The Planning Inspectorate

Report to Gloucestershire County Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO THE GLOUCESTERSHIRE WASTE CORE STRATEGY DPD

Document submitted for examination on 5 September 2011

Examination hearings held between 31 January and 12 March 2012

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Abbreviations Used in this Report

AA	Appropriate Assessment
BATNEEC	Best Available Technologies Not Involving Excessive Costs
CD	Core Document
CHP	Combined Heat and Power
C+I	Commercial and Industrial
CS	Gloucestershire Waste Core Strategy Local Plan
DPD	Development Plan Document
EA	Environment Agency
EfW	Energy-from-Waste
FC	Focused Change
GCC	The County Council
HRA	Habitats Regulations Assessment
HRC	Household Recycling Centre
JMWMS	Joint Municipal Waste Management Strategy
LP	Local Plan
MM	Main Modification
MSW	Municipal Solid Waste
MWDS	Minerals and Waste Development Scheme 2011 - 2014
NPPF	National Planning Policy Framework
PPG	Planning Policy Guidance
PPS	Planning Policy Statement
RS	Regional Strategy
RTAB	Regional Technical Advisory Body
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
tpa	tonnes per annum
WDA	Waste Disposal Authority

Non-Technical Summary

This report concludes that the Gloucestershire Waste Core Strategy DPD (CS) provides an appropriate basis for waste planning in the County over the next 15 years providing a number of modifications are made to the Plan. The County Council has specifically requested that I recommend any modifications necessary to enable them to adopt the CS. All of the modifications to address this were proposed by the County Council and I have recommended their inclusion with some minor changes where necessary after full consideration of the representations from other parties on these issues.
The modifications can be summarised as follows:

- The inclusion of a policy to give effect to the central theme of the NPPF which is the presumption in favour of sustainable development **(MM0)**;
- Revisions to the tonnages of residual MSW for which other recovery management capacity provision needs to be made together with other changes in the presentation of data for other waste streams and a firmer commitment to monitor these matters and review the CS as necessary **(MM3 and MM1)**;
- The addition of a policy to both guide the identification of areas of search and/or specific sites for landfill in a future Local Plan and set out criteria against which any planning application for a new or extended landfill can be assessed **(MM13)**;
- Additional policies on landscape protection **(MM19)** and historic heritage **MM21)** to ensure that these topics continue to be addressed in a manner consistent with national policy following the publication of the National Planning Policy Framework and the replacement of the previous Planning Policy Statements that the CS relied upon.
- The replacement of policy WCS10, which does not correctly represent national Green Belt policy, with a revised policy that is wholly consistent with section 9 of the National Planning Policy Framework **(MM18)**;
- Extensive redrafting of policy WCS4 so that it is consistent with national policy and the vision and strategic objectives of the CS and, in respect of the HRA process as it applies to individual planning application proposals, ensures that the CS is legally compliant **(MM10)**; and
- Other changes necessary in order to ensure that the CS is both based on a strategy, strategic objectives and implementation policies that meet the objectively assessed development and infrastructure requirements for the plan period and consistent with national policy **(MM1 to MM39 inclusive but excluding those already specifically referenced)** .

Introduction

1. This report contains my assessment of the Gloucestershire Waste Core Strategy DPD (CS) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers whether the CS is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared; justified; effective and consistent with national policy.

2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The County Council (GCC) published the pre-submission draft CS in December 2010. Following consideration of the representations made and other matters GCC published and consulted upon a Revised CS[1] and a Schedule of Focused Changes[2] in June 2011. However, in correspondence[3] and again at the Pre Hearing Meeting[4] GCC confirmed that it was the December 2010 version that it wished me to examine. The basis for my examination therefore is the submitted draft CS (September 2011[5]) which is the same as the document published for consultation in December 2010.

3. My report deals with the main modifications that are needed to make the CS sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act GCC requested[6] that I should make any modifications needed to rectify matters that make the CS unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.

4. The main modifications that go to soundness have been subject to public consultation and, where necessary, Sustainability Appraisal (SA) and I have taken the consultation responses into account in writing this report.

Assessment of Duty to Co-operate

5. Section s20(5)(c) of the 2004 Act now requires that consideration be given to whether the local authority has complied with any duty imposed on them by section 33A of the 2004 Act (which was introduced by the Localism Act 2011) in relation to the Plan's preparation. It is my understanding that this duty does not apply to plans submitted for examination prior to the 15 November 2011 when the relevant section came into effect. However, this is not the advice received by GCC[7] and in submissions made during the opening of the

[1] CD1.2
[2] CD1.3
[3] CD13.2
[4] CD13.18, Notes of Pre Hearing Meeting
[5] CD1.1
[6] CD13.60
[7] CD13.54.3

examination hearings GCC explained how it considered that it had complied with the new duty. This was then put in writing as an examination document[8].

6. When the examination hearings took place guidance to local authorities on this matter was confined to the draft National Planning Policy Framework (NPPF) and the Planning Advisory Service web site hosted by the Department for Communities and Local Government. Arrangements for cross boundary working at regional level in relation to planning for waste management have been well established for some years mainly through the forum of the Regional Technical Advisory Body (RTAB). RTABs include representatives from waste planning authorities, industry, the Environment Agency (EA) and other relevant organisations. Among their roles is to advise the former regional planning bodies on waste matters. GCC explained how it has participated in and been informed by the work of the South West RTAB in preparing the CS. Had the duty applied in respect of this CS, I am satisfied that the evidence demonstrates that GCC would have complied with it.

Assessment of Soundness

Preamble

7. The final stages in the preparation of the CS have taken place in a period of significant actual and prospective change to the planning system following the May 2010 general election and the establishment of the coalition government. These policy and legislative changes continued up to and beyond formal submission. Principal among them have been the publication in July 2011 of the draft NPPF and the coming into force of the Localism Act in November 2011. GCC explained during the examination hearings how these and other factors had influenced the nature of the CS which is now in the form of a hybrid document rather than that of a pure CS. It sets out:

    - GCC's vision and strategic objectives for waste management planning in the County;
    - planning policies to facilitate delivery of waste management capacity at each level in the waste hierarchy;
    - one policy explaining how 'other recovery' facilities for the management of residual waste will be delivered with the allocated sites supported by an Appendix (number 5) detailing site profiles and the general and site specific development criteria to be taken into account by any prospective developer; and
    - development management policies.

8. The Revised Minerals and Waste Development Scheme 2011 – 2014 (MWDS)[9] is somewhat ambivalent about the further DPDs/Local Plans that will be prepared while CD11.9 lists those adopted Waste Local Plan policies that have been either saved or deleted. At the time of the examination hearings the NPPF remained a consultation draft document and the weight that could be

[8] CD13.57
[9] CD11.1

attached to it was therefore limited. Nevertheless, it was prudent to assume that most, if not all, Planning Policy Statements (PPSs) would be replaced by either the final version of the NPPF itself or in due course by the National Waste Management Plan in the case of PPS10, *Planning for Sustainable Waste Management*. In addition, the draft NPPF also contained some significant pointers towards the future nature of plan making which may also impact on the number and format of the documents that GCC ultimately brings forward. However, it emerged in discussion that there could therefore be some significant policy gaps in GCC's local development framework. These matters and the main modifications proposed by GCC to address them are discussed below, mostly under Issue 4.

9. The final version of the NPPF was published on 27 March 2012. This was after the final examination hearing session and therefore after the nature of the main modifications to be proposed had been discussed and agreed in general terms but before consultation on them began. As part of that process therefore views were also sought on the implications, if any, for the CS of the NPPF. These included comments on proposed change **MM0** which introduces, without alteration to its wording, the model policy on the presumption in favour of sustainable development and supporting text to give effect to the central theme of the NPPF. Importantly, PPS10 was not replaced by the NPPF and remains national planning policy on waste management until the new National Waste Management Plan is published in the future.

10. Representations were received to the effect that the policy is unsound since it does not include a definition of sustainable development and that its scope should be widened to include references to either current or prospective national waste policy. The first point seems to ignore the fact that the NPPF itself includes such a definition[10]. The second suggestion is also unnecessary. The proposed policy, in effect, adds a little clarity to the statute as set out in s38(6) of the Planning and Compulsory Purchase Act 2004. National waste policy as it stands at the time of any planning application would be among the material considerations referred to in the policy and to which the weight appropriate at the time should be given. The courts have held that what constitutes a material consideration is exceptionally wide in scope and I see no reason for the CS to identify any particular document, policy or matter as such. I therefore recommend **MM0** as drafted.

11. Between publication in December 2010 of the submission CS for consultation and the formal submission in September 2011, two further material documents were published. First, on 23 March 2011 a ministerial statement outlining the key role of the planning system in the government's plans for the British economy (set out in Planning for Growth) was issued. Second, on 31 March 2011 the government's Chief Planner wrote to all chief planning officers advising them of changes to PPS10 and, in particular, a revision to the waste hierarchy. GCC sets out in CD13.10 how these matters have been addressed in the CS and I recommend **MM2** to bring Figure 4 into accord with the latest national guidance on the waste hierarchy.

[10] CD14.10 the box before paragraph 6 on page 2

12. The draft Regional Strategy (RS) for the South West Region has not been adopted and has not progressed beyond the Proposed Changes document of 2008[11]. This document does nevertheless represent a material consideration to which some weight should be attached given the stage towards adoption reached. This is particularly relevant to the consideration of Issue 1.

13. GCC as a waste disposal authority (WDA) has prepared a Joint Municipal Waste Management Strategy (JMWMS) in partnership with the six district councils. This process has run in parallel with the preparation of the CS and, following the firm guidance in PPS10 and its Companion Guide[12], there has been a close relationship between the two. Neither the JMWMS nor the CS specifies any particular technology for the management of the residual municipal solid waste (MSW). While this is generally in accordance with the advice in PPS10 it has nevertheless caused understandable disquiet in the local community, particularly as I understand the various public exhibitions mounted by the WDA appeared to be far more specific on both matters than the CS.

14. By the time the examination hearings started the WDA had selected the preferred bidder and both the technology chosen (energy-from-waste (EfW)) and the site on which the facility is intended to be built (that part of the Javelin Park owned by GCC) were confirmed. While I had consistently made it clear that the purpose of the examination was not to discuss the specifics of the WDA's residual MSW contract process[13], this decision by the WDA does nevertheless provide an added focus for the matters discussed under Issues 3 and 6 with respect to the suitability of Javelin Park for all 'other recovery' facilities as defined in the CS.

Main Issues

15. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified seven main issues upon which the soundness of the CS depends.

Issue 1 – Whether the amount of waste planned for is justified by the evidence base and consistent with national and regional policy.

Introduction

16. There is a wealth of advice in PPS10 and its Companion Guide on the approach waste planning authorities should take when assessing the waste facility capacity for which provision should be made in their development plans. Underlying this however is the requirement and assumption that the RS will apportion by waste planning authority area the tonnages of waste requiring management[14]. However, as pointed out above [paragraph 12], the South West RS has not been adopted and thus there is no formal apportionment on which the CS can rely.

[11] CD11.35
[12] CD12.32
[13] See for example CD13.5, paragraph 6.4 and CD13.18, note of Pre Hearing Meeting
[14] CD12.31, paragraph 9

17. The 2008 version of the RS does contain indicative allocations for 2010, 2013 and, for reference only, 2020[15]. However, these allocations appear to be based on work published in 2004[16]. In any event, it is made clear in the RS that waste data is something that should be kept under very regular review and the period covered is too short for the purposes of the CS.

18. GCC has therefore produced its own technical papers on waste data[17] and the CS is based upon the findings set out therein. While it was still able to the Regional Planning Body did not raise any issues in this regard and, in the circumstances applying within the region, in general terms I see no reason to criticise this approach. However, GCC has dealt differently with the principal waste streams for which the CS makes provision and I deal with these in turn.

MSW Stream

19. GCC has relied on the WDA for MSW arisings data. This approach appears to be justified as the WDA has very reliable data upon which to draw. In simple terms GCC has:

    - taken the known MSW arisings for the last available year and applied an annual percentage increase to derive the equivalent figure at the end of the plan period;
    - made assumptions about the amount of this annual arisings figure that will be composted and recycled;
    - independently assumed that the amount of waste not requiring residual treatment will rise to about 60% by 2020 and keep at this level thereafter; and
    - assumed that the residual MSW going to landfill for disposal will decline substantially from in excess of 150,000 tonnes per annum (tpa) up to 2013/14 to less than 8,500 tpa thereafter following the commissioning of treatment facilities under the residual MSW contract.

20. This information is presented first in CD10.3, Table 7 and then updated in CD10.4, Table 3l. All of the assumptions are challenged to some degree by those making representations that the CS is thus not founded on a robust evidence base and therefore unsound.

21. Dealing with the first bullet point, although actual waste arisings for 2010/11 were marginally lower than the figure assumed by the WDA, the effect of compounding this lower figure throughout the plan period is quite small. Of more significance for the overall amount is the annual rate of increase assumed. This is taken to be some 1.6% per annum up to 2020 and about 0.8% per annum thereafter. The 1.6% figure derives from work carried out for GCC[18] while the lower figure for later years is linked to forecast growth in

[15] CD11.35, Tables 1 and 2 on pages 211-213
[16] CD11.36
[17] CD10.3 and CD10.4
[18] CD13.38

household numbers on the assumption that initiatives to achieve zero waste growth at a household level by 2020 will succeed.

22. Criticisms of the assumptions underlying the 1.6% growth figure may be summarised as follows:

    - the research was undertaken during much more favourable economic circumstances which would have lead to higher waste production per household;
    - the figure is influenced very significantly by a high growth in the amount of waste taken to the Household Recycling Centres (HRC) which is not properly explained in the research;
    - although account is taken of one-off planned service changes, none is taken of future legislative and fiscal measures which will lead to reduced levels of waste production;
    - no account is taken of the current and likely continuing economic downturn in the early years of the CS when the compounding effect for later years of a high initial growth rate is at its greatest; and
    - the CS should plan for zero growth in MSW rather than working towards zero growth by 2020 making the necessary service changes, such as not collecting green waste but leaving it for home composting, required for this to be achieved.

23. GCC maintains that there is very clear evidence that increasing household numbers, reducing average household size and increasing population are the key factors driving waste growth. However, GCC accepts that these factors have been in play during the period 2006/7 to 2009/10 when waste arisings have actually fallen year-on-year. GCC believes that this is due both to implemented service changes, which were factored into the 1.6% assumption, and the economic downturn, which was not. It is therefore considered by GCC that it is this factor that is having the additional effect on MSW arisings[19].

24. In the light of this conclusion and the current economic outlook for the national economy, the WDA's view that growth of 1.6% per annum will occur from as early as 2012/13 appears optimistic (or pessimistic from the representors' standpoint). For example, no evidence was produced to indicate why the performance of the local economy should differ from that of the national economy. I do however consider the WDA to be correct in its view that success locally in de-coupling growth in MSW from economic growth will be an important influence on the total arisings during the plan period.

25. I turn now to all the remaining bullet points since these are each aspects of the same argument. In essence those that consider the CS unsound take the view that it is far too conservative in the assumptions made and targets set for the recycling and composting of MSW. The evidence put during the examination and particularly at the examination hearings is that, given the very high percentage of this waste stream that is suitable for recycling, 60%

[19] CD13.12, paragraphs 1.7-1.14

should be easily achieved now and that a much more challenging target should be included and, more importantly planned for, although there was no consensus as to what that target should be.

26. GCC set out in evidence[20] and in more detail at the examination hearings why it believes the 60% target to be challenging but achievable if:

    - each of the partner district councils implement the agreed JMWMS recycling system;
    - HRCs achieve at least 65% recycling and increase the amount of waste reuse; and
    - householder participation in using the recycling systems exceeds 80% capturing at least 80% of the available materials.

27. Furthermore, GCC's view was that although the very high rates quoted by other participants at the examination hearings were being achieved, circumstances in those particular district areas were different to those in Gloucestershire's districts. Moreover, when looking at rates for those counties, such as Oxfordshire, as a whole, rates remained below 60%.

28. It seems to me that GCC's view of the future MSW scenario is, in general terms, likely to be of the right order. It is based upon an analysis of locally derived data in the context of knowledge about local circumstances, particularly those that will influence the likely effectiveness of planned waste reduction and service change initiatives.

29. Nevertheless, the forecasts are sensitive to the assumptions that underpin them. To get some sense of the extent, GCC provided at my request some further re-workings of CD10.4, Table 3l using assumptions that I had specified[21] and then produced its own further paper with these and additional scenarios set out[22].

30. What is clear from this further work is that any change in any assumption has an effect throughout the Table on which the submitted CS is based. These effects are not confined to the residual MSW tonnage for which no treatment facility currently exists but extend also to the composting and recycling tonnages for which additional capacity may, under certain combinations of assumptions, need to be found.

31. On reflection, GCC proposed through **MM3** to present the MSW for which provision needs to be made to 2040 as a range between 112,000 tpa and 170,000 tpa. This range is drawn from its own paper[23] with the lower figure being a high recycling scenario while the higher figure is drawn from the medium recycling scenario. The assumptions that underlay these two scenarios are set out in the table and more fully in CD13.58. Although the range extends to 2040 for the purposes of the WDA, the top end figure is

[20] CD13.12, paragraphs 1.16-1.29
[21] CD13.56
[22] CD13.58
[23] CD13.58 Table 2

proposed to be included in policy WCS4 as the maximum for which the CS should make provision in the plan period.

32. This main modification was the subject of significant representations. In summary objections were raised to making provision for a date some 12 years beyond the plan period and for basing the upper figure on an exceptionally conservative recycling rate of only 55% from 2017/18. I address these in turn.

33. Embedded within **MM3** is a significant change in approach by GCC. First, the effective plan period for MSW management has been extended to 2040 and, second, the amount of waste for which provision is to be made has been increased at the top end of the range by some 20,000 tpa.

34. While I appreciate that the WDA may need to look forward over a period of 25 years that is largely a function of the nature of the residual MSW management contract it has decided to pursue. Given the uncertainty over the assumptions that need to be made on a range of matters, the fact that the uncertainty increases over time, the effect that each assumption has on the outcome and the likelihood that providing on the basis of a tonnage assumed now for the whole of the period to 2040 could be self-fulfilling in producing that tonnage leads me to the conclusion that basing the CS on a 'design' year of 2040 is not justified.

35. Similarly, the assumed recycling rate of 55% throughout on which the top end figure is based is at odds with Strategic Objective 2 both as submitted and as proposed to be modified. This aims to achieve at least 60% household waste recycling/composting by 2020 and I see no justification for not including this assumption in the analysis from which the range to be included in the CS is drawn.

36. While I therefore agree that **MM3** is required I do not consider the figures put forward by GCC to be justified. I consider that the lower figure should be 108,000 tpa. This is taken from CD13.58 Table 2 but for the year 2028 rather than 2040. It is therefore the equivalent of the figure proposed by GCC. The upper figure of 145,000 tpa has been provided at my request[24] by GCC since it is not possible to derive it from any of the documents produced during the examination. This figure is based on the same growth assumption as the medium recycling scenario but applies a recycling rate of 60% from 2019/2020 to align more closely with the strategic objectives of the CS. With these changes, I recommend **MM3**. I appreciate the point made by the WDA[25] that the residual MSW treatment tonnage is marginally higher in the early years than it is in 2028 but I note also the comments made about the uncertainties inherent in forecasting (which monitoring will help to resolve) and understand that any treatment facility coming forward may also deal with a certain C+I waste tonnage.

Commercial and Industrial (C+I) Waste Stream

37. The Companion Guide to PPS10 states that the evidence base will generally

[24] CD14.12
[25] CD14.12 footnotes to Appendix 2

consist of arisings information for C+I wastes available from the EA[26]. However, for various reasons this data is not readily available at the waste planning authority level. GCC has therefore based the CS on 'managed' data; that is, the amount of C+I waste now managed at the various waste facilities within the County. The RS should assist in this respect. However, it does not principally because of the issues discussed above [paragraphs 12 and 17].

38. Jacobs supported by Halcrow were commissioned by the Department for Environment, Food and Rural Affairs to undertake a national survey of C+I waste arisings and management methods, the survey being part-funded in partnership with the London Waste and Recycling Board and the South West Region. The document[27] says that the results of the 2009 survey represent the most reliable and comprehensive set of **national** data on C+I waste arisings for over 5 years (my emphasis). Importantly, the survey caveats and limitations are set out in paragraph 1.6 of the report. These include:

    - that the sample was designed primarily to produce national level results;
    - sampling was intensified in the two partner regions specifically to improve the quality of the regional results;
    - detailed commentary on the waste arisings data at waste planning authority level in the South West on page 131 and following of the report; and
    - that the survey took place during a year within the deepest recession since the 1930s which is likely to have affected business activity and therefore C+I waste tonnages.

39. The final report was published in December 2010 and therefore could not have been taken into account by GCC in the preparation of the pre-submission CS which was consulted upon that month. GCC has also set out its reservations about the value of the survey for the purpose of CS forecasts[28].

40. CD10.4, section 4 sets out in some detail how GCC has approached this matter which highlights the complexity and the challenges presented by the data itself, the terminology used by the EA and its interpretation by industry in making statistical returns. Nevertheless, the methodology used cannot, in my opinion, give a clear picture of the C+I waste that is produced by commerce and industry within the County. Rather it reflects current waste movements into and out of the County and the way industry manages that waste that is imported. Most of this goes to landfill and there is little evidence to support the 0% growth, or indeed any other percentage figure, that has been assumed in preparing the CS.

41. My understanding is that the basis for the C+I recovery tonnage range included in the CS is the objective to divert waste now going to landfill to other waste management methods. That however assumes that the imported waste

[26] CD12.32, Annex C, paragraph 2
[27] CD13.23, Executive Summary
[28] CD13.12, section 2

is capable of such treatment and is not simply the residual waste from other management facilities either in the County or elsewhere for which landfill is the only practicable option. As the participants at the examination hearings confirmed, actual movements of this waste stream will be dictated by the availability of facilities and market factors. There must be some risk that the approach adopted will therefore reinforce current market conditions rather than provide for Gloucestershire's needs.

42. In summary, I appreciate the reservations of some representors that the evidence base for this waste stream is not robust. However, few have provided any alternative and more robust means of assessing the amount of C+I waste arisings for which provision should be made. Indeed, some of the representations made in response to the consultation on the proposed main modifications simply serve to reinforce the level of uncertainty that exists in this area. The survey design limitations of the Jacobs survey would appear to suggest that in the absence of a validating data source, it would not be a robust alternative at the County level. I consider therefore that GCC has made the best use of the available data in these circumstances although I do not consider that it represents the arisings within the County for which the CS should make provision. I agree with the minor presentational changes and factual updates included within **MM3** for the reasons set out by GCC[29].

Other Waste Streams

43. The footnote to Table 1 of the CS[30] confirms that all the other waste stream totals that form the statistical basis of the CS are licensed waste managed in the County and not arisings although hazardous waste stream data appears to contain elements of both[31]. The concerns raised in respect of the C+I waste stream are therefore equally valid here but so is the acknowledgement that GCC has little alternative but to adopt this approach.

44. With regard to *hazardous waste* the difficulties caused by double counting when assessing how this waste stream flows into, around and out of the County is well illustrated in CD13.12, section 3. What is clear is that there is a heavy reliance on the capacity provided by the specialist hazardous waste landfill and associated facilities at Wingmoor Farm East. Although the formal position at the date of CS submission with regard to this landfill was that the planning permission had expired, a further planning permission covering the whole of the plan period was issued before the examination hearings commenced[32]. However, by the end of the examination hearings that planning permission was itself subject to an application for judicial review. The capacity assumptions underlying the CS for this waste stream are almost wholly dependent on the final outcome of this planning application[33].

45. Turning to *construction and demolition waste* the outcome of the discussion at the examination hearings was that while there may well be sufficient management capacity within the County to recycle and recover other materials

[29] CD1.3 and CD14.1
[30] CD1.1, paragraph 2.20
[31] CD10.4, paragraph 7.2.1
[32] CD13.3
[33] CD10.4, section 7.8

from this waste stream the issue to be addressed is the availability of facilities to absorb the residual waste. In essence these would be exempt schemes or landfill.

Landfill capacity

46. Non-hazardous, hazardous and inert landfill sites and capacity are discussed in the CS[34]. Non-hazardous and hazardous landfill capacity is provided at three sites and one site respectively by two national waste management companies. The rate at which this capacity is depleted will depend to a substantial degree on the extent to which the other assumptions that underpin the CS prove to be correct and the success of adjoining waste planning authority areas in providing waste recycling and recovery capacity to divert waste from landfill and/or additional landfill capacity within their own areas. The only robust conclusion that can be drawn from several examination documents[35] is that there remains considerable uncertainty about the life of the available voidspace and whether or not it will be sufficient for the plan period.

Conclusions on this Issue

47. Whether the CS is founded on a robust evidence base and therefore sound is finely balanced. GCC has been hampered to a considerable extent by the nature of the apportionments contained in the RS which is not and will not now be adopted. The absence of reliable trend data at regional or local level on waste arisings other than MSW has been a further constraint. While not ideal, in all these circumstances, the decision to underpin the CS by managed data for all non-MSW waste streams is understandable and there is no consensus as to a more robust alternative. A considerable number of assumptions have been made by GCC in order to assess the capacity gap that the CS needs to address. While many are the subject of legitimate debate, none are inherently unreasonable and the same level of uncertainty could be said to apply to the alternative assumptions and scenarios put forward at the hearing sessions and in the representations on the proposed main modifications. I therefore consider that subject to **MM3** (altered as indicated above [paragraph 36] which will also require consequential changes to other main modifications) which I recommend should be made to the CS, the amount of waste for which capacity is to be provided within each waste stream is founded on a robust evidence base.

48. However, other than for MSW, I do not consider that GCC can argue that the CS is meeting the needs of the County since these are not identified by the evidence base. This has implications for the vision discussed under Issue 2. I have some sympathy for the view expressed by GlosVAIN, Glosain and Standish Parish Council and others that the approach adopted could lead to an overprovision of waste management capacity although it is questionable whether this would in fact occur in what is a market-driven sector. However, to rely on facilities that may come forward in other areas as suggested by some representors would not be consistent with national policy that communities should take more responsibility for their own waste and enable

[34] CD1.1 paragraphs 4.123-4.125
[35] CD1.11, CD10.4 and CD13.11

sufficient and timely provision of facilities to meet their own needs[36].

49. I do nevertheless welcome and recommend **MM1** which includes a clear commitment to monitor new data as it is produced and assess any implications for the CS. GCC, in concert with others as they fulfil their respective duties to cooperate, might also wish to consider using the 2009 survey[37] as a building block for further work to investigate these important data gaps.

Issue 2 – Whether the Vision, Strategic Objectives and Spatial Strategy are justified by the evidence base.

50. Having considered the further statements that were submitted in response to my Issues and Questions [38] and the evidence given during the examination hearings I believe the concerns of those who consider the CS unsound on this Issue to be very similar to those that were expressed in relation to the MSW forecasts. In essence, the concern is not fundamentally about either the process by which the spatial strategy emerged or the technical justification for Zone C itself. Rather, it is that the effect of what are said to be unambitious recycling and composting targets will be exacerbated by the single-site solution being promoted within Zone C for the management of residual MSW and, to a lesser extent, C+I waste. It is said that this strategy is being pursued without proper consideration of an alternative featuring a more dispersed network of facilities of a size appropriate to the particular area of the County in which they are located.

51. In CD13.12, Section 6 GCC sets out with extensive references to other examination documents how the spatial strategy of the CS emerged. In particular, it refers to the intervention of the Government Office for the South West and, to a lesser degree, the Regional Planning Body which resulted in strategic sites being identified in the CS. Having regard to the outcomes of the Sustainability Appraisal process[39], the emerging RS and national planning policy statements I consider that the identification of Zone C as the area within which such sites should be located to be justified by the evidence.

52. The threshold of 50,000 tpa must be arbitrary to some degree. No clear alternative threshold has been suggested. The figure chosen is clearly explained and justified as being in accordance with national and regional guidance[40]. Provided it is not interpreted with excessive rigidity in policy implementation I see no reason why this threshold figure should not be included within the CS.

53. It is argued by GCC that the vision and the CS policies will allow any combination of strategic and local sites to come forward[41]. Although that would seem to be a possible outcome given the wording of several of the policies, it is not what the third paragraph of the vision says[42]. This clearly

[36] CD12.31 paragraph 3 second bullet
[37] CD13.23
[38] CD13.7
[39] CD1.6 and CD1.7
[40] CD13.12, paragraphs 6.10 to 6.12
[41] CD13.12, paragraph 6.3
[42] CD1.1 paragraph 3.33

states that residual waste will be managed only through a number of strategic recovery sites located only in Zone C with focused change (FC)10 clarifying that this relates to MSW and C+I waste only. However, this is not reinforced by the wording of policy WCS4 as submitted. While ensuring that strategic scale residual waste recovery facilities can only be located within Zone C, it would also permit non-strategic residual waste recovery facilities to be built anywhere in the County. There is therefore an apparent tension between the vision and the strategic objectives that flow from it and the policies that implement it.

54. Further evidence of the likely outcome of the vision as submitted is given in the WDA's Outline Business Case[43]. In explaining the purpose of the Reference Project as confirmation that a viable solution capable of providing an acceptable, deliverable and environmentally sustainable solution that will meet Gloucestershire's requirements has been identified, the WDA stresses that it is not selecting its preferred solution. The 'technology neutral' stance is emphasised. The Reference Project is, however, a single-facility solution located at Javelin Park with EfW with stand alone combined heat and power (CHP) as the most favourable technology on the basis of carbon modelling and financial analysis. While proposals from bidders for dispersed facilities or a multi-technology approach would be considered by the WDA against the criteria in the evaluation framework[44] the preferred bidder's scheme[45] is, in all essential respects, that shown as the Reference Project.

55. It is in accordance with the guidance in PPS10 that there should be a close alignment between the preparation of the JMWMS and the CS since they are interdependent delivery routes for sustainable waste management. The vision, strategic objective 3 and the spatial strategy which directs strategic scale facilities to Zone C would certainly facilitate the residual MSW contract outcome. However should, for whatever reasons, the preferred bidder's scheme not be permitted, the vision as submitted would appear to constrain any alternative proposal that does not involve strategic scale facilities located within Zone C. If that is not the intention of the vision, its phrasing needs to be altered.

56. Finally, although the submitted CS vision refers only to, in summary, providing a waste management system for the County, FC10 proposes to alter this to read '…ensuring enough capacity is made available to meet Gloucestershire's needs.' This would be consistent with what GCC say is the aim of net self-sufficiency[46]. However, for the reasons set out in the discussion of Issue 1, the needs of the County are not known. This change would not therefore be justified by the evidence base. However, as Mr Watson explained on behalf of the Gloucestershire Friends of the Earth Network, the desired effect could be achieved by altering the word 'sustainable' in the sixth paragraph of the vision to 'and adequate'. This would be consistent also with the principles of proximity and self sufficiency set out in the Waste Framework Directive[47].

[43] CD13.26 section 4
[44] CD13.26, paragraph 4.4.8.10.4
[45] CD13.19
[46] CD13.12, paragraph 6.15
[47] CD12.2 Article 16

57. In conclusion on this Issue, the vision, strategic objectives and spatial strategy in the submitted CS are consistent with national and, to the extent that it is material, regional policy and (having regard to the conclusions on Issue 1) justified by the evidence base. The detailed wording of the vision may not reflect GCC's actual intentions with regard to the implementation of the residual MSW treatment project and several other detailed alterations to the wording were put forward by participants at the examination hearings.

58. I do not believe that the matters discussed under this Issue relate directly to the soundness of the CS since the vision that it wishes to pursue is for GCC. However, there needs to be a coherent relationship between the vision, the strategic objectives and the policies which are meant to achieve them. For these reasons I recommend **MM4 and MM5**.

59. Included within **MM5** is an amendment to Strategic Objective 2 which introduces the tonnage of C+I waste required to be diverted from landfill through increased recycling and composting facilities. Cory Environmental (Gloucestershire) Ltd has suggested that a consequential change should also be made to policy WCS2 as part of **MM7.** GCC agrees that this would be sensible. As a consequential change to the wording of a policy, I do not believe this goes to the soundness of the CS. This can therefore be given effect by GCC as appropriate by way of an additional modification.

Issue 3 – Whether the Habitats Regulation Assessment (HRA) process is legally compliant and provides a robust evidence base.

Introduction

60. GCC has undertaken HRA throughout the development of the CS. This was explained in some detail by GCC during the examination hearing and the various documents reporting on the process are listed in the Final Report[48] produced by ERM as consultants to GCC. ERM list in Table 2.1 of that report:

    - the European sites within the study area;
    - summaries of both their qualifying features and current vulnerabilities/conservation objectives and key environmental conditions to support site integrity; and
    - the key sensitivities from general waste facility impacts under the headings 'water pollution', 'air pollution' and 'disturbance'.

    The intention of the report is to address as appropriate each of the five steps in the HRA process set out in Box 1.1 of the document.

61. Two issues are raised by the approach. The first is whether the process complies with the requirements set out in the Conservation of Habitats and Species Regulations 2010. The second is whether the report provides a robust evidence base for the CS.

[48] CD5.1 paragraph 1.2

Compliance with the 2010 Regulations

62. Regulations 61 and 102 are very similar in their requirements, the main distinction being that Regulation 102 very clearly refers to land use plans. In essence, the competent authority (GCC in this case) is required:

    - to establish whether the plan (either alone or in combination with other plans and projects) is likely to have a significant effect on a European site;
    - if it is, to make an appropriate assessment (AA) of the implications for that site in view of the site's conservation objectives; and
    - in the light of the conclusions of the AA, give effect to the plan only after having ascertained that it will not adversely affect the integrity of the European site.

63. Following the screening process ERM concluded that the vision, strategic objectives and the policies of the submitted CS were compliant with the 2010 Regulations although this finding is subject to caveats with respect to the allocated sites in policy WCS4[49]. These caveats relate only to 'air pollution' impacts from thermal treatment facilities. ERM were able to conclude that there would be no likely significant effect arising from any other non-thermal treatment recovery facility with regard to 'air pollution' impacts and were able to draw the same conclusion in respect of 'water pollution' and 'disturbance' impacts from all the recovery technologies under consideration.

64. However, at the parameters set out in the report, ERM were unable to conclude that there would be no likely significant effect with respect to thermal treatment facilities at each of the allocated sites. The first 'compliance' issue raised therefore is whether the next step in the HRA process, namely AA, was undertaken.

65. From the report structure and presentation it is not particularly clear that it was. However, during the examination hearing GCC and ERM explained in far more detail the process that had been undertaken and I am satisfied that the ERM report does amount to both the screening and the AA steps in the HRA process.

66. Nevertheless, an important matter emerged during the discussion at the examination hearing which is material to this sub-issue. Using the AERMOD air dispersion model various combinations of stack heights and annual treatment capacities were used to generate a total of nine scenarios for each of the proposed sites studied. A more limited analysis was then undertaken using another model (ADMS) for fewer sites at a single stack height of 80m but for the same annual treatment capacities. ERM explained that both models were equally valid although the way that terrain data is treated in ADMS is more subtle and perhaps more appropriate to the Gloucestershire situation.

67. ERM did however confirm that the assessment had looked at the effect of each

[49] CD5.1 Table 9.1

proposed site in isolation and had not considered them together. Although ERM gave a detailed explanation of the technical reasons why the cumulative effects had not been modelled and that, indeed, the outcomes would not be helpful[50], the fact remains that there must be some question as to whether the CS as a whole has been subject to the HRA process which is what Regulation 102 requires. The reason for this doubt is that, as submitted, the CS would allow a thermal treatment facility to be developed on all of the sites allocated in policy WCS4. The effect of this outcome of the CS has not been assessed.

68. On further legal advice[51] GCC proposed main modifications to the CS to include additional wording in certain policies the effect of which would be to prohibit the development of any site unless further detailed work at the planning application stage demonstrates that there would be no adverse effect on the integrity of any European site. The wording derives from a judgement handed down on 24 October 2011[52] (Feeney) and GCC argues that this would satisfy Regulation 102(4) by ensuring that the CS would not be given effect unless the necessary assurance about the effect on the conservation objectives of the designated area could be concluded.

69. Natural England has endorsed this approach in its representation on the main modifications. However, several representors continue to argue that this approach is flawed and not legally compliant. In doing so, they quote extensively from the Advocate General's opinion in *Commission v United Kingdom*[53]. However, they do not refer to paragraph 49 of the Advocate's opinion to which the judge in Feeney clearly gave considerable weight in coming to his decision.

70. On the basis of the clear legal advice received by GCC and in the absence of any equally clear contrary legal opinion I am satisfied that with the policy wording proposed within several main modifications (**MM10, MM15 and MM30**) the CS would be legally compliant on this issue

The robustness of the evidence base

71. ERM present a summary of the air dispersion modelling results in Tables 6.1 and 6.2 of the Final Report[54]. This shows (Table 6.1) that when using AERMOD it is not possible to conclude for any of the sites proposed in the CS that there would be no likely significant effect on any of the European sites included in the study at any combination of stack heights and annual treatment capacities when using the generic EfW plant configurations developed for modelling purposes. Table 6.2 reveals the results when using the ADMS model. Here, for most of the sites proposed in the CS a conclusion of not likely to give rise to a significant effect alone or in combination (but see discussion under the previous sub issue) can be drawn for a facility with a stack height of 80m and an annual treatment capacity up to 200,000 tpa. The exception is Javelin Park where that conclusion can only be drawn for a facility with up to 100,000 tpa annual capacity, there being no modelling at any

[50] CD13.54.4
[51] CD13.54.3 and CD13.54.8
[52] CD13.54
[53] Case 6/04 *Commission v United Kingdom* [2005] ECR I-9017 ECJ
[54] CD5.1

intermediate annual tonnage.

72. During the examination hearing ERM explained that detailed modelling for an actual scheme design would almost certainly lead to an outcome which would allow the 'not likely to be significant' conclusion to be drawn and the proposal to proceed at any of the sites. That may well be the case, but given that the evidence put forward was that both models are equally valid[55], the cautious conclusion from the ERM report is that there is no certainty that a thermal treatment facility can be built at any of the sites proposed in the CS.

73. While this might appear to undermine the effectiveness of the CS, thermal treatment is only one of the 'other recovery' technologies described in the CS and to which policy WCS4 relates. While this may present a difficulty for the WDA (see paragraph 54 above) if such technologies cannot, on more detailed investigation, be accommodated on any of the sites proposed in the CS there are several other technologies which could be pursued within the policy.

74. Since the CS does not purport to facilitate any particular technology solution on any specific site in order to facilitate the JMWMS I do not consider it to be unsound on this issue.

Issue 4 - Whether the CS provides the necessary guidance for the preparation of the further DPDs that may be required and a strategic policy basis for development management.

Introduction

75. The evolving nature of the CS and the uncertainty regarding the format and timing of the other local plans that may or may not come forward is referred to earlier (paragraphs 7 and 8). CD11.9 sets out those adopted Waste Local Plan policies that have been either saved or deleted. Until a development management local plan is brought forward the CS may therefore provide the only policy basis on which to determine those aspects of submitted waste management proposals not addressed by saved policies. To be sound, the CS must therefore leave no policy gaps, the policies themselves must be consistent with national policy and with each other and the CS as a whole should provide a proper basis for the preparation of further local plans.

76. As stated above (paragraphs 9 and 10), the main modifications were discussed in general terms prior to the publication of the NPPF. Most of the representations on those main modifications that are relevant to this Issue concern what are perceived to be inconsistencies between the CS policy as proposed to be changed for soundness and national policy now expressed in the NPPF.

Policy gap and provision of DPD guidance: Landfill/Landraise

77. The discussion in paragraphs 44 to 46 concludes that there is considerable uncertainty about the future capacity available for the landfilling of those hazardous, non-hazardous and construction and demolition wastes remaining after recycling, composting and/or treatment as appropriate. This is

[55] CD5.1 paragraph 9.2

recognised in the CS[56] where the possible requirement to identify suitable non-hazardous landfill locations through a local plan around 2017/18 is acknowledged. Later[57], the then undetermined planning application at Wingmoor Farm East is referred to in the context of hazardous waste. Although the outcome if the permission is granted is discussed, the implications if it is not are not considered.

78. In view of the way the document is arranged, the submitted CS gives no specific guidance for the preparation of any subsequent local plan regarding the location or areas of search for new landfill/landraise capacity. Moreover, as Waste Local Plan policy 20 on landfill/landraising has not been saved, the absence of any development management policy leaves GCC's development plan framework silent on this issue. While GCC suggested that PPS10 might be relevant, this policy guidance may also have a short life.

79. GCC propose through **MM13** an additional policy and explanatory text to address this weakness in the effectiveness of the CS to deliver the right facilities in the right place at the right time. The preamble to criterion 2 appears to duplicate what is said in criterion 5. I consider that this should be rephrased to read 'The proposed landfill would enable' as suggested by Cory Environmental (Gloucestershire) Ltd in its further representation. I also agree that the wording of criterion 5 should be consistent across the CS. The wording therefore needs to be changed to accord with that in policy WCS4 which I turn to later under Issue 5.

80. With these changes I recommend **MM13** as required for soundness.

Policy gaps: landscape quality and historic heritage

81. With respect to these two matters GCC has sought to avoid repeating in policy national guidance expressed in PPSs. This approach was itself in accordance with national guidance[58] in PPS12, in place at the time. However, by the time of the examination hearings it seemed very likely that most PPSs would be replaced in the very near future while the exact content of the NPPF and associated documents (if any) was unknown. Reliance on those documents may therefore lead to a foreseeable policy gap and thus an ineffective and unsound CS. This anticipated outcome has largely been confirmed by the publication of the NPPF in its final form.

82. With respect to landscape quality in development management, FC10[59] is welcomed by CPRE as a statement, but it is not supported by any policy either in the CS or among the saved Waste Local Plan policies. While at the time of the examination hearing the necessary policy framework was provided by PPS7, *Sustainable Development in Rural Areas*[60] GCC propose to introduce a revision to policy WCS11 to address this matter (**MM19**).

[56] CD1.1 paragraphs 4.116 to 4.129
[57] CD1.1 paragraph 4.136
[58] CD12.33 paragraph 4.32
[59] CD1.3
[60] CD12.29

83. A number of representations have been made to the effect that policy WCS11 as proposed to be modified is not consistent with the NPPF and the CS is thus unsound. However, in many respects the NPPF is deliberately not as detailed or prescriptive as the PPSs it replaces so as to enable local communities to establish, through local plans, policy approaches appropriate to local circumstances. With regard to landscape the recognition of the intrinsic character and beauty of the countryside is one of the 12 core principles that the NPPF says should underpin both plan-making and decision-taking (paragraph 17). The approach to the wider landscape set out in the policy as proposed to be modified would seem to be consistent with this core principle and the criteria based approach set out would also appear to be in accord with what is said on this in paragraph 113 of the NPPF.

84. The test to be applied in the case of major development proposals within any of the County's three Areas of Outstanding Natural Beauty is, in essence, that in paragraph 116 of the NPPF. While including in policy the effects on the setting of an Area of Outstanding Natural Beauty is not specifically envisaged by the NPPF nor is its inclusion in local plan policy expressly excluded. In any event, if the policy was to be varied as suggested by some, the test would simply be applied as part of the assessment of the effect on the general landscape. Taking all these matters into account therefore I recommend **MM19** as drafted by GCC

85. For similar reasons, GCC has not specifically addressed historic heritage or incorporated policy HE2.3 from PPS5, *Planning for the Historic Environment*[61] in CS policy. English Heritage does not consider that the relevant saved Waste Local Plan policies[62] provide an up-to-date policy framework in accordance with current national policy. English Heritage supports additional policy WCS12a and the supporting text which GCC proposes to address this matter and I therefore recommend **MM21**.

Consistency with national policy: environmental performance of existing waste sites

86. GCC explained during the examination hearing that the primary purpose of submitted policy WCS8 was to safeguard existing waste management sites from encroachment by other incompatible development being granted planning permission by the district councils. The principle underlying the policy was that the pollution control authorities would enforce their respective regimes, an approach which is consistent with national policy[63]. Where other policies implied that further development on existing waste sites would be acceptable, GCC explained that the proposal would have to satisfy policy WCS7 which concerns cumulative impact.

87. GCC accepted that to be effective, the policy needed to be supported by a list of the sites to which it applied that was kept under regular review to be as current as practicable. I therefore recommend **MM16** which gives effect to this necessary change for the effectiveness of the policy. GCC also explained

[61] CD12.28
[62] CD11.8 policies 29 and 31 in particular
[63] CD12.31 paragraph 27 and CD12.32 paragraph 8.5

that the intention of FC29[64] was to ensure that time limited permissions for waste management facilities were also subject to the policy as some could be for a lengthy period where associated with, say, a longstanding landfill site. However, such a protection would not be appropriate where the reason for the time limited permission was a 'trial run' to assess the environmental impact of the development. Such sites would not therefore be included on the list of premises to which the policy is to apply and for the avoidance of doubt FC29 has not been pursued as part of **MM16**.

Consistency with national policy and provision of DPD guidance: Green Belt

88. Policy WCS10 addresses development in the Green Belt and is an important policy within the CS since a substantial proportion of Zone C is designated Green Belt and it is to this Zone that the spatial strategy directs all strategic scale waste management facilities. Indeed, three of the five sites allocated in the CS are located within the Green Belt. It therefore provides both development management policy and guidance for any future site location local plan for a range of waste management facilities addressed by policy WCS4 and other policies.

89. PPG2 *Green Belts*[65] was still extant at the time of the examination hearings. Of course, PPG2 has been replaced by the NPPF which addresses the protection of Green Belt land in section 9. All of the key principles of Green Belt policy which have been in place for over 50 years remain in place. Paragraph 90 effectively replaces paragraph 3.12 of PPG2. However, in this case, the NPPF lists the developments which are not inappropriate development in Green Belt in the circumstances set out (which are the same as those formerly in PPG2 paragraph 3.12). Importantly, the making of material changes in the use of land is not included in the list. Since the deposit of waste in or on the land is generally held to be a material change in the use of that land, the NPPF removes any doubt that such proposals would now be inappropriate development in Green Belt.

90. The construction of new buildings inside a Green Belt is inappropriate development unless it is for defined purposes none of which include the management of MSW and C+I waste[66]. Inappropriate development is, by definition, harmful to the Green Belt[67]. The very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness and any other harm is clearly outweighed by other considerations[68]; it is for the applicant to show why permission should be granted.

91. While paragraph 3 of PPS10[69] says that the particular locational needs of some types of waste management facilities should be recognised when defining detailed Green Belt boundaries and determining planning applications, it does not dilute these fundamental national policy principles. Indeed, as the NPPF

[64] CD1.3
[65] CD12.27
[66] CD14.10 paragraph 89
[67] CD14.10 paragraph 87
[68] CD14.10 paragraph 88
[69] CD12.31

post-dates PPS10 specific reference to waste management facilities could be expected if that had ever been government's intention. Moreover, the Companion Guide to PPS10[70] explains that the way to achieve what is said in the main PPS is by way of a limited alteration to the Green Belt boundary through the local plan process. This is not something that is within the control of GCC in a two-tier authority area and must be achieved working in partnership with others as is fully explained in the evidence[71].

92. This very clear and longstanding national policy approach to development in the Green Belt is not accurately reflected by policy WCS10. It is essentially permissive of what must amount to inappropriate development and misinterprets the tests set out in the above paragraphs. While it will be helpful to potential developers to indicate the kind of 'other considerations' that GCC is likely to take into account in the Green Belt balance, the first listed in the policy is a circular argument while the fourth and fifth misunderstand how such arguments are taken into account in that process.

93. GCC propose to change policy WCS10 and the supporting text by way of **MM18.** Cory Environmental (Gloucestershire) Ltd has raised a number of representations in respect of this new policy. The first line of the proposed policy makes clear the presumption against proposals that amount to inappropriate development in Green Belt. New buildings are, as a matter of national policy, inappropriate development in Green Belt and the distinction made in the NPPF between such development and the re-use of existing buildings would now be correctly reflected in the CS. The reference made to energy recovery is, in my opinion, a misinterpretation of NPPF paragraph 91 which actually recognises that elements of many renewable energy projects will comprise inappropriate development. The final sentence of the paragraph to which attention is drawn is an 'other consideration' to which appropriate weight will be given in the Green Belt balance. There is nothing in the proposed policy WCS10 that is inconsistent with this approach.

94. While I do not consider that the second paragraph of the proposed policy is inconsistent with the NPPF I do agree that replacing the phrase 'other matters' with 'any other harm' would avoid any potential confusion. With this amendment, I therefore welcome and recommend **MM18** which redrafts policy WCS10 in a form that is consistent with national policy.

Consistency with national policy: Anaerobic digestion and bulking and transfer

95. Anaerobic digestion sits at the 'other recovery' level in the waste hierarchy rather than the 'recycling' level[72]. However, as early as 2007, national policy favoured anaerobic digestion as a technology choice, particularly for separately collected food waste[73]. The separate policy treatment for this technology type and substantial text changes embodied in FC13[74] and carried forward in **MM7 and MM9** is therefore recommended as necessary to make the CS consistent with national policy.

[70] CD12.32 paragraphs 7.34 and 7.35
[71] CD10.12
[72] CD13.45.1
[73] CD12.15 Chapter 5 paragraphs 24 to 26
[74] CD1.3

96. True bulking and transfer facilities have no waste management function; they simply facilitate the more efficient movement of material. The separation of this type of development from submitted policy WCS2 is sensible and the proposed policy put forward in FC13 and embodied within **MM22** is consistent with the criteria set out in PPS10. This main modification is therefore recommended.

Consistency with national policy: the technology neutral stance of the CS

97. I have alluded to this matter above (paragraph 13) and commented that this is generally consistent with the approach set out in PPS10[75]. GCC also explains why it considers this approach to be correct and in accordance with several areas of national policy[76]. During the examination hearings CPRE drew attention to Annex E of PPS10 which suggests that in testing the suitability of sites and areas against the criteria set out in paragraph 20 of the PPS account should also be taken of best available technologies not involving excessive costs (BATNEEC). Although more detail is given in the Companion Guide to PPS10, no further advice as to how BATNEEC should be applied in this context is given[77]. For example, the scoping matrices referenced there do not appear to address the issue at all[78]. Industry participants at the examination hearings explained how BATNEEC was used in the environmental permitting regime where much more precise detail is known about site context, materials to be managed and technology to be permitted so as to allow techniques for emissions control, which is at the heart of the process, to be assessed.

98. The waste hierarchy favours recycling and composting that meets quality protocols over other recovery technologies. However, within those other recovery technologies, except for anaerobic digestion, national policy expresses no preference for one EfW technology over another[79]. It may be that as set out in the consideration of Issues 3 and 6, not all of the sites allocated in policy WCS4 prove to be suitable for all the other recovery technologies identified in the CS[80]. However, in principle, there is no evidence that the technology neutral stance of the CS is inconsistent with national waste policy. No main modification to the CS is therefore proposed or necessary for it to be sound.

Other policy changes

99. GCC proposes a number of other changes to policy wording to address what are relatively minor but none the less important inconsistencies raised by statutory and other consultees. In the main these arose from the initial pre-submission consultation, were included in the schedule of FCs[81] and were then the subject of further consultation. These are largely uncontroversial and I recommend all of these (**MM6 to MM8, MM11, MM12, MM14, MM15, MM17, MM20 and MM23**) as necessary to make the CS sound.

[75] CD12.31 paragraph 18
[76] CD13.13 paragraphs 2.5 to 2.9
[77] CD12.32 paragraph 7.36
[78] CD12.5 within part 2
[79] CD12.15 Chapter 5 paragraphs 17 to 29
[80] CD1.1 paragraphs 4.58 to 4.74
[81] CD1.3

Issue 5 – Whether submitted policy WCS4 is an effective strategic development management policy

100. This policy is pivotal to the successful implementation of the vision and strategic objectives of the CS. The submitted policy seeks to establish:

- the amount of MSW and C+I waste for which residual waste recovery capacity will be made;
- the part of the County to which strategic residual waste recovery facilities will be directed (Zone C);
- the specific sites (four in total in the submitted WCS) allocated for residual waste recovery;
- the circumstances in which planning permission for strategic residual waste recovery facilities will be granted outside the allocated sites;
- that planning permission will not be granted for strategic scale waste recovery facilities outside Zone C;
- that non-strategic residual waste recovery facilities will be permitted anywhere in the County subject to the criteria set out.

101. The policy does not explicitly:

- state that planning permission will be granted for strategic residual waste recovery proposals on the allocated sites;
- establish the criteria against which any such proposal would be assessed;
- draw the information given about the individual allocated sites in Appendix 5 of the CS into the development management function of the CS;
- explain what is meant by the term 'sustainable' waste management system in the final section of the policy.

102. As a result of the discussion at the examination hearings GCC propose to make substantial changes to the submitted policy through **MM10.** This proposed policy itself has also been subject to further representations.

103. In the preamble to the policy the maximum tonnages of MSW and C+I waste for which provision needs to be made is set out. When considering **MM3** I have explained why the figure for MSW should be changed (paragraphs 32 to 36).

104. The policy then sets out the criteria against which proposals for strategic residual recovery facilities on the five sites allocated will be permitted. Criterion (b) is unnecessary. Whether a site is in the Green Belt or not is a matter of fact at the time any planning application is submitted and determined. Policy WCS10 would then apply and it is therefore unnecessary to either list the sites or cross refer to the policy.

105. I do not accept the argument made by Cory Environmental (Gloucestershire) Ltd that criterion (c) is, in effect, too onerous in that it applies to all other recovery facility proposals and not just to those involving thermal treatment. As I understand it, AA is only required if screening so indicates. The implication of the ERM Final Report[82] is that for non-thermal treatment facilities screening would indicate that AA is not required at any of the sites identified in the policy as proposed to be modified. I therefore see no reason to disagree with this part of **MM10.**

106. Finally, several representors have drawn attention to the wording of criterion (d). I agree that the word 'principally' creates a degree of uncertainty and should be deleted. I have reservations about the criterion limiting proposals to those meeting the County's 'needs' when, as discussed under Issue 1, these are not known for most of the waste streams (see paragraph 48 in particular). However, as further research is carried out the position may become clearer and, on balance, the wording should be retained. Finally, now that the NPPF has confirmed the central position of sustainable development in the planning process and set out what it means, I see no lack of clarity in this part of the criterion which, overall, is consistent with PPS10. As set out in paragraph 79 above, this wording also needs to be included in additional policy WCS6a as part of **MM13**.

107. The next part of the policy deals with proposals for strategic residual recovery facilities on land that is not within the boundaries of any of the five allocated sites. Criterion (a) ensures that to be permitted the proposal site must be within Zone C, criterion (b) states that it must be shown that the proposed development cannot be provided on one of the allocated sites and criterion (c) requires that the general development criteria in Appendix 5 of the CS are met.

108. Criterion (d) is not necessary since s38(6) of the 2004 Act requires all planning applications to be determined in accordance with the development plan. I do however agree with CPRE that the criterion (d) applying to proposals on the allocated sites is equally applicable to the same types of facilities elsewhere in Zone C since the same issues would be raised.

109. Similarly, I see no reason why criterion (c) (see paragraph 105) should not be applied equally to non-allocated site proposals within Zone C. In fact, GCC itself alludes to this in the final part of proposed criterion (d) although which policies are being referenced and their terms is not transparent.

110. To conclude on this Issue, with certain changes I recommend **MM10** as required to make the CS effective and consistent with national policy and thus sound. The changes required are:

- change the MSW figure in the preamble to 145,000 tpa;
- delete the first criterion (b);
- add 'SPA' at the appropriate place in the first criterion (c);

[82] CD5.1

- delete the word 'principally' from the first criterion (d);
- replace the second criterion (d) by the corrected first criterion (c);
- add a new criterion (e) with the same wording as the corrected first criterion (d).

Issue 6 – Whether the allocated sites are justified, effective and consistent with national and regional policy and whether the additional sites put forward are necessary to make the CS sound.

Introduction

111. I have considered under Issue 1 the capacity gap for which the CS needs to make provision and under Issue 2 I have concluded that the spatial strategy put forward to deliver that capacity is justified by the evidence base. Under this Issue I turn to what as a result of **MM10** are the five sites that are allocated in the CS to deliver the required other recovery capacity for the residual MSW and C+I waste tonnages calculated. There are two aspects to this. First, is whether the sites themselves have emerged through a process which is underpinned by a robust evidence base. Second, is whether the required capacity is deliverable at the sites themselves. Included within this is the implication for each site of my conclusions on Issue 3 and a consideration of the site specific issues that emerged through the evidence and how they might affect the assessment of each site against the policies discussed under Issue 4. Finally, I consider whether either of the additional sites put forward would be required and justified by the evidence base in any event.

The site identification process

112. This is set out exhaustively in the evidence base, most particularly in CD10.17 which explains the approach and CD4.4 which sets out the response to the site options consultation and gives the reasons for each of the sites in the submitted CS being carried forward. These two core documents are supported by an array of technical evidence papers prepared for each site considered and presented in a common format.

113. The approach is robust. The issue that has been identified by those making representations and participating in the examination hearings is what they consider to be the inconsistency in the application of certain aspects, particularly the landscape and visual impact assessment, across the sites and the manner in which this analysis has been taken forward into the general and site specific development criteria in Appendix 5 of the submitted CS. I believe that this goes to the deliverability of the allocated sites rather than the principle of their identification.

Site deliverability: general issues

114. My understanding is that Appendix 5 of the submitted CS applies only to the specific sites that are identified in submitted policy WCS4. The intention is to give guidance to potential developers about the issues that need to be addressed when preparing planning applications and environmental statements where necessary. There is however nothing in submitted policy WCS4 that requires the key development criteria to be met although some

would be assessed in any event against other development management policies in the CS. As a result of **MM10** and the further changes to it that I have identified (paragraph 110) some of these matters have changed and the general development control criteria will now apply to any proposal coming forward under policy WCS4 (**MM26**). Now that the general and key development criteria are explicitly drawn into policy WCS4 it is important for the delivery of the CS that they are clear.

115. The submitted Appendix sets out a series of general development criteria (confusingly called key development criteria) applicable to all sites. For each site there are then set out site specific locational information, environmental considerations and key development criteria. In the submitted CS the relationship between these separate elements is not always clear.

116. Access and highways is an example of where the relationship works well. Under general development criteria it says that a full transport assessment will be required. For each site the particular access/highway circumstances are set out under 'environmental considerations' and what the transport assessment needs to address is set out in the 'key development criteria'. On this matter the submitted proposal would be judged against policy WCS14. There is therefore a clear link between the Appendix and the relevant policy and the information that a developer needs to provide is documented. In other areas, particularly landscape and visual impact, the relationship is less successful.

117. Through main modifications **MM26 to MM39** inclusive GCC propose an extensive re-write of Appendix 5. It is now clearer and many of the inconsistencies have been removed. For example, **MM31** completely changes the manner in which landscape and visual impact is treated and removes wording that some representors saw, with some justification, as favouring a particular type of development for Javelin Park. I have had regard to the further representations made on these main modifications (some of which do not relate to soundness but to matters of fact that GCC can address as appropriate by way of an additional modification) and recommend them without any further change.

118. No evidence of any 'showstoppers' emerged through the examination for any of the five sites now proposed in policy WCS4. The following considerations should be read therefore in that context.

Site deliverability: Wingmoor Farm Sites

119. I address the three sites (site 1-Wingmoor Farm East; site 2a-The Park; and site 2b-Wingmoor Farm West) together because the key deliverability issue - the location of each site within the Green Belt- is common to them all. As a matter of policy, the type of development envisaged for each site under policy WCS4 is inappropriate development in the Green Belt. As the re-drafted Appendix 5 makes clear, the larger the buildings proposed and the taller any associated emissions stack needs to be in order to achieve the required dispersion of any pollutants to atmosphere the more challenging it will be to achieve a design that complies with policies WCS11 and WCS13. Non-thermal treatment facilities may be less challenging in this respect but it will be a matter of judgement whether an applicant can show the other considerations

necessary to clearly outweigh the totality of the harm to the Green Belt and thus demonstrate that the very special circumstances required for the development to be approved exist.

Site deliverability: Javelin Park

120. Although the WDA's aspirations for this site are now clear (paragraph 14) this is just one of the potential developments that could take place on the allocated site in accordance with policy WCS4.

121. The site is very open to views from a wide area including parts of the Cotswolds Area of Outstanding Natural Beauty. There seems little doubt that a thermal treatment facility of some size will require a tall emissions stack to satisfy the requirements of the HRA process. ERM stated during the examination hearings that it would generally be possible to design a pollution control system to avoid any adverse effect on the integrity of a European site. The issue at Javelin Park is how that solution would interplay with the landscape and visual impact of the resulting development design. In this context, I note that previous planning permissions at the site have limited by condition the height of any buildings to around 16m[83].

122. A further issue arose in respect of the area of the site that remains available. The submitted CS site is jointly owned by GCC and another. The other landowner then indicated that it no longer supported the allocation in the CS thus placing its deliverability in severe doubt in the absence of GCC exercising any powers of compulsory purchase which it indicated that it would not pursue. However, GCC is confident that the reduced site is sufficient to deliver the required capacity and on the evidence of the preferred bidder[84] this would appear to be the case since the facility design can be accommodated within the reduced area. This change is made by way of **MM38.**

Site deliverability: Land at Moreton Valence

123. This site is separated by the M5 motorway from Javelin Park and many of the points raised in paragraph 121 above are equally valid. Of more concern however when considering the contribution that might be made towards the provision required by the CS is the fact that the allocated area is largely already developed for existing waste management uses, either permitted or in prospect. Without some considerable reconfiguration of these uses, which could in itself impact on the net contribution from any new development to the CS's requirements, the additional capacity forthcoming might be quite limited.

124. GCC propose by way of **MM39** a small extension to the submitted site boundary and explain why this is smaller than that promoted by the site operator in the text accompanying the main modification[85]. No further representations have been made by the operator in response and I therefore recommend this change.

[83] CD13.31
[84] CD13.19
[85] CD14.1

Site deliverability: Summary

125. For the reasons set out above I have considerable reservations that the sites allocated will lead to the delivery of the required other recovery capacity. Their location in the Green Belt is a significant constraint on any built development at the three Wingmoor Farm sites. At both Javelin Park and Moreton Valence the accommodation of any substantial built development that needs to include an emissions stack of any significant height would, in my opinion, present the designers with a challenge in the distinctive landscape context. Whichever of the two sites was developed first would then, in my view, pose an even greater challenge for the development of the other when the cumulative impact came to be assessed against policy WCS7.

126. There are few, if any, other sites available within Zone C[86]. However, the changes to the vision discussed under Issue 2 and the alterations to policy WCS4 identified under Issue 5 will now allow for any other sites within Zone C that GCC may not have considered to come forward and/or the residual waste capacity to come forward through multi-site and/or multi technology proposals across the County. With this greater flexibility introduced by **MM4, MM5 and MM10** I believe the CS will be effective in delivery of the required waste management capacity and thus sound.

Additional sites put forward

127. The first of these was the additional land at Moreton Valence that I have dealt with in paragraph 124 above. The second related to land at Sharpness Dock. However, it emerged during the examination that the landowner's current and foreseeable position was that the land would not now be released for such development. In view of this and the impact on the deliverability of the site, the representor accepted that this matter could not be pursued[87]. Accordingly I do not address this matter any further.

Issue 7 - Whether the CS provides a robust basis to enable measurement to take place and the need for remedial action to be identified.

128. Section 5 of the CS sets out how the strategy will be delivered and by whom. Timescales are established where appropriate and mitigation measures identified where possible to overcome any identified constraints. Section 6 sets out how the progress towards delivery of the CS will be measured.

129. With respect to the key policies such as policy WCS4 the action to be taken in the event that the necessary facilities are not delivered is limited. In essence, it amounts to the resubmission of a revised planning application or revising the CS strategy and policies. GCC confirmed that this understanding was correct[88].

130. Although I still have some reservations about this, given the greater flexibility now inherent in the CS as a result of the main modifications proposed I do not consider that this raises any issue of soundness. Although I formally

[86] CD10.17
[87] CD13.45.5
[88] CD13.16 Paragraph 3.1

recommend **MM24 and MM25** since they have been styled as such by GCC, I regard the changes made as consequential on other changes and thus more in the form of additional modifications than changes required in themselves for soundness.

Assessment of Legal Compliance

131. My examination of the compliance of the CS with the legal requirements is summarised in the table below. Subject to the comments below, I conclude that the CS meets them all.

132. Throughout the CS preparation the Regional Planning Body has generally expressed the view that the emerging document is in general conformity with the RS as it then stood. By the time GCC sought confirmation of this at pre-submission publication the requirement to do so had been repealed by the Local Democracy, Economic Development and Construction Act 2009. Nevertheless, by virtue of s20(5) of the 2004 Act, it remains for me to determine whether or not the CS is in general conformity with the RS. GCC has given its view on this matter [89]. I have no evidence to the contrary and share the views expressed in this statement.

LEGAL REQUIREMENTS	
Minerals and Waste Development Scheme (MWDS)	The Core Strategy was initially identified within the approved MWDS April 2005 which was then revised in the MWDS more recently approved in August 2011. The Core Strategy's content and timing are compliant with this which sets out an expected adoption date of September 2012.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in December 2005 and consultation has been compliant with the requirements therein, including the consultation on the post-submission proposed 'main modification' changes (MM)
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (December 2010) sets out why AA is not necessary. The legal compliance matters relating to the HRA process have been addressed under Issue 3
National Policy	The Core Strategy complies with national policy except where indicated and modifications are recommended.
Regional Strategy (RS)	The Core Strategy is in general conformity with the RS.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act and Regulations (as amended)	The Core Strategy complies with the Act and the Regulations.

[89] CD13.59.1

Overall Conclusion and Recommendation

133. The Plan has a number of deficiencies in relation to soundness for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.

134. The Council has requested that I recommend main modifications to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix further changed as I have indicated in my report the Gloucestershire Waste Core Strategy DPD satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Brian Cook

Inspector

This report is accompanied by the Appendix in a separate document containing the Main Modifications. The modifications are expressed either in the conventional form of ~~strikethrough~~ for deletions and <u>underlining</u> for additions of text, or by specifying the modification in words in *italics*.

APPENDIX: SCHEDULE OF MAIN MODIFICATIONS

MM0

Changes resulting from introduction of NPPF

Insert new wording after Paragraph 1.8 as follows:

How does the WCS relate to other plans and strategies?

1.8 It is important to remember that the WCS is not a standalone strategy. It has a key role to play in helping to deliver the aims and objectives of other strategies such as the National Waste Strategy, the Regional Waste Strategy, the Gloucestershire Sustainable Community Strategy (SCS) and the Joint Municipal Waste Management Strategy (JMWMS). Appendix 2 summarises these key links. Further commentary is also provided in Section 3.0.

1.8a Whilst the WCS was prepared against the context of the previous set of Planning Policy Statements and Planning Policy Guidance Notes, the WCS has been assessed against the new National Planning Policy Framework (NPPF) (published in March 2012) and the Councils considers that the WCS is consistent with the primary objectives and policy contained in the NPPF.

1.8b Since the introduction of the NPPF there is now a national requirement for a presumption in favour of sustainable development which should be incorporated into Local Plans as a Policy. Our proposed approach is set out in Core Policy WCS0 below:

Core Policy WCS0 – Presumption in Favour of Sustainable Development

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in the WCS (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

How has the WCS been prepared?

1.9 The WCS has been subject to extensive and continuous engagement with stakeholders. This has helped to ensure that the policies and proposals are fully justified, effective and consistent with national policy. The strategy has also been subject to an ongoing process of Sustainability Appraisal (SA) including a final SA report on this document (available separately).

Paragraph 4.228 Amend Text as follows:

~~Although the issue of planning and development within AONB is covered to a large extent by national planning policy, given the extensive coverage of AONB in Gloucestershire it is considered appropriate to include a specific local policy within the WCS reflecting the higher-level policy set out in Planning Policy Statement 7: Sustainable Development in Rural Areas (2004) and other relevant national policy.~~

Paragraph 4.256 Amend as follows as follows:

~~4.256~~ National planning policy relating to design includes ~~PPS1: Delivering Sustainable Development (2005)~~ the National Planning Policy Framework which emphasises that planning policies should promote high quality inclusive design in terms of function and impact not just for the short term but over the lifetime of the development. ~~It states that design which is inappropriate in its context or which fails to take the opportunities available for improving the character and quality of an area and the way it functions should not be accepted.~~

Paragraph 4.275 Amend Text and Footnote as follows:

The National P~~p~~lanning P~~p~~olicy Framework[~~49~~] states that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. ~~where a new development is likely to have significant transport implications, a Transport Assessment (TA) should be prepared and submitted with a planning application for the development. It will then be used to determine whether the impact of the development on transport is acceptable.~~

[~~49~~] ~~PPG13: Transport~~

Appendix 1

Update the schedule in light of the NPPF and any new policies within the WCS as outlined in CD14.7 Position Statement on the Consistentcy of the WLP with the NPPF.

Appendix 2:

Replace references to individual planning policy statements with reference to NPPF

MM1

Textual changes related to waste data forecasting

Paragraph 2.21 Inset additional text as follows:

It can be seen that the largest waste stream in Gloucestershire is C&I, followed by MSW, C&D and hazardous. In December 2010, DEFRA published a Survey of Commercial and Industrial Waste Arisings (2010). For Gloucestershire the survey estimated the total amount of C&I waste arising in 2009 to be 526,188 tonnes, higher than the managed figure of 375,000 tonnes set out in Table 1 and Figure 2 above. However, because the DEFRA survey has a number of limitations, does not take account of exported waste and includes a proportion of metals (which the managed figure of 375,000 tonnes does not) the managed figure is considered to represent a robust basis on which to make future provision for C&I waste. Although MSW is not the largest waste stream it is perhaps the most important because of the financial penalties faced by local authorities that continue to landfill it. This is discussed later on.

After paragraph 3.32 New sub heading as follows:

Monitoring waste forecasts and capacity requirements

New paragraph 3.32a as follows:

3.32a Clearly all the waste data and the implications for forecasting and capacity requirements needs to be monitored. Where any new data set or forecast significantly alters the pattern of waste requirements identified and outlined within this plan, this will require a reassessment and partial review of the policies and proposals contained in the WCS. In particular the more recent data published on the arisings of commercial and industrial waste (as highlighted in paragraph 2.21) will need to be monitored carefully in terms of how this data set might be taken forward by the relevant agencies and organisations. For example this might lead to a review of the data which emerged through the preparation of the South West Regional Spatial Strategy.

Add new text to the end of paragraph 6.12 as follows:

The monitoring of waste data will need to be considered through the AMR as appropriate. In particular any processes as outlined in paragraph 3.32a need to be considered very carefully to ensure that the development plan remains up to date.

MM2

New waste hierarchy diagram to be included throughout the plan

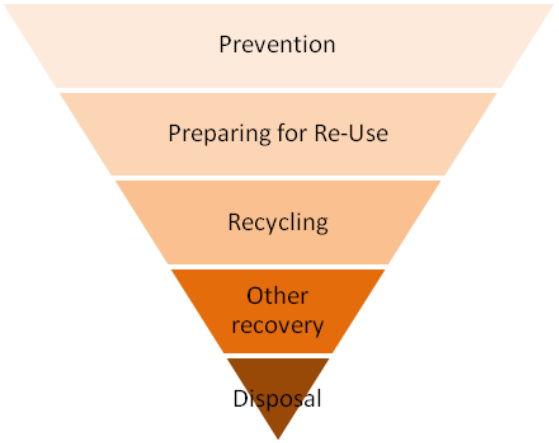


Figure 4 pg 30, Pg39, 42, 43, 51, 63

MM3

Changes to Section 3 text relating to reassessment of numbers

Paragraph 3.14 Inset text as follows:

3.14 At the local level, the **Gloucestershire Joint Municipal Waste Management Strategy** (JMWMS) provides a 'route-map' for managing waste in the County between 2007 and 2020. It was prepared by the Gloucestershire Waste Partnership (GWP) which consists of the County Council and the six District Councils. Importantly it identifies the need to provide between 150,000 - 270,000 tonnes of residual waste recovery capacity for MSW by 2014/2015[24] However, the most recent projections by the WDA suggest that the requirement during the WCS period is between 108,000-145,000tpa depending on future rates of waste growth and the amount of waste which is recycled.

[24]Residual waste is that which is leftover after re-use, recycling and composting

Paragraph 3.16 – Amend as follows

It is anticipated that the contract will be awarded in ~~2011~~ 2012 and the facility will be operational in 2015. It should be noted that a facility may need to run to 2040 beyond the end of the WCS period. The WCS has a key role to play in ensuring that appropriate sites are made available.

Paragraph 3.23 – Insert

Notwithstanding our aspiration for achieving zero growth by 2020, forecasts ~~Forecasts~~ suggest that the amount of MSW will increase to 359,612 tonnes in 2027/8. On this basis and having regard to existing capacity, for municipal waste there is a need to provide the following:

- For the early part of the plan period to 2020 there is unlikely to be a requirement for any additional capacity for recycling/composting unless any existing capacity is lost. However after 2020 a ~~A~~ small/limited number of additional, or increased capacity, of recycling/composting/AD facilities may be required to ensure that Gloucestershire's target of at least 60% recycling/composting ~~by 2020~~ is met (between ~~around~~ 9,000 -17,000 tonnes/year for composting and 10,000 - 21,000 tonnes/year for recycling).

- Currently there is no residual waste recovery capacity in place for municipal waste. Although the WCS will run for 15 years from adoption (to 2027), the WDA is looking to procure capacity from 2015 for a period of 25 years. The WDA currently estimate that provision needs to be made for between 112,000 – 170,000 tpa by 2040 ~~A residual waste recovery facility (or facilities) able to process around 150,000[26] tonnes per year~~ of residual municipal waste (waste that cannot reasonably be recycled or composted). This tonnage is likely to require either one large strategic site of about 5 hectares or 2-3 smaller sites of about 2 hectares each. The WCS will only make provision for a maximum of 145,000 for the recovery of MSW during the WCS period.

~~26 This is an approximate requirement based on the latest available waste flow forecast produced by the Waste Disposal Authority and is based on achieving a 60% recycling rate by 2020.~~

Paragraph 3.24 - Insert additional text as follows:

Unlike MSW it is difficult to determine how much C&I waste will need to be managed in the future because there are no obvious past trends. For the purposes of the WCS it has been assumed that there will be a 0% growth rate for C&I waste. We can calculate how much additional C&I capacity is required using the targets set out in the South West Regional Spatial Strategy (RSS). The RSS recycling/re-use target for Gloucestershire is 300,000 – 320,000 tonnes/year by 2020 which leaves a capacity gap of between 91,000 – 111,000 tonnes/year when set against the current capacity of 209,000 tonnes/year. The recovery target for 2020 (including transfer) is between 260,000 – 290,000 tonnes/year which set against the current capacity of 217,000 tonnes/year leaves a capacity gap of between 43,000 – 73,000 tonnes/year.

Paragraph 3.25 - Replace bullet 1 text as follows:

3.25 On this basis and having regard to existing capacity it is considered that there is a need to provide the following:

- ~~Waste recovery facilities with sufficient capacity to divert between 143,000 – 193,000 tonnes/year of C&I waste from landfill. This relates to waste recovery in the broadest sense and could include various forms of residual recovery, composting and recycling. This level of provision could be met on 1 large Strategic site (8 ha of land in total), 2 Strategic sites or possibly 3 to 4 smaller Strategic sites (of minimum 2 ha each).~~
- Waste recovery facilities with sufficient capacity for the composting and recycling of between 91,000 to 111,000 tonne/year and recovery of between 43,000 – 73,000 tonnes/year of C&I waste diverted from landfill by 2020. This level of provision in total could be met on 1 large Strategic site (8 ha of land in total), 2 Strategic sites or possibly 3 to 4 smaller Strategic sites (of minimum 2 ha each).

- Some level of appropriate supporting infrastructure for the above, but not necessarily new facilities. As with municipal waste facilities, it may be that existing facilities could be expanded or that sufficient capacity would be available if their full capacity was utilised.

Table 3 – Amend as follows

Waste Facilities for:	**Tonnage per annum range**	**Hectares (ha) needed*** **	**Single Site**	**Multi Site**
MSW Residual Waste	~~136,000 to 148,000 (around 150,000** according to information from the WDA)~~ 108,000 – 145,000**	**5 - 6 ha** (based on the potential accommodation of 50,000 t on minimum 2 ha)	**1** large strategic site of about 5 ha	**2 - 3** smaller strategic sites of minimum 2 ha each
~~MSW Contingency / Supporting Infrastructure~~	~~As above~~	~~**5 - 6 ha** (based on the potential accommodation of 50,000 t on minimum 2 ha)~~	~~**1** large strategic site of about 5 ha as a specific MSW Residual Waste contingency site / Supporting Infrastructure~~	~~**2 - 3** smaller strategic sites of minimum 2 ha each as specific MSW Residual Waste contingency sites / Supporting Infrastructure~~
C&I ~~Recovery*~~ Waste	~~143,000 to~~	**6 - 8 ha**	**1** large strategic	**2** large strategic

Management Facilities Recycling/composting Recovery	~~193,000~~ 91,000 – 111,000 43,000-73,000	(based on the potential accommodation of 50,000 t on minimum 2 ha)	site of a minimum of about 5 ha and up to 8 ha	sites of 4 to 5 ha each Or **3 - 4** smaller strategic sites of minimum 2 ha each
*A range of strategic facilities reducing the amount of C&I waste sent to landfill such as strategic recycling facilities, MRFs, IVC, AD, MBT, Autoclave, Thermal Treatment. ** This is an approximate requirement based on the latest available waste flow forecast produced by the Waste Disposal Authority and is ~~based on achieving a 60% recycling rate by 2020~~dependent upon a number of variables e.g. recycling rates and overall waste growth. ***Based on Key Planning Criteria Matrix – Regional Waste Management Strategy Appendix D.				

MM4

Spatial Vision (to be reflected in Executive Summary as well as within Chapter 3)

Amend text as follows:

'By 2027 Gloucestershire is a clean, green, healthy and safe place in which to live, work and visit. Residents and businesses are fully aware of the economic and environmental importance of waste management, including its impact on climate change and proactively minimise their waste production to achieve 'zero-growth' across all waste streams by 2020.

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. At least 60% of household waste is recycled and composted by 2020.

The 'residual' municipal and commercial waste that cannot reasonably be re-used, recycled or composted is seen as a valuable resource ~~and~~ that is likely to be managed through a number of ~~'strategic'~~ waste recovery sites. Any strategic sites (>50,000 tonnes/year) should be located in the central area of the county, proximate to the main urban areas along

the M5 corridor including Gloucester and Cheltenham.

Strategic sites will be located so as to maximise the potential use of heat and power and give priority to the re-use of previously developed land and buildings.

'Local' facilities (<50,000 tonnes/year) including supporting infrastructure such as waste transfer and bulking are dispersed more widely around the county including those ~~more distant~~ rural areas such as the Forest of Dean and the Cotswolds.

These strategic, local and existing waste facilities will form an integrated and adequate ~~sustainable~~ waste management system. In particular this will ensure~~ing enough~~ sufficient capacity is made available to meet ~~for~~ Gloucestershire's waste needs. Waste arisings from outside of Gloucestershire should only be managed within the county where it can be demonstrated to be the most sustainable option.

Gloucestershire's communities, key landscape/environmental assets and land liable to current and future potential flood risk, are safeguarded from the adverse impacts of waste management activities. The continuing role of landfill is recognised but increasingly seen as a last resort'.

MM5

Strategic Objectives and associated text Amend as follows:

Strategic Objective 2 – Re-use, Recycling and Composting (to be reflected in Executive Summary as well as within Chapter 3)

To make the best use of Gloucestershire's waste by ensuring that residents and businesses re-use as much of their waste as possible and that if waste cannot be re-used, it can easily be recycled or composted to achieve the following:

- At least 60% household waste recycled/composted by 2020 with an aspiration for 70% by 2030.
- Diversion of an additional 91,000 – 111,000 tonnes/year of C&I waste from landfill through recycling/composting facilities.
- Diversion of an additional 85,000 tonnes/year of C&D waste from licensed landfill through inert recycling and recovery.

Strategic Objective 3 – Other Recovery (including energy recovery) (to be reflected in Executive Summary as well as

within Chapter 3)

To recover the maximum amount of value including energy from any waste that cannot be re-used, recycled or composted through the provision of the following:

- ~~Around 150,000[1]~~ Provision for between 108,000 - 145,000 tonnes/year residual waste recovery capacity for municipal waste by 2027.
- Recovery facilities with the capacity to divert between ~~a proportion of the 1~~43,000 – ~~197~~3,000 tonnes/year of C&I waste ~~that needs to be diverted~~ from landfill by 2020.

~~This is an approximate requirement based on the latest available waste flow forecast produced by the Waste Disposal Authority and is based on achieving a 60% recycling rate by 2020.~~

Paragraph 4.32 Amend as follows:

The Council's target is to recycle/compost at least 60% of its household waste by 2020 with an aspirational target of 70% by 2030. This exceeds the National Waste Strategy (2007) target of 50% over the same period. The rate achieved in Gloucestershire in 2009/10 was 42% so there is still some way to go. If we are to achieve or exceed our target we need to ensure that recycling and composting is made as simple as possible and that sufficient facilities are made available both at the domestic and commercial level.

Paragraph 4.37 Amend as follows:

The waste forecasts outlined in Section 3.0 identify the need for a relatively small amount of additional composting/recycling capacity for MSW (~~around~~ between 19,000 – 38,000 tonnes) by 2027. Additional recycling and composting capacity will also assist with our requirement to divert between ~~143,000 and 193,000~~ 91,000 and 111,000 tonnes per year of C&I waste from landfill.

Paragraphs 4.79 – 4.80 Amend as follows:

4.79 Our waste data forecasts suggest that we need to provide residual waste recovery capacity of ~~around~~ a maximum of 145,000 tonnes per year for MSW. It also suggests that there is a need for recovery facilities, including 'other' recovery facilities, with the capacity to divert ~~between 143,000 – 193,000~~ a maximum of 73,000 tonnes/year of C&I waste from landfill.

4.80 As outlined previously in Table 3, the capacity requirement for MSW could be met either on one large strategic site of about 5 hectares or on 2-3 smaller sites of about 2 hectares each. For C&I, the capacity requirement

(including the additional recycling requirements of 91,000 – 111,000 tpa) could be met on 1 large Strategic site (8 ha of land in total), 2 Strategic sites or possibly 3 to 4 smaller Strategic sites (of minimum 2 ha each).

MM6

Core Policy WCS1 – Waste Reduction Amend as follows:

The County Council will continue to work in partnership with local communities, the District Councils and other public and private sector organisations including local schools and colleges to raise awareness and positively influence attitudes and behaviour so as to reduce the amount of waste produced and ensure a greater proportion of waste is re used.

MM7

Core Policy WCS2 Recycling/Composting (to include FC13 + other associated changes)

Various amendments to Section 4 as follows:

Paragraphs 4.24 – 4.39 Amend text as follows:

4.24 Where waste cannot be eliminated or re-used, our priority should be to recycle or compost ~~or process~~ it ~~by means of AD facilities~~. This helps to recover resources from the waste rather than simply disposing of it.

4.26 Windrow composting is generally suitable for green or garden waste, whereas in-vessel composting is more suitable for food wastes (plate scrapings etc). Food waste can also be processed through an anaerobic digester which has the added benefit of generating renewable energy (see below).

~~4.27 Anaerobic digestion is the natural process by which bacteria break down organic material in the absence of oxygen. An AD facility is a controlled version of this process taking place in a vessel or series of vessels.~~

~~4.28 Almost any organic material can be processed using AD including paper, cardboard, grass cuttings, food, industrial effluents, energy crops (grown specifically such as maize silage), sewage and animal waste. This makes AD suitable for dealing with organic MSW and C&I waste (which includes a lot of organic material) waste water and agricultural waste. It is not suitable for some waste such as inert C&D waste.~~

~~4.29 The AD process produces biogas and digestate. Biogas can be used to generate heat and electricity through combined heat and power (CHP) and can also be turned into 'biomethane' which can be used as a vehicle fuel or injected in the mains gas grid. Digestate is a solid and liquid residue made up of leftover, indigestible material and dead micro-organisms. It is used as a fertiliser and soil conditioner, but this has to meet certain quality standards.~~

~~4.30 There are limitations to AD including the fact that it requires a consistent, segregated supply of waste such as kitchen waste which is not always available, depending on the waste collection arrangements that may be in place. AD facilities in England have, to date tended to be geared towards agricultural and sewage waste. However, the Government is very keen to roll the technology out further to deal with MSW and C&I waste, but there will be a need for industry to come forward with arrangements that satisfy the pollution control agencies.~~

~~4.31 There are currently no operational AD facilities in Gloucestershire treating MSW or C&I waste. For MSW in Gloucestershire it is likely that AD would generally be used for segregated waste (i.e. not residual waste) that currently~~

~~goes to composting facilities but nevertheless could form a useful part of an integrated system.~~

4.34 First, we need to consider the provision of larger scale recycling and composting facilities such as bring sites (bottle banks etc.) household recycling centres, materials recycling facilities and composting facilities. ~~We also include within this bracket the provision of waste bulking and transfer facilities because materials passing through such facilities are generally destined for further processing operations.~~

~~4.38 Although our forecasts suggest that sufficient capacity exists for bulking and transfer facilities, there may be different spatial arrangements in the future for example those arising from the shadow Joint Waste Board (JWB). It is important therefore for the WCS to be sufficiently flexible.~~

4.39 Having regard to the relatively modest requirement for additional recycling and composting capacity for MSW~~, the need for flexibility in relation to bulking and transfer~~ and having regard to previous consultation responses, the most appropriate way forward is considered to be a 'criteria-based' approach. The same applies to some extent to C&I waste, however because of the additional capacity required the strategic sites identified under Core Policy WCS4 maybe suitable for waste management facilities which might come forward to meet this capacity gap.

Core Policy WCS2

Amend policy as follows:

Core Policy WCS2 – Recycling & Composting ~~/Anaerobic Digestion (including Bulking and Transfer)~~

In order to achieve the Gloucestershire local authorities' household recycling and composting target of at least 60% by 2020, the Council will support in principle, proposals relating to the development of new and expanded recycling and composting ~~anaerobic digestion, bulking and transfer~~ facilities including businesses that process recyclates and re-use waste.

Planning permission will be granted subject to the following criteria being met:

1. **It can be demonstrated that the impact on the environment and neighbouring land uses is acceptable. Proposals for composting~~/AD~~ generally must be at least 250m from sensitive land uses such as housing unless it can be demonstrated that it can operate in closer proximity without adverse impact.**
2. **The highway access is suitable for the proposed vehicle movements.**
3. **The proposal contributes towards providing a sustainable waste management system for Gloucestershire.**
4. **If the proposal is of a 'strategic' scale (>50,000 tonnes/year) it is located in the area defined as 'Zone C' (see Key Diagram).**

Particular support will be given to proposals that:

- **Are located within[1] or close to an urban area; and/or**
- **Involve the re-use of previously developed land, vacant or underutilised employment land and/or redundant rural buildings including farm diversification opportunities; and/or**
- **Involve co-location with an existing operation of a similar or complimentary nature; and/or**
- **Incorporate alternatives to the transport of waste by road (rail, water etc.), and/or**
- **Are well located to allow employees to reach the site by foot, cycle or public transport.**

Proposals for the development of markets for recycled materials, in particular initiatives to assist small to medium-sized businesses to re-use/recycle their discarded waste materials will be supported and encouraged through partnership working including the Gloucestershire Waste Partnership.

[1] It is acknowledged that in the case of composting ~~or anaerobic digestion~~ it may prove difficult to locate within an urban area due to a 250m buffer generally being required for issues relating to bio-aerosols. ~~This should not however apply to recycling and bulking/transfer facilities.~~

How will we know if the policy is working?

4.43 There are a number of measures including:

- Percentage of household waste sent for re-use, recycling and composting.
- Percentage of municipal waste landfilled.
- Total available recycling/composting capacity.
- Number of planning applications refused on the basis of Policy WCS2.
- Number of new/expanded recycling and composting~~/AD~~ facilities permitted per year.
- Number of 'strategic' composting, ~~AD~~ and recycling facilities permitted inside and outside 'Zone C' per year
- Number of recyclates 're-processing' facilities in Gloucestershire.

MM8

Policy WCS3 - Amend to include reference to Transport Assessment under Criteria 2 as follows:

2. Where viable, the proposal incorporates the use of alternatives to road transport such as rail and water and that where road transport is used the highway access is suitable for the proposed vehicle movements and is supported by a transport assessment and travel plan setting out measures to encourage employees to reach the site by foot, cycle or public transport.

MM9

Core Policy WCS3a AD (FC13 +other associated text changes)

Move location in document slightly to fit under recovery section

Section 4

Insert new text as follows:

Anaerobic Digestion

4.53a Anaerobic Digestion is the natural process by which bacteria break down organic material in the absence of oxygen. An AD waste facility is a controlled version of this process taking place in a vessel or series of vessels. It is very similar to IVC in that it is generally suited to treating source segregated organic waste such as food waste, waste water and agricultural waste. It is not suitable for inert C&D waste.

4.53b Although classed as 'other recovery' under the revised waste hierarchy, AD can under certain circumstances be considered to deliver a better overall outcome than recycling and composting such as when managing food waste. In addition because of similarities with IVC, AD is not generally used to manage mixed residual waste therefore AD has scope to contribute to both MSW composting requirements (an additional 19,000 – 38,000 tpa) and the C&I recycling/composting additional requirements of 91,000 – 111,000 tpa. In addition it might be possible that AD could contribute under certain circumstances towards the additional recovery requirement for C&I waste of 43,000 – 73,000 tpa.

4.53c Almost any organic material can be processed using AD including paper, cardboard, grass cuttings, food, industrial effluents, energy crops (grown specifically such as maize silage), sewage and animal waste. AD can be carried out on a small-scale (e.g. a farm based system managing livestock manure) or on a larger, commercial-scale such as the management of food waste collected by local authorities. It can also be used to manage the sewage sludge created by the treatment of waste water (see Core Policy WCS5).

4.53d The AD process produces biogas and digestate. Biogas can be used to generate renewable energy in the form of heat and electricity through combined heat and power (CHP) and can also be turned into 'biomethane' which can be used as a vehicle fuel or injected in the mains gas grid. Digestate is a solid and liquid residue made up of leftover, indigestible material and dead micro-organisms. It is used as a fertiliser and soil conditioner, but this has to meet certain quality standards.

4.53e There are limitations to AD including the fact that it requires a consistent, segregated supply of waste such as food waste which is not always available, depending on the waste collection arrangements that may be in

place. AD facilities in England have, to date tended to be geared towards agricultural and sewage waste. However, the Government is very keen to see this technology adopted to deal with MSW and C&I waste and in March 2010 published 'Accelerating the Uptake of Anaerobic Digestion in England: an Implementation Plan'.

4.53f The implementation plan highlights the potential use of AD in dealing with food waste, agricultural material such as manure and slurry and sewage sludge. There will however be a need for industry to come forward with arrangements that satisfy the pollution control agencies.

4.53g There are currently no operational AD facilities in Gloucestershire treating MSW or C&I waste[33]. In accordance with Government Policy, the Council will therefore support in principle, proposals for new AD facilities in appropriate locations and our policy on this matter is set out overleaf. For MSW in Gloucestershire it is likely that AD would generally be used for segregated waste (i.e. not residual waste) that currently goes to in-vessel composting facilities but nevertheless could form a useful part of an integrated system contributing towards the envisaged capacity gap requirements of the WCS.

4.53h Our approach towards the management of residual waste is set out in Core Policy WCS4.

[33] There is permission for an MSW AD facility at Rose Hill Farm in Dymock, but this is not yet operational. There is also permission for a small AD at Stanley's Quarry in the Cotswolds, but this is for agricultural waste. Additionally some AD processes are undertaken at Hayden and Netheridge Sewage Treatment Works and the Unilever factory in Gloucester.

New Policy – Core Policy WCS3a

Core Policy WCS3a – Anaerobic Digestion

In the interest of maximising the recovery of value (energy) from organic waste the Council will support in principle, proposals relating to the development of new or expanded anaerobic digestion facilities in Gloucestershire.

Planning permission will be granted subject to the following criteria being met:

1. **It can be demonstrated that the impact on the environment and neighbouring land uses is acceptable.**
2. **The highway access is suitable for the proposed vehicle movements.**
3. **The proposal contributes towards providing a sustainable waste management system for Gloucestershire.**
4. **If the proposal is of a 'strategic' scale (>50,000 tonnes/year) it is located in the area defined as 'Zone C' (see Key Diagram).**

Particular support will be given to proposals that:

- **Incorporate Combined Heat and Power (CHP) where practicable; and/or**
- **Are located within or close to an urban area; and/or**
- **Involve the re-use of previously developed land, vacant or underutilised employment land and/ or redundant rural buildings including farm diversification opportunities; and/or**
- **Involve co-location with an existing operation of a similar or complimentary nature; and/or**
- **Incorporate alternatives to the transport of waste by road (rail, water etc.), and/or**
- **Are well located to allow employees to reach the site by foot, cycle or public transport.**

How will we know if the policy is working?

4.53i There are a number of measures including:

- Total available AD capacity for food waste.
- Total available AD capacity for agricultural waste.
- Total available AD capacity for sewage sludge.
- Number of planning applications refused on the basis of Policy WCS3a.
- Number of new/expanded AD facilities permitted per year.
- Number of 'strategic' AD facilities permitted inside and outside 'Zone C' per year.
- Renewable energy generation from AD.

4.53j Further information is set out in Section 6.0 –Measuring Progress.

MM10

Core Policy WCS4 Recovery and associated text changes

Amend Core Policy as follows:

Core Policy WCS4 – Other Recovery (including energy recovery)

In order to divert waste from landfill, ~~in particular biodegradable waste,~~ in the period to 2027, the WPA will make provision for the following residual waste recovery capacity:

- MSW Up to 145,000 tonnes/year
- C&I Up to 73,000 tonnes/year

~~All 'strategic' residual waste recovery facilities (>50,000 tonnes/year) will be located in the central area of Gloucestershire, close to the main urban areas along the M5 corridor including Gloucester and Cheltenham. This area is designated 'Zone C' and is shown on the Key Diagram.~~

~~Within 'Zone C' the following sites are allocated for residual waste recovery:~~
Planning permission will be granted for strategic residual recovery facilities (>50,000 tonnes/year) within the outline boundaries of the site allocations shown in Appendix 5 at:

1. Wingmoor Farm East ~~(primarily C&I, but with MSW potential)~~
2a. ~~Wingmoor Farm West –~~ The Park ~~Sites A & B (primarily MSW, but with C&I potential)~~
2b. Wingmoor Farm West
3. Javelin Park ~~(primarily MSW, but with C&I potential)~~
4. Land at Moreton Valence ~~(primarily C&I, but with MSW potential)~~

~~These strategic sites are illustrated on the Key Diagram. Detailed site boundaries and key development criteria are set out in the Strategic Site Schedules at Appendix 5. Planning permission for 'strategic' residual waste facilities will only be granted outside the allocated sites where it can be demonstrated that the strategic sites are unavailable and that there is a clear justification that proposals will meet the identified recovery capacity and not compromise any other policies contained in this strategy.~~
Subject to the following:

(a) That the requirements of the General and Key Development Criteria for the respective site in Appendix 5 are met;
(b) Proposals are supported by sufficient information for the purposes of an appropriate assessment of the implications of the proposal, alone or in-combination with other plans and projects, for any Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site. The conclusions of the assessment, in accordance with Council Directive 92/42 EEC and the Conservation of Habitats and Species Regulations 2010, must show that a proposal can be delivered without adverse effect on the integrity of any SAC, SPA or Ramsar site.
(c) That any proposals for waste recovery are for Gloucestershire's waste needs unless it can be demonstrated, through a supporting statement, to be the most sustainable option to manage waste arisings from outside of the county at that facility

Where a proposal for a strategic residual waste recovery facility is on land not within the boundary of a site allocation in Appendix 5, planning permission will not be granted unless:

(a) The application site is within Zone C;
(b) It can be demonstrated that the proposed recovery capacity cannot be provided on the sites allocated in Appendix 5;
(c) That the requirements of the General Development Criteria in Appendix 5 being met; and
(d) Proposals are supported by sufficient information for the purposes of an appropriate assessment of the

implications of the proposal, alone or in-combination with other plans and projects, for any Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar site. The conclusions of the assessment, in accordance with Council Directive 92/42 EEC and the Conservation of Habitats and Species Regulations 2010, must show that a proposal can be delivered without adverse effect on the integrity of any SAC, SPA or Ramsar site.

(e) That any proposals for waste recovery are for Gloucestershire's waste needs unless it can be demonstrated, through a supporting statement, to be the most sustainable option to manage waste arisings from outside of the county at that facility

Planning permission will not be granted for strategic scale residual waste recovery facilities (>50,000 tonnes/year) outside Zone C.

'Non-strategic' residual waste recovery facilities (<50,000 tonnes/year) will be permitted both within and outside Zone C where the facility forms part of ~~a sustainable~~ an integrated and adequate waste management system and would be subject to the following criteria:

- The proposal is located on an industrial estate or permitted/allocated employment land ~~permitted or allocated for B2 general industrial use~~; and/or
- The proposal is located on previously developed land; and/or
- The proposal involves the development of an existing waste management facility or mineral site; and
- The facility would meet the relevant policies and criteria of the development plan.

New paragraph 4.99

For any proposals on any of the allocated sites, they will need to meet the General and Key Development criteria in appendix 5. The General Development Criteria is also generally applicable to any proposals which might come forward on unallocated sites. For any proposals coming forward on site allocations 1 – 2b will in particular need to accord with the requirements of Core Policy WCS10 relating to the Green Belt. Although a Habitat Regulations Assessment (HRA) was carried out in support of the WCS allocations, to demonstrate that no adverse effect on the ecological interest and integrity of SACs, SPAs and Ramsar sites occurs, a detailed assessment of potential affects will need to be undertaken in accordance with the policy. For each site allocation identified in Appendix 5 the particular European sites are indicated which will need to be taken into account.

MM11

Policy WCS5 - Amend as follows:

The development or expansion of waste water treatment facilities will be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the development plan, or in the interests of Gloucestershire's waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact, ~~and~~ that any such adverse impacts can be satisfactorily mitigated and that the proposal would be consistent with the objectives of the Water Framework Directive (WFD).

MM12

Paragraph 4.125 - Amend as follows:

For non-hazardous landfill, having regard to the current voidspace available and rates of tipping, it is estimated that there is at least 10-13[1] years remaining capacity. However this is a conservative estimate and the likelihood is that, due to future reductions to landfill as a result of mechanisms such as the Landfill Tax, 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.

[1]This includes capacity at Wingmoor Farm East which was granted planning permission in September 2011 for landfill operations to run until 2029. However this application is subject to a judicial review and therefore the situation may need to be reassessed in the near future

MM13

New Policy WCS6a Landfill and associated text changes

Paragraph 4.129 - Amend text as follows

'The current landfill capacity identified in paragraph 4.124 is considered sufficient to meet the needs for the County. This includes capacity at Wingmoor Farm East which was granted planning permission in September 2011 for landfill operations to run until 2029. However this application is subject to a judicial review and therefore the situation may need to be reassessed in the near future. Therefore the position of future landfill capacity will require monitoring and is likely to require further consideration through a review of the WCS or preparation of a separate development plan document potentially starting in 2017/2018. The DPD would include specific details as to suitable locations for landfill sites; this would either be in the form of areas of search and/or specific sites. To get to that stage detailed assessment of suitable geology, aquifers and source protection zones would have to be considered. This follows Environment Agency Landfill Directive Regulatory Guidance Note 3 (Version 4.0, December 2002) Groundwater Protection: Locational aspects of landfills in planning consultation responses and permitting decisions) on landfill design and construction which excludes non-hazardous landfills on or in a major aquifer. Other planning issues such as transport, ecology, flood risk, amenity and proximity to sensitive receptors would also need to be taken into consideration. If in the interim a planning application for waste disposal by landfill were to be submitted the policy below outlines those matters which would need to be considered in the determination of such a proposal.

New Core Policy WCS6a

Core Policy WCS6a – Landfill

Proposals for new landfill developments or extensions to existing landfill sites will only be permitted where it can be demonstrated that:

1. The waste cannot be managed further up the waste hierarchy through reuse, recycling and recovery; and

2. The proposed landfill would enable;

i. restoration of current or former minerals sites (subject to technical suitability of the site); or

ii. a demonstrable improvement in the quality of the land; or

iii. facilitating an appropriate after use; or

iv. engineering or other operations.

3. The proposed development would not compromise the permitted restoration of mineral sites or existing landfill sites by the diversion of significant amounts of material;

4. The site does not adversely effect the following designations – major aquifers, source protection zones and European Sites; and

5. Any proposal for new or extended landfill will need to indicate that it is for Gloucestershire's waste needs unless it can be demonstrated, through a supporting statement, to be the most sustainable option to manage waste arisings from outside of the county at that facility

How will we know if the policy is working?

- Percentage of waste landfilled.
- Amount of landfill capacity.
- Number of landfill applications permitted.
- The number of applications where the 'county's needs' was used a refusal reason.

MM14

Policy WCS6 - Insert additional text as follows:

Factors to be included in any assessment of environmental acceptability will include:

1.The quality of life, amenity and health of local residents and other land users;

2.Impacts on neighbouring land-uses (including the local road network) and the potential for the achievement of appropriate 'stand-off distances' between the facility and residential properties;

3.The need for the facility, where applicable, its relationship with existing activities and the potential wider environmental implications of not managing the waste stream~~; and~~

4. Where applicable, the potential for successful land restoration; and

5. That the hazardous waste is managed as high up the waste hierarchy and/or as close to source as possible.

MM15

Policy WCS7 & associated text changes

Policy WCS7 – Amend text as follows:

In determining proposals for waste related development for new or enhanced waste management facilities the Council will have regard to the cumulative effects of previous and existing waste management facilities on local communities alongside the potential benefits of co-locating complimentary facilities together. Planning permission will be granted where the proposal would not have an unacceptable cumulative impact.

In considering the issue of cumulative impact, particular regard will be given to the following:

1. Environmental quality;
2. Social cohesion and inclusion; and
3. Economic potential.

Within these broad categories this will, subject to the scale and nature of the proposal, include an assessment of the following issues: noise, odour, traffic (including accessibility and sustainable transport considerations), dust, health,

ecology and visual impacts.

Traffic impacts will be given particular attention as they are diffuse by their nature and thus not contained on sites.

Paragraph 4.183 Insert text as follows:

Should development proposals come forward on any of these sites, a further assessment will be needed at the planning application stage to determine the potential impact once the details of any proposal are known. Planning conditions can then be used to control certain aspects of the development as appropriate e.g. hours of operation and the impacts of noise, dust and odour. The same principles apply to speculative waste related development proposals on unallocated sites. In relation to the Council Directive 92/42 EEC and the Conservation of Habitats and Species Regulations 2010 the WCS will only make provision for a level and location of residual waste management development where there will be no adverse effect on the integrity of any SAC, SPA or Ramsar site, even if this is below the indicative residual waste recovery capacity set out in this WCS.

MM16

Policy WCS8 & associated text changes

Paragraph 4.193 Inset text as follows

The waste management sites within the county can regularly change due to new permissions being granted and facilities closing. Therefore the Council will produce a list of the current waste management sites within the county in its monitoring report which will be produced on an at least yearly basis. This is likely to include around 150 sites on average. The sites will be grouped into the respective districts and the Local Planning Authority will be notified accordingly and it will be these sites to which Policy WCS8 applies. Our proposed approach is set out in Core Policy WCS8 below.

Policy WCS8 Insert additional text as follows:

Existing and allocated sites for waste management use[1] will normally be safeguarded by local planning authorities who must consult the Waste Planning Authority where there is likely to be incompatibility between land uses. Proposals that would adversely affect, or be adversely affected by, waste management uses will not be permitted unless it can be satisfactorily demonstrated by the applicant that there would be no conflict.

The Waste Planning Authority (WPA) will oppose proposals for development that would prejudice the use of the site for waste management.

[1]includes sewage treatment works

MM17

Policy WCS9 Amend as follows:

In order to reduce the likelihood and impact of flooding both on and off-site there will be a general presumption that all waste-related development will be located in areas of low flood risk, (Flood Zone 1) unless it can be demonstrated that there are no suitable, alternative sites available.

Only if no suitable sites are available in Flood Zone 1 will consideration be given to sites within Flood Zone 2 and only if no suitable sites are available in Zone 2 will consideration be given to sites within Flood Zone 3a. Proposals ~~relating to sewage treatment works~~ which are classified as 'less vulnerable' may come forward in Flood Zones 1, 2 and 3a although the sequential approach will still apply.

Proposals for 'more vulnerable' waste development including landfill/landraise and hazardous waste treatment and disposal will only be permitted in Flood Zone 3a where it can be demonstrated through application of the 'exception test' that:

- The development provides wider sustainability benefits to the community that outweigh flood risk having regard to the Gloucestershire Strategic Flood Risk Assessment (SFRA); and
- The site is previously developed or if not, that there are no reasonable and available alternative sites on previously developed land; and
- The development will be safe without increasing flood risk elsewhere and where possible, will reduce flood risk overall.

Proposals for waste-related development within Flood Zone 3b (the functional floodplain) will not be permitted other than 'water compatible' proposals such as sewage transmission infrastructure and pumping stations and, subject to the exception test, development which is classified as 'essential infrastructure'.

A Flood Risk Assessment (FRA) will be required for all development of 1 hectare or more and for any proposal located within Flood Zone 2 and 3a. The FRA should consider all sources of potential flood risk.

The design of all new development will be required to take account of current and potential future flood risk from all sources both on and off-site including in particular the use of Sustainable Drainage Systems (SUDS).

MM18

Policy WCS10 & associated text changes

Paragraph 4.218 Amend as follows:

4.218 The WPA will work in partnership with the local authorities of Gloucester, Cheltenham and Tewkesbury in relation to potential Green Belt revisions arising through the Joint Core Strategy or other relevant Development Plan Documents (DPD) to ensure that any such revision takes full account of proposed waste management facilities including where appropriate the designation of 'inset' sites within the Green Belt.

New paragraph 4.220 Insert as follows:

The matters which might indicate that very special circumstances might exist in relation to waste related proposals might include the lack of suitable and available non - Green Belt sites. In particular a proposal would need to indicate a particular identified need for the facility to be located where it is proposed such as proximity to the main waste arisings, or a relationship to an existing waste management facility. However the proposal would need to demonstrate that it did not conflict with the purposes of Green Belt designation and the positive contribution that can be made by the development to the use of land in the Green Belt.

Core Policy WCS10 – Green Belt - Replace existing policy with text below:

There will be a presumption against proposals for waste management that amounts to inappropriate development within the Gloucester – Cheltenham Green Belt except where it can be demonstrated that there are 'very special circumstances'.

Very special circumstances' to justify inappropriate waste development proposals will not exist unless the totality of the harm to the Green Belt and any other harm can be clearly outweighed by other considerations.

Where the proposal involves the re-use of an existing building in the Green Belt:

- It must not have a materially greater impact than the existing building on the openness of the Green Belt and the purpose of including land within it; and
- The building must be of permanent and substantial construction and be capable of conversion without major or complete reconstruction; and
- The form, bulk and design of the buildings is in keeping with its surroundings; and

- The proposal would be consistent with other relevant development plan policies.

MM19

Core Policy WCS11 and associated text changes

Replace Paragraph 4.223 with the following:

4.223 Gloucestershire has a diverse landscape as a result of a number of factors including its unique geology, culture, and socio-economic influences. In 2006 a Landscape Character Assessment was produced on behalf of Gloucestershire County Council which identified 38 landscape types within the county. It accompanied two earlier district landscape assessments for the Forest of Dean (2002) and the Cotswolds (2004).

4.224 Over 50% of the county is falls within the Cotswold AONB, Wye Valley AONB and the Malvern Hills AONB and as a national designation AONBs have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty of the landscape and countryside should therefore be given great weight in planning policies and planning decisions in these areas. Planning policies should also support suitably located and designed development that may be necessary to facilitate the economic and social well-being of the AONB and its communities[44].

Replace paragraph 4.229 with the following:

4.229 The proposed locational strategy set out in Core Policy WCS4 ensures that all of the strategic site allocations identified in the WCS are located outside of the AONB. There is however of course the possibility of speculative unplanned development proposals coming forward and as such we need to ensure an appropriate policy framework is in place to determine these against the national designation of AONB and the potential impact of development on all landscapes of the county.

4.230 Our proposed approach is set out in Core Policy WCS11

[44]See PPS7: Sustainable Development in Rural Areas (2004).

Core Policy WCS11 - Replace with following:

Core Policy WCS11 – Landscape

General Landscape

Proposals for waste development will be permitted where they do not have a significant adverse effect on the local landscape as identified in the Landscape Character Assessment[1] or unless the impact can be mitigated. Where

significant adverse impacts can not be fully mitigated, the social, environmental and economic benefits of the proposal must outweigh any harm arising from the impacts.

Areas of Outstanding Natural Beauty (AONB)

Proposals for waste development within or affecting the setting of the Cotswolds, Wye Valley and Malvern Hills Areas of Outstanding Natural Beauty (AONB) will only be permitted where it can be demonstrated that:

- There is a lack of alternative sites not affecting the AONB to serve the market need; and
- The impact on the special qualities of the AONB as defined by the relevant management plan (including the landscape setting and recreational opportunities) can be satisfactorily mitigated; and
- The proposal complies with other relevant development plan policies.

In the case of major development within the AONB, a proven public interest must be demonstrated. Planning permission will only be granted in exceptional circumstances following the most rigorous examination and subject to the criteria above.

The County Council will continue to work in partnership with the respective AONB Conservation Boards and/or Joint Advisory Committees to help deliver the vision and objectives of the AONB Management Plans and Waste Core Strategy (WCS).

[1]http://www.gloucestershire.gov.uk/index.cfm?articleid=13187

MM20

Core Policy WCS12 Amend policy as follows:

Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNR) will be safeguarded from inappropriate waste management development.

Planning permission for waste management development within or outside a Site of Special Scientific Interest (SSSI) or National Nature Reserve (NNR) will only be granted where it can be demonstrated that:

- **The development would not conflict with the conservation, management and enhancement of the site unless the harmful aspects can be satisfactorily mitigated; ~~or~~ and**
- **The benefit of the development clearly outweighs the impacts that the proposal would have on the key features of the site; and**

- **The proposal complies with other relevant policies of the development plan; and**
- **In the case of a SSSI, there would be no broader impact on the national network of SSSIs.**

Local nature conservation designations will also be safeguarded from inappropriate development and planning permission will only be granted for development affecting such designations where it can be demonstrated that the impact of the development can be satisfactorily mitigated ~~or~~ and that the benefit of the development clearly outweighs any impact.

Development proposals will be required to assess their impact on the natural environment and make a contribution to local nature conservation targets to ensure net gain for biodiversity.

Proposals that incorporate beneficial biodiversity or geological features into their design and layout will be favourably considered particularly where the proposal would result in a positive contribution to a Strategic Nature Area (SNA) as identified on the Nature Map for Gloucestershire.

~~**Where proposals for major developments are within or close to Strategic Nature Areas (SNAs) they will be required to assess and make an appropriate contribution to nature conservation targets in those areas.**~~

MM21

New Historic Environment Policy WCS12a and associated text changes

Amend Historic Environment section as follows:

Historic Environment

4.248 Gloucestershire ~~is fortunate to have~~ has a rich historic environment that includes designated heritage assets such as listed buildings, scheduled monuments, conservation areas, registered parks and gardens, and registered battlefields, as well as many undesignated ~~other~~ archaeological sites and other historic structures. ~~Detailed I~~Information on these 'heritage assets' is set out in the archaeology evidence paper[46] available separately~~,~~ and detailed information is held in the county Historic Environment Record.

4.249 Like any form of built development, due consideration must be given to the potential impact of new and expanded waste management facilities on the historic environment.

4.250 National policy on planning and the historic environment is currently set out in ~~Planning Policy Statement 5: Planning for the Historic Environment (March 2010)~~ the National Planning Policy Framework[47].

~~4.251 Like all planning policy statements the provisions set out in PPS5 are a material consideration which must be taken into account in determining applications for planning permission. PPS5 emphasises that core strategies~~

~~and other development plan documents should not repeat the policies set out in PPS5 or reformulate them unless there are specific factors which would justify a variation to the policies.~~

~~4.252 Taking this into account it is not considered necessary or appropriate to include a specific policy on the historic environment within the WCS. Any planning decision made by the Council as Waste Planning Authority (WPA) where the proposal has the potential to impact on Gloucestershire's historic environment and assets, will be determined having due regard to the policies and objectives laid out in PPS5 – Planning for the Historic Environment. In addition there are detailed polices related to archaeology and the historic environment that remain in force in the WLP. It is our intention that these policies will continue to be used along side PPS5 as appropriate until they are updated through the preparation of a separate development management waste DPD to be prepared following adoption of the WCS.~~

4.253 There will be a general presumption against development which would cause damage or involve significant alteration to Gloucestershire's heritage assets and their settings. Scheduled monuments and other designated heritage assets will be afforded the highest level of safeguarding. Proposals which are likely to affect the historic environment will need to be supported by an appropriate evaluation proportionate to the assets importance to understand the potential impact on the significance of the asset. This should include measures to adequately mitigate adverse impacts or as a last resort compensate or offset any loss or damage to the asset.

4.253 Our proposed approach is set out in policy WCS11a below.

[46] www.gloucestershire.gov.uk/wcs/evidence
[47] www.communities.gov.uk

New Policy WCS12a – insert as follows:

Policy WCS12a Historic Environment

Planning permission for waste management that would have a significant adverse impact upon heritage assets including their integrity, character and setting will only be granted where it can be demonstrated that:

- *The benefits of the development clearly outweighs the impacts that the proposal would have in the key features of the site; or*
- *The proposal includes adequate measures to mitigate adverse impacts; and*
- *The proposal complies with other relevant polices of the development plan.*

There will be a presumption in favour of the conservation of designated heritage assets, and of those heritage assets with archaeological interest that are of demonstrably of equivalent significance.

How will we know if the policy is working?

- Number and % of proposals where impact on the Historic Environment is citied as a reason for refusal.
- Number of planning applications within 100m of a historic asset.

MM22

WCS13a Bulking and associated text changes

Section 4

Paragraph 4.264 Amend text as follows:

4.264 Most of Gloucestershire's waste is transported by road. Whilst Gloucestershire has an extensive road network including good links to the M4 and M5 motorways and other strategic routes, clearly in the interests of sustainability and reducing the impact of road transport on the environment, we need to consider first how to minimise the impact of transporting waste by road e.g. through bulking and transfer and second, whether more of our waste can be transported by alternative sustainable modes of transport in particular water (river and canal) and rail. This could potentially help to reduce the overall impact of waste management operations within the county.

Bulking and Transfer

4.264a One of the main ways in which we can reduce the impact of waste being transported by road is through the effective use of 'bulking and transfer' facilities. These are temporary waste storage facilities where waste is taken to be sorted and stored before being transported onwards for further management or disposal. Some facilities deal with mixed-waste, others with single waste types such as asbestos. Some include an element of waste recycling and recovery.

4.264b Importantly, the bulking of waste for onward transport to other waste facilities allows for greater efficiency, helps reduce journey length and in turn can help reduce traffic impacts.

4.264c If for example we provide bulking and transfer facilities in the right locations across Gloucestershire, some bin lorries will be able to drop their load close to where it was collected from allowing for the waste to be 'bulked up' and put onto larger vehicles for onward transfer to an appropriate facility as currently happens at Lydney and Cirencester. This is particularly applicable to more remote areas which are some way distant from the main waste management facilities.

4.264d As we described earlier, there are a number of existing waste bulking and transfer facilities in Gloucestershire dealing with different waste types including MSW, C&I, C&D and clinical waste. An element of waste transfer also takes place at other facilities including Household Recycling Centres (HRC).

4.264e Whilst our Waste Data Paper suggests that we already have adequate transfer capacity, there are a number of reasons why new or expanded facilities or a different spatial arrangement might be required in the future. These include changes in local authority contracts, different collection arrangements (for example arising from

the implementation of the Joint Municipal Waste Management Strategy (JMWMS)) and commercial changes.

4.264f This may result in the need for new or expanded bulking and transfer facilities either to replace existing ones or to serve other parts of the County not currently covered.

4.264g Policy WCS13a overleaf therefore provides a criteria-based approach for bringing forward new bulking and transfer facilities in appropriate locations across the County. It should be noted that any waste transfer proposal which includes an element of recycling will also be considered having regard to Core Policy WCS2 as well as any other relevant core policies.

Paragraph 4.265 Amend text as follows:

Sustainable Transport

4.265 As we have outlined above, most waste in Gloucestershire is transported by road. Whilst the impact of this can be mitigated to a certain extent through effective bulking and transfer, in the interest of sustainable development we need to consider whether more of our waste can be transported by alternative modes of transport e.g. rail and water. The main issue militating against this is generally 'economies of scale' where the movement of waste or any bulk goods by rail or water only generally works with large tonnages over long distances. For example, significant quantities of waste are moved by rail from Bristol to Buckinghamshire.

New Policy WCS13a – insert as follows:

Core Policy WCS13a – Bulking and Transfer

In order to promote greater efficiency and to reduce the potential impact of transporting waste by road, particularly on the Strategic Road Network (SRN) the Council will support in principle, proposals relating to the development of new and expanded bulking and transfer facilities.

Planning permission will be granted subject to the following criteria being met:

1. **It can be demonstrated that the impact on the environment and neighbouring land uses is acceptable.**
2. **The highway access is suitable for the proposed vehicle movements.**
3. **The proposal contributes towards providing a sustainable waste management system for Gloucestershire.**

Particular support will be given to proposals that:

- **Are located within or close to an urban area; and/or**

- **Involve the re-use of previously developed land, vacant or underutilised employment land and/or redundant rural buildings including farm diversification opportunities; and/or**
- **Involve co-location with an existing operation of a similar or complimentary nature; and/or**
- **Incorporate alternatives to the transport of waste by road (rail, water etc.), and/or**
- **Are well located to allow employees to reach the site by foot, cycle or public transport.**

How will we know if the policy is working?

4.264h There are a number of measures including:

- Total available bulking and transfer capacity.
- Number of planning applications refused on the basis of Policy WCS13a.
- Number of new/expanded bulking and transfer facilities permitted per year.

MM23

Policy WCS14 -Amend as follows:

Any development exceeding the thresholds set out in the Department for Transport publication 'Guidance on Transport Assessment' must be supported by a Transport Assessment (TA) and Travel Plan. Consideration will also be had to the location of the proposed development in determining whether a TA is required.

MM24

Section 5 Implementing the Strategy

The changes to section 5 of the WCS can be found under Appendix 1 of this schedule due to difficulties to show the changes due to the layout and formatting. It provides the implementation framework for WCS6a Landfill and WCS12a Historic Environment.

MM25

Section 6 Measuring Progress

The changes to section 6 of the WCS can be found under Appendix 2 of this schedule. This is because there are a number of changes to the monitoring section and these are difficult to show due to it's layout

The changes relate to:

- Removal of National Indicators and Core Output Indicators.

- Minor alterations to existing sections due to changes in policies which arose through the examination sessions.
- New monitoring sections for new policies WCS6a Landfill and WCS12a Historic Environment.

MM26

Appendix 5 General Development Criteria Miscellaneous Changes

Add wording to first box as follows:

General Development Criteria for All Sites
These criteria are applicable to the sites identified within Policy WCS4. However, these criteria are generally applicable to all strategic waste management development proposals and will also be relevant to the consideration of any waste development proposals proportionate to the scale of the development proposed.

Delete third box as follows:

~~***Key Development Criteria***~~

MM27

Appendix 5 General Development Criteria Amenity Impact

Delete text from *Amenity Impact* as follows:

An evaluation should be carried out of the potential environmental impact of development, including noise, dust, fumes, smell and traffic, on the surrounding area and highway network. Appropriate measures would be required to ensure that there would be no unacceptable impact on the local community. ~~The evaluation should be carried out in accordance with the requirements of Core Policy WCS4 of this document.~~

MM28

Appendix 5 Changes relating to archaeology sections

Amend text in General Development Criteria - Archaeology as follows:

In accordance with ~~PPS 5 Planning for the Historic Environment~~:Policy WCS11a Historic Environment:

Pre-validation/determination: a description of the significance of the heritage assets affected and the contribution of their setting to that significance, together with an assessment of the impact of the proposals, should be provided.

A ~~D~~desk-based assessment, followed by field evaluation if necessary, should be undertaken in order to assess the significance of the heritage assets affected.

Post-permission: mitigation of the loss of significance of any identified heritage assets through appropriate recording will be secured by planning conditions or agreements.

Insert additional information on local heritage assets as follows:

Wingmoor Farm East

Possible evidence of prehistoric or Roman settlement in the area; archaeological potential of the site is uncertain. There are four Grade II Listed buildings within 1km of the site boundary.

Javelin Park

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.

Moreton Valence

There are six Grade II Listed buildings within 1km of the site boundary and one Scheduled Monument.

Additional Changes related to archaeology

Amend The Park as follows:

Within WWII airfield. ~~Part of the site has been landfilled; t~~The archaeological potential of the ~~remainder~~ site is unknown.

Amend Wingmoor Farm West as follows:

Within WWII airfield. Part of the site ~~has~~ may have been landfilled; the archaeological potential of the remainder site is unknown.

MM29

Appendix 5 Changes relating to Contaminated Land sections

General Development Criteria - amend Contaminated Land sub-heading as follows:

Contaminated and Unstable Land

Amend criteria to include reference to unstable land as follows:

Where contaminated and/or unstable land has been identified or could be present, development should provide the opportunity for investigation and remediation.

Amend Contaminated Land section within The Park Site Schedule as follows:

~~Area A on the Wingmoor West site~~ The site would have potential for localised contamination from fuel spillages. There are some above ground storage tanks shown on the historic mapping 1954 to 1975. Tewkesbury Borough Council has no details of the industrial units on the site and any potential for contamination of the ground.

It is likely that contamination, if any, would be small and localised. This site has not been inspected under Part IIA. It is considered as low priority and unlikely to be determined as Contaminated Land under Part IIA.

Amend Contaminated Land section within the Wingmoor Farm West Site Schedule as follows:

~~Area A on the Wingmoor West site would have potential for localised contamination from fuel spillages. There are some above ground storage tanks shown on the historic mapping 1954 to 1975. Tewkesbury Borough Council has no details of the industrial units on the site and any potential for contamination of the ground.~~

It is likely that contamination, if any, would be small and localised. This site has not been inspected under Part IIA. It is considered as low priority and unlikely to be determined as Contaminated Land under Part IIA.

MM30

Appendix 5 Changes relating to Ecology/HRA sections

Amend Ecology/HRA section of General Development Criteria as follows:

Survey(s) are required to determine whether notable species, habitats or possibly designated sites may be adversely affected by development. All surveys carried out should be assessed to determine:

1. The biodiversity importance of the land and its surrounds.
2. All impacts of the proposed development on biodiversity.
3. The choice of any necessary avoidance, mitigation and/or compensation measures for biodiversity.
4. Provision of landscaping/restoration and where possible enhancements for biodiversity on the land and/or surrounds.
5. Arrangements for appropriate after-care and long-term management of the land and/or surrounds.

Habitats Regulations Assessment (HRA):
The strategic sites identified within Policy WCS 4 have been subject to a study to consider any potentially significant effects on Natura 2000 sites i.e. European Sites of Nature Conservation Importance protected under the EU Habitats Directive (92/43/EEC) as transposed into UK law by the Conservation of Habitats and Species Regulations 2010 (the 2010 Regulations). European Sites include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). It is government policy to also consider Ramsar sites (wetlands of international importance) as if they were European Sites. Further information regarding European Sites and the results of the HRA are contained in the detailed report which supports the WCS. The overall aim of the HRA is to ensure that the strategy will not affect the integrity of these protected sites.

Any development proposals for waste management facilities which come forward at any of the strategic sites contained in Policy WCS 4 will need to be supported by sufficient information to assess the implications of a proposal, alone or in combination with other plans or projects, for any SAC, SPA or Ramsar site. The consideration of the assessment must show that a proposal can be determined without adverse impact on the integrity of any SAC, SPA or Ramsar site. ~~refer to the detailed findings of the HRA report. In most cases the strategic waste sites are some way distant from European Sites and therefore many forms of waste management development would potentially not have a significant impact on European Sites. The HRA has not precluded the development of thermal treatment facilities at any waste site, but for these proposals it must be demonstrated that there will be no significant effect on European Sites either alone or in combination with other plans or projects.~~ Each individual ~~waste~~ strategic site schedule indicates the particular European Sites which will need to be considered at the planning application stage. ~~The following applies: Section 61 of The Conservation of Habitats and Species Regulations 2010.~~

Amend Ecology/HRA Key Development Criteria for Wingmoor Farm East as follows:

In respect of the General Development Criteria, the presence of Key Wildlife Site (Wingmoor Farm Meadow) is confirmed as adjacent to the land and protected species (e.g. badger and great crested newt) may occur nearby or on the land. Trees, ponds and rough grassland are habitat features which could be affected by development on this land. ~~Any proposal for waste management at Wingmoor Farm East will need to demonstrate that there will be no significant effect on European Sites either alone or in combination with other plans or projects. Dixton Wood SAC will require specific consideration.~~

In respect of the General Development Criteria for HRA any AA will need to ensure that there will be no adverse effect on the integrity of any SAC, SPA or Ramsar site, either alone or in combination with other plans or projects. In particular, Dixton Wood SAC will require specific consideration in such an assessment.

Amend Ecology/HRA Key Development Criteria for The Park as follows:

In respect of the General Development Criteria, the presence of protected species has been confirmed by surveys connected with previous developments in the vicinity (e.g. great crested newt and badgers) with reptiles and nesting birds also likely to be present on or near this land. Trees, ponds, watercourses and rough grassland are habitat features which could be affected by further development on this land.

~~Any proposal for waste management at Wingmoor Farm West & The 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. Dixton Wood SAC will require specific consideration.~~
In respect of the General Development Criteria for HRA any AA will need to ensure that there will be no adverse effect on the integrity of any SAC, SPA or Ramsar site, either alone or in combination with other plans or projects. In particular, Dixton Wood SAC will require specific consideration in such an assessment.

Amend Ecology/HRA Key Development Criteria for Wingmoor Farm West as follows:

In respect of the General Development Criteria, the presence of protected species has been confirmed by surveys connected with previous developments in the vicinity (e.g. great crested newt and badgers) with reptiles and nesting birds also likely to be present on or near this land. Trees, ponds, watercourses and rough grassland are habitat features which could be affected by further development on this land.

~~Any proposal for waste management at Wingmoor Farm West & The 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. Dixton Wood SAC will require specific consideration.~~
In respect of the General Development Criteria for HRA any AA will need to ensure that there will be no adverse effect on the integrity of any SAC, SPA or Ramsar site, either alone or in combination with other plans or projects. In particular, Dixton Wood SAC will require specific consideration in such an assessment.

Amend Ecology/HRA Key Development Criteria for Javelin Park as follows:

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. In respect of the General Development Criteria for HRA any AA will need to ensure that there will be no adverse effect on the integrity of any SAC, SPA or Ramsar site, either alone or in combination with other plans or projects. In particular, the Severn Estuary SAC, SPA, Ramsar, Walmore Common SPA, Ramsar, Cotswold Beechwoods SAC and Rodborough Common SAC will require specific consideration.

Amend Ecology/HRA Key Development Criteria for Moreton Valence as follows:

In respect of the General Development Criteria, badgers have been confirmed in the general area and so this protected species may be the main constraint along with boundary features of hedgerows, trees and ditches which may possibly support other protected species (e.g. nesting birds and bats).

~~Any proposal for waste management at Morton Valence will need to demonstrate that there will be no significant effect on European Sites either alone or in combination with other plans or projects.~~ In respect of the General Development Criteria for HRA any AA will need to ensure that there will be no adverse effect on the integrity of any SAC, SPA or Ramsar site, either alone or in combination with other plans or projects. In particular, ~~T~~the Severn Estuary SAC, SPA, Ramsar, Walmore Common SPA, Ramsar, Rodborough Common SAC and Cotswold Beechwoods SAC will require specific consideration.

Amend Ecology/HRA Environmental Considerations for The Park as follows:

The nearest European site is Dixton Wood SAC, at a distance of ~~5.8~~ c.6 km.

Wingmoor Farm Meadow GWT Reserve & Key Wildlife Site; Lowland meadows Priority Habitat and Wingmoor Farm Meadow GC/SO92/W01 Grassland Inventory sites are located within 1km of the two sites.

~~Site A (The Park)~~

Brown Argus (Aricia agestis) have been identified within 50m of the site.

Rye Brome (Bromus secalinus), Brown Hare (Lepus capensis), Small Heath (Coenonympha pamphilus) and Wall (Lasiommata megera) have been identified within 1km of the site.

Amend Ecology/HRA Environmental Considerations for Wingmoor Farm West as follows:

The nearest European site is Dixton Wood SAC, at a distance of 5.8 km.

Wingmoor Farm Meadow GWT Reserve & Key Wildlife Site; Lowland meadows Priority Habitat and Wingmoor Farm Meadow GC/SO92/W01 Grassland Inventory sites are located within 1km of the two sites.

~~Site A (The Park)~~

~~Brown Argus (Aricia agestis) have been identified within 50m of the site.~~

~~Rye Brome (Bromus secalinus), Brown Hare (Lepus capensis), Small Heath (Coenonympha pamphilus) and Wall (Lasiommata megera) have been identified within 1km of the site.~~

~~Site B (Wingmoor West)~~

Brown Hares (Lepus capensis) have been identified adjacent to the site.

Brown Argus (Aricia agestis), Small Heath (Coenonympha pamphilus) and White Letter Hairstreak (Satyrium w-album), have all been identified within 1km of the site.

Amend Ecology/HRA Environmental Considerations for Javelin Park as follows:

The nearest European site is the Severn Estuary SAC, SPA, Ramsar at a distance of c.6~~.3~~ km. Other nearby European sites include Walmore Common SPA, Ramsar (~~6.7~~ c.6.5km), Cotswold Beechwoods SAC (c.7~~.1~~ km) and Rodborough Common SAC (c.7.5~~6~~ km).

Amend Ecology/HRA Environmental Considerations for Moreton Valence as follows:

The nearest European site is the Severn Estuary SAC, SPA, Ramsar at a distance of c.5.~~3~~5 km. Other nearby European sites include Walmore Common SPA, Ramsar (c.6.~~3~~5km), Rodborough Common SAC (c.~~7.9~~ 8km) and Cotswold Beechwoods SAC (c.8~~.0~~ km).

MM31

Appendix 5 Changes relating to Landscape/Visual Impact sections

Amend Landscape/Visual Impact General Development Criteria as follows:
All proposals for waste management development must be supported by a landscape and visual impact assessment (LVIA). In particular the requirements of Core Policies WCS11 and WCS13 should be considered carefully within this assessment.

A broad based LVIA was carried out for all the allocated sites and the main findings are contained in the profiles to each site schedule.

The landscape consideration for each site schedule should be considered carefully in the detailed assessment which should acompany any proposals.

It should be noted that in the broad based assessment that the following possible building heights and scale of development were considered:

~~The landscape appraisal for all sites considered the possible building height and land take for three different facility sizes:~~

Small - 2000-6000m^2, with buildings up to 20m in height and potential emissions stack up to 40m in height.

Medium - 3000-7000m^2, with buildings up to 30m in height and potential emissions stack up to 60m in height.

Large - 4000-9000m^2, with buildings up to 40m in height and potential emissions stack up to 80m in height.

These size ranges are a guide to be considered when proposals come forward on any of the allocated sites.

For proposals falling within small developments (under 20m)

Developers should used materials and infrastructure that should reflect the local style of the surrounding area, designed to site as low in the landscape as possible using neutral, matt colours and avoiding the introduction of reflective materials.

Sensitive site planning is required to reduce the requirement for additional infrastructure and expansive areas of hardstanding.

The preservation and enhancement of existing woodland and hedgerow planting should be utilised. Boundary enhancements should be made where possible including the advanced planting of a native woodland mix of primarily deciduous trees and shrub understory planting to screen the site.

For proposals falling within medium to large developments (over 20m)

Boundary enhancements should be made where possible to include the advanced planting of a native woodland mix of

primarily deciduous trees and shrub understory planting to screen the lower levels of the site.

However, where development is proposed that breaches the potential screening levels, proposals should be designed with particular attention to the requirements of Core Policy WCS13 to ensure that the building is of the highest architectural standard. Appropriate external architectural treatment/building materials, for example neutral, matt colours should be used and the introduction of reflective, shiny materials must be avoided.

Where possible, large roof and hardstanding expanses should be avoided or broken up to reduce the perceived scale of the facility. For all allocated sites particular consideration should be given to the potential impact on the setting of the Cotswolds AONB and how proposals have addressed potential mitigation measures through design.

In the cases of 'large' scale development proposals (40m+ buildings and stacks) there will be a need to demonstrate that the highest possible architectural design has been employed.

Amend Landscape/Visual Impact Environmental Considerations for Wingmoor Farm East as follows:

The site is considered to currently be of poor landscape quality and condition ~~with a medium capacity to accept change and medium landscape suitability for development of a waste facility, but is considered to have a low capacity to accommodate larger structures.~~

The site could be potentially viewed at oblique angles from the north of Swindon village and Brockhampton Lane.

~~If proposals included the erection of an emissions stack (e.g. 40-80m in height), this would probably create a significant vertical landmark out of keeping with the surrounding landscape character.~~

There could be impact on the natural quality of the landscape setting for the Cotswold AONB.

Amend Landscape/Visual Impact Environmental Considerations for The Park as follows:

The Park is a flat site containing four (4 No.) 2-3 storey height, low long hanger style light industrial / storage buildings and a number of smaller container sized structures to the south.

Surrounding The Park to the north and west is a heavily vegetated bund which screens views from properties in Stoke Orchard and surrounding areas.

To the south is the Wingmoor Farm recycling centre, which is enclosed by remediated landfill of grassed mounds.

~~Due to the disturbed nature of the surrounding landscape (south) and enclosed character of the study area, The Park and Wingmoor Farm West could accommodate a small or medium scale facility with minimal impact on the surrounding area. Though the Waste Management Facility with the remediated landfill screens properties to the south, due to the~~

~~proximity of Stoke Orchard, The Park site would be considered inappropriate for a large scale development.~~

~~It should be noted that properties to the south of the existing landfill, in particular those on Lowdilow Land and a lesser extent properties to the north fringe of Swindon village, are currently experiencing substantial adverse impacts in relation to the landfill activities and increasing height of the landform. Any development to this study area should be carefully planned so as to not vertically encroach above the existing landfill height.~~

~~Inclusion of a medium or large emission stack (60m +) would create a vertical landmark in the surrounding area, however would be of slight to moderate adverse impact due to the frequency of similar structures in the wider area.~~

~~Other potential landscape impacts:~~ There could be

- ~~W~~wintertime views of the facility from the residential properties located in Stoke Orchard to the north.

- ~~Permanent alteration of the site in terms of scale and intensity of development resulting from a facility both taller and larger than the existing units.~~
- ~~Deterioration of the existing landscape character due to the construction of a facility significantly larger than any existing on site, associated external works and activity on site.~~

Amend Landscape/Visual Impact Environmental Considerations for Wingmoor Farm West as follows:

~~The Park is a flat site containing four (4 No.) 2-3 storey height, low long hanger style light industrial / storage buildings and a number of smaller container sized structures to the south.~~

~~Surrounding The Park to the north and west is a heavily vegetated bund which screens views from properties in Stoke Orchard and surrounding areas.~~

~~To the south is the Wingmoor Farm recycling centre, which is enclosed by remediated landfill of grassed mounds.~~

~~Due to the disturbed nature of the surrounding landscape (south) and enclosed character of the study area, The Park and Wingmoor Farm West could accommodate a small or medium scale facility with minimal impact on the surrounding area. Though the Waste Management Facility with the remediated landfill screens properties to the south, due to the proximity of Stoke Orchard, The Park site would be considered inappropriate for a large scale development.~~

~~It should be noted that properties to the south of the existing landfill, in particular those on Lowdilow Land and a lesser extent properties to the north fringe of Swindon village, are currently experiencing substantial adverse impacts in relation to the landfill activities and increasing height of the landform. Any development to this study area should be carefully planned so as to not vertically encroach above the existing landfill height.~~

~~Inclusion of a medium or large emission stack (60m +) would create a vertical landmark in the surrounding area, however would be of slight to moderate adverse impact due to the frequency of similar structures in the wider area.~~

~~Other potential landscape impacts:~~

- ~~Wintertime views of the facility from the residential properties located in Stoke Orchard to the north.~~
- ~~Permanent alteration of the site in terms of scale and intensity of development resulting from a facility both taller and larger than the existing units.~~
- ~~Deterioration of the existing landscape character due to the construction of a facility significantly larger than any existing on site, associated external works and activity on site.~~

The landscape is generally of poor quality in the vicinity of the site. The site is screened to the north by The Park and to the south by the adjacent remediated landfill.

Amend Landscape/Visual Impact Environmental Considerations Javelin Park as follows:

~~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.~~

The site is located in an area that is relatively low and flat, therefore any facility would be clearly visible from the Cotswolds AONB, the M5 and the surrounding low-lying areas. Some screening has already been undertaken to the western boundary.

Amend Landscape/Visual Impact Environmental Considerations for Moreton Valence as follows:

~~The existing industrial nature of the site is a detracting feature in the surrounding landscape, however it is well screened to the north, west and south by existing mature vegetation. The existing bund to the east provides some mitigation; however is itself out of keeping with the flat landscape character of the wider area.~~

~~The study area would be able to accommodate development of a similar scale and height as existing on site with negligible impact, however taller structures (approximately 15m in height or above) would be visible over the existing screening vegetation, in particular the erection of an emissions stack of any height would have a detrimental impact on the wider area as it would create a significant vertical landmark out of keeping with the surround landscape character.~~

~~Permanent alteration of the site in terms of scale and intensity of development resulting from a facility both taller and larger than the existing surrounding industrial units. Any notable increase in building height (20m +) within a relatively low and flat landscape would be prominent above existing vegetation.~~

The site is located in an area that is relatively low and flat, therefore any facility would be clearly visible from the Cotswolds AONB, the M5 and the surrounding low-lying areas.

Wingmoor Farm East – Key Development Criteria Landscape/Visual Impact – delete whole sub-section:

The Park – Key Development Criteria Landscape/Visual Impact – delete whole sub-section:

Wingmoor Farm West – Key Development Criteria Landscape/Visual Impact – delete whole sub-section:

Javelin Park – Key Development Criteria Landscape/Visual Impact – delete whole sub-section:

Moreton Valence – Key Development Criteria Landscape/Visual Impact – delete whole sub-section:

MM32

Appendix 5 - General Development Criteria – New Category

Amend to include reference to proximity to the rail network as follows:

New sub-heading:

Proximity to Railway Network

New text:

Network Rail should be consulted on all planning applications for waste management proposals within 250m of the railway property.

MM33

Appendix 5 Strategic Site Schedules – Suitable Uses Sections

Remove Suitable Uses from each site profile.

MM34

Appendix 5 - Site Schedules – Flood Risk/Water Protection Sections

Update/rename aquifers as follows:

Wingmoor Farm East

~~The site is adjacent to, but not within, a minor aquifer although the EA identified the site as a non-aquifer with un productive strata and low risk to groundwater.~~ The EA identified the site as overlying unproductive strata with the groundwater risks associated with the location as low for the geological setting.

"Wingmoor Farm West" and "The Park"

The EA identified the site as overlying unproductive strata with the groundwater risks associated with the location as low for the geological setting. ~~The two areas are partially overlying a minor aquifer, although the EA identified the sites as a non-aquifer with un productive strata and low risk to groundwater.~~

Javelin Park

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 strata and low risk to groundwater.~~

Moreton Valence

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. ~~Site 546 is mostly lying over a Minor Aquifer Intermediate 1. The site is also within 250m of a Minor Aquifer High (H3) although the EA identified the site as a non-aquifer with un productive strata and low risk to groundwater.~~

MM35

Appendix 5 Changes relating to Green Belt sections

Wingmoor Farm East – Key Development Criteria

Amend Green Belt as follows:

~~The Green Belt status of the site may require demountable buildings to be provided on Wingmoor Farm East and their use limited to the duration of the landfill operations and site restoration.~~

The development proposals must be in accordance with national Green Belt policy and Policy WCS10 of this DPD.

Subject to satisfying the requirements of Policy WCS10, any waste development at this site should be tied to the life of the existing landfill and site restoration.

The Park – Key Development Criteria

Amend Green Belt as follows:

~~The Green Belt status of the site may require demountable buildings to be provided on Wingmoor Farm West and their~~

~~use limited to the duration of the landfill operations and site restoration.~~

The development proposals must be in accordance with national Green Belt policy and Policy WCS10 of this DPD.

Wingmoor Farm West – Key Development Criteria

Amend Green Belt as follows:

~~The Green Belt status of the site may require demountable buildings to be provided on Wingmoor Farm West and their use limited to the duration of the landfill operations and site restoration.~~

The development proposals must be in accordance with national Green Belt policy and Policy WCS10 of this DPD.

Subject to satisfying the requirements of Policy WCS10, any waste development at this site should be tied to the life of the existing landfill and site restoration.

MM36

Appendix 5 Strategic Site Schedules Wingmoor Farm East

Amend Site Description as follows:

The site is located within the former Waste Local Plan strategic site allocation and ~~forms~~ falls within part of the larger landfill ~~scheme~~ planning permission for the site. ~~However, to this date part of the site remains unworked.~~

Amend Planning Status as follows:

~~All permissions relating to waste activities and the landfill technically expired in 2009. The operator has applied to extend the date of landfill operations until around 2029/30, which includes the site proposed here. Due to the large amount of voidspace for landfill remaining and the submitted proposals for waste management to continue until 2029, for the purposes of Waste Core Strategy preparation there is sufficient evidence to suggest that there is prospect for delivery of proposals at this site. Clearly this is subject to the determination of the application to extend operations.~~

The larger Wingmoor Farm East landfill complex, within which this site is located, has permission to continue operations until 2029[1].

[1]Subject to the outcome of a judicial review on the planning permission which was granted in September 2011 for landfill operations to run until 2029.

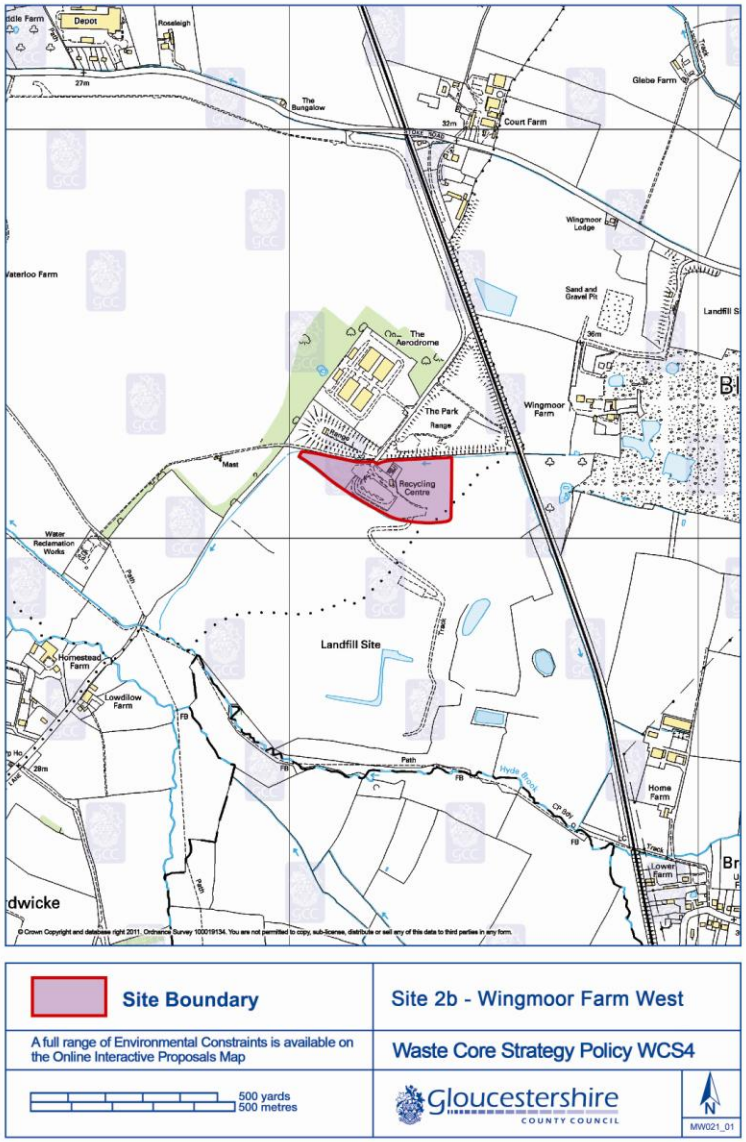
MM37

Split The Park and Wingmoor Farm West into two separate schedules:

The Park – Site 2a

Wingmoor Farm West – Site 2b

Amend boundary of Wingmoor Farm West (Site 2b) as follows



Amend the planning status in relation to The Park and Wingmoor Farm West as follows:

~~The Park currently has district permissions for warehousing type operations and recycling operations by Printwaste.~~

~~Cory Environmental Ltd. have permission for an IVC and a dirty MRF, but both are subject to a Section 106 agreement, but the MRF is unlikely to be implementable due to the time limit for implementation having expired.~~

~~A resource recovery park proposal for 160,000 tpa was submitted in 2005, but withdrawn in 2010 due to the operator wishing to make material amendments which would require re-submission of the application.~~

~~Wingmoor West – this site is currently permitted for use as a HRC.~~

The Park - currently has district permissions for warehousing type operations. Planning permission has also been granted for an In-Vessel Composting (IVC) facility.

Wingmoor West – this site is currently permitted for use as a Household Recycling Centre and the location for a sealed asbestos disposal facility.

Appendix 5 Strategic Site Schedules The Park

Delete all references to Wingmoor Farm West within Easting, Northing and Site area

Amend Site Location as follows:

The site comprises two areas. The site ~~comprises two areas of land. It~~ is located two miles west of Bishops Cleeve and five 5 miles north of Cheltenham, off Stoke Road, south of Stoke Orchard. It is some distance from the Stoke Road, west of the railway line, and accessed via a well-maintained road which also serves other users in area including landfill operations and shooting clubs.

Amend Site Description as follows:

Former second world war aerodrome now used for a mixture of waste-related and other industrial type activities. The area known as the Park The area known as the Park It consist~~e~~s of former airplane hangers converted to industrial units. ~~and the Wingmoor Farm West area is concreted hardstanding currently used as a Household Recycling Centre~~

Appendix 5 Strategic Site Schedules Wingmoor Farm West

Site No – Change to 2b

Delete all references to The Park within Easting, Northing and Site area

Amend Site Location as follows:

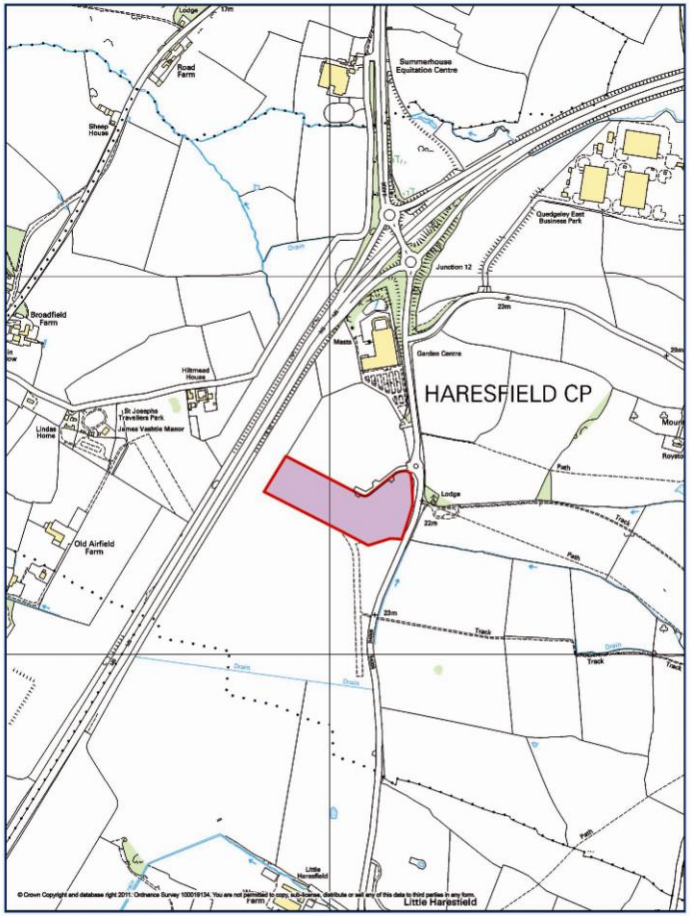
The site ~~comprises two areas of land. It~~ is located two miles west of Bishops Cleeve and five 5 miles north of Cheltenham, off Stoke Road, south of Stoke Orchard. It is some distance from the Stoke Road, west of the railway line, and accessed via a well-maintained road which also serves other users in area including landfill operations and shooting clubs.

Amend Site Description as follows:

~~Former second world war aerodrome now used for a mixture of waste-related and other industrial type activities. The area known as the Park consistes of former airplane hangers converted to industrial units and the Wingmoor Farm West area~~ The site is part concreted hardstanding currently used as a Household Recycling Centre and is situated within a larger area permitted for landfilling operations.

MM38

Inset Map 3 – Revised boundary as follows:



Amend Site Area as follows:

c.~~11.2~~5hectares

Amend Site Description as follows:

Large area of previously developed airfield land, which once contained buildings associated with a military airfield. The site is vacant apart from large piles of crushed recycled aggregate. The land is currently owned by the County Council.

Amend Neighbouring Uses as follows:

There are 6 hectares 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.2km to the north (known as Hunts Grove) has been permitted for residential development and work on this is currently underway.

Amend Planning status as follows:

A number of planning permissions and applications relating to storage and distribution exist covering the ~~whole~~ site and adjacent land.

Amend Access/Highways as follows

The s~~S~~ite has ~~52,000m²~~ B8 (storage/distribution) permission although this is not currently operational.

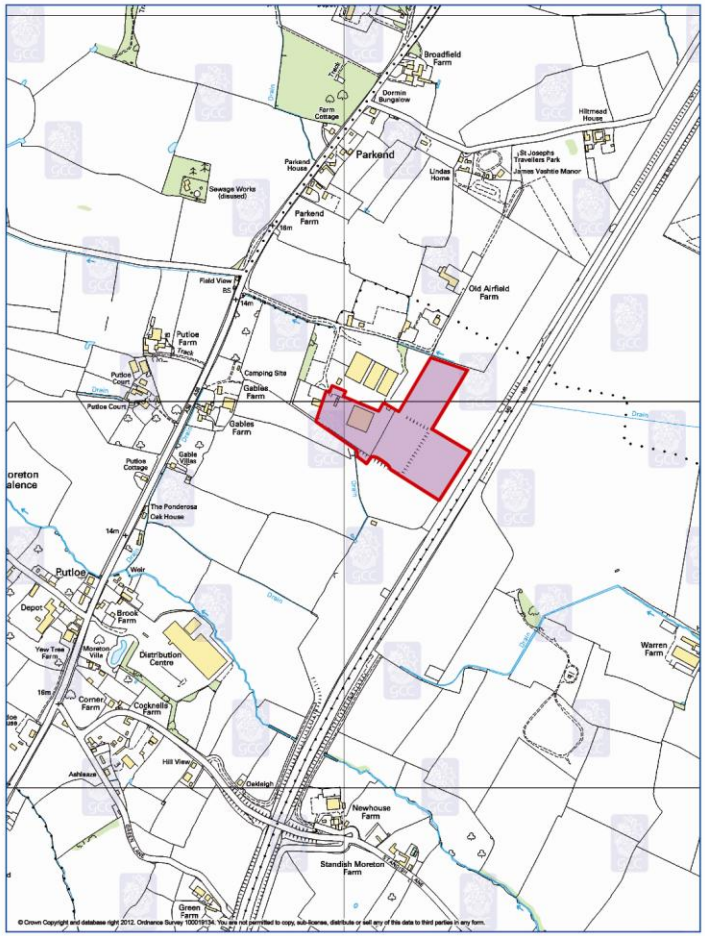
Amend CHP Potential as follows:

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 at the site or adjacent Javelin Park site.

MM39

Inset Map 3 – Revised boundary as follows:



Appendix 5 Strategic Site Schedules Moreton Valance

Amend Site Area as follows:

c. ~~5.6~~ 7 hectares

Amend Site Description as follows:

The site is an irregular ~~L~~ shape with a grassed earth bund to the east notable from the M5 motorway. The site comprises a variety of buildings and stockpiles of materials associated with the on-site recycling/reuse activities including skip sorting and container delivered C&D & C&I waste in large square central shed and MRF/conveyor system.

Amend Access/Highways as follows:

The site has fairly good access with some waste activity already occurring. The site is in close proximity to Strategic Road Network (M5 Junction 12) via A38/Cross Keys Roundabout. There are currently some congestion issues at A38/Cross Keys Roundabout.

~~The~~ Part of the site has current permitted usage is up to 200,000 tonnes/year, ~~but~~ with the EA licence limit ~~is~~ up to 300,000 tonnes/year and some parts of site have no restriction The section closest to the motorway is currently unpermitted.~~, though there is physical limit to how much could be operated on the site.~~

A new facility on the site could ~~probably~~ potentially result in a net increase in traffic, but could be closer to neutral depending on details of what could currently be operated (and assuming strategic waste facility ~~would need to~~ might replace current consents).

The site is considered to be too far from existing rail/water infrastructure for these modes to be suitable. The site is outside reasonable walking distances, and cycle/bus access is also likely to be fairly limited.

Appendix 1 MM24

Policy	Delivery mechanism/s (i.e. how will the policy be delivered?)	Delivery Agencies		Delivery Funding	Delivery Timescale	Potential constraints to delivery	Mitigation to overcome potential constraints
		Lead	Other				
WCS3a – Anaerobic Digestion (AD)	- Through the granting of planning permission. The delivery of sites for AD will be largely down to the waste industry to come forward with where there is market demand. The criteria set out in the policy provide a framework against which to consider the merits of any proposal that comes forward.	Waste Industry	GCC acting as WPA Environment Agency	- The funding of new AD facilities will be the responsibility of the private waste industry. - Officer time spent processing any planning application. - The WDA and WCA may be involved in proposing schemes due to policy and renewal of contracts.	- Core Policy WCS3a to be implemented with immediate effect upon adoption of Waste Core Strategy and to be applied thereafter until updated or replaced. - The timing of new facilities coming forward will be largely down to the private waste industry. The policy provides the criteria to determine any proposal when it comes forward.	- Local opposition to development proposals. - Failure to achieve planning permission. - Lack of suitable source, segregated waste feedstock	- Developer to undertake pre-application consultation. - Planning appeal or re-submission of revised planning application. - Introduction of more source-segregated collections e.g. kitchen waste
WCS6a – Landfill	- Through the granting of planning permission. The delivery of sites for	GCC	Waste Industry Environment	- The funding of new landfill capacity will be the responsibility of the private waste	Core Policy WCS6a to be implemented with immediate effect upon adoption of the	- Local opposition to development proposals. - Failure to achieve	- Developer to undertake pre-application consultation.

	landfill will be largely down to the waste industry to come forward with. The criteria set out in the policy provide a framework against which to consider the merits of any proposal that comes forward.		Agency	industry	Waste Core Strategy and to be applied thereafter until updated or replaced.	planning permission.	- Planning appeal or re-submission of revised planning application. - Market demand is outside of the scope of the WCS.
WCS12a – Historic Environment	Through the granting/refusal of planning permissions in relation to any development within or affecting a site of historic importance.	GCC		- Funding of any market-led waste related development within or affecting a site of historic importance would be the responsibility of the private sector. - The cost of any mitigation to make the proposed development acceptable or to incorporate the historic environment into the design of the proposal would also be the responsibility of the public sector.	Core Policy WCS12a to be implemented with immediate effect upon adoption of the Waste Core Strategy and to be applied thereafter until updated or replaced. - Speculative development proposals affecting the historic environment could come forward at any time.	None	N/A
WCS 13a – Bulking and	- Through the granting of planning	GWP (including	GCC acting	- The funding of new or expanded bulking	- Core Policy WCS13a to be implemented	- Local opposition to	- Developer to undertake pre-

Transfer	permission. The need for the delivery of new or expanded bulking and transfer sites will be a matter for the WDA, the WCA and the private waste industry. The criteria set out in the policy provide a framework against which to consider the merits of any proposal that comes forward. - Partnership working e.g. Gloucestershire Waste Partnership (GWP) and any future procurement.	WDA and WCA) Waste Industry	as WPA	and transfer facilities will potentially be met by the public sector, the private sector or a combination of the two depending on contractual arrangements that may be put into place. - Officer time spent processing any planning application	with immediate effect upon adoption of the Waste Core Strategy and to be applied thereafter until updated or replaced. - The timing of new facilities coming forward will be largely down to a combination of the WDA and WCA through the GWP and the private waste industry. The policy provides the criteria to determine any proposal when it comes forward.	development proposals. - Failure to achieve planning permission.	application consultation. - Planning appeal or re-submission of revised planning application.

Appendix 2 MM25

6. Measuring Progress

6.1 Having set out our strategy and the means by which it will be implemented we need to set out how we will measure the progress that is being made.

6.2 Monitoring is an essential part of any good strategy. In particular, it allows us to establish whether policies are achieving their objectives i.e. delivering what they are intended to deliver.

6.3 It also allows us to establish if policies are having any unintended, wider consequences (positive or negative) for example on the environment, society or the economy.

6.4 Where monitoring demonstrates that policies are not achieving their objectives or are having unintended consequences, particularly negative ones, appropriate measures can be put into place to rectify the situation.

6.5 This could be for example, a revision to a policy or even its replacement with an alternative. In some instances, more wholesale changes to the whole strategy may even be needed.

6.6 Effective monitoring also allows for:

- Plans to be adapted if circumstances change;
- Progress against national and regional targets to be measured;
- Progress against any local targets to be measured including the Sustainable Community Strategy (SCS);
- Progress against sustainability objectives to be measured; and
- Any meaningful trends to be established over time e.g. waste reduction.

6.7 Our proposed monitoring framework is set out below. It is based on the established 'objectives, policies, targets and indicators' approach to monitoring, which involves defining strategic objectives and developing these into policies before setting policy targets and indicators to determine if the policies are achieving their objectives or having unintended consequences.

6.8 We have already defined our strategic objectives (Section 3.0) and developed these into core policies (Section 4.0) including targets where applicable. In the monitoring framework below we set out the indicators that will be used to measure progress.

6.9 The framework considers each core policy in turn, highlights its aims and objectives and where applicable any specific targets. It then considers how the policy relates to the SA objectives set out in our Sustainability Appraisal (SA) Scoping Report[1] as well as any other relevant national, regional and local objectives e.g. from the Regional Waste Strategy (2004).

6.10 It then sets out the indicators that will be used to measure the impact that policies are having. Four different types of indicator are included:

- Contextual Indicators (provide general background information on all key changes taking place in the area).
- Core Output Indicators (a nationally agreed set of indicators intended to measure the direct effect of each policy). Currently taken from Core Output Indicators – Update 2/2008 (CLG).
- Local Output Indicators (a locally agreed set of indicators intended to measure the direct effect of each policy).
- Significant Effect Indicators (show the effects that policies are having on the goals/objectives set out in the Sustainability Appraisal).

6.11 The framework also identifies the various sources of data and the organisation/s responsible for monitoring.

6.12 The framework will form the basis of future monitoring arrangements and the results will be published no later than December each year through the Council's Annual Monitoring Report (AMR)[2]. The monitoring of waste data will need to be considered through the AMR as appropriate. In particular any processes as outlined in paragraph 3.32a need to considered very carefully ensuring that the development plan remains up to date.

6.13 This will provide a transparent assessment of the degree to which the WCS and its core policies are achieving their objectives or having unintended consequences.

6.14 Where monitoring suggests that policies need to be revised or replaced this will be carried out through future stakeholder consultation and subsequent revisions to the WCS.

[1] See www.gloucestershire.gov.uk/sustainabilityappraisal
[2] See www.gloucestershire.gov.uk/amr

Reduction		
Policy		**WCS1 – Waste Reduction**
Policy Aims, Objectives and Targets		The policy seeks to ensure that the waste associated with the construction and ongoing occupation of new development is minimised as far as possible. All 'major' development must be supported by a Waste Minimisation Statement (WMS). The target is therefore to ensure that 100% of major developments are supported by a WMS. The policy also aims to ensure that awareness of waste reduction is raised to achieve a positive change in attitude and behaviour with regard to waste reduction. The WCS vision includes as an aim zero-growth in waste production by 2020.
Relevant SA objectives		Broad SA Objectives 4. To promote education and economic development in Gloucestershire giving opportunities to people from all social and ethnic backgrounds. Derived from this objective is a site focused objective which seeks: To educate the public about waste issues and to maximise community participation and access to waste services and facilities in Gloucestershire. 14. To reduce waste to landfill and in dealing with all waste streams to actively promote the waste hierarchy to achieve the sustainable management of waste. 15. To reduce contributions to and to adapt to climate change. Derived from this objective is a site focused objective which seeks: To reduce the global use of primary materials and minimise net energy balance requirements.
Other Relevant Aims, Objectives and Targets	International & National	National Waste Strategy - To reduce the amount of household waste not re-used, recycled or composted from over 22.2 million tonnes in 2000 by 29% to 15.8 million tonnes in 2010 with an aspiration to reduce it to 12.2 million tonnes in 2020 – a reduction of 45%. This is equivalent to a fall of 50% per person (from 450 kg per person in 2000 to 225 kg in 2020).
	Regional[3]	Regional Waste Strategy - by 2020 all business will have a waste minimisation and recycling action plan. The South West Region will become a minimum waste producer by 2030, with business and households maximising opportunities for reuse and recycling.
	Local[4]	Reduce the amount of waste sent to landfill, incineration, energy recovery and maximising the waste reused, recycled and composted – (currently within Local Area Agreement (LAA)). Sustainable Community Strategy (SCS) - to manage waste in a sustainable way. Gloucestershire Joint Municipal Waste Management Strategy (JMWMS) - to reduce Gloucestershire's municipal waste by addressing waste generation at the household level and further up the supply chain. From 2007 to visit a minimum of 50 schools per year. To reduce the growth of Gloucestershire's municipal waste arisings to zero by 2020.
Baseline Position[5]		The total amount of waste managed in Gloucestershire for the base years 2008 and 2009/10 was 1,183,000 tonnes.
Indicators	National[6]	~~Core Output Indicator W2: Amount of municipal waste arising, and managed by management type by waste planning authority.~~ ~~Residual household waste per household. (currently National Indicator (NI) 191)~~ ~~Percentage of household waste sent for reuse, recycling and composting (currently NI 192).~~
	Local	Number of 'major development' applications that include a Waste Minimisation Statement.

[3] The Regional Spatial Strategy (RSS) is proposed to be abolished but the Regional Waste Strategy (RWS) remains a valid material consideration.
[4] Includes Local Area Agreement (currently running 2008-2011 and any replacement that may be reported locally to the Gloucestershire Strategic Partnership), Sustainable Community Strategy (SCS) and Joint Municipal Waste Management Strategy.
[5] Includes relevant Contextual Indicators.
[6] ~~Includes Core Output Indicators and National Indicators (198).~~

		Number of educational/promotional visits/exhibitions carried out per annum. Total amount of waste arising in Gloucestershire.
	Significant Effect	~~Per capita reduction in CO_2 emissions in the LA area (largely reported through District Councils AMRs) (currently NI 186).~~
Data Sources		GCC District Councils Annual Monitoring Report (AMR)
Monitoring Body		GCC District Councils
Recycling and Composting		
Policy		**WCS2 – Recycling & Composting~~/Anaerobic Digestion (including Bulking and Transfer)~~**
Policy Aims, Objectives and Targets		The aim of the policy is to provide a framework that will allow proposals relating to the development of new and expanded recycling~~,~~ and composting~~, anaerobic digestion, bulking and transfer~~ facilities including businesses that process recyclates and re-use waste, to be determined. The provision of additional facilities will help the Council to achieve its target of at least 60% household recycling and composting by 2020 and help to facilitate the delivery of other objectives including the diversion of MSW and C&I waste from landfill. The policy also supports proposals relating to the development of markets for recycled materials. ~~The policy will also help to deliver the Council's Landfill Allowance Trading Scheme (LATS) requirements to 2020.~~
Relevant SA objectives		Broad SA Objectives 5. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development. 12. To reduce the adverse impacts of lorry traffic on communities through means such as: a) reducing the need to travel b) promoting more sustainable means of transport e.g. by rail or water c) sensitive lorry routing d) the use of sustainable alternative fuels e) promoting the management of waste in one of the nearest appropriate installations. 14. To reduce waste to landfill and in dealing with all waste streams to actively promote the waste hierarchy to achieve the sustainable management of waste. 15. To reduce contributions to and to adapt to climate change. Derived from this objective is a site focused objective which seeks: To reduce the global use of primary materials and minimise net energy balance requirements.
Other Relevant Aims, Objectives and Targets	International & National	EU Landfill Directive: By 2010 the biodegradable waste landfilled must be reduced to 75% of that produced in 1995. By 2013 the biodegradable waste landfilled must be reduced to 50% of that produced in 1995. By 2020 the biodegradable waste landfilled must be reduced to 35% of that produced in 1995. National Waste Strategy (2007): Household waste recycling and composting: at least 40% by 2010, 45% by 2015 and 50% by 2020.
	Regional	Regional Waste Strategy - by the year 2020 over 45% of waste is recycled and re-used and less than 20% of waste produced in the region will be landfilled.
	Local	Reduce the amount of waste sent to landfill, incineration, energy recovery and maximising the waste reused, recycled and composted – (currently within Local Area Agreement (LAA)).

		SCS - to manage waste in a sustainable way. JMWMS – minimum household recycling & composting rate of 40% by 2009/10, 50% by 2014/15 and 60% by 2019/20. Achieve an average participation rate of 80% in recycling & composting collection schemes.
Baseline Position[7]		In 2009/10, the county average household recycling and composting rate was 42%. There are currently ~~four~~ five commercial-scale composting facilities in Gloucestershire with a total capacity of ~~113,000~~ 149,000 tonnes per year. There are six household recycling centres (HRCs) with a total capacity of 66,299 tonnes per year. There is also additional recycling capacity at other bulking, transfer and C&I facilities within the county.
Indicators	National	~~Core Output Indicator W1: capacity of new waste management facilities by waste planning authority.~~ ~~Percentage of household waste sent for reuse, recycling and composting (currently NI 192).~~ ~~Percentage of municipal waste landfilled (currently NI 193).~~
	Local	Total available recycling/composting capacity. Number of new/expanded recycling and composting~~/AD~~ facilities permitted per year. Number of planning applications refused on the basis of Policy WCS2. Number of 'strategic' composting and recycling facilities permitted inside and outside 'Zone C' per year. Number of recyclates 're-processing' facilities in Gloucestershire.
	Significant Effect	~~Per capita reduction in CO_2 emissions in the LA area (largely reported through District Councils AMRs) (currently NI 186).~~ ~~Overall/general satisfaction with local area (currently NI 005).~~ Number of people employed in waste-related activities.
Data Sources		GCC Annual Monitoring Report (AMR)
Monitoring Body		GCC
Policy		**WCS3 – Inert Waste Recycling and Recovery**
Policy Aims, Objectives and Targets		The policy provides a framework against which to consider proposals relating to the development of inert waste recycling and recovery facilities. The aim is to divert around 85,000 tonnes per year of inert waste (largely construction and demolition waste) from landfill.
Relevant SA objectives		Broad SA Objectives 5. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development. 12. To reduce the adverse impacts of lorry traffic on communities through means such as: a) reducing the need to travel. b) promoting more sustainable means of transport e.g. by rail or water. c) sensitive lorry routing. d) the use of sustainable alternative fuels. e) promoting the management of waste in one of the nearest appropriate installations. 13. To restore mineral sites to a high standard in order to achieve the maximum after use benefits including the conservation and enhancement of biodiversity. 14. To reduce waste to landfill and in dealing with all waste streams to actively promote the waste hierarchy to achieve the sustainable management of waste.
Other Relevant	International &	National Waste Strategy - to halve the amount of construction, demolition and excavation wastes going to landfill by

[7] Includes relevant Contextual Indicators

Aims, Objectives and Targets	National	2012. National and Regional Guidelines for Aggregates Provision (2005-2020) published June 2009 includes a target of 65 million tonnes per annum of secondary/recycled materials in the south west by 2015.
	Regional	Regional Waste Strategy – to make better use of inert waste materials, particularly construction and demolition waste, to substitute for primary aggregates. Waste development plans will make provision for facilities to maximise the reuse recycling and composting of C&D waste. The reuse, and recycling of C&D waste will be encouraged to reduce the need for primary aggregates.
	Local	SCS - to manage waste in a sustainable way. Reduce the amount of waste sent to landfill, incineration, energy recovery and maximising the waste reused, recycled and composted – (currently within Local Area Agreement (LAA)).
Baseline Position[8]		In 2008 a total of 293,000 tonnes of construction and demolition waste was managed in Gloucestershire. Of this, about 211,000 tonnes was either went to landfill, or was used for landraise or was treated (e.g. concrete being crushed and screened and then used in construction for low grade aggregate). There are 28 permanent inert waste facilities for recycling and recovery. This includes transfer, treatment, crushing, screening and storage with a total capacity of 504,000 tonnes per year.
Indicators	National	~~Core Output Indicator M2: production of secondary and recycled aggregates by mineral planning authority.~~ ~~W1: Capacity of new waste management facilities by waste planning authority.~~
	Local	Percentage of C&D waste transferred for recycling, reprocessing, for use in land reclamation and landscaping or sent for disposal to landfill. Number of proposals for permanent inert recycling and recovery facilities permitted per year. Number of proposals for temporary inert recycling and recovery facilities permitted per year. Number of 'strategic' scale permanent inert recycling and recovery facilities permitted outside 'Zone C' per year.
	Significant Effect	~~Overall/general satisfaction with local area. (currently NI 005).~~ Number of people employed in waste-related activities.
Data Sources		GCC Annual Monitoring Report (AMR)
Monitoring Body		GCC
Policy		**WCS3a –Anaerobic Digestion**
Policy Aims, Objectives and Targets		The aim of the policy is to provide a framework against which proposals for new and expanded anaerobic digestion facilities can be determined. The provision of additional AD facilities will compliment the provision of new and expanded recycling and composting facilities in the county and will help to divert organic waste such as kitchen waste from landfill. This in turn will help the Council to achieve its Landfill Allowance Trading Scheme (LATS) requirements to 2020. The provision of new or expanded AD facilities also offers the potential to generate renewable energy in the form of biogas which can be used to generate heat and electricity through combined heat and power (CHP) or turned into 'biomethane' and used as a vehicle fuel or injected into the mains gas grid.
Relevant SA objectives		Broad SA Objectives 5. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development.

[8] Includes relevant Contextual Indicators

		e) promoting the management of waste in one of the nearest appropriate installations. 14. To reduce waste to landfill and in dealing with all waste streams to actively promote the waste hierarchy to achieve the sustainable management of waste. 15. To reduce contributions to and to adapt to climate change. Derived from this objective is a site focused objective which seeks: To reduce the global use of primary materials and minimise net energy balance requirements.
Other Relevant Aims, Objectives and Targets	International & National	EU Landfill Directive: By 2010 the biodegradable waste landfilled must be reduced to 75% of that produced in 1995. By 2013 the biodegradable waste landfilled must be reduced to 50% of that produced in 1995. By 2020 the biodegradable waste landfilled must be reduced to 35% of that produced in 1995. Climate Change Act: To reduce UK CO_2 emissions by at least 26% by 2020 and all UK greenhouse gas emission by at least 80% by 2050. EU Renewable Energy Directive: Requires the UK to source 15% of its energy from renewable sources by 2020. Anaerobic Digestion – Shared Goals (DEFRA 2009): By 2020 anaerobic digestion will be an established technology in this country, making a significant and measurable contribution to our climate change and wider environmental objectives. Climate Change Task Force Greenhouse Gas Action Plan: Significant increase in the take-up of on-farm anaerobic digestion, with the aim of 20% of manures being used in such plants.
	Regional	Regional Waste Strategy - by the year 2020 over 45% of waste is recycled and re-used and less than 20% of waste produced in the region will be landfilled. Regional Spatial Strategy although proposed to be abolished, requires that by 2020, at least 310,000 tonnes of waste per year is 'source separated' (including separated organic materials sent direct to composting and anaerobic digestion systems).
	Local	Reduce the amount of waste sent to landfill, incineration, energy recovery and maximising the waste reused, recycled and composted – (currently within Local Area Agreement (LAA)). SCS - to manage waste in a sustainable way. JMWMS – minimum household recycling & composting rate of 40% by 2009/10, 50% by 2014/15 and 60% by 2019/20. Achieve an average participation rate of 80% in recycling & composting collection schemes.

Baseline Position[9]		There are currently no operational AD facilities in Gloucestershire treating MSW or C&I waste. There is permission for an MSW AD facility at Rose Hill Farm in Dymock, but this is not yet operational. There is also permission for a small AD facility at Stanley's Quarry in the Cotswolds, but this is for agricultural waste. Additionally some AD processes are undertaken at Hayden and Netheridge Sewage Treatment Works and the Unilever factory in Gloucester.
Indicators	National	~~Core Output Indicator W1: capacity of new waste management facilities by waste planning authority.~~ ~~Percentage of household waste sent for reuse, recycling and composting (currently NI 192).~~ ~~Percentage of municipal waste landfilled (currently NI 193).~~
	Local	Total available AD capacity. Total available AD capacity for agricultural waste. Total available AD capacity for sewage sludge. Number of new/expanded AD facilities permitted per year. Number of planning applications refused on the basis of Policy WCS3a. Number of 'strategic' AD facilities permitted inside and outside 'Zone C' per year. Renewable energy generation.
	Significant Effect	~~Per capita reduction in CO_2 emissions in the LA area (largely reported through District Councils AMRs) (currently NI 186).~~ ~~Overall/general satisfaction with local area (currently NI 005).~~ Number of people employed in waste-related activities.
Data Sources		GCC Annual Monitoring Report (AMR)
Monitoring Body		GCC

[9] Includes relevant Contextual Indicators

Other Recovery (including Energy Recovery)		
Policy		**WCS4 – Other Recovery (including Energy Recovery)**
Policy Aims, Objectives and Targets		The policy aims to ensure the provision of sufficient residual waste recovery capacity to deal with ~~around 150,000~~ up to 145,000 tonnes per year of residual waste. Provision of other waste recovery capacity will also contribute towards the diversion of ~~between 143,000 and 193,000~~ up to 73,000 tonnes of commercial and industrial waste from landfill per year. The policy includes four 'strategic' site allocations to help ensure sufficient other recovery capacity is made available. The policy allows for non-strategic proposals to come forward where relevant criteria can be met.
Relevant SA objectives		Broad SA Objectives 3. To protect and improve the health and well-being of people living and working in Gloucestershire as well as visitors to the County. 5. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development. 8. To protect, conserve and enhance Gloucestershire's wildlife and natural environment – its landscape and biodiversity. Derived from this objective is an objective which seeks: To protect, conserve and enhance the landscape in Gloucestershire. 11. To prevent the pollution of land, air and water in Gloucestershire and to apply the precautionary principle. Derived from this objective are 4 site focused objectives as follows: To prevent pollution and to apply the precautionary principle in consultation with waste regulation authorities. To protect and enhance soil / land quality in Gloucestershire. To protect and enhance air quality in Gloucestershire. To protect and enhance water quality in Gloucestershire. 12. To reduce the adverse impacts of lorry traffic on communities through means such as: a) reducing the need to travel. b) promoting more sustainable means of transport e.g. by rail or water. c) sensitive lorry routing. d) the use of sustainable alternative fuels. e) promoting the management of waste in one of the nearest appropriate installations. 14. To reduce waste to landfill and in dealing with all waste streams to actively promote the waste hierarchy to achieve the sustainable management of waste. 15. To reduce contributions to and to adapt to climate change. Derived from this objective is a site focused objective which seeks: To reduce the global use of primary materials and minimise net energy balance requirements.
Other Relevant Aims, Objectives and Targets	International & National	National Waste Strategy (2007) - recovery of municipal waste – 53% by 2010, 67% by 2015 and 75% by 2020. Energy from waste is expected to account for 25% of municipal waste by 2020. ~~Landfill Allowance Trading Scheme (LATS) requirements for Gloucestershire to 2020 i.e. permitted landfill of 50,069 tonnes per annum.~~
	Regional	Regional Waste Strategy – to reuse, recycle and recover value from the maximum practicable amount of waste that is produced. By 2020, value should be recovered from the residual municipal waste by mechanical, biological or thermal treatment or a combination of these processes, having regard to the waste hierarchy. Waste development plans should make provision for sufficient facilities for treatment of this proportion of waste arisings. Waste development plans should make provision for facilities to recover value from an additional 39% of anticipated commercial and industrial waste by means of

		mechanical, biological or thermal treatment or a combination of these processes by 2020. Development plans should encourage the provision of waste management facilities which are capable of dealing with more than one waste stream where the waste is of similar nature.
	Local	SCS - to manage waste in a sustainable way. Reduce the amount of waste sent to landfill, incineration, energy recovery and maximising the waste reused, recycled and composted – (currently within Local Area Agreement (LAA)).
Baseline Position[10]		There are currently very few 'other recovery' waste management facilities in Gloucestershire. There are few recovery facilities for MSW and limited capacity for C&I waste. Due in part to this lack of facilities, in 2008, 57.5% of MSW and 83.7% of C&I waste was sent to landfill.
Indicators	National	~~Core Output E3: Renewable energy generation.~~ ~~Percentage of municipal waste landfilled (currently NI 193).~~
	Local	Amount of residual waste recovery capacity for MSW and C&I waste. Total amount and percentage of C&I waste and MSW 'treated' through 'other recovery' waste management processes per year. Installed capacity of new renewable energy systems. (currently LAA: LI 21) Percentage of renewable energy sourced from the by-products of waste management. Number of facilities developed on strategic sites allocated in the WCS. Number of 'strategic' scale residual waste recovery facilities permitted within and outside 'Zone C' per year. Number of 'non-strategic' residual waste recovery facilities permitted within and outside 'Zone C' per year.
	Significant Effect	Air quality. Household recycling and composting rate. ~~Per capita reduction in CO_2 emissions in the LA area. (currently NI 186)~~ Levels of NO_2 and other pollutants from road traffic. Landfill void capacity.
Data Sources		Annual Monitoring Report (AMR) GCC
Monitoring Body		GCC

[10] Includes relevant Contextual Indicators

Policy		WCS5 – Waste Water
Policy Aims, Objectives and Targets		The policy provides a framework against which proposals for new or expanded waste water treatment facilities will be considered. The aim is to ensure that proposals are only permitted where needed to serve existing or proposed development or in the interests of Gloucestershire's waste water management provided the need outweighs any impact and that any impact can be mitigated. Particular support will be given to proposals that utilise Anaerobic Digestion (AD). No specific sites are allocated or targets identified because at this stage Gloucestershire's waste water treatment capacity requirements are unknown due to lack of certainty over the future location and quantum of growth.
Relevant SA objectives		Broad SA Objectives 5. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development. 8. To protect, conserve and enhance Gloucestershire's wildlife and natural environment – its landscape and biodiversity. Derived from this objective is an objective which seeks: To ensure that waste sites have the potential for adequate screening and/or innovative design to be incorporated. 11. To prevent the pollution of land, air and water in Gloucestershire and to apply the precaution principle. Derived from this objective is an objective which seeks: To protect and enhance water quality in Gloucestershire. 12. To reduce the adverse impacts of lorry traffic on communities through means such as: a) reducing the need to travel. b) promoting more sustainable means of transport e.g. by rail or water. c) sensitive lorry routing. d) the use of sustainable alternative fuels. e) promoting the management of waste in one of the nearest appropriate installations. 15. To reduce contributions to and to adapt to climate change. Derived from this objective is a site focused objective which seeks: To reduce the global use of primary materials and minimise net energy balance requirements.
Other Relevant Aims, Objectives and Targets	International & National	Future Water – The Government's Water Strategy for England - water companies will seek to ensure that at least 20% of all energy used by the UK water industry comes from renewable sources by 2020.
	Regional	N/a although the RSS Proposed Changes (2008) included Policy RE6 which stated that local authorities must ensure that rates of planned development do not exceed the capacity of existing water supply and wastewater treatment systems and do not proceed ahead of essential planned improvements to these systems.
	Local	More resilient communities (currently LAA Outcome 13). SCS - To manage waste in a sustainable way. A key consideration will be the quantum and location of housing and employment growth yet to be determined through District Council Core Strategies and the associated infrastructure requirements identified through that
Baseline Position[11]		There are currently 84 operational waste water treatment facilities in Gloucestershire. The two major facilities are Netheridge west of Gloucester City Centre and Hayden, south west of Cheltenham. Both of these major facilities have Anaerobic Digestion (AD) on-site allowing for energy generation used on site and exported to the national grid.
	National	~~E3: Renewable energy generation.~~

[11] Includes relevant Contextual Indicators

Indicators		~~W1: Capacity of new waste management facilities by waste planning authority.~~
	Local	Total number of waste water treatment facilities in Gloucestershire. Number of new or expanded waste water treatment facilities permitted per year. ~~Installed capacity of new renewable energy systems associated with waste water proposals (LI 21).~~ Percentage of renewable energy sourced from the by-products of waste management. Energy capacity in mega watts from renewable energy facilities associated with waste water treatment in Gloucestershire and the % this represents of total renewable energy capacity in Gloucestershire.
	Significant Effect	~~Per capita reduction in CO_2 emissions in the LA area (currently NI 1860.~~ Water quality. ~~Overall/general satisfaction with local area (currently NI 005).~~
Data Sources		Annual Monitoring Report (AMR) GCC Water Utility Companies
Monitoring Body		GCC
Disposal		
Policy		**WCS6 – Hazardous Waste**
Policy Aims, Objectives and Targets		The policy aims to provide a policy framework to determine hazardous waste proposals that would help move the management of hazardous waste up the waste hierarchy. The policy does not make any specific site allocations or include any specific targets.
Relevant SA objectives		<u>Broad SA Objectives</u> 3. To protect and improve the health and well-being of people living and working in Gloucestershire as well as visitors to the county. 5. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development. 10. To ensure that waste sites have the potential for adequate screening and / or innovative design to be incorporated. 11. To prevent the pollution of land, air and water in Gloucestershire and to apply the precautionary principle. 14. To reduce waste to landfill and in dealing with all waste streams to actively promote the waste hierarchy (i.e. Prevent, Reduce, Reuse, Recycle, Recover, Dispose) to achieve the sustainable management of waste.
Other Relevant Aims, Objectives and Targets	International & National	National Waste Strategy (2007) key objective – to secure the investment in infrastructure needed to divert waste from landfill and for the management of hazardous waste. The Government will continue to pursue policies which lead to reductions in hazardous waste arisings. DEFRA Hazardous Waste Policy Statement (2010) - Hazardous waste should be managed by waste producers and waste managers in accordance with the EU waste hierarchy.
	Regional	Regional Waste Strategy - Waste streams that are hazardous or costly to recycle will be phased out and replaced by new clean materials that can be reused/ recycled effectively.
	Local	SCS - to manage waste in a sustainable way. Reduce the amount of waste sent to landfill, incineration, energy recovery and maximising the waste reused, recycled and composted – (currently within Local Area Agreement (LAA)).

Baseline Position[12]		The amount of hazardous waste produced in Gloucestershire in 2008 was 38,000 tonnes. The total managed in the County in 2008 was 90,000 tonnes due to some waste being imported. Most of the managed total (94.5%) was disposed of at the specialist landfill at Wingmoor Farm (East) near Bishop's Cleeve. Additionally a number of the County's waste transfer stations, household recycling centres and End of Life Vehicle (ELV) dismantlers handle small tonnages of hazardous wastes such as oils, lubricants and asbestos.
Indicators	National	~~Core Output Indicator W1: Capacity of new waste management facilities by waste planning authority.~~
	Local	Total amount of hazardous waste arising in Gloucestershire. Total amount of hazardous waste managed in Gloucestershire. Percentage of hazardous waste managed in Gloucestershire sent to landfill versus that which is recovered including recycling.
	Significant Effect	Air quality. Landfill void capacity. ~~Overall/general satisfaction with local area (currently NI 005).~~
Data Sources		Annual Monitoring Report (AMR) GCC Environment Agency
Monitoring Body		GCC
Policy		**WCS6a – Landfill**
Policy Aims, Objectives and Targets		The policy aims to ensure that the required capacity for landfill in the County can be met. This policy does not encourage landfill but provides a mechanism for landfills sites to come forward if there is a need for them.
Relevant SA objectives		Broad SA Objectives 5. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development. 11. To prevent pollution of land, air and water in Gloucestershire and to apply the precautionary principle. 12. To reduce the adverse impacts of lorry traffic on communities through means such as: a) reducing the need to travel b) promoting more sustainable means of transport c) sensitive lorry routing d) the use of sustainable alternative fuels e) promoting the management of waste in one of the nearest appropriate installations. 14. To reduce waste to landfill and in dealing with all waste streams to actively promote the waste hierarchy (i.e. Prevent, Reduce, Reuse, Recycle, Recover, Dispose) to achieve the sustainable management of waste.
Other Relevant Aims, Objectives and Targets	International & National	Landfill Directive Targets for Biodegradable Waste – 75% of that produced in 1995 by 2010, 50% of that produced in 995 by 2013 and 35% of that produced in 1995 by 2020. Landfill tax rates 2011-2012 - Standard rate for active waste: £56 per tonne (2011/2012) - will rise to £64 per tonne in April 2012.
	Regional	RSS Proposed Changes – Policy W1 - Municipal Waste Minimum Landfill Capacity 160 000 tpa, C&I capacity 285-315 000tpa
	Local	Reduce the amount of waste sent to landfill, incineration, energy recovery and maximising the waste reused, recycled and composted (currently within the LAA)

[12] Includes relevant Contextual Indicators

Baseline Position[13]		There are currently three operational non hazardous landfill facilities and one hazardous landfill within the County. The Waste Data Paper 2010 identified 6,029,500m² of non hazardous landfill and 1,206,200m² of hazardous landfill capacity.
Indicators	Local	Amount of landfill capacity. Number of landfill applications permitted. The number of applications where the 'county's needs' was used a refusal reason.
	Significant Effect	Landfill void capacity. Total waste management capacity.
Data Sources		Annual Monitoring Report (AMR) GCC
Monitoring Body		GCC
Minimising Impact		
Policy		**WCS7 – Cumulative Impact**
Policy Aims, Objectives and Targets		The policy aims to provide a policy framework to determine whether proposals for waste related development on or in close proximity to an existing waste management site will have an unacceptable 'cumulative' impact on the local community and environment with regard to issues such as noise, smell, traffic, dust etc. The policy does not include any specific targets.
Relevant SA objectives		Broad SA Objectives 3. To protect and improve the health and well-being of people living and working in Gloucestershire as well as visitors to the county. 5. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development. 11.To prevent the pollution of land, air and water in Gloucestershire and to apply the precautionary principle. Derived from this objective are 4 site focused objectives as follows: To prevent pollution and to apply the precautionary principle in consultation with waste regulation authorities. To protect and enhance soil / land quality in Gloucestershire. To protect and enhance air quality in Gloucestershire. To protect and enhance water quality in Gloucestershire. 12. To reduce the adverse impacts of lorry traffic on communities through means such as: a) reducing the need to travel. b) promoting more sustainable means of transport e.g. by rail or water. c) sensitive lorry routing. d) the use of sustainable alternative fuels. e) promoting the management of waste in one of the nearest appropriate installations.
Other Relevant Aims, Objectives and Targets	International & National	PPS10 - In deciding which sites and areas to identify for waste management facilities, waste planning authorities should assess their suitability for development against a number of criteria including 'the cumulative effect of previous waste disposal facilities on the well-being of the local community, including any significant adverse impacts on environmental quality, social cohesion and inclusion or economic potential'.
	Regional	-

[13] Includes relevant Contextual Indicators

	Local	SCS - we do not compromise the quality of life for future generations. Our environment is central to our quality of life and we take action year-on-year to enhance, protect and cherish it.
Baseline Position[14]		The total amount of managed waste in the base years 2008 and 2009/10 was 1,183,000 tonnes. This waste is managed at a number of facilities including 3 non-hazardous landfills, 1 hazardous landfill, 6 household recycling centres, 22 waste transfer stations, 34 ELV/metal facilities, 7 composting facilities, 2 treatment facilities, 19 inert disposal sites, 29 C&D waste management sites, 2 aggregate recycling sites, 2 clinical waste transfer, 1 clinical waste treatment, 1 radioactive waste storage facility, 2 major sewage treatment works, 1 storage facility for road planings etc. and 2 'other' facilities (metal drum recycling etc).
Indicators	National	~~Core Output Indicator W1: Capacity of new waste management facilities by waste planning authority.~~
	Local	Number and % of waste related proposals permitted on existing waste management sites per annum. Number and % of proposals where cumulative impact was cited as a reason for refusal.
	Significant Effect	Air quality. ~~Overall/general satisfaction with local area (currently NI 005).~~
Data Sources		Annual Monitoring Report (AMR) GCC
Monitoring Body		GCC
Policy		**WCS8 – Safeguarding Sites for Waste Management**
Policy Aims, Objectives and Targets		The aim of the policy is to safeguard existing waste management facilities/capacity and proposed (allocated) sites for waste management, from other uses that would affect or be affected by, those sites. Proposals that would prejudice the use of these sites for waste management will be resisted. A list of current waste sites will be produced alongside the Council's monitoring report.
Relevant SA objectives		Broad SA Objectives 1. To promote sustainable development and sustainable communities in Gloucestershire giving people the opportunity to live in an affordable and sustainably designed and constructed home. 2. To safeguard sites suitable for the location of waste management facilities or future mineral development from other proposed development. 10. To prevent flooding, in particular preventing inappropriate development in the floodplain and to ensure that development does not compromise sustainable sources of water supply. 15. To reduce contributions to and to adapt to climate change. Derived from this objective is a site focused objective which seeks: To reduce the global use of primary materials and minimise net energy balance requirements. Additionally another site focused objective seeks: To reduce contributions to and to adapt to climate change.
Other Relevant Aims, Objectives	International & National	PPS10 states that 'In determining planning applications, all planning authorities should, where relevant, consider the likely impact of proposed, non-waste related, development on existing waste management facilities, and on sites and areas

[14] Includes relevant Contextual Indicators.

and Targets		allocated for waste management. Where proposals would prejudice the implementation of the waste strategy in the development plan, consideration should be given to how they could be amended to make them acceptable or, where this is not practicable, to refusing planning permission.
	Regional	-
	Local	SCS - to manage waste in a sustainable way. To make concerted local efforts to address climate change and deal with the consequences. Protecting the natural and built environment in the face of climate change and the challenges posed by economic growth (including housing, traffic, and waste management). Reduce the amount of waste sent to landfill, incineration, energy recovery and maximising the waste reused, recycled and composted & more resilient communities – (currently within Local Area Agreement (LAA)).
Baseline Position[15]		The total amount of managed waste in the base years 2008 and 2009/10 was 1,183,000 tonnes. This waste is managed at a number of facilities including 3 non-hazardous landfills, 1 hazardous landfill, 6 household recycling centres, 22 waste transfer stations, 34 ELV/metal facilities, 7 composting facilities, 2 treatment facilities, 19 inert disposal sites, 29 C&D waste management sites, 2 aggregate recycling sites, 2 clinical waste transfer, 1 clinical waste treatment, 1 radioactive waste storage facility, 2 major sewage treatment works, 1 storage facility for road planings etc. and 2 'other' facilities (metal drum recycling etc).
Indicators	National	Core Output Indicator W1: Capacity of new waste management facilities by waste planning authority.
	Local	Number and % of non-waste developments permitted on existing waste management sites. Number and % of non-waste developments permitted on proposed (allocated) waste sites. Number and % of proposals where impact on an existing or proposed waste management facility was cited as a reason for refusal .
	Significant Effect	~~Overall/general satisfaction with local area (currently NI 005).~~ Achievement of housing and employment provision targets established through LDF process.
Data Sources		Annual Monitoring Report (AMR) District Councils GCC
Monitoring Body		GCC

[15] Includes relevant Contextual Indicators

Policy		WCS9 – Flood Risk
Policy Aims, Objectives and Targets		The aim of the policy is to ensure that waste related development is not at risk of flooding and does not exacerbate the risk of flooding elsewhere. The sequential test will be applied with preference given to proposals within low risk flood areas. The design of all new development will be required to take account of current and potential future flood risk both on and off-site. The policy does not include any specific targets.
Relevant SA objectives		<u>Broad SA Objectives</u> 1. To promote sustainable development and sustainable communities and to protect and improve the health and well-being of people living and working in Gloucestershire as well as visitors to the county. 5. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development. 10. To prevent flooding, in particular preventing inappropriate development in the floodplain and to ensure that development does not compromise sustainable sources of water supply. 15. To reduce contributions to and to adapt to climate change.
Other Relevant Aims, Objectives and Targets	International & National	Making Space for Water – To manage the risks from flooding and coastal erosion by employing an integrated portfolio of approaches which reflect both national and local priorities. Future Water (Government's Water Strategy for England) - sustainable delivery of secure water supplies and an improved and protected water environment. Vision for 2030 includes; more adaptable drainage systems delivering reduced flood risk and better management of surface water drainage and consistent and holistic management of urban flood risk, with strategic planning, partnerships of responsible bodies and clear understanding of various flood risk responsibilities.
	Regional	N/a although the RSS (Proposed Changes) which is proposed to be abolished requires the use of sustainable drainage systems to minimise flood risk, and, taking account of climate change and the increasing risk of flooding (coastal and river) the priority is to defend existing properties, and where possible locate new development into places with little or no risk of flooding, protect floodplains, follow a sequential approach to development in flood risk areas, use development to reduce the risk of flooding and identify opportunities for managed realignment to reduce the risk of flooding and create new wildlife areas.
	Local	SCS - to manage waste in a sustainable way. To make concerted local efforts to address climate change and deal with the consequences. Protecting the natural and built environment in the face of climate change and the challenges posed by economic growth (including housing, traffic, and waste management). More resilient communities (currently LAA - Outcome 13).
Baseline Position[16]		The County is drained predominantly by the lower reaches of the River Severn, which flows through the centre of Gloucestershire from the north east to the south west. The Cotswold Hills to the east of the county and the upland areas of the Forest of Dean to the west form the Severn's catchment boundary; areas which are in sharp contrast to the lowland river valley. To the south east of the Cotswold Hills the prevalent catchment is the River Thames catchment, which drains the majority of the Cotswold District. Almost 11,000 properties in Gloucestershire are at risk of river flooding from a 1-in-100 year event. The most recent major flood event was in 2007 with the following numbers of properties affected in each District; 1,831 in Tewkesbury Borough, 965 in Gloucester City, 900 in Cotswold District, 623 in Cheltenham Borough, 200 in Stroud

[16] Includes relevant Contextual Indicators

		District and 93 in Forest of Dean District.
Indicators	National	~~Core Output Indicator E1: Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.~~
	Local	The number and % of waste permissions located upon designated floodplain land per annum. The number and % of waste refusals where the floodplain and safeguarding water supplies acted as part of the reason for the refusal per annum. Number and % of waste management proposals incorporating sustainable drainage measures per annum.
	Significant Effect	~~Overall/general satisfaction with local area (currently NI 005).~~ Total waste management capacity.
Data Sources		Annual Monitoring Report (AMR) GCC Development Management Environment Agency (EA)
Monitoring Body		GCC
Policy		**WCS10 – Green Belt**
Policy Aims, Objectives and Targets		The aim of the policy is to safeguard the Gloucester – Cheltenham Green Belt from inappropriate development that would compromise the objectives of the designation. Waste related development within the Green Belt will only be permitted where specified criteria can be met and 'very special circumstances' are demonstrated. The policy does not include any specific targets. The policy also acknowledges potential future revisions to the Green Belt and the possibility of defining inset sites for existing and proposed waste management sites within the Green Belt.
Relevant SA objectives		Broad SA Objectives 8. To protect, conserve and enhance Gloucestershire's wildlife and natural environment – its landscape and biodiversity. 9. To protect, conserve and enhance Gloucestershire's material, cultural and recreational assets including its architectural and archaeological heritage.
Other Relevant Aims, Objectives and Targets	International & National	~~PPG2~~NPPF (Section 9: Green Belts) - maintains the presumption against inappropriate development within Green Belts. Green Belt policies in development plans should ensure that any planning applications for inappropriate development would not be in accord with the plan. With suitable safeguards, the re-use of buildings should not prejudice the openness of Green Belts. ~~Local planning authorities should include in their development plans policies for the re-use of buildings in Green Belts.~~ PPS10: Planning for Sustainable Waste Management – planning strategies should protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications.
	Regional	Regional Waste Strategy – recognises the potential constraints arising from Green Belt and other national designations such as AONB in finding waste management sites close to the sources of the waste arising. The draft RSS (Proposed Changes) which is proposed to be abolished, states that where the general extent of the Green Belt is changed, detailed boundaries will be set in the relevant Local Development Frameworks. In relation to Gloucestershire it states that the green belt will continue to maintain the separate identities of Cheltenham and Gloucester by keeping land open between them. However, necessary provision for new homes and to fulfil Gloucester and Cheltenham's economic

		potential cannot be met within the existing urban areas.
	Local	More resilient natural & built environment (currently within LAA). SCS – to manage waste in a sustainable way. Protecting the natural and built environment in the face of climate change and the challenges posed by economic growth (including housing, traffic, and waste management).
Baseline Position[17]		The current Gloucester / Cheltenham Green Belt was incorporated into the County of Gloucestershire Development Plan First Quinquennial Review published in 1960. In the 1981 Structure Plan the Green Belt was extended to the north of Cheltenham to prevent coalescence with Bishops Cleeve. It covers an area of approx 8,100 hectares the vast majority of this being within Tewkesbury Borough. Existing waste facilities within the Green Belt include the Wingmoor Farm (East) and Wingmoor Farm (West) waste management operations near Bishop's Cleeve. Also, preferred sites and areas of search at Wingmoor Farm were identified in the Waste Local Plan (2004) originally saved under transitional arrangements but not saved from 2007 due to a direction from the Secretary of State. They remain a material consideration however until replaced.
Indicators	National	N/a
	Local	Total extent of the Gloucester/Cheltenham Green Belt (hectares). Number of waste related planning permissions granted in the Green Belt per annum. Number of waste related planning applications refused per annum where Green Belt issues were cited as part of the reasons for refusal.
	Significant Effect	~~Overall/general satisfaction with local area (currently NI 005).~~ Total waste management capacity.
Data Sources		Annual Monitoring Report (AMR) GCC Development Management
Monitoring Body		GCC
Policy		**WCS11 – ~~Areas of Outstanding Natural Beauty (AONB)~~ Landscape**
Policy Aims, Objectives and Targets		The policy aims to ensure that waste development does not have a harmful impact on any of the three Areas of Outstanding Natural Beauty located in Gloucestershire. Proposals for waste development will only be permitted where certain criteria can be met. In the case of major development within the AONB, permission will only be granted in exceptional circumstances where a proven public interest can be shown. The policy also aims to continue partnership working between the County Council and AONB management boards. The policy does not include any specific targets.
Relevant SA objectives		<u>Broad SA Objectives</u> 5. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development. 8. To protect, conserve and enhance Gloucestershire's wildlife and natural environment – its landscape and biodiversity. Derived from this objective is a site focused objective which seeks: To protect, conserve and enhance the landscape in Gloucestershire. Another site focused objective seeks: To ensure that waste sites have the potential for adequate screening and/or innovative design to be incorporated. 9. To protect, conserve and enhance Gloucestershire's material, cultural and recreational assets including its architectural

[17] Includes relevant Contextual Indicators

		and archaeological heritage.
Other Relevant Aims, Objectives and Targets	International & National	~~PPS7: Sustainable Development in Rural Areas –~~ NPPF: Nationally designated areas comprising National Parks, the Broads, the New Forest Heritage Area and Areas of Outstanding Natural Beauty (AONB), have been confirmed by the Government as having the highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty of the landscape and countryside should therefore be given great weight in planning policies and development control decisions in these areas. Major developments should not take place in these designated areas, except in exceptional circumstances. PPS10: In testing the suitability of sites and areas local authorities should take into account a number of factors including visual intrusion and the need to protect landscapes of national importance including AONB.
	Regional	Regional Waste Strategy – recognises the potential constraints arising from Green Belt and other national designations such as AONB in finding waste management sites close to the sources of the waste arising. Regional Spatial Strategy Proposed Changes 2008 – although proposed to be abolished, states that "*The quality, character, diversity and local distinctiveness of the natural and historic environment in the South West will be protected and enhanced, and developments which support their positive management will be encouraged. Where development and changes in land use are planned which would affect these assets, Local Authorities will first seek to avoid loss of or damage to the assets, then mitigate any unavoidable damage, and compensate for loss or damage through offsetting actions. Priority will be given to preserving and enhancing sites of international or national landscape, nature conservation, geological, archaeological or historic importance".*
	Local	More resilient natural & built environment. (currently within the LAA). SCS – to manage waste in a sustainable way. Protecting the natural and built environment in the face of climate change and the challenges posed by economic growth (including housing, traffic, and waste management).
Baseline Position[18]		There are 47 Areas of Outstanding Natural Beauty (AONB) in the UK. There are three AONB in Gloucestershire, the largest being the Cotswolds AONB which covers around 51% of the County. Parts of the Wye Valley AONB and Malvern Hills AONB also fall within Gloucestershire.
Indicators	National	N/a
	Local	Number of waste related planning applications refused per annum where AONB issues were cited as part of the reasons for refusal. Number of waste related planning permissions granted in an AONB per annum.
	Significant Effect	~~Overall/general satisfaction with local area (currently NI 005).~~ Total waste management capacity. ~~E2: Change in areas of biodiversity importance.~~
Data Sources		Annual Monitoring Report (AMR) GCC AONB Advisory Committees/Conservation Boards
Monitoring Body		GCC

[18] Includes relevant Contextual Indicators.

Policy		**WCS12 – Nature Conservation (Biodiversity and Geodiversity)**
Policy Aims, Objectives and Targets		The policy aims to ensure that sites of national and local importance for biodiversity and nature conservation are safeguarded from inappropriate waste management development. Planning permission will only be granted where certain criteria can be met including mitigation ~~or~~ and where it can be shown that the benefit of the development outweighs the impacts the proposal would have. Favourable consideration will be given to proposals that incorporate beneficial biodiversity or geological features into their design and layout. ~~Major developments proposed within or close to Strategic Nature Areas (SNAs) will be required to assess and make an appropriate contribution to nature conservation targets in those areas~~. Development proposals will be required to assess their impact on the natural environment and make a contribution to local nature conservation targets to ensure gain for net biodiversity.
Relevant SA objectives		Broad SA Objectives 5. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development. 8. To protect, conserve and enhance Gloucestershire's wildlife and natural environment – its landscape and biodiversity. Derived from this objective is a site focused objective which seeks: To protect, conserve and enhance biodiversity in Gloucestershire. Another site focused objective seeks: To protect, conserve and enhance the landscape in Gloucestershire. 9. To protect, conserve and enhance Gloucestershire's material, cultural and recreational assets including its architectural and archaeological heritage. Derived from this objective is a site focused objective which seeks: To protect, conserve and enhance geodiversity in Gloucestershire. 11.To prevent the pollution of land, air and water in Gloucestershire and to apply the precautionary principle. Derived from this objective are 4 site focused objectives as follows: To prevent pollution and to apply the precautionary principle in consultation with waste regulation authorities. To protect and enhance soil / land quality in Gloucestershire. To protect and enhance air quality in Gloucestershire. To protect and enhance water quality in Gloucestershire.
Other Relevant Aims, Objectives and Targets	International & National	~~PPS9: Biodiversity Geological Conservation~~ NPPF- Plan policies and planning decisions should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests. In taking decisions, local planning authorities should ensure that appropriate weight is attached to designated sites of international, national and local importance; protected species; and to biodiversity and geological interests within the wider environment. Where a proposed development on land within or outside a SSSI is likely to have an adverse effect on an SSSI (either individually or in combination with other developments), planning permission should not normally be granted. Sites of regional and local biodiversity and geological interest, which include Regionally Important Geological Sites, Local Nature Reserves and Local Sites, have a fundamental role to play in meeting overall national biodiversity targets. ~~Criteria-based policies should be established in local development documents against which proposals for any development on, or affecting, such sites will be judged.~~
	Regional	Regional Spatial Strategy Proposed Changes (2008) – although proposed to be abolished states that local authorities should use the SW Nature Map and work with interested local stakeholders including local biodiversity partnerships and local record centres to map local opportunities for biodiversity enhancement in Local Development Documents. Proposals which provide opportunities for the beneficial management of these areas and habitats and species generally should be supported.
	Local	More Resilient Natural & Built Environment (currently within the LAA). SCS - To manage waste in a sustainable way.

		SCS - Protecting the natural and built environment in the face of climate change and the challenges posed by economic growth (including housing, traffic, and waste management).
Baseline Position[19]		The South West supports some 25 species that are globally important, 700 species that are of national conservation concern, 34 species that are endemic to the UK, 11 of which are only found in the South West. In Gloucestershire there are currently 122 Sites of Special Scientific Interest (SSSI) 755 Key Wildlife Sites (KWS) 11 Local Nature Reserves and 4 National Nature Reserves (NNR). A Nature Map has been compiled for Gloucestershire and identifies landscape-scale blocks of land referred to as Strategic Nature Areas (SNAs). The SNAs identify where the greatest opportunities for habitat restoration and creation lie.
Indicators	National	~~Core Output Indicator E2: Change in areas of biodiversity importance.~~ ~~Improved local biodiversity – proportion of local sites where positive conservation management has been or is being implemented (currently NI 197).~~
	Local	Number of waste related planning applications refused per annum where nature conservation issues were cited as part of the reasons for refusal. Number of waste related planning permissions granted in an area with features of national or local nature conservation importance.
	Significant Effect	~~Overall/general satisfaction with local area (currently NI 005).~~ Total waste management capacity. Extent of implementation of Gloucestershire Nature Map (related to waste management). ~~Per capita reduction in CO_2 emissions in the LA area (currently NI 186).~~
Data Sources		Annual Monitoring Report (AMR) GCC Gloucestershire Biodiversity Partnership/LAA
Monitoring Body		GCC Gloucestershire Biodiversity Partnership
Policy		**WCS12a – Historic Environment**
Policy Aims, Objectives and Targets		The policy aims to ensure that waste development proposals do not have a harmful impact upon Gloucestershire's historic environment. Planning permission will only be granted where certain criteria can be met including mitigation or where it can be shown that the benefit of the development outweighs the impacts that the proposal would have.
Relevant SA objectives		Broad SA Objectives 5. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development. 9. To protect conserve and enhance Gloucestershire's material, cultural and recreational assets including its architectural and archaeological heritage. 12. To reduce the adverse impacts of lorry traffic on communities through means such as: a) reducing the need to travel b) promoting more sustainable means of transport c) sensitive lorry routing d) the use of sustainable alternative fuels

[19] Includes relevant Contextual Indicators.

		e) promoting the management of waste in one of the nearest appropriate installations. 14. To reduce waste to landfill and in dealing with all waste streams to actively promote the waste hierarchy (i.e. Prevent, Reduce, Reuse, Recycle, Recover, Dispose) to achieve the sustainable management of waste.
Other Relevant Aims, Objectives and Targets	International & National	NPPF – Designated 'historic assets' such as those with historic, archaeological, architectural and artistic significance will likely have particular procedures that would need to be applied to any planning decision. Such as scheduled ancient monuments and listed buildings.
	Regional	-
	Local	More resilient natural and built environment (currently within the LAA)
Baseline Position[20]		The county ha 519 scheduled monuments, 14,974 listed buildings and over 31,000 other archaeological sites recorded in the Historic Environment Record.
Indicators Data Sources	Local	Number and % of proposals where impact on the Historic Environment is citied as a reason for refusal. Number of planning applications within xx m of a historic asset.
	Significant Effect	
	Annual Monitoring Report (AMR) GCC	Overall/general satisfaction with local area (currently NI 005).
Data Sources		Annual Monitoring Report (AMR) GCC
Monitoring Body		GCC
Policy		**WCS13a –Bulking and Transfer**
Policy Aims, Objectives and Targets		The aim of the policy is to provide a framework against which to consider proposals for new or expanded bulking and transfer facilities. A further aim is to promote greater efficiency and to reduce the potential impact of transporting waste by road, particularly the Strategic Road Network (SRN). Planning permission will be granted subject to a number of criteria being met.
Relevant SA objectives		Broad SA Objectives 5. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development. 12. To reduce the adverse impacts of lorry traffic on communities through means such as: a) reducing the need to travel b) promoting more sustainable means of transport e.g. by rail or water c) sensitive lorry routing d) the use of sustainable alternative fuels e) promoting the management of waste in one of the nearest appropriate installations. 15. To reduce contributions to and to adapt to climate change. Derived from this objective is a site focused objective which seeks: To reduce the global use of primary materials and minimise net energy balance requirements.
Other Relevant	International &	NPPF Planning can help to reduce the need to travel, reduce the length of journeys and make it safer and easier for people to

[20] Includes relevant Contextual Indicators

Aims, Objectives and Targets	National	access jobs, shopping, leisure facilities and services by public transport, walking, and cycling. Consistent application of these planning policies will help to reduce some of the need for car journeys (by reducing the physical separation of key land uses) and enable people to make sustainable transport choices.
	Regional	Regional Spatial Strategy (incorporating the Regional Transport Strategy) although proposed to be abolished, states that waste planning authorities should make provision in their waste development frameworks for a network of strategic and local waste collection, transfer, treatment (including recycling) and disposal sites to provide the capacity to meet the indicative allocations for their area.
	Local	SCS - Protecting the natural and built environment in the face of climate change and the challenges posed by economic growth (including housing, traffic, and waste management). To manage waste in a sustainable way. To make concerted local efforts to address climate change and deal with the consequences. Gloucestershire Local Transport Plan 2006 – 2011: to reduce the impact of road transport on communities and the environment. Integrate all forms of transport, land use and economic planning leading to a better more efficient transport system. Gloucestershire Draft Local Transport Plan 2011-2026: to reduce transport's emissions of carbon dioxide and other greenhouse gases, with the desired outcomes of tackling climate change.
Baseline Position[21]		There are currently 22 waste transfer stations in Gloucestershire dealing with MSW, C&I and C&D waste and two dealing specifically with the transfer of clinical waste[22]. Six are used for MSW transfer and these have a total capacity of 157,000 tonnes/year including 122,000 tonnes/year for general/ residual waste to landfill disposal and 35,000 tonnes/year for the transfer of recyclables.
Indicators	National	~~Core Output Indicator W1: capacity of new waste management facilities by waste planning authority.~~ ~~Average journey time per mile during the morning peak (currently NI 167 Congestion).~~ ~~Per capita reduction in CO2 emissions in the LA area (currently NI 186).~~
	Local	Total available bulking and transfer capacity. Number of new/expanded bulking and transfer facilities permitted per year. Number of planning applications refused on the basis of Policy WCS13a.
	Significant Effect	~~Per capita reduction in CO_2 emissions in the LA area (largely reported through District Councils AMRs) (currently NI 186).~~ Number of people employed in waste-related activities.
Data Sources		GCC Annual Monitoring Report (AMR)
Monitoring Body		GCC

[21] Includes relevant Contextual Indicators
[22] Transfer also takes place at other facilities including metal and end of life vehicles facilities.

Policy		**WCS14 – Sustainable Transport**
Policy Aims, Objectives and Targets		The policy seeks to encourage waste related development that utilises alternative modes of transport to the road including rail and water. Where appropriate development must be supported by a Transport Assessment and Travel Plan. Any development that would have an adverse impact on the highway network will be refused unless it can be mitigated.
Relevant SA objectives		Broad SA Objectives 1. To promote sustainable development and sustainable communities in Gloucestershire giving people the opportunity to live in an affordable and sustainably designed and constructed home. 11. To prevent the pollution of land, air and water in Gloucestershire and to apply the precautionary principle. 12. To reduce the adverse impacts of lorry traffic on communities through means such as: a) reducing the need to travel. b) promoting more sustainable means of transport e.g. by rail or water. c) sensitive lorry routing. d) the use of sustainable alternative fuels. e) promoting the management of waste in one of the nearest appropriate installations. 15. To reduce contributions to and to adapt to climate change.
Other Relevant Aims, Objectives and Targets	International & National	~~PPG13: Transport –~~ NPPF: To promote more sustainable transport choices for both people and for moving freight. Ensure that development comprising jobs, shopping, leisure and services offers a realistic choice of access by public transport, walking, and cycling, recognising that this may be less achievable in some rural areas. Where developments will have significant transport implications, Transport Assessments should be prepared and submitted alongside the relevant planning applications for development. In preparing their development plans local authorities should ~~promote opportunities for freight generating development to be served by rail or waterways by influencing the location of development and by identifying and where appropriate protecting realistic opportunities for rail or waterway connections.~~ support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.
	Regional	Regional Spatial Strategy (incorporating the Regional Transport Strategy) although proposed to be abolished, states that waste should be managed as close as practicable to where it arises in order to minimise the distance waste is transported, particularly by road.
	Local	SCS - Protecting the natural and built environment in the face of climate change and the challenges posed by economic growth (including housing, traffic, and waste management). To manage waste in a sustainable way. To make concerted local efforts to address climate change and deal with the consequences. Gloucestershire Local Transport Plan 2006 – 2011: to reduce the impact of road transport on communities and the environment. Integrate all forms of transport, land use and economic planning leading to a better more efficient transport system. Gloucestershire Draft Local Transport Plan 2011-2026: to reduce transport's emissions of carbon dioxide and other greenhouse gases, with the desired outcomes of tackling climate change.

Baseline Position[23]		Within Gloucestershire, there is over 3000 miles of road, of which 80 miles are motorway or Trunk Road (managed by the Highways Agency) and 3,300 miles are local roads managed by the County Council. The M5 is the busiest route carrying up to 90,000 vehicles a day. Across Gloucestershire, daily traffic flows increased by 6.1% between 2000 and 2006. Gloucestershire is served by three main railway lines: Birmingham to Bristol main line. Gloucester (Standish Junction) to Swindon. Newport (Severn Tunnel Junction) to Gloucester. There are nine stations on this network in Gloucestershire. There are currently no dedicated rail freight terminals in Gloucestershire and all rail freight is transiting through the County. Commercial shipping is limited to small scale operations at Sharpness Docks. Some existing waste management facilities and some of the strategic allocations listed under Core Policy WCS4 have potential to link to the rail and water network. No rail handling of waste currently occurs in the County but waste metal is transferred by ship at Sharpness Docks.
Indicators	National	~~Average journey time per mile during the morning peak (currently NI 167 Congestion).~~ ~~Per capita reduction in CO_2 emissions in the LA area (currently NI 186).~~
	Local	Number and % of waste related developments utilising non-road means of transport (rail, water). Number and % of waste related planning applications supported by a Transport Assessment (TA). Number and % of waste related planning applications supported by a Travel Plan. Number of Section 106 agreements relating to transport entered into per annum. The number and % of all waste refusals per annum, where highways was cited as part of the reason for refusal.
	Significant Effect	~~Overall/general satisfaction with local area (currently NI 005).~~ Air Quality. Levels of NO_2 and other pollutants from road traffic.
Data Sources		Annual Monitoring Report (AMR) GCC
Monitoring Body		GCC

[23] Includes relevant Contextual Indicators.