Development Agency
South East England Development Agency (Seeda)
South East England Partnership Board
South West Regional Aggregate Working Party
Southern Brick Federation
South East England Regional Assembly
Sport England
Springfields Nursery
St Briavels Against Quarrying
St Marks and Hesters Way Community Association
Stagecoach West
Stanley's Quarry

Stewart Ross Associates
Stone Federation Great Britain
Stone Supplies (Cotswold)
Stow and District Civic Society
Stowe Mork Fence Residents Association
Malvern Hills District Council
Strategic Land Partnerships
Stroud Civic Society
Stroud College in Gloucestershire
Stroud News and Journal/ Chelt and Glos Independent
Stroud Valleys Project
Stroud and District Citizens Advice Bureau
Sunhill Action Group
Swanbrook Transport Ltd.
TACR Consultancy
Tarmac Ltd.
Teg Environmental Ltd
Terence O' Rourke Ltd
Tetbury Civic Society
Tewkesbury Citizens Advice Bureau
Tewkesbury Civic Society
Tewkesbury Conservation Association
Tewkesbury Youth and Community Centre
Thames Planning and Amenity Forum
Thames Water Plc
The Citizen Newspaper
The Co-Operative Group
The Composting Association
The Filkins Stone Company
The Living Green Centre
The Planning Inspectorate
The Reddings Community Association
The Stone Garden Company
The UK Cast Stone Association
Threatened Valleys Campaign (Upper Thames Branch)
Tlt Solicitors
Transco - National Grid
Transport 2000
Traveller Law Reform Project
Trenchard Collieries Ltd
Tribal MJP
Trust HQ Gloucestershire NHS Health Authority
Tuffley Community Association
Tufnell Town and Country Planning

Twigworth Breakers Ltd
University Of Gloucestershire
Urbaser Ltd
Virgin Trains
Viridor
Vision 21 Waste and Pollution Working Group
Wessex Trains
WRAP
Wales Environment Agency
Wales and West Utilities
Wardell Armstrong LLP
Warner Estate Holdings Plc
Waste Exchange Uk Ltd
Waste Recycling Group Ltd.
Wellington Park Properties Ltd
Wessex Water
West Gloucestershire Green Party
The Salvation Army - West Midlands Divisional HQ
West Midlands Regional Assembly
Westgrove (Properties) Ltd
Whaddon Youth and Community Centre
Wilderness Stone Ltd
Wildfowl and Wetlands Trust
Wilts and Glos Standard
Women's National Commission
Woods Hardwick Planning Ltd
Wotton-Under-Edge Civic Society
Wye Valley AONB Office
Wynstones School
Zone 4/24 Disabled Persons Transport Advisory Committee

APPENDIX 2

LIST OF PUBLICATION RESPONDENTS

The following is a list of the individuals and organisations that submitted representations in relation to the publication Waste Core Strategy (WCS) in December 2010 set out in alphabetical order.

Adam Neil - New Earth Solutions Group Ltd.
Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD)
Alan Watson Public Interest Consultants on behalf of SWARD and Bishop's Cleeve Parish Council (endorsed by Gloucestershire Friends of the Earth)
Anne Griffiths
Anthony Boonham
Barbara Farmer - SWARD and Bishop's Cleeve Parish Council
Barbara Morgan - Network Rail (Bristol)
Ben Stansfield - Cory Environmental (Gloucestershire) Ltd.
Brian Clifford - Network Rail (Derby)
Claire Cullen-Jones - Cheltenham Borough Council
Councillor Barbara Tait - Stroud District Council
Councillor Gordon Shurmer - Gloucestershire County Council
David Adams - AXIS PED Ltd on behalf of Urbaser Ltd.
David Berry - The Coal Authority
Diane Mautterer - Gloucestershire VCS Environment Strategy Group
Holly Jones - Tewkesbury Borough Council
Josephine Marsden
Kathryn Oakey - Elmstone Hardwicke Parish Council
Katy Wallis - Grundon Waste Management Ltd.
Kevin Parr - Enzygo Ltd on behalf of John Laing Investments Ltd.
Kit Stokes – Aspect 360 on behalf of Hardwick Court Estate
Leah Wellings - Dursley Town Council
Lucy Binnie - Land and Mineral Management Ltd. on behalf of Smiths (Gloucester) Ltd
Malcolm Watt - Cotswolds Conservation Board
Mary Newton - Forest of Dean Friends of the Earth
Michael Ratcliffe - Cheltenham Chamber of Commerce
Neil Chapman - Highways Agency
Nick Burroughs - Vale of White Horse District Council
Nick Dummett - Campaign to Protect Rural England (CPRE)
Peter Richmond
Robert Purton - David Lock Associates on behalf of Lichen Renewal
Roger Cullimore - Moreton C Cullimore (Gravels) Ltd
Ruth Clare - Environment Agency
S. Doherty - Civil Aviation Authority
Simon Hanes
Simon Steele-Perkins - Strategic Land Partnerships

Stephen Moore
Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council
Thames Water Utilities Ltd.
Tim Perkins - Entec UK Ltd. on behalf of Viridor Waste Management Ltd.
Tim Quinton - Natural England
Caroline Power - English Heritage
Councillor Sarah Lunnon - Gloucestershire County Council
Dr Shona Arora - NHS Gloucestershire
Gary Parsons - Sport England (South West)
Meyrick Brentnall - Gloucester City Council
Richard Lacey - Stonehouse Town Council
Jane Hennell - British Waterways

APPENDIX 3

LIST OF FOCUSED CHANGE RESPONDENTS

The following is a list of the individuals and organisations that submitted representations in relation to the revised publication Waste Core Strategy (WCS) incorporating focused changes (June 2011) set out in alphabetical order:

Andrew Montague
Andrew Page
Andy Clarke
Ann Jarvis
Anna Treby
Belinda Montague
Ben Stansfield - Cory Environmental
Caro Kingsnorth
Caroline Power - English Heritage
Caryn Cox - NHS Gloucestershire
Chris Harmer
Derek Kingscote
Fran Welbourne
Gary Scott
George Montague
Gordon Bell
Heather and Andrew Munday
Holly Jones - Tewkesbury Borough Council
Ian Rank Broadley
Ivor *(surname not specified)*
James Bosomworth
James Hartley - Cheltenham Borough Council
Jennifer Jarrett
John Bennett - Dorset County Council
Julian Powell
Juliette Ttofa
Karen Clarke
Kay Allen
K Quick
Lisa-Jayne Fallows
Lisa J West
Lucy Binnie - Land and Mineral Management on behalf of Smiths
Mary Newton – Gloucestershire Friends of the Earth Network
Mary Newton - Forest of Dean Friends of the Earth
Matthew Fox - GVA Grimley on behalf of Graftongate Investments Ltd. and Consi Investments Ltd.
M E Michael
Michael Ratcliffe - Cheltenham Chamber of Commerce

Mick Thorpe - Gloucester City Council
Mike Bradbury - Staunton PC
Neil Chapman - Highways Agency
Nick Burroughs - Vale of White Horse DC
Nick Dummett – Council for the Protection of Rural England (CPRE)
Patrick Rochfort
Paul Reed
Peter Richardson - Quedgeley PC
Rachael Bust - Coal Authority
Rob Gaffney
Ruth Clare - Environment Agency
Sally King - Natural England
Stephen Bate
Stewart Mitchell – Grundon Waste Management Ltd.
Tim Montague
Tom Bland - Complete Circle
Sue Oppenheimer on behalf of GlosVAIN, Glosain, Standish Parish Council and Haresfield Parish Council
Venk Shenoi