Gloucestershire
COUNTY COUNCIL

Waste Core Strategy

Evidence Report:

Stakeholder Responses to the Issues & Options Papers

March 2007

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Section 1 Introduction

This report provides an overview of the responses received by Gloucestershire County Council to a number of consultations undertaken on waste related issues.

In particular the report sets out, in summary form, the comments made by stakeholders in respect of Issues and Options for preparing the Gloucestershire Waste Core Strategy (WCS). Where respondents have raised similar and related issues these are linked together.

The detailed representations made by each respondent are not repeated here but quotations and excerpts are used to give a flavour of the comments and themes raised. A full report of the representations (some 270 pages) is available as a separate annex to this report.

This report does not provide a statement of intended direction by the County Council in respect of each representation. It was considered that to provide such a steer during this process of evidence gathering and continuous community involvement could prejudice future decisions based on evidence that has yet to be presented. At this stage it is not appropriate to rule anything either in or out.

The purpose of Issues & Options Evidence Gathering

The Issues and Options consultation represents one of the first stages in producing a planning strategy for waste in Gloucestershire. This new style document will replace the County's current Waste Local Plan.

Although site-specific issues are not being considered at this early stage, an opportunity was given to debate strategically important locational matters such as the County's key waste management areas.

The representations made to the Issues and Options papers will help the County Council in developing realistic alternatives for waste policy direction. These will be presented at the next preparation stage, known as 'Preferred Options'. Further stakeholder consultation and participatory events are planned during 2007[3].

Stakeholder Consultation

The main WCS Issues and Options consultation started during the week of the 17th July 2006 and was timetabled for an 8-week period to 15th September 2006. However, to enable additional representations to be made, the period was extended until to the end of the year (2006). This was not a strict deadline, and any responses received after this date, were also considered during the preparation of the WCS, though they may not be included in this document.

[3] A Project timetable for preparing the WCS can found within the Council's Minerals & Waste Development Scheme (MWDS) http://www.gloucestershire.gov.uk/index.cfm?articleid=10577

The Issues and Options stage of the WCS should be carried out under continuous stakeholder involvement and, as such to impose a strict end date, beyond which comments could be made, would have been inappropriate.

This report also draws on evidence gathered from:

- a request for issues in Nov 2005 (through newsletter no.4)
- the Joint Waste Forum
- The Issues & Options consultation
- The JMWMS consultation
- The Great Gloucestershire Debate

The Issues and Options consultation comprised two written papers: Part A is a summary version using plain English and with minimal use of acronyms and planning jargon; Part B provided a more comprehensive review of the issues and options including detailed waste data. A Sustainability Appraisal (SA) Report was also produced, which was available along with the Issues and Options papers.

To further assist stakeholders, a standard response form was provided (see Appendix B). This form was made available along with the consultation papers. An interactive online version of the response form was also produced.

Conformity with the Statement of Community Involvement (SCI)

The Issues & Options consultation took the form of a mailed out letter to over 1400 local, regional and national stakeholders. A colour newsletter (No.5) accompanied the letter to encourage public participation.

In accordance with the County's adopted Statement of Community Involvement[4], copies of all consultation documents were made available to view at each of the County libraries, County and District Offices and were posted on the County Council's website. 'Hard' copies of the papers were available free-of-charge.

[4] The County Council adopted a Statement of Community Involvement (SCI) in December 2005. http://www.gloucestershire.gov.uk/index.cfm?articleid=9369

Section 2
Evidence Gathering

This section outlines some of the main evidence gathering initiatives that have been undertaken by the County Council up to the end of 2006.

Stakeholder Forum Outcomes

On the 22nd March 2006 a public forum was set up to discuss waste issues. It was held jointly with the County Council's Waste Management Team, who are responsible for managing municipal waste in the County.

The event was independently facilitated, by *Entec*, who produced a report detailing the key outcomes. This report is available to view on the County Council's website[5].

Vision and Objectives
Stakeholders wanted to see a plain English Vision with more emphasis on waste minimisation and encompassing education regarding waste management covering both business and householders.
Stakeholders considered the objectives were too complex and used too much jargon. In respect of the objectives *Entec* recommended:

- Attitudes and behaviour: an objective regarding education should be integrated;
- Development planning: the feasibility of safeguarding suitable sites should be reconsidered;
- Environmental impact: the objectives should be strengthened; and
- Resources and funding: objectives need to be more direct in defining the sourcing of funding.

Waste Strategy Issues
Waste minimisation:
- Education is vital to encourage people to produce less waste, recycle and compost more, and to increase people's responsibility for the waste they produce;
- Incentives and penalties to reduce the amount of waste produced by householders and to increase recycling and composting;
- Producers and retailers have a responsibility to reduce waste particularly packaging and government should be lobbied.

Recycling and composting:
- Increased recycling and composting is strongly supported;
- The JMWMS should include measures to make recycling and composting easier for people;
- Economic impacts and the cost efficiency of different treatment technologies are important considerations.

Residual waste management:
- Energy from waste is seen as preferable as a means of dealing with residual waste than landfill; and

[5] *Entec* Report available from the Downloads section at: http://www.gloucestershire.gov.uk/index.cfm?articleid=13349

- Recycling and composting should be maximised prior to energy recovery or landfill.

Location:
- Decisions on location are dependant on the type of facility; and
- Decentralised, local facilities are preferred for recycling centres and composting sites but larger centralised facilities for energy from waste and hazardous waste sites.

To respond to the views on the JMWMS *Entec* **recommended** that:
- Education features strongly in the JMWMS;
- Incentives and penalties to encourage waste minimisation, recycling and composting;
- The scope of the waste strategy should include manufacturers and retailers;
- The strategy should aim to make recycling and composting easier;
- Energy recovery should be considered in preference to landfill following maximising recycling and composting; and
- Depending on the facility type, decentralised, local facilities should be considered in the strategy.

Waste Facility Locational Issues
The main messages regarding waste facility locational issues were:
- Good transport access, particularly by sustainable modes;
- Generally in close proximity to waste arisings;
- Locational criteria should be applied differently according to the size and type of facility;
- Environmental impacts are very important: pollution control and the potential impacts of sites on human health.

To respond to the views on locational criteria *Entec* **recommended** that:
- The following criteria receive the highest weighting in evaluating potential facility sites:
  - proximity to waste arisings
  - proximity to good road transport connections
  - proximity to sustainable transport modes
  - remoteness from residential areas
  - potential for reducing environmental pollution and human health risk
- Consideration should be given to applying criteria differently according to the size and type of facility; and
- Those additional criteria suggested by stakeholders should be considered in drawing up the final list of criteria to be used by GCC.

Joint Waste 'Attitudes' Survey

This survey (undertaken in November/December 2005 – January 2006) was a joint initiative between the Waste Management and the Waste Planning teams. It looked at attitudes towards

waste management and recycling among stakeholders in Gloucestershire. A questionnaire was sent by email or post to around 1200 people. This group consisted of consultees that were either historical (from previous minerals and waste local plan involvement), or statutory requirement (e.g. all of the adjacent parish councils). Waste groups, environmental/pressure groups, all parish councils and other interested parties (e.g. University of Gloucestershire, business link, and MPs) were also invited to take part. In addition, the survey was placed in a prominent area of the Gloucestershire County Council website so that it was available to members of the public. In total 388 people responded.

The key findings were:

- Respondents were predominantly 'satisfied' or 'very satisfied' with rubbish and recycling collection services overall and also with Household Recycling Centres (HRCs) and recycling sites. A lot of people said that they didn't have or use garden waste collection services, suggesting that either such services are limited in some way or need greater promotion.

- People felt that composting at home was the best option, suggesting this type of recycling could be further promoted, although there was also support for council collected green waste. Not many people liked the idea of taking their own waste to a HRC.

- The majority of respondents felt that most items (in particular glass, plastic, paper, cans) should be collected. The only items respondents weren't so keen to have collected were nappies and sanitary items. Clearly the message about recycling of packaging and newspapers/ magazines has had a positive effect with most people believing it is important to recycle these via collections.

- It was generally felt that the Local Authority should play an active role in commercial waste recycling.

- 85% of people considered they could make room for 3 different waste receptacles at their home (one for recyclables, one for organic material and one for rubbish). This result is in keeping with previous questions which suggested that people would do more at home to recycle, so long as the actual collection is done by the council and doesn't involve a trip to a recycling site or HRC.

- There was strong support for the notion that recycling should be mandatory.

- In respect of the locational priorities for new waste management facilities, preventing environmental pollution, safeguarding nature conservation interests, avoiding Greenfield land and good highway access were considered particularly important by participants.

The Great Gloucestershire debate

This was an eight week event undertaken by the County Council to initiate public debate around waste issues. The Debate was held between November 2006 and March 2007.

A summary of the issues is set out below. For more information please refer to the County Council's website.

Issues
The Debate was structured by theme, covering the following issues:

- Global warming - the need to change our waste disposal/recycling habits.
- Reduce, Re-use Recycle – how can we do more?
- Packaging – supermarkets and what we can do about it.
- Collection of household waste – level and frequency of service.
- Commercial waste – what is it and where does it come from?
- Waste management technologies – creating energy from waste.
- The future – the vision and future timescales for implementation.

Outcomes
One of the aims of the event was to raise public awareness and educate people about current waste issues. Some of the key points that have come out of the debate so far for the WCS are:

- Everyone is responsible for the waste they create.
- People pay taxes therefore they shouldn't have to recycle – councils should do it for them.
- Waste should not be allowed into Gloucestershire from outside of the County – who benefits?
- Additional materials should be recycled by councils (e.g. cardboard and tin foil).
- We need to embrace energy from waste, but with safeguards against pollution.
- Incentivise recycling and set up community composting schemes.
- Supermarket packaging is a major contributor to household waste and they should provide the facilities for recycling it.

Section 3
Issues & Options Consultation Review

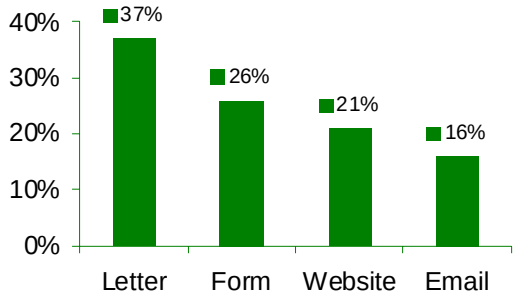
This section is divided into two parts, the first summarises the type/method of response to the Issues & Options consultation, and the second provides an overview of the issues raised.

Respondent Analysis

In total 43 stakeholders responded specifically to the WCS Issues and Options consultation.

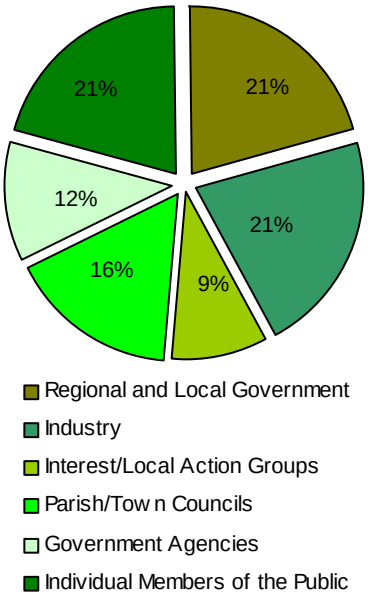
The table below sets out the methods stakeholders used to respond. Please note that some respondents used a variety of response methods for submitting their consultation comments.

Method of response by stakeholders



The diagram below illustrates the percentage breakdown of the respondents by stakeholder type.

Consultation stakeholders by type



Review of responses

The standard questionnaire used as part of the Issues & Options consultation was divided into twelve main 'issue' headings. For ease of reference this response report follows those same categories, which are:

1. The Spatial Vision
2. Time period of the plan
3. Implementing the waste hierarchy
4. Making provision for waste
5. Locational issues

6. Implementing the Joint Municipal Waste Management Strategy
7. Assessing cumulative impact
8. Dealing with hazardous waste
9. Waste management and the Green Belt
10. Waste management and natural areas
11. Sustainability Appraisal
12. Other issues

Under each of the headings, a summary of the main findings from the questionnaire has been provided along with some of main themes and comments made by participants.

Please note that not all respondents answered each question and therefore the percentages given relate only to those who filled in that particular section.

1. The Spatial Vision

Standard response form results

Question 1.1 Do we need a Spatial Vision? Of those participants that responded to this question, 65% agreed that a vision is need for the WCS.

Question 1.2 What would be your Vision for waste in Gloucestershire? A variety of constructive comments and ideas were put forward in response to this question.

Summary of written comments on the spatial vision for the WCS

A spatial vision requires a geographic component.

Include a statement that refers to the management of greenhouse gas emissions.

Don't consider incineration or energy from waste due to potential for pollution.

The vision should be clear as to how Gloucestershire shall look in 2026, i.e. *'Gloucestershire's waste production shall be reduced by X and the remaining waste will be managed by X facilities located at….'.*

Recycling of wood/card/paper/plastics should be compulsory for householders and businesses. Subsidised composting kits for domestic use.

Higher recycling rates. Encourage increased door step recycling and make it simple and consistent. Link the vision to the Municipal Waste Management Strategy.

Reduce the amount of commercial waste landfilled. Place an emphasis on domestic and industrial recycling with fines for non-compliance. Don't accept waste from out of the County.

Natural England and the Highways Agency in general support the interim Spatial Vision. The Environment Agency also consider it to be acceptable but believe the Waste Local Plan vision to be more comprehensive.

The majority of new waste management facilities should be located near to point of production, Cheltenham and Gloucester.

"Within reasonable costs, to make Gloucestershire a place where reducing and recycling waste becomes second nature through the use of education, especially concentrating on young people".

There should be an aim for 'zero waste', protection of Greenfield sites and environmentally sensitive land.

Waste minimisation is important therefore authorities should have greater powers. Inclusion of a strong sharp statement i.e. *'Zero tolerance of waste'*.

Standard response form results

Question 1.3 Will the objectives set out in the WCS deliver sustainable waste management? There was no clear response - 36% agreed whereas 40% did not.

Question 1.4 How would you alter the objectives? There was a variety of responses provided to this question, a summary of which is set out below.

Summary of written comments on the objectives for the WCS

The objectives are *"very complicated"* and *"not easy to understand"*. They are more 'visionary' than 'objectives'. Re-order the objectives to make them more logical.

Need reference to: greenhouse emissions; collecting plastic packaging; education; responsibility; zero waste; higher recycling/composting targets; alternatives to landfill as a priority; economic viability; combined heat and power schemes; collocation of facilities; reduce cross-boundary movements.

Objective One
To reduce the amount of waste produced in Gloucestershire.

- Some respondents deemed the proposed objective appeared to be correct as a way forward; however, the targets could be improved upon.

Objective Two
To make the best use of the waste produced within Gloucestershire through increased re-use and recovering value from waste.

- The sustainability appraisal states that Vision Option 2 will meet a number of objectives but does not explain why or how, e.g. protecting the environment, preventing development in the flood plain etc.

- It was suggested that consideration must be given to the inclusion of waste/heat and power transfer/generating stations for local power in Gloucestershire.

Objective Three
To encourage sensitive waste management practices within Gloucestershire to preserve/enhance the overall quality of the environment and avoid risks to human health.

- It was considered that the approach is good but *"not attainable with incineration or continued use of landfill".*

Objective Four
To achieve a sustainable waste management system by minimising waste as a priority and encouraging communities to take responsibility for the waste they produced through better education about waste issues.

- Some respondents suggested that consideration should be given to an extension of subsidised home composting kits for domestic use.

Objective Five
To assist in creating economic prosperity and employment for Gloucestershire by encouraging competitiveness, meeting the needs of business, and encouraging markets for goods made from recycled materials.

- Overall respondents supported this objective.

Objective Six
To ensure that waste management issues are properly considered an incorporated into new development proposals.

- No comments were made regarding this objective.

Objective Seven
To reduce undesirable environmental impacts resulting from the handling processing, transport and disposal of waste and meet legal requirements.

- This objective was also believed to be the correct approach, but not attainable with incineration or continued use of landfill.

Objective Eight
To protect communities from negative impacts of waste management and to protect designated landscapes and sites of nature conservation value from inappropriate development.

- In particular, one respondent commented that the objective *"sounds reasonable but its aims are not substantiated in* [the Waste Local Plan] *Policies 23 and 26"*.

Objective Nine
To make the best use of land by re-using previously developed sites in preference to undesignated Greenfield locations.

- This objective should include reference to the use of Brownfield land over Greenfield land where this is the most sustainable option.

- Conversely, a respondent also indicated that Objective 9 should also highlight the importance of *"…Some Brownfield sites"* which *"have significant biodiversity and geological interest".*

Objective Ten
To reduce the environmental impacts of transporting waste by encouraging waste disposal to take place at the closest appropriate facility and to use more sustainable means of transporting waste.

- Some respondents commented that waste disposal sites are not strategically sited, however support was offered for development of a waste site per district.

- Consideration should be given for conservation areas.

Objective Eleven
To provide a strategy for managing the majority of the County's waste in reasonable distance from its source of arising.

- Concern has been raised that *"...a disproportionate amount of waste is being transported from the SE of England to Gloucestershire".*

Objective Twelve
To safeguard sites suitable for the location of waste management facilities from other proposed development.

- Demonstrable need should be demonstrated to retain sites allocated for waste management uses.

- The use of the phrase *"…sites suitable…"* is considered to be too vague, there is a real risk that this could be applied to unallocated sites.

Objective Thirteen
To provide a strategy for assessing the appropriateness of waste management facilities in the Green Belt, and of the Green Belt boundaries themselves.

- No comments were made regarding this objective.

Objective Fourteen
To set out a framework for monitoring and reviewing waste development plan documents.

- No comments were made regarding this objective.

2. Time period of the plan

Standard response form results

Question 2.1 What is an appropriate timeframe for the plan? Half of the respondents considered that 2018 was an appropriate timeframe to work towards.

Question 2.2 Should the plan look in detail to 2018 and more generally to 2020? The majority agreed with this approach.

Summary of written comments on the timescale for the WCS

It should be the same as the Regional Spatial Strategy and consistent with district plans.

Respondents suggestions included: as soon as possible; 2010; in detail to 2012 and then more generally to 2020; as long ahead as possible; a review in 10 years is appropriate.

Flexibility is important. The timeframe needs to recognise *"attitudes to recycling and future advances in technology"* may result in a need to review established timescales.

"2020…coincides with the BMW landfill diversion targets and the length of the JMWMS".

It is important to ensure that facilities are delivered by 2013/14 in line with the implementation of LATS.

The Environment Agency considered that long timescales may result in uncertainties therefore look in detail to 2020 to tie in with national targets.

3. Implementing the waste hierarchy

Standard response form results

Question 3.1 Is waste minimisation an appropriate objective? All responses to this question agreed it is appropriate.

Question 3.2 What format should a waste minimisation policy take? More than half of the responses preferred the current policy to be revised in order to take account of new issues.

Question 3.3 Should developers of large-scale new developments should be responsible for the waste they generate? 96% stated 'yes'.

Question 3.4 How should developers contribute? Of the responses entered, 62% thought that developers should combine allocating part of their site whilst also making monetary contributions.

Summary of written comments on the implementation of a waste hierarchy

One respondent considered that the approach used for waste minimisation was an *"excellent way forward"*.

Revise the policy to include threshold sizes of planning application for submitting a waste statement.

Roll forward existing adopted policy, provided it is fit for purpose and is 'spatial'.

Developers should only be responsible for the building site waste that they create. Avoid over-ordering materials. Pay for tree planting to off-set disposal.

"Built-in facilities should be provided for some waste management", however caution should be taken to ensure that such contributions do not become a form of tax. On-going charges for maintaining infrastructure are *"neither workable nor reasonable"*.

Would be of benefit to *"include a specific policy on energy from waste and the various types of waste treatment and technology options contained in PPS22".*

"There should be no threshold", everyone involved in the construction industry and even DIY projects should be subject to submitting a waste minimisation statement.

"Applicants should be responsible financially for disposing of all waste from their operations".

"Developers will pass on the waste 'charges' to the new property owners, who will then end up paying twice for their waste services".

Better consideration of enforcing such policies is required *"how do you ensure that a developer actually plumbs in the water butts and doesn't just provide one".*

Standard response form results

Question 3.5 Should unavoidable waste be composted/recycled in the first instance? Over half of participants provided some form of a response to this question, of which over 90% agreed.

Question 3.6 Should there be a policy encouraging recovery of value from waste? 74% of responses received agree.

Question 3.7 How should a recovery policy be worded? Many participants provided suggestions in response to this question (see below).

Summary of written comments on the implementation of a waste hierarchy

Policy and consultation documents should use simple terms and phrases.

Collect additional recyclable materials (including from small businesses), but markets are needed for recycled materials and compost. Need to balance financial and economic factors.

More emphasis should be placed upon viewing waste as a resource. Support should be given to explore new recycling market outlets this is likely to lead to a higher re-use of materials i.e. metals.

Policy needs to be sufficiently detailed: material specific, define the process, the site and what 'value' means.

The first step towards sustainable waste management is to re-use any salvageable waste items. Manually sort waste at all depots.

"A method should be chosen that is the best balance of financial and environmental factor".

Due to *"rising energy costs and finite supplies of fossil fuels"* it has been suggested to consider the recovery of energy from waste as part of a longer term solution.

Section 106s should be better applied to ensure appropriate mitigation measures are performed.

Consideration must be given to combined heat/power facilities. *"Energy recovery needs to be addressed in an open honest manner."*

Reference must be given to *"weight relative or time taken to decompose or space used"*.

This should be a temporary policy to allow for a transition period to a *"zero waste solution"*.

Include the following statement from the JMWMS:

"We will provide residual waste treatment capacity to divert waste from landfill, and find/or develop markets for recovered materials; we intend to manage any residual waste (..black bag waste) that remains as a potential resource."

Standard response form results

Question 3.8 How should the 'need' for facilities be addressed? Not all respondents fully understood this question, however, many participants provided suggestions (see below).

Summary of written comments on the implementation of a waste hierarchy

Gloucestershire County Council taking the lead e.g. *"changing its specification for roads where recycled aggregates are preferred to primary materials".*

Need is an integral component in the structure of a community: *"'need' a requirement of necessity"*.

"Competition is required to keep costs of management down. 'Need' should not therefore be a mandatory issue".

"Communities...should take responsibility for their own arisings". More local facilities e.g. skip areas.

The financial as well as environment costs *"need to be emphasised at all times"* to prevent the depletion of the World's resources.

One respondent notes that the 'need' for facilities *"Needs to be* (assessed) *on a spatial level"*.

Greater responsibility 'ownership' needs to be taken by society, if this is achieved then *"businesses will begin to provide goods and packaging which will enable communities to reduce their waste production".*

The WCS must deal with 'need' and should be more specific and provide details on the number and type of waste management facilities needed within a given time scale.

Use experience of other countries in Europe in terms of new technologies. Better partnership working between Local Authorities and the Waste Industry sector.

Strong emphasis on waste management techniques being developed as part of a new development.

Consultation and policy documents should be clear and simple to understand.

It is accepted that diverting waste from landfill will mean waste plants need to be built… fewer larger plants will mean less communities are affected.

"Site allocations should be based on up to date evidence and need" but also must be subject to close monitoring throughout the plan period.

Standard response form results

Question 3.9 Alternative ideas for implementing the waste hierarchy? (see below).

Summary of written comments on the implementation of a waste hierarchy

No further acceptance of waste from outside the County of Gloucestershire, better facilities should be available to home owners to ensure that they recycle/dispose of waste in close proximity to where it was generated.

More focus on educating the community and reassuring them that recyclates being collected are being re-used.

Put pressure on householders by imposing fines on each household for every extra bag of waste generated.

Reduce packaging. Manufacturers, businesses and supermarkets should be made responsible for the waste they generate. Local authorities should be lobbying central government in this respect.

"There must be more emphasis on home composting, more local recycling facilities and less transportation of waste". Pressure should be excerpted to move waste up the hierarchy. Wider range of materials must be accepted for recycling door-to-door.

"We have to look at the complete waste hierarchy and concentrate on the main issue 'waste prevention and reduction' instead of always just starting with recycling".

"Civic amenity sites could be converted so that they can also perform a function as local re-use and recycle centre".

The Council should lead by example for example *"by ensuring its own developments have in built facilities and push contractors to work to higher standards"*.

"The waste hierarchy needs to be implemented as a package…landfill is an essential part of the package and always will be".

Incentives need to be in place, for example Council Tax concessions, to ensure wider participation from all levels of the community i.e. businesses and householders.

There will be an increase in the amount of composting required. The failure of sites to gain permission for composting needs to be considered in the new document.

4. Making provision for waste

Standard response form results

Question 4.1 Should the WCS follow a similar strategy to that in the Waste Local Plan? 67% of responses received agreed.

Summary of written comments on making provision for waste

Strategic sites should be allocated but small scale developments should be subject to criteria based policies.

"The overarching strategy should be based on your evidence, the latest policy frameworks and the findings of your SA".

The timescale is considered to be unachievable it needs to be *"accelerated and compressed"*.

Tougher enforcement on the submission of waste minimisation statements by developers, and include an element of control via the planning decision notice.

Standard response form results

Question 4.2 Should a greater number of waste sites be allocated to allow flexibility? 62% of responses received thought that allocating more sites than may be required will allow greater flexibility.

Question 4.3 Should applications for recycling/ composting be determined on a criteria basis? 59% of participants agreed with this approach.

Summary of written comments on making provision for waste

"Site allocations should be based on up to date evidence and need" but shall also be subject to close monitoring throughout the plan period. Possibility to use a 'phasing' approach.

"LPAs must have regard to the development plan' when assessing an application consequently determination of proposals on a *"case-by-case basis would be contrary to planning legislation"*.

Effects of vehicular movements on local environments should be kept to a minimum (an issue in Uley Parish Plan).

Deletion of strategic sites but provision of *"potential capacity site"*.

Possibly use a combined approach whereby unallocated sites can be brought forward that do not have to undergo a comparative test against allocated sites.

Standard response form results

Question 4.4 Should Area Action Plans be prepared? Where a specific part of the county is likely to undergo significant change due to waste management operations 95% of respondents deemed that an AAP should be prepared.

Summary of written comments on making provision for waste

AAPs can be used to integrate uses, in particular large urban extensions or regeneration plans e.g. Gloucester Docks.

AAPs should be used to their full potential i.e. *"integration of different uses"*.

Standard response form results

Question 4.5 Should there be a differentiation between local and strategic sites? 76% of responses received stated 'yes'.

Question 4.6 Is 50k tonnes an appropriate threshold for a strategic facility? Just under half of respondents provided an answer to this question, of which 50 per cent indicated that different thresholds should be applied.

Please note that the percentages stated here are slightly distorted as more than one response was provided on a couple of questionnaires.

Summary of written comments on making provision for waste

Use different thresholds for different waste types.

"Strategically important sites of any type of facility would … benefit from being identified in the Core Strategy… All other possible sites could be identified as part of the Issues and Options stage of the Site Specific Allocations DPD".

200k tonnes should be used as current throughputs exceed 50k tonnes.

Introduction of a 5-yearly plan, whereby received waste is reduced in stages *"i.e. 2,000 tonnes per annum"*.

"In terms of the appropriate threshold for strategic sites, it may be advantageous to have different thresholds which reflect difference in key influencing factors as evidenced by capacity, environmental impact etc".
No threshold should be used as throughput is underestimated. Concern has been raised that it may be complicated to measure.

"We don't believe there should be any allocation for strategic sites".

Standard response form results

Question 4.7 Site Identification Matrix -
Over half of all participants provided a response to this question, however, more than one entry was entered on a few therefore the results are slightly distorted.

Summary of matrix diagrams

Composting green waste – There was a clear steer in the responses with a preference for identifying no sites in a DPD and relying upon criteria based policy.

Composting kitchen waste – A quarter of respondents considered that all preferred sites should be identified in the DPD.

Biodegradable, reuse, recycling, and transfer/bulking up – No definitive answer was apparent as an equal number of respondents selected identification of strategic sites, identification of all preferred sites, and identification of broad areas of search.

Inert reuse, recycling, and transfer/bulking up – There was no clear favourite choice with three of the options being popular: the identification of all preferred sites; only strategic sites; or no identification at all.

Recovery/treatment facility – There was a clear preference from respondents towards identification of all preferred sites in a DPD.
Disposal sites – Nearly half of all responses entered favoured the identification of all preferred sites in a DPD.

'Other' facility – Hazardous/special waste was highlighted as an important area for consideration, an equal number of respondents preferred either the identification of only strategic sites or no identification but rely on a criteria based policy.

Summary of written comments on making provision for waste

The identification of new sites provides an opportunity to reassess the sites and ensure the most environmentally acceptable site is chosen.

"Over-reliance on spatial allocation of sites over a wide spectrum of 'waste management' will lead to delay and non-optimum provision'…'and could result in ransom situations".

"Reliance on allocated sites will increase road miles particularly in relation to some wastes, which could otherwise be dealt with on a more local and ad hoc network".

Evidence from the number of applications coming forward on sites not in the Waste Plan suggests that it is unnecessary to over-allocate land and it will be more appropriate to allocate fewer sites and introduce criteria-based policies.

It is essential to address the development of waste water in DPDs – both site specific and criteria based approaches are considered necessary. If spreading sewage sludge to land is unviable then disposal by incineration needs to be recognised in the waste plan.

Criteria based policy should be included as it offers flexibility in particular with unpredictable fluctuations on land uses.

5. Locational Issues

Standard response form results

Question 5.1 Locational Matrix by Waste Type - Responses indicate that the following types of facilities should be situated on edge of town locations:

- Composting green waste;
- Composting kitchen waste;
- Biodegradable reuse, recycling, transfer/bulking up;
- Inert reuse, recycling, transfer/bulking up;
- Recovery/treatment facility.

A large majority of responses indicate that it is preferable to locate disposal sites in rural areas.

Summary of written comments on locational issues

This type of questioning is too rigid, whereas site and locational criteria compliance is of more relevance.

The Environment Agency consider that pre-determined criteria distinguishing between urban and rural should not be used as development should be of the right type, in the right place at the right time.

Sites should be at least 500m from housing; have suitable road access; prevent pollution; and use sustainable modes of transport.

Standard response form results

Question 5.2 Centralised or Dispersed Locations Matrix - The following operations were preferred in dispersed locations i.e. local facilities in each District:

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

Recovery/treatment facility is preferred to be sited on centralised facilities near the strategic city and town of Gloucester and Cheltenham.

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

A high number of respondents were unsure where to site 'other facilities' i.e. special/hazardous waste.

Standard response form results

Question 5.3 Should sites for additional landfilling be identified? Approximately half of participants provide a response to this question of which 47% considered that planning for full-expected capacity to enable identification of sites for more landfill capacity towards the later stages of the WCS period was the preferred option. A further 33% considered limited provision should be made, and 20% believed no specific provision should be made.

Summary of written comments on locational issues

One respondent stated that the answer was to *"Put in waste plants!"*

Standard response form results

Question 5.4 What criteria should be used to find additional landfill sites? Around 46% of participants responded to this question (see below).

Summary of written comments on locational issues for landfill operations

The following issues were raised as possible criteria by respondents:

- Close partnership working with other government bodies/agencies and waste industry;
- Upholding the proximity principle, minimise transport;
- Avoiding areas of population or a reasonable distance away;
- No health hazard or water courses;
- Suitable geology;
- Visual impact - well landscaped to protect visual amenity;
- Rural areas, but not green belt or AONB;
- Good accessibility to the site;
- Value added assessment;
- Use of Brownfield sites, in particular quarries and ex-industrial sites;
- Land contamination;
- Protection of environmentally sensitive areas, including nature conservation;
- Provision of a waste minimisation statement, and increasing targets of waste to be driven up the hierarchy;
- Appropriate use of land;
- Use of water and rail for transportation.

Landfill should only be undertaken after secondary recovery. A zero waste approach would mean this issue would not arise.

Standard response form results

Question 5.5 Landfill Locational Criteria Ranking The results presented here are slightly distorted in that some respondents ranked all of the criteria as being of the most important. However, notwithstanding this, the following results were deduced:

1 Locating facilities near to the source of waste arising;
2 Preventing environmental pollution;
3 Visual impact of the facility;
4= Impact on neighbouring land uses;
4= Safeguarding nature conservation interests;
6= Suitability of local roads;
6= Use of sustainable modes of transport;
8= Protecting the historic environment;
8= Protecting Greenfield land;

8= Locating new waste facilities with complementary existing activities;

Summary of written comments on locational issues for landfill operations

Consideration should be given to the variety activities on a site.

Spatial patterns should be identified in accordance with the RSS. New facilities will be defined by the extent of new development for housing/employment.

The County's disposal capacity should be seen as of sub-regional significance
Addition of a further criterion with reference to vehicular movements: *"Proposals which will potentially attract higher trip rates (need) to fully consider their impact on the trunk road network and provide mitigation measures where appropriate".*

Concern over a possible influx of vehicular movements in rural areas, in particular within AONBs.

Impacts on biodiversity are likely to be lower in urban areas i.e. town/city centre, and carries greater *"potential for large gains for biodiversity via developer contributions..*(however)*.. such a strategy has the greatest potential for harm"*. Upon identification of sites, biodiversity assessments must be undertaken.

Would prove beneficial to highlight key settlement areas and describe current facilities and possible potential in the future.

Ownership constraints should be taken into account to prevent long-term under-provision or the use of compulsory purchasing powers.

The Environment Agency state that *"There will be a presumption against permitting (and to object to any planning application) of any new composting process(or any modification to an existing process) where the boundary of the facility is within 250 metres of a workplace or the boundary of a dwelling…"'*. (See Appendix F).

"…The County's disposal capacity should be considered of sub regional significance".

A cross section of different facilities must be provided for waste water treatment plants, these facilities also provide services to local areas but outside of their catchment areas.

Changes in legislation regarding the disposal of sludge may result in the need for an increase in incineration.

"The plan may benefit from the provision of additional landfill capacity, but the policy will need to reflect the choices made about which types of residual waste treatment technology will be developed during the plan period as these will dictate the level of landfill voidspace required".

6. Implementing the Joint Municipal Waste Management Strategy (JMWMS)

Standard response form results

Question 6.1 How should the JMWMS be implemented? 46% of participants provided a response to this question, of which:

- 52% thought using criteria based policy would help to translate the JMWMS processing requirements into site allocations.
- 11% deemed that the allocation of specific sites would best assist in the transition.
- 16% suggested other techniques, as summarised below.

Summary of written comments on the implementation of the JMWMS

A combination of allocations and criteria where the aims are:

- *"Practical in a short time frame"*;
- Flexible;
- Avoid creating 'ransom' sites;
- *"Acknowledgement of fast-changing land use"*;

Use a combination of sites and criteria: site allocations on *"larger more controversial uses"*; and criteria based approach *"for the smaller more benign uses"*.

7. Assessing cumulative impact

Standard response form results

Question 7.1 How do you define/assess 'cumulative impact'? Only a small percentage of respondents provided comments in reply to this question. This reflects the difficulty inherent in the issue.

Summary of written comments on assessing the cumulative impact

The following issues were raised:

- Traffic movements and sustainable transport;
- Impact on infrastructure;
- Visual impact;
- Health hazard (vermin, emissions);
- Environmental impact including water, flora, fauna, agriculture;
- Type of waste (hazardous or not?);
- Impact on amenity (noise, dust, smell, light).

The findings of the Wingmoor Farm Task Group will provide an important piece of evidence in assessing cumulative impacts of waste management facilities in the Bishops Cleeve area of the County. *"The issue is of critical importance… the convenience of the many should not be at expense of the few."*

Standard response form results

Question 7.2 Safeguarding existing waste facilities from encroaching development? A potential safeguarding policy was set out and

over half of participants provided a response to this question.

- 59% of respondents considered the approach proposed in the safeguarding policy would be suitable.

- 18% suggested other methods, as outlined below, whilst 23% did not have a particular view.

Summary of written comments on preventing encroachment

Suitable sites for waste management can be hard to find therefore such sites must be protected from encroachment by sensitive land uses. *"Safeguarding must be retained in the waste local development Document".*

"Key regeneration projects should not be fettered by waste allocations".

To avoid blight the policy needs to be flexible enough to allow for other uses in light of fast land use changes, the safeguarding policy should be revised to:
"The WPA will normally oppose proposals for development within or in proximity to existing and allocated sites for waste management use where it would prejudice the site being developed of used for appropriate wastes management operations. Proposals for incompatible or alternative uses will only be permitted where it can be satisfactorily demonstrated that the site is no longer suitable, or required, for waste management purposes".

Effective partnership working between the WPA and District Councils to ensure buffer zones are created and enforced.

Prevent sterilisation of suitable waste management sites by effective policy formulation.

Use of an exclusion zone, for example 250m around composting sites.

8. Dealing with hazardous waste

Standard response form results

Question 8.1 Should the objective of minimising hazardous waste be included in the WCS? 86% of responses received agreed that this is an appropriate objective for the WCS.

Summary of written comments on dealing with hazardous waste

No comments were made.

Standard response form results

Question 8.2 Should existing hazardous waste facilities be safeguarded provided they are environmentally acceptable? Just less than half of participants responded to this question. However, 83% of responses agreed that it is appropriate to safeguard existing hazardous waste facilities provided that they are environmentally acceptable.

Summary of written comments on safeguarding existing hazardous waste facilities

"Depends on:
(i) Quality and quantity of hazardous waste;
(ii) Permit restrictions;
(iii) Inclusion of medical waste?"

Due to its specialist nature safeguarding existing facilities will provide certainty for operators.

"Stringent controls would need to be monitored and frequently updated".

Concern about what environmentally acceptable means and how it is defined – who says it is? What parameters are used?

Standard response form results

Question 8.3 What criteria should be used to define 'environmental acceptability'? A minority of respondents participated in this question.

Summary of written comments on 'environmental acceptability' of Hazardous waste facilities

The following represents the main criteria respondents felt could be used for guiding whether proposals/existing sites are 'environmental acceptable'. Several respondents marked more than five or only marked one therefore the results are slightly distorted.

1 Impact on neighbouring land-uses;
2 The need for the facility;
3= Location of the site in relation to local, regional, or national hazardous waste arisings;
3= The pollution control record for the facility;
5 Locating new hazardous waste facilities with complementary existing activities;
6= The suitability of local roads to handle traffic and the site access;
6= The effect of the facility closing will have on the environment.

A risk assessment should be undertaken, or requiring submission of a statement as part of an application to address the environmental impacts.

Standard response form results

Question 8.4 Are there other options for managing hazardous waste? A quarter of respondents provided a response to this question.

Summary of written comments on other options for managing hazardous waste

The analysis of hazardous waste management data is supported by the Environment Agency.

In addition to the environmental acceptability, should the facility be *"above or below ground?"*

The facility at Wingmoor Farm is a strategic operation beyond the boundaries of Gloucestershire and Warwickshire County Council would be concerned if the capacity were lost.

Quality and quantity of hazardous waste; health impact on the community; medical waste?; time limited?; above or below ground?

Criteria should be relative to the type of hazardous waste being managed, the ranking is meaningless.

Hazardous waste management sites must not be allowed within 1 or 2 km of residential areas.

"Cross or on border agreements with neighbouring authorities".

"Producer responsibility including eco-design… and promoting re-manufacturing and recycling".

9. Waste Management and the Green Belt

Standard response form results

Question 9.1 What factors determine the appropriateness of waste facilities in the Green Belt? 37% of respondents answered this question.

Summary of written comments on waste management and the Green Belt

The following indicates the top five factors which must be used to determine the appropriateness of a waste management facility within the Green Belt.

1 Re-using previously developed land or redundant agricultural buildings;
2 Suitability of local roads to handle traffic and the site access;
3 Proximity to arisings and reducing the distance waste has to travel;
4 Maintaining the openness of the Green Belt;
5 Good facility design;

Further comments included:

Waste management facilities must not be sited within the Green Belt.

The impact of a proposal on the trunk road network also needs to be considered.

"Green Belt policy should make allowances within it for waste management facilities. Composting for example is a largely agricultural style operation that would have less impact upon the Green Belt".

The review of the Gloucester / Cheltenham Green Belt provides an opportunity for locating waste facilities near to centres of population, which should be explored between the respective authorities.

Standard response form results

Question 9.2 Should Green Belt boundaries be redrawn to provide more opportunities for waste management facilities? 50% of respondents answered this question of which there was an equal split between those who consider that redefining the Green Belt is an appropriate in order to provide more land for waste management facilities and those that disagree.

Summary of written comments on waste management and the Green Belt

No additional comments were made.

10. Waste management and natural areas

Standard response form results

Question 10.1 Example policies were provided for environmental designations – are they appropriate? 47% of respondents provided a response to this question. Overall the results indicate that the policy wording for Archaeology is the most agreeable.

Question 10.2 How should policies be worded? A small number of respondents provided additional comments.

Question 10.3 Are there other designations that should be included? As above.

Summary of written comments on environmental designations

This is *"a heck of a lot of gobbledygook and jargon which means very little to the people who will be most affected".*

The Interim Code of Practice for Sustainable Urban Drainage Systems should be adopted.

Health and air quality should be included as being a strategic environmental asset.

The human population should be recognised, i.e. impact on communities.

AONB
"Sewage treatment and pumping facilities are required close to development creating the waste..(therefore)*..It may not always be feasible/sustainable to avoid development in the AONB for such types of development*".

AONB policy should be amended as follows:
"Proposals for waste development within or affecting the setting of areas of outstanding natural beauty will only be permitted where:

- *There are no alternative sites not affecting the AONB to serve that market need; and*
- *The impact on the special qualities of the AONB (including the landscape setting and recreational opportunities) can be successfully mitigated)"*.

There is a requirement to have a *"network of some facilities"*.

There is a requirement for AONBs to be more flexible to allow small scale facilities – an integrated network of facilities serving local communities (PPS7 para 21). Specify which local facilities are needed in the AONB *"support local provision and give guidance how it can be acceptable"*. Lorry movements also need careful consideration.

Suggested AONB policy wording:
Sustainability objectives will inform the determination of proposals for waste management development within Areas of Outstanding Natural Beauty, where a very important objective is to preserve and enhance the landscape. Permission may be granted where it can be shown that the proposal is in accordance with the following:
- The proposed development forms part of a network of facilities for the sustainable treatment of locally arising wastes, appropriate in scale and activity;
- It would cause no undue or unacceptable harm to the landscape or the environment, either through its location, or mitigation to a high standard.

- It would offer defined benefits to the community in the AONB, the land and landscape (including through integrated farm diversification), or contribute to local sustainable activity.
- It would not unacceptably increase traffic impact.
In the case of major development proposed in the AONB a proven national interest needs to be demonstrated which can be evaluated as outweighing any impacts resulting from the development.

A proven national interest, and no alternative sites outside the AONB, need to be demonstrated for waste development in the AONB.

Nature Conservation
Inclusion of European designations i.e. SAC, pSAC, RAMSAR. The setting of the Severn Estuary.

To bring the wording of the nature conservation policy in line with PPS it should be amended to include the phrase *"…clearly outweigh the impact it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of SSSIs"*.

Clear references to other relevant plans and strategies that concern national assets must be made, e.g. PPS9 Biodiversity and Geological Conservation, Regional Spatial Strategy, River Basin Management Plans, Coastal Habitat Management Plans and AONB Management Plans.

The Core Strategy should contain a generic policy for biodiversity and geological conservation that can be applied throughout the county and is not location specific (this is produced in DEFRA's 'Planning for Biodiversity and Geological Conservation: A Guide to Good Practice', para 4.31).

The revised version of MR.5 (as quoted in italics) be adopted as an overarching policy. This will help to address issues surrounding species of biodiversity importance (e.g. Biodiversity Species List for England [NERC Act Section 41], National Red Data Book Species and Gloucestershire BAP Species) wherever they occur.

"Geoconservation should have a separate policy".

The term 'exceptional circumstances' must be defined as it *"creates a dangerous policy as it appears widely open to abuse"*. More emphasis should be placed on preserving our ecological heritage and biodiversity for future generations.

The policy should move away from 'demonstrable harm' to 'precautionary principle'.

11. Sustainability Appraisal

Standard response form results

Question 11.1 14% of participants provided comments on the Sustainability Appraisal.

Summary of written comments on the Sustainability Appraisal

The Environment Agency are generally satisfied with the SA of the WCS.

"..revisit some of your explanations so that your SA better articulates your reasoning for marking in the way that you have".

Tests of Soundness
Further evidence required on partnership working – Test I

Lack of phasing, implementation and monitoring. How have other plans, strategies e.g. Local Transport Plan been taken into account? – Test IV

Better exploration of AAPs for urban extensions to aid in identification of possible integrated uses – Test IV

Stronger emphasis within the SA is needed on the unsustainable process of land-fill as a waste management method.

Import/export of waste from Gloucestershire, is this a problem? - Test VI

The LPA needs to be flexible in identifying sites for disposal in the Severn Vale .

Landfill is fundamentally unsustainable and this should be emphasised more heavily in the SA.

Greater emphasis should be placed on climate change and any economic downturn in the next 20 years.

12. Further comments

Summary of additional comments made to the Issues & Options papers *(Question 12.1)*

Markets must be found for recycled materials. Don't waste water, provide garden incinerators for householders' waste, and don't light bonfires before 8:30pm in the summer.

"The approach is good but the objectives are not attainable with incineration or continued use of landfill".

The policies in the WCS need to be flexible enough to allow for the expansion of waste management sites which are a direct result of increased development.

"PPS10 is clear that unallocated sites should be considered 'favourably' subject to compliance criteria".

Waste management facilities for hazardous chemicals, engine oil and oil filters must be developed with easy access to encourage the correct disposal of these resources.

Issue of agricultural waste needs examining in greater detail.

Consultation documents should be simplified.

"…no reference to AONB management plans in Section 3 'Policy Context".

More emphasis should be placed upon the proximity principle to focus on waste management problems within the County, before addressing regional or national problems.

"Adequate importance is placed upon the protection of green field sites and the conservation of environmentally sensitive and valuable land".

Focus on recovering value from waste. The public concern about energy from waste means that this issue should be revisited including the use of combined heat and power schemes.

Policies should be flexible enough to cope with technological advances within the waste industry.

"High local recycling and composting targets by 50% by 2010 and 75% by 2015 should be set".

"Because of the climate of pubic objection to waste proposals, it is a mistake to build into the planning process the tools for objectors to use against new proposals, by writing into the plan prescriptive policies/allocations, without alternative or positive approaches being written in".

Implementation of a *"phasing-out"* process of disposal via landfill.

"Waste is a resource, and current strategy relies far too heavily upon disposal".

Application on the usefulness of waste for deriving energy, and for stimulating other industrial processes should be further examined.

No mention of the Landscape Character Assessments.

"How can you 'manage' C&I, C&D and Agricultural waste if there is no enforceable control and hence no sanctions on the producer".

Sewage treatment must be considered by developers as a requirement of planning conditions.

Network rail would support the principle of and any promotion of initiatives to transport waste by rail.

"Should WDAs import and export waste? Surely the polluter should deal with their own pollution as locally as possible".

The Highways Agency would support the movement of waste by rail and water.

Education and awareness raising of waste issues are key. Use examples of good schemes as the way forward.

"Generally a comprehensive and carefully thought through and presented document".

"Careful consideration should be given to the option of pyrolysis followed by a very high and controlled flame temperature...inputs of heavy metals must be avoided".

Expansion on the types of waste collected via kerbside collection schemes.

Section 4
Key Issues Arising

Many pertinent comments were made by respondents during the on-going Issues and Options evidence gathering. This section briefly highlights some of the key strategic issues that the WCS needs to address. Please note that this list is not exhaustive.

Key Issues

- Increase waste awareness and education.
- Make documentation easier for people to understand.
- Make the partnership working aspects of preparing the WCS more explicit.
- Retain waste minimisation as a key element of the strategy.
- Increase composting and recycling and make it easier for residents to undertake these activities.
- The need for a network of small-scale local facilities across the County, including in rural areas.
- Waste should be seen as a resource, from which 'value' (i.e. new products or energy) should be recovered.
- The use of combined heat/power facilities.
- Flexible site provision needed for C&D waste operations.
- C&I waste facility provision.
- The potential for using stand-off distances to safeguard existing/future waste facilities and mitigate possible impacts from new facilities.
- The use of thresholds for strategic/local site allocations – are they appropriate or necessary?
- The WCS needs to identify broad locations for residual waste treatment facilities proximate to arisings.
- Set out the criteria for assessing the cumulative impact of waste operations, including those in the Green Belt.
- The importation of waste from outside of the County.
- Define what constitutes 'environmental acceptability' of existing hazardous waste facilities (as required by RSS policy).

Appendix A
WCS Questionnaire Quantitative Results

Please note that this section reproduces the questions and also provides an indication of the results received up to the end of 2006.

A variety of response methods were used by the 43 respondents whom participated in the consultation exercise, of which: 37% sent a letter; 26% completed the questionnaire; 21% participated via the questionnaire provided on the Internet; 16% shared their views via email.

It should be noted that some of the percentages illustrated below are not 'true' results, this is due to a number of respondents providing more than one answer, or the layout of the question does not permit a straight forward calculation. However, all of the results detailed below do provide a very good indication of the overall response/reaction to particular areas to be covered within the Waste Core Strategy. The consultation exercise has been an effective technique in encouraging responses from a wide range of members of the public.

Issue W1. – The Spatial Vision

1.1 Do you think that we need a vision for the WCS?

A	Yes	100%
B	No	
C	Don't know	

1.2 What would be your vision for sustainable waste management in Gloucestershire?

47% provided a response to this question

1.3 Do you think that the objectives for the WCS will deliver sustainable waste management?

A	Yes	46%
B	No	27%
C	Don't know	27%

1.4 If you answered No to 1.3 above, how would you alter the current objectives?

32% provided a response to this question.

Issue W2. – Time period of the plan

2.1 What do you consider to be an appropriate time frame for the WCS to work towards?

A	2018	48%
B	2020	13%
C	2026	13%
D	Other	26%

2.2 Do you think that the WCS should look in detail to 2018, and then more generally to 2026?

A	Yes	70%
B	No	25%
C	Don't know	5%

Issue W3. – Implementing the waste hierarchy

3.1 Is seeking to minimise waste an appropriate objective for the WCS?

A	Yes	100%
B	No	
C	Don't know	

3.2 What format do you think any waste minimisation policy should take?

A Rely on the saved WLP Policy 36 and roll it forward broadly in its current state in the WCS; 10%

B Revise WLP Policy 36 to take account of new issues,, such as threshold sizes of planning applications to determine whether applicants need to submit a waste minimisation statement.; 52%

C A combination of a & b above; 28%

D Another format; 10%

3.3 Should developers of large-scale new developments (for example houses, shops, offices etc) by responsible for the waste they generate?

A	Yes	95%
B	No	5%
C	Don't know	

3.4 If you answered YES to 3.3 above then how do you think applicants for large-scale new developments should contribute to the management of the waste generated by their projects?

A Allocating part of the site for suitable waste facilities; 19%

B Making monetary contributions towards the development of waste management infrastructure Elsewhere; 5%

C A combination of both of the above; 66%

D Other; 10%

3.5 **Do you consider that waste which cannot be avoided should be composted or recycled in the first instance?**

A	Yes	91%
B	No	9%
C	Don't know	

3.6 **Should the WCS include a specific policy to encourage the recovery of value from waste that cannot be practically composted or recycled?**

A	Yes	74%
B	No	4%
C	Don't know	22%

3.7 **If you answered YES to 3.6 above please use this space to include a wording or list the key points you would like to see in such a policy.**

33% provided a response to this question.

3.8 **How do you consider the issue of 'need' for waste management facilities should be addressed in the WCS, if at all?**

37% provided a response to this question.

3.9 **Do you have any other ideas how the Waste Hierarchy could be implemented?**

26% provided a response to this question.

Issue W4. – Making provision for waste

4.1 **Do you think that the WCS should broadly roll forward the same overarching strategy as that adopted in the WLP?**

A	Yes	71%
B	No	10%
C	Don't know	19%

4.2 **Do you think more sites for waste management facilities should be allocated than may be required to allow greater flexibility/choice?**

A	Yes	64%
B	No	36%
C	Don't know	

4.3 **Do you think that it is appropriate not to allocate sites for recycling/composting, and to determine** applications on a case-by-case basis?

A	Yes	59%
B	No	41%
C	Don't know	

4.4 Should Area Action Plans be prepared for parts of the County subject to significant change due to waste management operations?

A Yes 95%
B No 5%
C Don't know

4.5 Do you think the WCS should differentiate between local and strategic sites?

A Yes 77%
B No 18%
C Don't know 5%

4.6 If you answered YES to 4.5 then do you think the current figure of 50,000 tonnes annual throughput is an appropriate threshold for 'strategic' sites?

A Yes 14%
B No 19%
C There should be different thresholds depending on the types of waste being handled; 53%
D No threshold should be used at all; 14%

4.7 There are a number of ways by which possible sites for waste management facilities might be identified. The top row of the table presents a number of these, while the first column lists different types of facilities. For each type of facility, please indicate which method of site identification you think is most appropriate by placing a tick in the relevant column.

Facility identification matrix	Identify only smaller sites in a DPD	Identify only strategic sites in a DPD	Identify all preferred sites in a DPD	Only identify broad areas of search in a DPD	Identify no sites in a DPD and rely on a criteria based policy
Composting green waste	21%		30%	16%	33%
Composting kitchen waste	28%		28%	22%	22%
Biodegradable re-use, recycling, transfer/bulking-up		29%	29%	29%	13%
Inert re-use, recycling, transfer/bulking-up		22%	17%	33%	28%
Recovery/treatment facility (e.g. MBT, EfW)		23%	36%	12%	29%
Disposal sites (landfill)		31%	38%	6%	25%
'Other' facility type, please specify		40%	20%	20%	20%

In order to calculate the results each row should total 100 per cent, therefore these results provide an indication of the preferred location of a particular type of facility.

Issue W5. – Locational Issues

5.1 Do you think it is most appropriate to locate waste management facilities in towns, in rural areas, or somewhere in between? The top row of the table below lists different locations, while the first column lists different types of facilities. Please place a tick where you think it is most appropriate to locate each type of facility.

Town or rural location?	Town	Edge of town	Rural	Not sure
Composting green waste	17%	61%	22%	
Composting kitchen waste	22%	67%	11%	
Biodegradable re-use, recycling, transfer/bulking-up		86%	14%	
Inert re-use, recycling, transfer/bulking-up		73%	27%	
Recovery/treatment facility (e.g. MBT, EfW)	7%	36%	36%	21%
Disposal sites (landfill)		13%	60%	27%
'Other' facility type, please specify			33%	67%

In order to calculate the results each row should total 100 per cent, therefore these results provide an indication of the preferred location of a particular type of facility.

5.2 In addition to the choice between town and rural locations for facilities there is also the potential for a centralised (large scale strategic) or decentralised (small scale local) pattern. Please place a tick where you think it is preferable to have centralised or dispersed facilities for each waste type.

Centralised or dispersed facilities	Centralised facilities (in or near Gloucester/ Cheltenham)	Dispersed facilities (local facilities in each District)	Combination of centralised and dispersed	Not sure
Composting green waste		76%	24%	
Composting kitchen waste	10%	71%	19%	
Biodegradable re-use, recycling, transfer/bulking-up	10%	57%	23%	10%
Inert re-use, recycling, transfer/bulking-up	19%	38%	33%	10%
Recovery/treatment facility (e.g. MBT, EfW)	42%	10%	24%	24%
Disposal sites (landfill)	29%	29%	29%	14%
'Other' facility type, please specify	14%		14%	72%

In order to calculate the results each row should total 100 per cent, therefore these results provide an indication of the preferred location of a particular type of facility.

5.3 Should the WCS identify sites for more landfill capacity towards the end of the WCS period (see issue 2) by:

A	Planning for full expected capacity	48%
B	Making limited provision	33%
C	Not making any specific provision	19%

5.4 If additional landfill void space has to be found, what criteria should be used for finding suitable sites for land filling residual waste? 47% provided a response to this question.

5.5 The matters set out in the table below are all very important criteria in finding suitable sites for waste management activities of all types. Please rank the ones you feel are most important from 1 to 5 (where 1 is the most important) but only using each ranking number once.

Ranking of locational issues	Rank
The suitability of local roads to handle traffic and the site access	10%
Protecting green-field land	7%
Locating new waste facilities with complementary existing activities	8%
Using sustainable modes of transport (e.g. by rail or water rather than by road)	10%
The impact on neighbouring land-uses (e.g. nearby businesses and residents)	11%
Safeguarding nature conservation interests (e.g. impact on wildlife, biodiversity etc)	11%
Protecting the historic environment and built heritage (e.g. listed buildings)	6%
Locating facilities near to the source of waste arising	17%
The visual impact of the facility	5%
Preventing environmental pollution (i.e. protection of water resources, noise, dust, air emissions, litter, vermin, birds, odours, vibration and land stability)	15%

Issue W6. – Implementing the Joint Municipal Waste Strategy

6.1 How should the waste processing requirements set out in the JMWMS be translated into site allocations?

A	By allocating specific sites	10%
B	By using criteria based policy (particularly for waste management options at the top of the waste hierarchy)	55%
C	Other	15%
D	Don't know	20%

Issue W7. – Assessing cumulative impact

7.1 What criteria would you use to determine the 'cumulative impact' of a waste management facility on a host community? 28% provided a response to this question.

7.2 How should existing waste management facilities be safeguarded from encroachment by potentially incompatible land-uses?

A	By using the approach proposed in the safeguarding policy	59%
B	By some other way, (please specify)	18%
C	Don't know	23%

Issue W8. – Dealing with hazardous waste

8.1 Is seeking to minimise hazardous waste at source an appropriate objective for the WCS?

A	Yes	85%
B	No	5%
C	Don't know	10%

8.2 Is it appropriate to safeguard existing hazardous waste management facilities provided that they are environmentally acceptable?

A	Yes	85%
B	No	5%
C	Don't know	10%

8.3 If you answered YES to 8.2, what criteria should be used to determine the acceptability of a facility for dealing with hazardous waste? The table below shows a list of criteria that need to be considered for both existing and proposed hazardous waste facilities. Please rank the criteria that need to be considered for both existing and proposed hazardous waste facilities. Please rank the criteria you feel are most important, from 1 to 5 (where 1 is the most important) but only using each ranking number once.

Determining the 'Environmental Acceptability' of Hazardous Waste Facilities	**Rank**
The location of the facility in relation to local, regional or national hazardous waste arisings	10%
The suitability of local roads to handle traffic and the site access	8%
The availability of sustainable modes of transport nearby (e.g. rail or water)	6%
The impact on neighbouring land uses (e.g. nearby businesses and residents)	11%
The impact on wildlife and biodiversity	7%
The impact on listed buildings, conservation areas and ancient monuments	3%
The compatibility of the facility with neighbouring land-uses	9%
The visual impact of the facility	5%

The need for the facility	13%
Locating new hazardous waste facilities with complementary existing activities	9%
The pollution control record of the facility	11%
The effect that the facility closing will have on the environment (e.g. derelict land issues, waste travelling to different facilities)	8%

8.4 What other options do you consider there are for managing hazardous waste?
19% provided a response to this question.

Issue W9. – Waste Management and the Green Belt

9.1 What factors should be used in determining the appropriateness of waste development in the Green Belt? Please rank the ones you feel are most important from 1 to 5 (where 1 is the most important) but only using each ranking number once.

Suitability of locating waste management facilities within the Green Belt	Rank
Proximity to arisings and reducing the distance waste has to travel	12%
Suitability of local roads to handle traffic and the site access	14%
The planning history of the site	5%
Co-locating complementary or ancillary activities with existing activities	12%
Good facility design	8%
Re-using previously developed land or redundant agricultural buildings	21%
Economic and employment benefits	4%
Maintaining the openness of the Green Belt	11%
Preventing the merging of nearby town areas	5%
Safeguarding the setting of historic towns	8%

9.2 Do you consider that redefining the Green Belt boundary to take into account and provide more potential for waste management facilities on existing sites/brownfield land is appropriate?

A	Yes	52%
B	No	48%
C	Don't know	

Issue W10. – Waste management and natural areas

10.1 Do you agree with the suggested wording for the policies on:

		Yes	No	Don't know
A	Nature conservation	50%	30%	20%
B	Water environment	75%	6%	19%
C	Landscape	53%	24%	35%
D	Archaeology	73%		27%

10.2 If you answered NO to any of the options in 10.1 please use this space for any additional comments you may have on the policies. 25% provided a response to this question.

10.3 Are there any other designations that you think should be included as being strategic environmental assets. 21% provided a response to this question.

Issue W11. – Sustainability Appraisal

11.1 In line with government guidance, this Issues and Options Paper has been subject to a Sustainability Appraisal that examines its likely social, environmental and economic impacts. Please use this space for any comment you may have ob the accompanying SA report.
28% provided a response to this question.

Issue M12. – Other Issues

12.1. Are there any other issues/options that this paper has not raised that you consider should be addressed? Or you may use this space for any general comments you wish to make about sustainable waste management in the county. **58% of respondents provided further comments.**

Appendix B
List of Respondents

Batchelor, Theresa
Billings -Ferrand, J. A.
Dauncey, Mrs.
Egerton, J.
Gerry, R.
Hooker, I.
McCurry, P.
Nott, D.
Quest, D.
Chartered Institute of Waste Management (CIWM)
Cheltenham Borough Council – Strategic Land Use Team
Council for the Protection of Rural England (CPRE)
Cllr. Ceri Jones - County Councillor for Bishops Cleeve
Cotswolds Conservation Board
Dursley Town Council
Environment Agency - South West Region Liaison
Environment Agency – Tewkesbury Office
Environment Agency (Regulatory Waste Team)
Gill Pawson Planning
Gloucester City Council – Planning Services
Gloucestershire County Council – County Ecologist
Gloucestershire County Council – Landscape Officer
Gloucestershire County Council – Waste Management Unit
Government Office for the South West (GOSW)
GVA Grimley
Natural England
Network Rail
Newland Parish Council
Quenington Parish Council
Route Management Highways Agency
Safety in Waste And Rubbish Disposal (SWARD)
Severn Trent Water Ltd
Shurdington Parish Council
Smiths (Gloucester) Ltd
Stroud District Green Party
TACR Consultancy
Tewkesbury Borough Council
Tewkesbury Town Council
Thames Water Plc
Uley Parish Council
Warwickshire County Council
Wessex Water Services Ltd
Woodchester Parish Council

Partnership Discussions

Cotswold District Council
Cheltenham Town Council
Forest of Dean District Council
Gloucester City Council
Stroud District Council
Tewkesbury Borough Council
Waste Disposal Authority
Gloucestershire Waste Partnership
Gloucestershire Strategic Partnership
Gloucester Heritage Urban Regeneration Company
Wessex Water
Severn Trent Water
Cotswolds AONB Partnership
Wiltshire County Council
(a programme for meeting waste industry representatives has been drawn-up for Spring 2007)

Appendix C

List of Acronyms

Please note that although the majority of these acronyms do not feature in this document, the list has been provided to assist readers with understanding other planning documentation.

AAP	Action Area Plan
AMR	Annual Monitoring Report
AONB	Area of Outstanding Natural Beauty
APC	Air Pollution Control Residue
BMW	Biodegradable Municipal Waste
C&D	Construction and demolition waste
C&I	Commercial and industrial waste
CABE	Commission for Architecture and the Built Environment
CBI	Confederation of British Industry
CPA	County Planning Authority
CPRE	Council for the Protection of Rural England
CS	Community Strategy
CVS	Local Council for Voluntary Services
DC	Development Control
DCLG	Department of Communities & Local Government
DEFRA	Department of Environment, Food and Rural Affairs
DETR	Department of the Environment, transport and the Regions
DoE	Department of Environment
DPD	Development Plan Document
EA	Environment Agency
FoE	Friends of the Earth
GCC	Gloucestershire County Council
GDPO	General Development Procedure Order
HSE	Health and Safety Executive
IPPC	Integrated Planning and Pollution Control
LDD	Local Development Document
LDF	Local Development Framework
LDS	Local Development Scheme
LPA	Local Planning Authority
LSP	Local Strategic Partnership
LTP	Local Transport Plan
LTP2	Local Transport Plan 2
M&W	Minerals and Waste
M&WDF	Minerals and Waste Development Framework
M&WDPD	Minerals and Waste Development Plan Document
MWDS	Minerals and Waste Development Scheme
M&WPA	Minerals and Waste Planning Authority
MLP	Minerals Local Plan
MPG	Minerals Planning Guidance Note
MPS	Minerals Planning Statement
MWMS	Municipal Waste Management Strategy
ODPM	Office of the Deputy Prime Minister
PPC	Pollution Prevention and Control
PPG	Planning Policy Guidance Note
PPS	Planning Policy Statement
RAWP	Regional Aggregates Working Party
RPB	Regional Planning Body
RPG	Regional Planning Guidance
RSS	Regional Spatial Strategy
RTAB	Regional Technical Advisory Body
RWMS	Regional Waste Management Strategy
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SAM	Scheduled Ancient Monument
SCI	Statement of Community Involvement
SEA	Strategic Environmental Appraisal
SMR	Sites and Monuments Record
SoS	Secretary of State
SPA	Special Protection Area
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
SSSI	Site of Special Scientific Interest
SWRA	South West Regional Assembly
T&CP	Town & Country Planning
WCA	Waste Collection Authority
WCS	Waste Core Strategy
WDA	Waste Disposal Authority
WLP	Waste Local Plan
WMS	Waste Minimisation Statement
WPA	Waste Planning Authority

Appendix D
Glossary of Terms

Please note that although the majority of these terms do not feature in this document the list has been provided to assist readers with understanding other planning documentation.

Anaerobic Digestion: A process where biodegradable material is encouraged to break down in the absence of oxygen. Material is placed into a closed vessel and in controlled conditions the waste breaks down into digestate and biogas.

Annual Monitoring Report (AMR): Assesses the implementation of the LDS and extent to which the policies in LDD's are being achieved.

Area Action Plan (AAP): Provide a planning framework for areas of change and areas of conservation.

Area of Outstanding Natural Beauty (AONB): A landscape area of high natural beauty, which has been designated under the National Parks and Access to the Countryside Act (1949).

Biodegradable: Materials which can be chemically broken down by naturally occurring micro-organisms into simpler compounds. In the context of this document it refers principally to waste containing organic material which can decompose giving rise to gas and leachate and other by-products.

Biogas: Gas produced by the decomposition of organic waste in the absence of oxygen, and which can be used as a fuel.

Bring System: A recycling system that relies on the public segregating and delivering waste materials to collection points (e.g. bottle and paper banks at local supermarkets).

Cell: The compartment within a landfill in which waste is deposited. The cell includes physical boundaries such as a low permeability base, a bund wall and low permeability cover.

Central (Community) Composting: Large scale schemes which handle kitchen and garden waste from households and which may also accept suitable waste from parks and gardens.
Civic Amenity Site (CAS) See Household Recycling Centres (HRC).

Combined Heat and Power: The combined production of heat (usually in the form of steam) and power (usually in the form of electricity). In waste-fired facilities, the heat would normally be used as hot water to serve a district-heating scheme.

Community Strategy: The Local Government Act 2000 requires local authorities to prepare a Community Strategy. It sets out the broad vision for the future of the local authority's area and proposals for delivering that vision.

Composting: A biological process which takes place in the presence of oxygen (aerobic) in which organic wastes, such as garden and kitchen waste are converted into a stable granular material. This can be applied to land to improve soil structure and enrich the nutrient content of the soil.

Controlled Waste: Comprised of household, industrial, commercial, hazardous and sewage waste which require a waste management license for treatment, transfer and disposal. The main exempted categories comprise mine, quarry and farm wastes. The government is currently consulting on the extension of controls to farm wastes. However, materials used for agricultural improvement, such as manure and slurry, will not become controlled. Radioactive and explosive wastes are controlled by other legislation and procedures.

Core Strategy: Sets out the long-term spatial vision for the local planning authority area and the strategic policies and proposals to deliver that vision.

Department for Communities and Local Government (DCLG): The Government department with responsibility for planning and local government.

Department for the Environment Food and Rural Affairs (DEFRA): Government department with national responsibility for sustainable waste management.

Development Control policies: A set of criteria-based policies required to ensure that all development within the area meets the vision and strategy set out in the core strategy.

Development Plan: In Gloucestershire this comprises the Structure Plan, District Local Plans, and the Minerals & Waste Local Plans.

Development Plan Document (DPDs): These are spatial planning documents that are subject to independent examination. They will have 'development plan' status. See the definition of Minerals & Waste Development Plan Document below.

EC or EU Directive: A European Community legal instruction, which is binding on all Member States, but must be implemented through legislation of national governments within a prescribed timescale.

Energy Recovery: Includes a number of established and emerging technologies, though most energy recovery is through incineration technologies. Many wastes are combustible, with relatively high calorific values – this energy can be recovered through (for instance) incineration with electricity generation, gasification, pyrolysis or refuse derived fuel.

Engagement: Entering into a deliberative process of dialogue with others, actively seeking and listening to their views and exchanging ideas, information and opinions. Unlike 'mediation' or 'negotiation' engagement can occur without there being a dispute to resolve.

Enquiry by Design: This process helps reach agreement between groups that would normally hold differing aspirations by bringing them together and focusing on the sustainability and quality of the urban environment itself. All concerns - technical, political, environmental and social - are tested and challenged by the design itself, so that design leads rather than follows the process.

Environment Agency: Established in April 1996, combining the functions of former local waste regulation authorities, the National Rivers Authority and Her Majesty's Inspectorate of Pollution. Intended to promote a more integrated approach to waste management and consistency in waste regulation. The Agency also conducts national surveys of waste arising and waste facilities.

Environmental Report: A document required by the SEA Directive as part of an environmental assessment, which identifies, describes and evaluates the likely significant effects on the environment of implementing a plan or programme.

Gasification: The thermal breakdown of organic material by heating waste in a low-oxygen atmosphere to produce a gas. This is then used to produce heat/electricity. Similar to pyrolysis.

Government Office for the South West (GOSW): The Government's regional office. Local Planning Authorities will use this office as a first point of contact for discussing the scope and content of Local Development Documents and procedural matters.

Green Belt: Areas of land defined in Structure Plans and District Wide Local Plans that are adjacent to urban areas, where permanent and strict planning controls apply in order to; check the unrestricted sprawl of built up areas; safeguard the surrounding countryside from further encroachment; prevent neighbouring towns from merging into one another;

preserve the special character of historic towns and assist urban regeneration.

Greenfield Site: A site previously unoccupied by built development.

Greenhouse Gases: Gases such as methane and carbon dioxide that are believed to contribute to global warming by trapping heat between the earth and the atmosphere.

Household Recycling Centres (HRCs): Sites to which the public can bring domestic waste, such as bottles, textiles, cans and paper for free disposal. HRCs may also accept bulky household waste and green waste. Where possible, the collected waste is recycled after sorting.

Hydrogeology: The study of the movement of water through its associated rock strata.

Incineration: The controlled burning of waste, either to reduce its volume, or its toxicity. Energy recovery from incineration can be achieved by utilising the calorific value of paper, plastic, etc to produce heat or power. Current flue-gas emission standards are very high. Ash residues still tend to be disposed of to landfill.

Inspector's Report: This will be produced by the Planning Inspector following the Independent Examination and will be binding on the County Council.

Inert Waste: Waste which, when deposited into a waste disposal site, does not undergo any significant physical, chemical or biological transformations and which complies with the criteria set out in Annex 111 of the EC Directive on the Landfill of Waste.

Integrated Pollution Prevention and Control (IPPC): Is designed to prevent or, where that is not possible, to reduce pollution from a range of industrial and other installations, including some waste management facilities, by means of integrated permitting processes based on the application of best available techniques.

Kerbside Collection: Any regular collection of recyclables from premises, including collections from commercial or industrial premises as well as from households. Excludes collection services delivered on demand.

Landfill: The deposit of waste onto and into land in such a way that pollution or harm to the environment is prevented and, through restoration, to provide land which may be used for another purpose.

Landfill Allowance Trading Scheme (LATS): Process of apportionment, by local authority area, of the tonnage of bio-degradable municipal waste that may be disposed of to landfill to meet EU Landfill Directive targets.

Landfill Gas: Gas generated by the breakdown of biodegradable waste under aerobic conditions within landfill sites. The gas consists primarily of methane and carbon dioxide. It is combustible and explosive in certain conditions.

Landfill Tax: A tax introduced in 1996 by HM Custom and Excise on waste deposited in licensed landfill sites, with the aim of encouraging more sustainable waste management methods and generating funds for local environmental projects. A revision to the landfill tax credit scheme in 2003 introduces the option of giving tax credits explicitly to biodiversity projects.

Landraise: Where land is raised by the deposit of waste material above existing or original ground level.

Landspreading: The application of wastes or sludges to the land and thereby facilitating their degradation and incorporation into the top layer of soil. Fertiliser is usually added to assist aerobic breakdown.

Land Use Planning: The Town and Country Planning system regulates the development and use of land in the public interest, and has an important role to play in achieving sustainable waste management.

Licensed Site: A waste disposal or processing facility which is licensed under the Environmental Protection Act for that function.

Local Development Framework (LDF): Comprises a portfolio of local development documents that will provide the framework for delivering the spatial planning strategy for the area.

Local Development Document (LDD): A document that forms part of the Local Development Framework. Can either be a Development Plan Document or a Supplementary Planning Document.

Local Development Scheme (LDS): Sets out the programme for the preparation of the local development documents. Must be submitted to Secretary of State for approval within six months of the commencement date of the Act regardless of where they are in terms of their current development plan.

Local Strategic Partnership (LSP): Non-statutory, non-executive body bringing together representatives of the public, private and voluntary sectors. The LSP is responsible for preparing the Community Strategy.

Materials Recovery/Recycling Facility (MRF): A site where recyclable waste, usually collected via kerbside collections or from Household Recycling Centres, is mechanically or manually separated, baled and stored prior to reprocessing.

Mediation: Intervention into a dispute by an acceptable impartial neutral person whose role it is to assist the parties in dispute to reach their own mutually acceptable settlement. It is essentially a voluntary procedure, its proceedings are confidential to the participants; any settlement however can be made public with the agreement of all parties.

Methane: A colourless, odourless gas formed during the anaerobic decomposition of putrescible waste. It is the major constituent of landfill gas.

Minerals & Waste Development Plan Document (M&WDPD): Spatial minerals and waste related planning documents that are subject to independent examination. There will be a right for those making representations seeking change to be heard at an independent examination. The WCS is a M&WDPD.

Minerals & Waste Development Scheme (M&WDS): Sets out the programme for the preparation of the minerals and waste development documents. Must be submitted to Secretary of State for approval within six months of the commencement date of the Act regardless of where they are in terms of their current development plan.

Minerals & Waste Development Framework (M&WDF): Comprises a portfolio of minerals and waste development documents which will provide the framework for delivering the spatial minerals and waste planning strategy for the area.

MPG: Mineral Planning Guidance.
MPS: Mineral Policy Statement – Guidance documents which set out national mineral planning policy. They are being reviewed and updated and are replacing MPGs.

Negotiation: Process of reaching consensus by exchanging information, bargaining and compromise that goes on between two or more parties with some shared interests and conflicting interests. Negotiation is likely to be part of the process of mediation, but can also happen outside of any formal mediation and without the assistance of a neutral person.

Office of the Deputy Prime Minister (ODPM): The former Government department with responsibility for planning and local government. In 2006 the department changed to the Department for Communities and Local Government (DCLG).

Planning Aid: Voluntary provision by planners of free and independent professional advice on planning to individuals or groups unable to afford to pay for the full costs of such advice. Planning Aid includes the provision of training so that its clients can be empowered through better understanding of how the planning system works and the development of skills that enable them to present their own case more effectively.

Planning Inspectorate (PINS): The Government agency responsible for scheduling independent examinations. The planning Inspectors who sit on independent examinations are employed by PINS.

Planning Policy Guidance Notes (PPGs): Government policy statements on a variety of issues that are material considerations in determining planning applications.

Planning Policy Statement (PPS): Guidance documents which set out national planning policy. They are being reviewed and updated and are replacing PPGs.

Preferred Area: Area within which waste management uses may be suitable in principle, subject to extensive consultation.

Proposals Map: Illustrates the policies and proposals in the development plan documents and any saved policies that are included in the local development framework.

Public Consultation: A process through which the public is informed about proposals fashioned by a planning authority or developer and invited to submit comments on them.

Putrescible Waste: Organic waste which, when deposited at a landfill site, will decompose and give rise to potentially polluting by-products in the form of liquids or gases.

Pyrolysis: The heating of waste in a closed environment (i.e. in the absence of oxygen) to produce a secondary fuel product.

Ramsar Site: An internationally designated area listed under the European Convention of Wetlands due to its importance for waterfowl habitats.

Restoration: The methods by which the land is returned to a condition suitable for an agreed after-use following the completion of tipping operations.

Recovery: The process of extracting a product of value from waste materials, including recycling, composting and energy recovery.

Recycled Aggregates: Aggregates produced from recycled construction waste such as crushed concrete, road planings etc.

Recycling: Involves the reprocessing of wastes, either into the same product or a different one. Many non-hazardous industrial wastes such as paper, glass, cardboard, plastics and scrap metal can be recycled. Hazardous wastes such as solvents can also be recycled by specialist companies, or by in-house equipment.

Reduction: Achieving as much waste reduction as possible is a priority action. Reduction can be accomplished within a manufacturing process involving the review of production processes to optimise utilisation of raw (and secondary) materials and recirculation processes. It can be cost effective, both in terms of lower disposal costs, reduced demand from raw materials and energy costs. It can be carried out by householders through actions such as home composting, re-using products and buying goods with reduced packaging.

Refuse Derived Fuel (RDF): A fuel product recovered from the combustible fraction of waste, in either loose or pellet form.

Regional Planning Guidance (RPG): Produced by the Government Office for the South West (GOSW)

on behalf of the Secretary of State. Until it is replaced by the new Regional Spatial Strategy (RSS) it provides a regional strategy within which Local Plans, Local Development Documents and the Local Transport Plan should be prepared.

Regional Spatial Strategy (RSS): This document is being prepared by the South West Regional Assembly and will replace the Regional Planning Guidance for the South West. It will have statutory development plan status.

Regional Technical Advisory Body (RTAB): Supports and advises on waste management options and strategies. Also develops regional targets and objectives for waste management.

Re-use: The reuse of materials in their original form, without any processing other than cleaning. Can be practised by the commercial sector with the use of products designed to be used a number of times, such as re-useable packaging. Householders can purchase products that use refillable containers, or re-use plastic bags. The processes contribute to sustainable development and can save raw materials, energy and transport costs.

Saved Plan/Policies: Under the Planning and Compulsory Purchase Act 2004 the Gloucestershire Minerals and Waste Local Plans have been 'saved' for a period of three years (either from the date of adoption or September 2004 as appropriate).

Secondary Aggregates: Aggregates derived from by-products of the extractive industry, e.g. china clay waste, colliery spoil, blast furnace slag, pulverised fuel ash.

Site of Special Scientific Interest: A site statutorily protected for its nature conservation, geological or scientific value.

Site-specific allocations and policies: Allocations of sites for specific or mixed uses or development. Policies will identify any specific requirements for individual proposals.

South West Regional Assembly (SWRA): Body responsible for regional planning and waste strategy matters in the South West.

Special Areas of Conservation (SAC): Designation made under the Habitats Directive to ensure the restoration or maintenance of certain natural habitats and species some of which may be listed as 'priority' for protection at a favourable conservation status.

Special Protection Area (SPA): Designations made under the EC Directive 79/409 on bird conservation (The Birds Directive), the aim of which is to conserve the best examples of the habitats of certain threatened species of bird the most important of which are included as priority species.

Stakeholder: Anyone who is interested in, or may be affected by the planning proposals that are being considered.

Strategic Environmental Assessment (SEA): Local Planning Authorities must comply with European Union Directive 2001/42/EC which requires a high level, strategic assessment of local development documents (DPDs and, where appropriate SPDs) and other programmes (e.g. the Local Transport Plan and the Municipal Waste Management Strategy) that are likely to have significant effects on the environment.

Statement of Community Involvement (SCI): The County Council must produce a local development document which sets out how and when the community can get involved in the preparation of DPDs. It should also set out the LPA's vision and strategy for community involvement, how this links to other initiatives such as the community strategy, and how the results will feed into DPD preparation. The SCI be subject to independent examination.

Structure Plan: A broad land use and transport strategy which establishes the main principles and

priorities for future development. Prepared by the County Council as part of the Development Plan.

Supplementary Planning Document (SPD): Policy guidance to supplement the policies and proposals in development plan documents. They will not form part of the development plan or be subject to independent examination. (Formally known as Supplementary Planning Guidance)

Sustainability Appraisal (SA): Local Planning Authorities are bound by legislation to appraise the degree to which their plans and policies contribute to the achievement of sustainable development. The process of Sustainability Appraisal is similar to Strategic Environmental Assessment but is broader in context, examining the effects of plans and policies on a range of social, economic and environmental factors. To comply with Government policy, Gloucestershire County Council is producing a Sustainability Appraisal that incorporates a Strategic Environmental Assessment of its Minerals and Waste Local Development Documents.

Sustainable Development: Development which is sustainable in that which meets the needs of the present without comprising the ability of future generations to meet their own needs.

Sustainable Waste Management: Means using material resources efficiently, to cut down on the amount of waste we produce. And where waste is generated, dealing with it in a way that actively contributes to economic, social and environmental goals of sustainable development.

Voidspace: The remaining capacity in active or committed landfill or landraise sites.

Waste: Is the wide ranging term encompassing most unwanted materials and is defined by the Environmental Protection Act 1990. Waste includes any scrap metal, effluent or unwanted surplus substance or article that requires to be disposed of because it is broken, worn out, contaminated or otherwise spoiled. Explosives and radioactive wastes are excluded.

Waste Arising: The amount of waste generated in a given locality over a given period of time.

Waste Hierarchy: Suggests that: the most effective environmental solution may often be to reduce the amount of waste generated – reduction. Where further reduction is not practicable, products and materials can sometimes be used again, either for the same or a different purpose – re-use. Failing that, value should be recovered from waste, through recycling, composting or energy recovery from waste. Only if none of the above offer an appropriate solution should waste be disposed.

Waste Local Plan: A statutory land-use plan prepared under the 1990 & 1991 Planning Acts. Its purpose is set out detailed land-use policies in relation to waste management development in the County.

Waste Management Licenses: Licenses are required by anyone who proposes to deposit, recover or dispose of controlled waste. The licensing system is separate from, but complementary to, the land use planning system. The purpose of a licence and the conditions attached to it is to ensure that the waste operation that it authorises is carried out in a way that protects the environment and human health.

Waste Minimisation: Reducing the volume of waste that is produced at source is at the top of the Waste Hierarchy.

Appendix E Environment Agency Position Statement

Current Agency guidance does not include "stand off distances" for the location of each type of waste facilities in respect of sensitive receptors. The EA has position statements in respect of composting facilities and the location of landfills in respect of Groundwater (RGN3).

All applications for a waste facility are required to include a detailed risk assessment. This assessment should examine the risks from the site which have the potential to cause harm. For each potential risk the possible pathways and possible receptors should be examined. From the results of the risk assessment the applicant should provide / suggest control measures within their application which would be assessed by the EA as part of the determination of the application.

In summary the EA's position statement regarding the location of composting facilities does not state that they will not accept composting facilities within 250 metres of a receptor. There is a presumption against permitting such facilities where the boundary of the facility is within 250 metres of a workplace or the boundary of a dwelling, unless the application is accompanied by a site-specific risk assessment, based on clear, independent scientific evidence which shows that the bioaerosol levels are and can be maintained at appropriate levels at the dwelling or workplace.

The Environment Agency's position on the health effects from composting any waste type was effective from 13th August 2001. It was released both internal and external to the Agency in the Agency's Technical Guidance on Composting Facilities, in order to clarify key issues for consistency and transparency.

The Agency's position is:
There will be a presumption against permitting [and to object to any planning application] of any new composting process [or any modification to an existing process] where the boundary of the facility is within 250 metres of a workplace or the boundary of a dwelling, unless the application is accompanied by a site-specific risk assessment, based on clear, independent scientific evidence which shows that the bioaerosol levels are and can be maintained at appropriate levels at the dwelling or workplace: and

The Agency will continue to work with DEFRA and others to identify appropriate controls measures that may allow operations to take place within 250 metres of the boundary or a dwelling/workplace.

The Agency will in the future identify and review the licences/registrations of all existing sites that may potentially affected by this position and assess the scale of impact. The timing of this work will depend on HSE research into dispersal monitoring and health effects and the peer review of existing research. Once of the scale of this impact has been assessed an action plan will be prepared and prioritised against existing Agency business planning priorities. No action should be taken by staff in relation to these sites until the HSE research is carried out and further guidance issued.

1. Background

This position statement has been produced as a result of the following information:

DETR and Agency research "Health Effects of Composting" and "Monitoring the Environmental Impact of Composting Plants"[6] shows that composting has the potential to harm the health of humans situated for long periods within 250 metres of composting operations.

This position covers only aerobic recovery processes for biodegradable waste and therefore its scope is limited to the composting of separated fractions of municipal solid waste and to other facilities composting industrial or commercial biodegradable wastes which fall to be regulated by way of waste management licence or waste exemption. It does not therefore cover treatment of whole/unsegregated waste or mechanically separated waste, such as MBT, though where such waste is being composted similar standards will apply as appropriate.

In this position statement, reference to composting means an aerobic, biological degradation process that produces a material suitable for recovery by spreading on land, used as cover at landfills or incorporating into growing media.

2. Waste Strategy

Waste Strategy 2000 recognises that to develop more sustainable waste strategies, the UK has to move from an over-reliance on landfill, to more integrated strategies including energy recovery, recycling and composting. The Landfill Directive requires a substantial diversion of the biodegradable fraction of MSW from landfill and this is reflected in challenging targets for recycling and composting in WS2000. The net result is expected to be an order of magnitude increase in the amounts of MSW composted. WS2000, as it applies in Wales, is currently under review. Targets for Wales will be produced in the waste strategy for Wales during 2001/2002.

3. Human health impacts

Under properly controlled conditions, including the location of the process relative to sensitive receptors, composting is an acceptable form of managing waste and provides a useful means of recovering biodegradable waste to produce a humus-like material. However, the biological degradation of waste, whether in a dustbin, landfill, compost process or anaerobic digestion plant utilises the action of natural micro-organisms and will produce odours, volatile organic compounds, and release bio-aerosols (air-borne micro-organisms, including pathogenic bacteria and fungal spores). These bacteria and fungi are released, mainly into the air throughout the composting process but are particularly prevalent during operations such as screening, shredding and turning. Levels of bacteria and fungi released are significant and, in particular, one fungus, *Aspergillus fumigatus*, a Class 2 pathogen, can be present in sufficient concentrations to give rise to adverse health effects in humans.

While such effects may be most manifest in the infirm and those with immune deficiency, a significant minority of the population can be affected by releases of these agents at any level significantly above background levels.

[6] Health Effects of Composting - A study of three composting sites and review of past data, AEAT, to be published August 2001. Monitoring the Environmental Impact of Waste Composting Plants R&D Technical Report P428, to be published August 2001.

Additionally, if non-sensitive population is exposed, they may become sensitised to low levels of bio-aerosols.

4. Agency Responsibility

The Environment Agency is required to ensure that waste is recovered or disposed of without endangering human health and without the use of processes or methods which could harm the environment and in particular without -

a) Risk to water, air, soil, plants or animals; or
b) Causing nuisance through noise or odours; or
c) Adversely affecting the countryside or places of special interest.

As with any other waste management process composting has the potential to adversely affect the environment and/or human health. In particular, research over the past five years has demonstrated that composting has the potential to produce significant environmental emissions in relation to noise, odours, dust and bio-aerosols (including bacteria and fungal spores).

While noise can be adequately controlled through operational measures and dust is reported as unlikely to cause a nuisance to the public, both odour and bio-aerosols have the potential to impact on the public at some distance from the operations. Although they can be reduced they are an inevitable consequence of the natural biodegradation process.

The emissions from waste composting processes have the potential to contain sufficiently high concentrations of bio-aerosols to cause and/or exacerbate certain respiratory disease in some of the population. One cause for concern arises from the thermo-tolerant fungus known as *Aspergillus fumigatus.*

Research carried out by DETR and the Agency has shown that concentration levels of the spores of the fungus are likely to be reduced to background levels within a distance of 250 metres from the source. The research also shows that 250 metres is probably sufficient to deal with other releases from a properly operated composting facility such as noise, dust and odour.

5. Measures

It is possible to take measures to reduce the adverse effects of composting. These include:

- Controlling the airflow by carrying out all or part of the process in a sealed building or under negative pressure;
- Operating in-vessel;
- Treating gases and odours produced by the process;
- Utilising a different turning regime with different equipment (although the pile must be thoroughly mixed, kept aerobic and maintained at the correct temperatures);
- Keeping the compost piles suitably damp;

6. Clarification of Position

All permit applications or *modifications* should be accompanied by a site-specific risk assessment. Where an operation is proposed within 250 metres of a sensitive receptor, there will be a presumption against permitting or exempting unless the site specific risk assessment based on sound, *independent*, scientific evidence which demonstrates that *appropriate levels* can be achieved and maintained at any working or dwelling place whose boundary lies within 250 metres of the boundary of the site for which the permit has been applied. In making the above references

it is assumed that the operator and their staff are not included as receptors in the risk assessment.

Modifications to existing sites will be primarily of concern where it is proposed that physical alterations or extensions to the site boundary will take the operations closer to a sensitive receptor. Modifications to the tonnage, or removal of containment (e.g. building) will only be of concern if these had specifically been introduced as mitigating factors for the justification of locating a proposal closer than 250m to a sensitive receptor.

For the purposes of the position *independent* simply means a recognised establishment, educational institute or appropriately qualified person who is third party to the proposal.

Reference to *appropriate levels* means effectively background levels specific to that locality. This may be judged to be de-minimus or the location may present particular circumstances that warrant undertaking background monitoring to establish a pre-composting base level, for instance where significant alternative sources of bio-aerosols are already present such as near a landfill.

7. Exempt facilities

The Agency has submitted proposals to DETR to change the existing exemption for composting (Schedule 3, paragraph 12). The proposals reflect most, if not all of the controls and restrictions considered necessary by the Agency and described in this position statement. In addition the Agency has recommended that certain composting operations be allowed to take waste from outside sources and then sent on for use by outside users. A charging scheme for registering and inspecting composting activities has also been proposed.

A Government consultation on the revision of Exempt Activities including revision to Paragraph 12 is expected soon.

This position should be taken to over-arch, take precedence but not replace existing guidance such as the current Internal Guidance on Paragraph 12 Composting Activities issued in February 2001.

Appendix F
Schedule of Representations

Please see separate attachment.

Waste Core Strategy Issues & Options

Public Consultation Summary

March 2007

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