

Gloucestershire Waste Core Strategy (WCS)
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Simon Hanes	1847	1847/1	<p>I am unclear whether all relevant technical solutions to the problem of waste management have been fully considered. In particular, whether pyrolysis as a method of reducing household waste to 25% of initial volume, producing an inert char with no fly ash and also producing sufficient energy to make the whole process self sustaining.</p> <p>Although this has been mentioned in WCS reports, I have not seen a critical comparison of this with other available techniques. I am aware that transportable waste pyrolysis systems are becoming available in the UK. I think the technology should be more fully investigated.</p>	<p>Comments noted. The publication WCS describes a number of different waste recovery technologies including autoclaving, mechanical biological treatment (MBT), modern thermal treatment (incineration) and advanced thermal treatment (pyrolysis and gasification).</p> <p>In line with national policy (PPS10 – Planning for Sustainable Waste Management) the WCS adopts a 'technology neutral' approach and the four strategic site allocations that have been identified are capable of accommodating a range of different residual waste recovery operations such as pyrolysis.</p> <p>The type of process that comes forward on the sites will be a matter for the waste industry and in relation to municipal waste, the WDA. Paragraph 4.91 has been amended to clarify the fact that the strategic site allocations are capable of accommodating a range of different waste recovery processes.</p> <p>See Focused Change 20.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Anthony Boonham	1848	1848/1	<p>When you are researching for this new plan I wonder how far you go in world wide terms to see what is the thinking in counties abroad. I subscribe to a news letter from 'Global Specs Inc.' and occasionally the focus is on Waste Management and I enclose a link, www.republicservices.com this is not the first time I have seen what is the old fashioned way of collecting waste i.e whatever you didn't put on the bonfire or compost you put it all in one rubbish bin; here though the waste is put through a complete recycling system everything being put in one bin.</p> <p>I consider the present system in Gloucestershire is frankly pathetic, there is nothing more annoying than having driven miles to take plastic waste only to get to the site only to see on the on the side of the container a huge lists of the plastics you cannot put in so then they go in landfill.</p> <p>I feel that an electricity generating incinerator should built and that it should be capable of taking waste from at least two counties and planning permission should be applied as this was an national requirement (as indeed I think it is) . That the waste sorting process should be as automated as possible and that any labour requirement should be given to the long term unemployed.</p> <p>With the River Severn running through several counties use should be made of this waterway (and associated canals) to transport the waste and so</p>	<p>Comment noted. The publication WCS identifies how many existing recycling and composting facilities there are in Gloucestershire and based on future predictions identifies how much additional capacity will be needed in the future.</p> <p>This 'capacity gap' is relatively modest (19,000 tonnes/year). As this is not a maximum target and having regard to the need for flexibility and previous consultation responses, the publication WCS includes a criteria-based policy to allow new or expanded facilities to come forward as appropriate (Core Policy WCS2). Current recycling arrangements at existing facilities such as household recycling centres (HRCs) are however beyond the scope of the WCS.</p> <p>The publication WCS identifies four strategic site allocations and outlines a number of potential waste recovery options for those sites including modern thermal treatment (incineration). There is however no national requirement for planning permission to be granted for such facilities. Any proposal will be determined having regard to the WCS and any other material considerations.</p> <p>In relation to the importation of waste from outside Gloucestershire, the WCS emphasises the need to make sufficient provision for Gloucestershire's waste to reduce the movement of waste across borders in the interest of sustainability. It is however the case that inevitably</p>

			reduce the number of lorries with their pollution damage to the environment.	<p>some commercial waste is imported into and exported out of the county.</p> <p>The issue of long-term unemployment is outside the scope of the WCS.</p> <p>The publication WCS emphasises the importance of encouraging the sustainable movement of waste including by water and rail. It also seeks to reduce the environmental impact of road transport through the use of Transport Assessments (TA) and Travel Plans where appropriate. See Core Policy WCS14 – Sustainable Transport.</p> <p>No Change.</p>
Nick Burroughs Vale of White Horse District Council	938	938/1	No comment.	<p>Noted.</p> <p>No Change.</p>
Stephen Moore	936	936/1	The only comment I would have is that the target of 60% recycled or composted by 2020 seems unambitious seeing that many places on the continent are already achieving levels higher than this.	<p>The WCS seeks to ensure that at least 60% of household waste is recycled or composted by 2020 with an aspiration for 70%. This target is derived from the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS). The national target set out in the Waste Strategy for England (2007) is 50% by 2020. The revised EU Waste Framework Directive also has a target of 50% by 2020. The Council's target cannot therefore be described as unambitious.</p> <p>Whilst it is the case that 60% recycling/composting has already been exceeded in Cotswold District and at the Household Recycling Centres (HRCs) it is not</p>

				<p>correct to extrapolate this to mean that a much higher rate than 60% is achievable across Gloucestershire. The HRCs for example have consistently achieved a higher rate of recycling because it is easier to engage with the public at these sites. This is very different to collecting waste door to door where opportunities to engage are much more limited.</p> <p>Based on information set out in the report 'The Composition of Kerbside Collected Household Waste in Gloucestershire' (October 2008) it is estimated that about 77% of the waste stream is recyclable. To achieve a countywide recycling rate of 60% would mean capturing around 75% of the available recyclable waste at the kerbside and to achieve the 70% target would mean capturing 92% of the available recyclables. This is much higher than is currently being achieved (about 50% on average).</p> <p>It is also the case that some communities achieve higher rates than others. For example it is anticipated that for 2010/11, Tewkesbury Borough Council will achieve a recycling and composting rate of 54% and Gloucester City 46% despite having broadly similar systems to Cotswold District which is achieving over 60%.</p> <p>For these reasons the WCS target of at least 60% recycling/composting by 2020 is considered to be both appropriate and challenging. No change to the recycling target is therefore proposed, however the text of the WCS has been amended to clarify that the aspiration for 70% recycling/composting is</p>
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				<p>to be achieved by the year 2030. This has arisen through the Council's review of its residual waste project.</p> <p>See Focused Change 11.</p>
<p>S. Doherty</p> <p>Civil Aviation Authority</p>	1648	1648/1	<p>Whilst the CAA would not wish to comment on such plans, where officially safeguarded aerodromes lie within the Council's area of jurisdiction, we recommend that the Council considers the need of such aerodrome(s) within your development plan and consult with the aerodrome operator(s)/licensee(s) directly.</p>	<p>Comment noted. The issue of airport safeguarding is addressed in the general and specific development criteria set out in the strategic site schedules attached at Appendix 5.</p> <p>No Change.</p>
<p>Councillor Gordon Shurmer</p> <p>Gloucestershire County Council</p>	810	810/1	<p>I would support Stoke Orchard Parish Council's objection to the choice of site number 2, Wingmoor Farm West. This is an unacceptable proposal for extending the area of waste activity into agricultural land, in the green belt.</p> <p>Similarly I would share their concern over the adverse net increase in traffic impact upon Stoke Road, with only academic reference to the possible need for highway improvements at the A435 junction. There is no reference to any consideration of the fact that currently, only totally inadequate pedestrian and cycle provision, is currently available on Stoke Road. Indeed it would appear that the Halcrow report that we commissioned and paid for would seem to have been forgotten which in these times of austerity perhaps should be investigated.</p>	<p>Whilst the Wingmoor Farm (West) strategic site allocation is located within the Gloucester – Cheltenham Green Belt, the site is previously developed and would not involve the use of agricultural land. Furthermore, national policy, whilst generally seeking to protect the Green Belt, recognises the particular locational needs of some waste management facilities.</p> <p>With regard to traffic impact, each of the strategic site allocations has been subject to an initial transport appraisal. The general development criteria attached at Appendix 5 of the publication WCS clearly state that a full Transport Assessment (TA) will need to accompany any proposal for development. This will ensure that if a detailed scheme comes forward, due consideration is given to any necessary highway infrastructure improvements such as junction enhancements, pedestrian and cycle links etc. This will supplement the initial highway assessment that has informed</p>

				<p>the publication WCS.</p> <p>No Change.</p>
<p>Councillor Gordon Shurmer</p> <p>Gloucestershire County Council</p>	810	810/2	<p>I would also object to the continued inclusion of the above site within the Waste Core Strategy on the grounds of concerns over the impact on public health. You will be aware that the recent report by DustScan has shown that dust associated with APC (air pollution control) residues could be detected in dust samples collected beyond the Waste Management site boundary. APC residue is apparently a highly alkaline hazardous waste. It may contain volatile heavy metals and organic compounds such as dioxins and furans and therefore may present a serious risk to public health.</p>	<p>The health concerns referred to relate to the existing hazardous waste landfill operation at Wingmoor Farm (East) which, as clearly explained in the WCS is the subject of a current planning application which is yet to be determined. The future development of the site in relation to the waste handled, any particular conditions and subsequent monitoring will be addressed through the planning application process. The strategic site allocation at Wingmoor Farm (East) whilst located within the overall boundary of the Wingmoor East operation is for residual municipal and commercial waste recovery (treatment) not hazardous waste.</p> <p>Notwithstanding the above, with specific regard to the dust assessment referred to, the Environment Agency in addition to its ongoing monitoring undertook a monitoring project at the Wingmoor Farm (East) site over a 10-week period (21st September to 30th November). A report was then provided to the Health Protection Agency (HPA) for consideration against relevant air quality standards and guidelines. The HPA has now responded and has concluded that airborne concentrations of dioxins, furans, polychlorinated biphenyls (PCBs) and metals are likely to be lower than recognised guideline values and are 'unlikely to be associated with a significant risk to health', and specifically for chromium in its hexavalent form 'at the likely exposure concentrations the risk of cancer is likely to be very small but efforts to reduce exposure</p>

				<p>would be prudent'.</p> <p>It is also pertinent to note that Planning Policy Statement 10 – Planning for Sustainable Waste Management, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'.</p> <p>No Change.</p>
<p>Kathryn Oakey</p> <p>Elmstone Hardwicke Parish Council</p>	818	818/1	<p>The Parish Council do not support the Waste Core Strategy at this stage. The concern of the Parish Council is that the strategy includes the Wingmoor Farm (East) where hazardous waste is dealt with. Planning has been extended temporarily once already at this site, and now another planning application to extend the life of the site has been put in and has currently been withdrawn. Until this site is approved it should be excluded from the strategy. There are already numerous health concerns at the site, and the reason the application has been withdrawn is that the Environment Agency are carrying out a dust impact assessment as there is now evidence that Air Pollution Control residue dust has been found outside of the site. We now understand that Grundons have been importing this toxic incinerator ash to the site for many years. Resident's fears concerning health issues have been asthma, breathing difficulties, stress and birth defects. It would seem that the only way to give confidence to us would be to have continuous monitoring of the sites, over the whole life of the sites, something that is not currently</p>	<p>Comment noted. With regard to the current Wingmoor Farm (East) landfill operation, the publication WCS clearly explains that this is the subject of a current planning application which is yet to be determined. The future development of the site in relation to the waste handled, any particular conditions and subsequent monitoring will be addressed through the planning application process. Additional text has however been included at paragraph 4.129 to clarify the implications of planning permission not being granted at the site (i.e. an early review of the WCS or preparation of a landfill DPD).</p> <p>See Focused Change 26.</p> <p>With specific regard to the dust assessment referred to, the Environment Agency in addition to its ongoing monitoring undertook a monitoring project at the Wingmoor Farm (East) site over a 10-week period (21st September to 30th November). A report was then provided to the Health Protection Agency (HPA) for consideration against</p>

			<p>done or proposed. We also have a worry about the impact this is having on the animals grazing the fields in close proximity to the sites, and also the crops grown in these fields, all of which get into the human food chain. We understand that there is a need for sites in the county however this site is not suitable for the current hazardous waste, some of which comes from out of county.</p> <p>The strategy should be one of smaller waste sites, for domestic waste, with hazardous waste being disposed of at source or as close to source as possible.</p>	<p>relevant air quality standards and guidelines. The HPA has now responded and has concluded that airborne concentrations of dioxins, furans, polychlorinated biphenyls (PCBs) and metals are likely to be lower than recognised guideline values and are 'unlikely to be associated with a significant risk to health', and specifically for chromium in its hexavalent form 'at the likely exposure concentrations the risk of cancer is likely to be very small but efforts to reduce exposure would be prudent'.</p> <p>It is also important to note that whilst the strategic site allocation at Wingmoor (East) is located within the boundary of the existing landfill operation, the allocation is for residual municipal and commercial waste recovery (treatment) not hazardous waste landfill.</p> <p>In order to provide flexibility, Core Policy WCS4 allows for small-scale proposals (<50,000 tonnes/year) to come forward in appropriate locations subject to compliance with relevant criteria. With regard to the disposal of hazardous waste close to source, Core Policy WCS6 has been amended to ensure that hazardous waste is managed as close to source as possible.</p> <p>See Focused Change 27.</p>
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Neil Chapman Highways Agency	447	447/1	In considering future waste management proposals within Gloucestershire, the Agency needs to be satisfied that any proposed development takes account of the potential impact of development on the Strategic Road Network (SRN) and in particular, the M5, A417 and the western section of the A40. We are also keen to ensure that decisions regarding new development take into account the need for closer integration of transport and land use planning and that assessments on the suitability of sites for waste development are based on the principles of sustainable travel. Any major development proposals coming forward within the plan area would need to be accompanied by a robust transport evidence base. Where necessary, Travel Plans should be produced in accordance with good practice guidelines. In assessing any future proposal, we would only support a scheme if it can be demonstrated that it would not have a direct impact on the SRN. In summary, we find the Waste Core Strategy to be sound, subject to the proposed changes outlined below.	<p>Comments noted. Core Policy WCS14 – Sustainable Transport will ensure that development proposals are supported by a robust evidence base including a Transport Assessment (TA) and Travel Plan where appropriate.</p> <p>This will help to ensure that potential impacts on the road network are fully taken into account with any mitigation identified as necessary e.g. junction improvements.</p> <p>No Change.</p>

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Neil Chapman Highways Agency	447	447/2	We welcome the proposed wording of this objective (Strategic Objective 5) in particular managing waste close to where it arises and promoting the use of sustainable transport. Furthermore, we support the principle of co-locating similar facilities on existing/previously developed sites with the aim of reducing the number of trips. However, whilst this approach is welcomed, it is important for strategic sites of this nature to be located in highly accessible locations within close proximity of where the waste is generated.	Support noted. As the respondent acknowledges, Strategic Objective 5 emphasises the importance of managing waste close to source. The four strategic site allocations are all located within the central area defined as 'Zone C'. This will help to ensure that the majority of Gloucestershire's waste is managed in close proximity to where it is generated. No Change.
Neil Chapman Highways Agency	447	447/3	We acknowledge that new and expanded facilities will be required throughout Gloucestershire in order to meet objectives for recycling and composting. With regards to Criteria 4, we acknowledge the requirement for strategic scale developments to be located within relative close proximity to the urban areas. However, our concern is that 'Zone C' as defined on the Key Diagram is centred upon the M5 Motorway corridor through Gloucestershire. With this in mind, we welcome the second part of the policy which identifies criteria in which proposals will receive particular support. In particular, we endorse the inclusion of 'incorporate alternatives to the transport of waste by road' and 'are well located to allow employees to reach the site by foot, cycle or public transport'.	Comments and support noted. No Change.

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Neil Chapman Highways Agency	447	447/4	With regards to Criteria 2 in the wording of this policy (Policy WCS3), in addition to the requirement for a Travel Plan, we would expect such proposals to also be accompanied by a robust Transport Assessment.	Agree. Core Policy WCS3 has been amended to include reference to the need for a Transport Assessment (TA). See Focused Change 14.
Neil Chapman Highways Agency	447	447/5	<p>We have previously provided detailed comments in respect of the four sites allocated for residual waste recovery, which remain valid. In particular, we have been significantly involved in discussions concerning Javelin Park and our concerns over the safe and efficient operation of Junction 12 of the M5 Motorway remain as set out in our comments submitted to date.</p> <p>With regards to non-strategic residual waste facilities, we seek the addition of further criteria to only provide facilities in locations close to existing urban areas incorporating alternatives to the transport of waste by road.</p>	<p>Comment in relation to Javelin Park noted.</p> <p>The general development criteria attached at Appendix 5 state that a Transport Assessment will be required in support of any proposal on the strategic site allocations. With specific regard to Javelin Park, the site-schedule acknowledges the congestion problems at peak times at Junction 12. It is important to note however that the site already has planning permission for storage and warehousing and that a strategic waste facility is likely to result in a net <u>decrease</u> in traffic compared to the existing planning permission.</p> <p>In relation to non-strategic facilities, the suggested criterion is considered to be too onerous and restrictive and could prevent appropriate small-scale facilities coming forward e.g. on existing industrial/employment sites. The issue of sustainable transport is already adequately addressed through Core Policy WCS14 and the supporting text.</p> <p>No Change.</p>

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Neil Chapman Highways Agency	447	447/6	Core Policy WCS7. As previously stated, the Agency requests that additional reference is made to accessibility and sustainable transport considerations. We acknowledge the reference to traffic impacts but feel this would be better placed as an issue in its own right given its importance when considering the cumulative impact of developments.	Comment noted. It is acknowledged that Core Policy WCS7 could usefully include reference to accessibility and sustainable transport considerations. The policy has therefore been amended accordingly. See Focused Change 28.
Neil Chapman Highways Agency	447	447/7	We reiterate that regard should be given to the advice contained within PPS10 which seeks to protect Green Belts but recognises the particular locational needs of some waste management facilities. The Agency requests that in considering the wider environmental and economic benefits of proposals, the full impact of a proposal on the SRN will need to be considered.	Comment noted. Core Policy WCS10 is consistent with PPS10 recognising the locational needs of waste management facilities. PPS10 is referred to in the supporting text. In relation to potential impact on the Strategic Road Network (SRN) Core Policy WCS10 ensures that proposals must be consistent with other relevant development plan policies. This will include Core Policy WCS14 – Sustainable Transport thereby ensuring that potential transport impacts will be taken into account. No Change.

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Neil Chapman Highways Agency	447	447/8	<p>We welcome the inclusion of this section (paragraphs 4.275 - 4.278) within the submission document. We support the reference to the GTA. However, it is important to note that whilst the GTA does provide useful indicative thresholds, these are a guide and the requirement for a full TA will also depend on the location of the proposed development and its proximity to the SRN. In addition to early discussions with the Local Highway Authority, it is imperative that for developments which could impact upon the SRN discussions are also held with the Highways Agency at the earliest opportunity. With this in mind, we would wish to see the wording of paragraph 4.278 amended to read:</p> <p>In short, any major waste development generating more than 100 two-way movements a day or more than 30 movements within one hour or significant freight or HGV movements per day is likely to require a Transport Assessment. Furthermore, proposals under this threshold but in locations which could impact upon the Strategic Road Network may also require a Transport Assessment. It is recommended that early discussion is held with the Local Highway Authority (and where relevant, the Highways Agency) to determine whether a TA is required and, if so, to agree its scope.</p>	<p>Support noted. It is acknowledged that the GTA thresholds are a guideline only and in some instances, a TA may be required for development falling below these thresholds. It is also acknowledged that in some instances, discussions with the Highways Agency may be needed.</p> <p>The supporting text at paragraph 4.278 has therefore been amended accordingly.</p> <p>See Focused Change 35.</p>

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Neil Chapman Highways Agency	447	447/9	<p>In line with our comments above, we would also expect to be consulted with regard to the appropriate scoping of and suitability of a Travel Plan for proposals which could impact upon the safe and efficient operation of the SRN. We would therefore wish to see paragraph 4.280 amended to read:</p> <p>' ... As with the TA, early discussion with the Local Authority (and where relevant, the Highways Agency) is recommended to agree the need, scope and suitability of a Travel Plan.</p>	<p>Comment noted. It is acknowledged that reference should be made to the Highways Agency in relation to the scoping and suitability of a Travel Plan.</p> <p>The supporting text at paragraph 4.280 has therefore been amended to include reference to the Highways Agency.</p> <p>See Focused Change 36.</p>
Neil Chapman Highways Agency	447	447/10	<p>Core Policy WCS14. The Agency is generally supportive of this policy and welcomes its inclusion within the Core Strategy. However, further to our suggested revisions to the supporting text of this policy outlined above, we would wish to see the wording of this policy amended to reflect these comments. We suggest the following revisions:</p> <p>' Any development exceeding the thresholds set out in the Department for Transport publication 'Guidance on Transport Assessment' must be supported by a Transport Assessment (TA) and Travel Plan. Furthermore, in addition to the size of the proposed development, consideration will be also had to the location of proposed facilities as to whether a TA is required. '</p>	<p>Comment noted. It is acknowledged that the location of the development will also be a consideration in terms of whether a Transport Assessment (TA) is required.</p> <p>Core Policy WCS14 has therefore been amended to include reference to the location of development.</p> <p>See Focused Change 37.</p>

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Neil Chapman Highways Agency	447	447/11	We welcome reference to our organisation in paragraph 5.4 and agree we have involvement as an indirect link to waste management in Gloucestershire. We welcome consultation on proposed sites at the earliest opportunity in order to prevent unnecessary delay upon submission.	Support noted. No Change.
David Berry The Coal Authority	133	133/1	<p>Surface Coal Resources and Prior Extraction. Although it is acknowledged that the Waste Core Strategy does not cover minerals specifically, as you will be aware, parts of Gloucestershire contain coal resources which are capable of extraction by surface mining operations.</p> <p>The Coal Authority is keen to ensure that coal resources are not unduly sterilised by new development. In instances where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process. Contact details for individual operators that may be able to assist with coal extraction in advance of development can be obtained from the Confederation of Coal Producers website at www.coalpro.co.uk/members.shtml.</p> <p>Coal Mining Legacy</p> <p>As you will also be aware, parts of Gloucestershire have been subjected to coal mining which will have left a legacy. Whilst most past mining is generally</p>	<p>Agree in part. The importance of avoiding the sterilisation of mineral resources and taking into account land stability issues is fully acknowledged.</p> <p>The general development criteria set out at Appendix 5 have been amended to include reference to unstable land.</p> <p>See Focused Change 39.</p> <p>However, in relation to mineral resources it is important to note that the general development criteria are intended to apply to the four strategic allocations identified in Core Policy WCS4.</p> <p>As none of these affect known areas of mineral resource it is not considered necessary to make any further amendment to the schedule.</p> <p>No Change.</p>

			<p>benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.</p> <p>Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area where coal exists near to the surface. The Planning Department at the Coal Authority was created in 2008 to lead the work on defining areas where these legacy issues may occur.</p> <p>The Coal Authority has records of over 171,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. Even in areas where coal mining was deep, in some geological conditions cracks or fissures can appear at the surface. It is estimated that as many as 2 million of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning process in coalfield areas needs to take account of coal mining legacy issues. The principal source of guidance is PPG14, which despite its age still contains the science and best practice on how to safely treat unstable ground.</p> <p>Within Gloucestershire there are approximately 3,500 recorded mine entries and around 160 coal</p>	
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			<p>mining related hazards. Mine entries and mining legacy matters should be considered by the Planning Authority to ensure site allocations and other policies and programmes will not lead to future public safety hazards.</p> <p>Although mining legacy occurs as a result of mineral workings, it is important that new development delivered through the Waste Core Strategy recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.</p> <p>As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of the Coal Authority may be required.</p>	
<p>David Berry</p> <p>The Coal Authority</p>	133	133/2	<p>It is noted that the majority of new waste management facilities, and the strategic site allocations, are located within Zone C, which falls outside of the defined coalfield area within Gloucestershire. However, the Waste Core Strategy makes provision for non-strategic developments to take place outside of Zone C, and it is therefore possible that such developments may take place within the coalfield area. Any such developments should therefore take account of any land instability issues resulting from former coal mining activities and, where necessary, incorporate appropriate mitigation measures to address them</p>	<p>Comments noted. The importance of avoiding the sterilisation of mineral resources and taking into account land stability issues is fully acknowledged.</p> <p>The general development criteria have been amended to include reference to unstable land.</p> <p>See Focused Change 39.</p> <p>However, as none of the strategic site allocations are located within a known area of mineral resource, it is not considered necessary to amend the general development criteria to refer to the</p>

			<p>in line with the guidance in PPG14. In addition, where development of new waste management facilities takes place in surface coal resource areas, consideration should be given to any impacts in terms of mineral sterilisation, along with whether the resource could be extracted in advance of development, in line with the guidance in MPS1. As currently worded, there is no reference to the need to consider these issues within the Waste Core Strategy. However, Appendix 5 (Strategic Site Schedules) contains a useful summary table of 'General Development Criteria'. It is considered that the criteria could be expanded to include reference to the above issues and included as a separate appendix applying to any development proposals - including unallocated/non-strategic sites.</p> <p>The Coal Authority would therefore suggest that the first table of General Development Criteria should be included as a separate Appendix setting out criteria to apply to all developments (including unallocated, non-strategic sites). The following amendments/additions to the table are also recommended to address the concerns set out above:</p> <p>Key Development Criteria:</p> <p>Contaminated and potentially unstable land - Where contaminated and unstable land has been identified or could be present, development should provide the opportunity for investigation and remediation.</p>	<p>issue of mineral sterilisation. In due course this issue will be dealt with through the Minerals Core Strategy for Gloucestershire.</p> <p>With regard to applying the general development criteria to all development proposals this would not be appropriate because it would be unreasonable to expect small-scale proposals to comply with each of the requirements set out in the schedule. The merits of small-scale proposals will be considered having regard to other relevant core policies and material considerations.</p> <p>No Change.</p>
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			<p>Mineral Resources - Where development would affect mineral resources, including surface coal, consideration should be given to any impacts in terms of mineral sterilisation, along with whether the resource could be extracted in advance of development.</p> <p>Reason To address the guidance in PPG14 (Development on Unstable Land) and MPS1 (Planning and Minerals).</p>	
<p>Leah Wellings</p> <p>Dursley Town Council</p>	214	214/1	No comment.	<p>Noted.</p> <p>No Change.</p>
<p>Roger Cullimore</p> <p>Moreton C. Cullimore (Gravels) Ltd.</p>	46	46/1	<p>As a Company we operate a number of inert tips for construction waste and as you may be aware the licensing system is now a lot more complex and costly to obtain from the Environment Agency. In fact, even specialist consultants have difficulty concluding satisfactory terms for clients' waste licenses, where previously we had been able to deal with these ourselves. It only adds to the cost, which understandably has to be passed on. As you know, large quantities have been tipped on various locations in the Gloucestershire part of the Cotswold Water Park. In the future, we should have some tipping space at Shorncote, and Wetstone Bridge in the Down Ampney area if planning approval is given to our scheme for gravel extraction. There will also be some on our small site at Frampton where permissions have recently been given, and there is a little left on an old Romp site there. Further tipping could be available at</p>	<p>The comments relating to potential future inert waste disposal capacity are noted.</p> <p>With regard to the need for an additional 1 million tonnes/year capacity for construction and demolition waste, no evidence has been provided by the respondent in support of this statement. The publication WCS and supporting Waste Data evidence paper clearly set out the situation in respect of construction and demolition waste.</p> <p>In particular, there are three points to note. First, a large amount of inert C&D waste is re-used on development sites meaning that it never actually enters the waste stream. Second, significant capacity is available within the county through waste exemptions i.e. activities which do not require an environmental permit e.g. quarry restoration, landscaping etc. Third, the Council's</p>

			<p>Twynning near Tewkesbury should our application meet with approval in the near future. From the wide range of work, including the new service area for Exit 12 M5 motorway and other construction sites, there is a need for 1m tonnes per annum in the County for construction waste alone.</p>	<p>Waste Data evidence paper update identifies sufficient existing disposal capacity for inert construction and demolition waste.</p> <p>There is nothing to suggest that any additional disposal capacity is required, however in the interest of diverting construction and demolition waste from landfill, the publication WCS identifies a capacity requirement of 85,000 tonnes/year for inert recycling and recovery of C&D waste.</p> <p>Core Policy WCS3 provides the criteria against which such proposals will be considered.</p> <p>No Change.</p>
<p>Lucy Binnie</p> <p>Land and Mineral Management Ltd. on behalf of Smiths (Gloucester) Ltd.</p>	767	767/1	<p>C&D waste is seriously underestimated and adequate provision has not been made for this waste stream such that the WCS will not be effective in meeting its strategic objectives, the second part of no.2 and also no.5. Going through section 2 Smiths handling of C&D waste in Gloucestershire in 2008 exceeded Table 1 figures.</p> <p>The assessment in the technical WCS-A, notwithstanding errors, does not provide a realistic figure for the provision of C&D. The assessment of the C&D managed in 2008 with a substantial reduction a drop of 110,000t does not appear valid.</p>	<p>Disagree. The tonnages of C&D waste that are managed in the County are not underestimated. The data that has been used is Environment Agency (EA) throughput data from Gloucestershire waste sites in 2008 (Waste Data Interrogator).</p> <p>The situation is complicated for sites which handle both C&I and C&D waste for a number of reasons:</p> <ol style="list-style-type: none"> 1. A quantity of inert C&D waste may be managed under an EA exemption. 2. If waste arrives in a general skip, there is not always a clear distinction between C&D and C&I waste and there can be overlaps. 3. Metals (from the C&D and C&I stream) are treated as a separate category. 4. Double counting of transferred waste has to be factored in.

			<p>The reference to short term disposal facilities for C&D wastes is deeply concerning with no subsequent follow through on this point notwithstanding the omission with the forthcoming exemption changes which will fundamentally change the figures of managed materials that the WCS must make provision for.</p>	<p>There is no reason to suggest that the WCS will not be able to meet its strategic objectives. The plan will certainly not limit existing operations which are performing a useful function.</p> <p>The C&D figures in WCS Publication Table 1 (293,000 t) for 2008 is calculated from the EA Waste Data Interrogator and it is important to note that this total does not include metals or exemptions. It also factors in double counting e.g. only 50% of the C&D transferred figure has been added to the managed total as, according to the EA, it is calculated that 50% of transferred C&D waste is double counted.</p> <p>The response alludes to the fact that there are 'errors' in the data but no clear examples have been referred to and no alternative datasets have been presented. Importantly, the Environment Agency (EA) have endorsed the Council's approach on data and have not flagged up any errors or discrepancies.</p> <p>It is presumed that the respondent is referring to Paragraph 2.73 of the publication WCS. This paragraph is focused on exempt activities regulated by the EA. It does not however presume that licensed facilities such as the Smiths site at Moreton Valence have a short term future. The EA have responded to the WCS Publication and have not indicated that the future changes to their system of exemptions (from 6th April 2011) will mean that the WCS must make significantly more provision for C&D waste management.</p>
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			<p>The terminology of 'landfill' for C&D seems unclear, landfill for non hazardous and hazardous is directly referred to but for C&D it is unclear. Is this licensed facilities or exempt and again raises questions as to the calculation of the C&D arisings and the provision for its management.</p> <p>Following through to Policy WCS3 the policy does not make enough provision nor is it robust enough for new facilities to come through. Policy WCS2 is an interesting comparison - it has no stated capacity but refers to a percentage figure when the text at 3.23 indicated only a limited amount of provision is required yet the policy includes mention of strategic facilities.</p> <p>Similarly for C&I wastes it is unclear about actual capacity, Smiths permission at Moreton Valence is included but it is not operational. And again figures produced and actual operations on site do not appear to match.</p>	<p>Paragraph 6.7.2 in the Waste Data paper clearly states that "the current capacity for C&D disposal (through licensed sites) in Gloucestershire is currently estimated at around 1,446,000 t. As with other capacity calculations, the figure has been arrived at on the basis of the EA Waste Management License capacity, and the capacity permitted through the planning permission. Paragraph 6.4.1 and Section 3 addresses the issue of inert exemptions.</p> <p>Policy WCS3 is perfectly reasonable in trying to reduce inert C&D waste to <u>licensed landfill</u> (own emphasis). As stated in the waste Data paper at Paragraph 6.9.15 it seeks to provide additional incentives to move waste up the waste hierarchy.</p> <p>The approach taken and the capacity figures for C&I are clearly described in Section 4 of the Waste data paper. This is a complex area and the document and its appendices need to be read thoroughly, in order to avoid misinterpretation.</p> <p>The permission for the (28,080 tpa) advanced thermal treatment plant at Smiths, Moreton Valence has been factored in as C&I treatment/recovery capacity due to the fact that it does have planning permission as the capacity exists even though the plant is not operating. This approach is considered appropriate and consistent with advice on how to prepare waste core strategies.</p>
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				<p>In relation to the figures produced (by the WPA through use of EA data) and the actual operations at Moreton Valence, this has been dealt with earlier in this response. Very recent license data supplied to GCC by the EA shows that in terms of C&D inputs at the site in 2010 this was only 44,650 t.</p> <p>The WPA has invited the respondent to back up the statements made in relation to waste data but no specific evidence has been provided against which to consider any potential changes.</p> <p>No Change.</p>
<p>Lucy Binnie</p> <p>Land and Mineral Management Ltd. on behalf of Smiths (Gloucester) Ltd.</p>	767	767/2	<p>WCS Policy 4, the site identified for Moreton Valence is a good location, co-locating with an existing successful recovery centre however the identified site does not have any spare capacity for the development of a new facility within the identified footprint and the operation maintains to do so would require additional land. To locate within the site would lose existing capacity and defeat the purpose of the benefits of a resource recovery centre and not help with sustainable waste management. This policy should include for expansion of existing waste management sites.</p>	<p>Comment noted. The WPA recognises that the site at Moreton Valence is in a good location and forms an important part of Gloucestershire's overall waste management system.</p> <p>It is not accepted however that the site boundary should be expanded under Core Policy WCS4. There is significant capacity for various types of waste management under the EA permit (No.48229 – Morton Valence) and the EA (Regis Attached Tonnage System) RATS data does not seem to indicate that this capacity is regularly under pressure due to high waste inputs.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Lucy Binnie Land and Mineral Management Ltd. on behalf of Smiths (Gloucester) Ltd.	767	767/3	WCS policy 8 - the position with temporary sites need to be clarified here as operational but temporary operations should be considered favourably as potentially permanent waste management sites.	<p>Comment noted. The purpose of Core Policy WCS8 is to ensure that existing and allocated waste management sites are safeguarded from other, incompatible land-uses. It is acknowledged that this general principle should also apply to temporary operations which serve an important function.</p> <p>Core Policy WCS8 has therefore been amended to include reference to temporary waste management operations.</p> <p>See Focused Change 29.</p>
Michael Ratcliffe Cheltenham Chamber of Commerce	455	455/1	<p>WCS2 - Recycling & Composting / Anaerobic Digestion (including bulking & transfer)</p> <p>The Cheltenham Chamber of Commerce expresses support for the Council's target of at least 60% recycling/composting by 2020. However, the Chamber recommends that the Gloucestershire Waste Partnership (GWP) should place more emphasis on the merits of Anaerobic Digestion (AD) as a preferred treatment option over composting. While it is recognised that AD is discussed within the document, the Chamber believes a greater emphasis would help to bring local policy more in-line with the Government's avowed commitment to AD, outlined in "Accelerating the Uptake of Anaerobic Digestion in England: an Implementation Plan" published by DEFRA in March 2010. Within this document the</p>	<p>The support expressed for the Council's recycling/composting target is noted. With regard to placing greater priority on anaerobic digestion (AD) the revised publication WCS includes a new separate policy and supporting text dealing with this issue. This clearly highlights the potential renewable energy benefits associated with this type of process.</p> <p>See Focused Change 13.</p>

			Government highlights the "great potential" that AD offers to contribute to tackling climate change and wider environmental objectives.	
Michael Ratcliffe Cheltenham Chamber of Commerce	455	455/2	<p>Strategic Objective 3 - Other Recovery (including energy recovery) p.38</p> <p>The Cheltenham Chamber of Commerce suggests that AD should be afforded more importance within the phrasing of this objective and believes that AD should be preferred over composting as a treatment method for organic wastes. The present structure of the paragraph suggests that composting would be considered more favourably than AD, even though AD has the added benefit of recovering energy and the liquid component of organic wastes.</p>	<p>Comment noted. The proposed changes to the WCS in relation to AD are considered sufficient. The benefits of AD have been fully explained. AD is considered alongside composting because of the similarities between AD and in-vessel composting (IVC) however the changes made to the revised publication WCS make it clear that AD may also be classed as 'energy recovery'.</p> <p>See Focused Change 13.</p> <p>It is important to note that the waste hierarchy is a guiding set of principles rather than a rigid framework. Both types of process will be considered favourably in appropriate locations subject to other relevant criteria.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Michael Ratcliffe Cheltenham Chamber of Commerce	455	455/3	<p>WCS 14 - Sustainable Transport</p> <p>While the Council's position on encouraging sustainable transport methods for the collection of waste is applauded, the Chamber of Commerce wishes to highlight the role that waste could play in fuelling sustainable transport solutions for Gloucestershire. It is recommended that the document acknowledges the potential for fuels, such as biohydrogen, biogas and bioethanol, which can be produced from anaerobic digestion of waste, to provide a holistic solution to a number of the county's pertinent environmental issues.</p> <p>The Chamber urges close integration of the Gloucestershire Waste Core Strategy with the latest Local Transport Plan (L TP3), which makes reference to exploring Light Rail solutions, in collaboration with the University of Gloucestershire.</p> <p>The University of Gloucestershire is currently working on research into the benefits of using organic waste, generated in the county, to produce biohydrogen as a fuel for public transport in and between Cheltenham and Gloucester. The Chamber of Commerce advocates an ultra-light rail solution, using hydrogen fuelcells-a proposal that has received all-Party support from MPs, and came second in a national competition for innovation and carbon reduction.</p>	<p>Comments noted. The issue of sustainable transport is already addressed through Core Policy WCS14 and the supporting text.</p> <p>In addition, the supporting text to the new AD policy highlights the potential use of bio-methane as a vehicle fuel.</p> <p>See Focused Change 13.</p> <p>The linkages between the WCS and the Local Transport Plan (LTP) are already identified in Appendix 2 – Influences on the Waste Core Strategy. No further amendments are considered necessary.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Michael Ratcliffe Cheltenham Chamber of Commerce	455	455/4	<p>WCS1 - Waste Reduction</p> <p>While the aspirations for waste minimisation in connection with major developments are laudable, it may be worth considering mandatory targets for recycling if the Council is serious about achieving 60% recycling by 2020.</p>	<p>A mandatory recycling target whilst laudable would be impossible to enforce/regulate through the planning process.</p> <p>No Change.</p>
Michael Ratcliffe Cheltenham Chamber of Commerce	455	455/5	<p>Recommendation</p> <p>To amplify our comments above on WCS2 and WSC14, we urge the Council to read the following highly relevant, recently produced report: Davidson, R. (2010) Fuelling Ultra Light Rail Public Transport from a Gloucestershire Organic Waste Treatment Plant: a feasibility analysis. Unpublished MSc thesis, University of Gloucestershire. The findings of this report, together with a closer alignment with Accelerating the Uptake of Anaerobic Digestion in England: an Implementation Plan published by DEFRA in March 2010, should be incorporated in a significantly revised version of the Waste Core Strategy, before it is submitted to Ministers.</p>	<p>The supporting text to the new AD policy includes reference to the Government's AD implementation plan and highlights the potential use of bio-methane as a vehicle fuel.</p> <p>See Focused Change 13.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
David Adams AXIS PED Ltd. on behalf of Urbaser Ltd.	266	266/1	<p>We broadly support the conclusions within the pro-forma to the Inset Map 3, specifically:</p> <ul style="list-style-type: none"> - Access/Highways: That the predicted effect of a new strategic waste facility is a likely net decrease in traffic, when balanced against the existing consents. That the construction of a new railway line link is likely to be prohibitively expensive and could have landownership issues. - CHP Potential: That the initial assessment work indicates that there would be a limited demand for a retrofitted heat network within the existing development, but that there is potential for a heat network to be incorporated within any future development. - Flood Risk: That the site lies fully in Flood Zone 1. - Landscape: That a waste facility "could" cause permanent alteration of the site in terms of scale, height and intensity of development resulting in a facility both taller and larger than existing surrounding units. We acknowledge that a strategic waste management facility will inevitably create a significant landmark, which may or may not appear out of keeping with the surrounding landscape. Nevertheless, we believe that it an exemplar landmark development which would be designed utilising sustainable development techniques could offer significant localised environmental benefits. A building which can 	<p>Support noted.</p> <p>No Change.</p>

			strike the right balance between a simple, industrial appearance and a compelling, elegant design could have the opportunity to offer an interesting experience for visitors and attractive views for traffic on the M5, irrespective of the simple consideration of its size.	
David Adams AXIS PED Ltd. on behalf of Urbaser Ltd.	266	266/2	<p>We believe the WCS is both 'legally compliant' and 'sound'. The Strategy has been prepared in accordance with the Minerals and Waste Development Scheme and the Council's adopted Statement of Community Involvement. It has been prepared in line with the Town and Country Planning (Local Development) (England) Regulations 2004, has been subject to Sustainability Appraisal, conforms with the RSS and has regard to national policy and the Sustainable Community Strategy within Gloucestershire. The Strategy is justified (in that it is founded on a robust and credible evidence base), is effective (in that it is deliverable, flexible and able to be monitored) and is consistent with national policy.</p> <p>Furthermore, we believe the WCS offers a clear and accountable approach to how the County Council and its partners will address the issue of planning for waste management in Gloucestershire in the period from 2012 to 2027. The strategy appears well written and drafted to ensure inclusive participation in the decision making process.</p> <p>For the reasons identified above we offer our support to the approach adopted within the WCS.</p>	<p>Comment noted. The suggested amendment is not considered to be necessary.</p> <p>Paragraph 2.53 as currently drafted makes it clear that the permission at Moreton Valence is not operational and that because of the lack of waste recovery facilities available new ones are required.</p> <p>Further detailed information is set out in the supporting waste data evidence paper which is available separately.</p> <p>No Change.</p>

			<p>Paragraph 2.53, correctly in our view, confirms the need for new recovery facilities for residual waste, highlighting the existence of no facilities in Gloucestershire dealing with residual MSW and C&I waste. For clarity, we believe the paragraph should be amended in accordance with the suggestions below, to re-a firm the need irrespective of the consented facility at Moreton Valence.</p> <p>Replace: "...Whilst planning permission for a small-scale gasification plant at Moreton Valence has been granted it is not currently operational."</p> <p>With: "...Whilst planning permission for a small-scale gasification plant at Moreton Valence has been granted it is not currently operational. Irrespective of the future implementation of the extant consent, insufficient capacity would exist to meet the required need."</p>	
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
David Adams AXIS PED Ltd. on behalf of Urbaser Ltd.	266	266/3	<p>Paragraph 2.74 identifies a number of key issues which must be addressed through the WCS. We believe the WCS provides a very concise and accurate summary of the key issues and challenges facing the County Council, its partners, the residents and businesses within Gloucestershire and other interested parties.</p> <p>We strongly support the acknowledgement at Key Issue 9 that; "...there are currently no residual waste recovery facilities for MSW (for waste that cannot be recycled or composted) and limited recovery capacity for C&I waste, leading to an over-reliance on landfill which needs to be reversed."</p>	<p>Support noted.</p> <p>No Change.</p>
David Adams AXIS PED Ltd. on behalf of Urbaser Ltd.	266	266/4	<p>We support the acknowledgement within Paragraph 3.23 that there is a need for a residual waste recovery facility (or facilities) able to process around 150,000tpa of residual MSW in addition to waste recovery facilities with sufficient capacity to divert between 143,000 - 193,000 tpa of C&I from landfill (referenced at Paragraph 3.25). We support the acknowledgement that the figures quoted are an approximate requirement based on latest available waste flow forecasts. We also support the acknowledgement that this is likely to require either one large strategic site of 5 - 8ha, or a number of smaller sites of about 2ha each.</p>	<p>Support noted.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
David Adams AXIS PED Ltd. on behalf of Urbaser Ltd.	266	266/5	<p>Paragraph 3.33 confirms that having had regard to the key issues and drivers, a 'spatial vision' has been produced for 2027. We agree and support the objectives of the spatial vision, and believe them to be broadly in accordance with national planning policy statement PPS10: Planning for Sustainable Waste Management, Waste Strategy (England) 2007, the Regional Spatial Strategy and other relevant national and regional policy.</p> <p>The spatial vision (and elsewhere within Chapter 3.0) refers to the need to manage "residual" waste that cannot be re-used, recycled or composted through a number of 'strategic' waste recovery sites.</p> <p>Whilst we believe the vision to be legally compliant and sound, concern is raised that the current wording is both unduly restrictive and inflexible. It is almost inevitable that, even with the most efficient of recycling initiatives and mechanisms in place, elements of waste may not be able to be recycled for a combination of factors (i.e. it is wholly uneconomical to do so or reprocessing facilities do not exist to process the material removed from the truly residual waste stream). The Waste Strategy England 2007 confirms at paragraph 17 that;</p> <p>"Recovering energy from waste which cannot sensibly be reused or recycled is an essential component of a well-balanced energy policy...."</p>	<p>Comment noted. It is acknowledged that for consistency with the preferred options stage and national policy, the WCS spatial vision should refer to residual waste that cannot <u>reasonably</u> be re-used, recycled or composted.</p> <p>See Focused Change 10.</p>

			<p>The Waste Core Strategy (Preferred Options) stated that; "Proposals for residual waste facilities will be permitted in appropriate locations where it can be demonstrated that...in demonstrating sustainability the facility will not manage waste that could reasonably be recycled or composted."</p> <p>We believe that the inclusion of the words "reasonably" (as per the Preferred Options) or "sensibly" (as per WSE 2007), within the relevant paragraph of the vision would provide the necessary mechanism to ensure that recovery takes place in accordance with the waste hierarchy, whilst acknowledging the flexibility necessary to deliver the facilities required.</p>	
<p>David Adams</p> <p>AXIS PED Ltd. on behalf of Urbaser Ltd.</p>	266	266/6	<p>Paragraph 4.76 considers the options of adopting a site specific approach or criteria-based approach to the delivery of facilities. We support the approach adopted within the WCS that a site specific approach provides greater certainty about what might come forward and where, and will increase confidence within the waste industry as to the availability of suitable sites, thereby improving prospects of delivery. Development proposed on the allocated sites would be required to accord with other criteria-based policies within the Development Framework, thereby ensuring that development is acceptable in environmental and land-use planning terms.</p>	<p>Support noted.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
David Adams AXIS PED Ltd. on behalf of Urbaser Ltd.	266	266/7	<p>Policy WCS4 identifies the strategic sites allocated in order to make provision for the capacity gap requirements for MSW & C&I. We support the inclusion of Site Ref. 3 (Javelin Park) and concur that the site is suitable and deliverable to meet the identified need. We also support the inclusion of the site to meet primarily the MSW need but in addition provides potential to manage C&I waste need.</p> <p>As commented elsewhere, we support the acknowledgement throughout the WCS that waste recovery facilities are required with sufficient capacity to divert the identified residual MSW and C&I wastes from landfill, which cannot be reasonably re-used, recycled or composted. The inclusion of the sites identified within WCS4 for recovery (including energy recovery) is an acknowledgement that the sites are acceptable, in principle at least, for the resultant impacts which these types of development inevitably give rise to (i.e. high levels of HGV traffic, significant built structures up to 40m in height, a stack of circa 80m, public perception fears etc). We strongly support the WCS in the acknowledgement that in order to meet the urgent requirement difficult decisions need to be made, but that the sites identified are suitable to make provision for the capacity gap.</p>	<p>Support noted.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Kevin Parr Enzygo Ltd. on behalf of John Laing Investments Ltd.	132	132/1	We write to you on behalf our client Complete Circle and in connection with Policy WCS4 'Other Recovery (including energy recovery)'. We would like to take the opportunity to register our support for the site at Javelin Park to be identified for strategic waste management use within the Waste Core Strategy. We consider that the allocation of the Javelin Park site within Policy WCS4 is legally compliant, having been subject to Sustainability Appraisal and with regard to the Gloucestershire MWDF, SCI and National and Regional Policy. We consider the allocation of the site to be sound, based upon a robust evidence base comprising WCS Site Options Consultation (October and November 2009), supporting Technical Evidence Papers and Sustainability Appraisal. We believe that the inclusion of the site for a strategic waste management facility will be deliverable in terms of the both the availability of the site for waste management use, and the site location, approximately 6 miles to the east of Gloucester, and some 500m to the south east of Junction 12 of the M5 motorway. The identification of the site for strategic waste management use is consistent with national policy and will contribute to increasing diversion of residual municipal waste from landfill in accordance with the Waste Hierarchy. In addition, the location of the site is in accordance with the Proximity Principle, and the use of the site for waste management will ensure that residual waste arising within the County is dealt with as close as possible to the point of its production.	Support noted. No Change.

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Brian Clifford Network Rail (Derby)	1103	1103/1	It is a function of my role to protect the interests of Network Rail from the potential impacts of mineral extraction and waste management operations, not to influence policy or promote such sites for development. However, it is generally requested that Network Rail be consulted on all planning applications for minerals and waste management proposals within 200m and 250m respectively of the railway property. I notice from the appendices (plans) that two of the four sites outlined in the above strategy, at Wingmoor Farm East and Wingmoor Farm West, include waste management facilities within 250m of the railway property. I would appreciate being notified, if and when the proposed strategy is adopted and thereafter consulted on any developments that fall into the above mentioned parameters.	<p>Comment noted. It is acknowledged that the proximity of railway property should be taken into account in considering development proposals for minerals and waste.</p> <p>The general development criteria have been amended to include reference to this issue.</p> <p>See Focused Change 40.</p>
Nick Dummett Campaign to Protect Rural England (CPRE)	365	365/1	1. The Government is reviewing the national waste strategy. While much that is current policy such as the proximity principle and the waste hierarchy is likely to remain, it is also clear that there will be significant changes and these may include incentives for greater recycling and to encourage uptake of new technologies such as Anaerobic Digestion. We note that this is recognised in the main text of the WCS and in Appendix 2 Influences on the WCS. In this appendix it states that preliminary findings from the DEFRA review will be available in spring 2011 and that "Any significant revisions to national policy will need to be reflected through future revisions to the WCS". We	<p>Comment noted. The current DEFRA review of national waste policy and delivery is acknowledged. It is understood that the early results of the review are likely to be made available in June 2011. It is not however considered appropriate to anticipate what will be included in the review or to delay the WCS until the review has been published.</p> <p>If Anaerobic Digestion (AD) is given increased prominence this has now been addressed through the new separate policy and supporting text on AD set out in the revised publication WCS.</p> <p>See Focused Change 13.</p>

			<p>presume that such revisions will be to future drafts before adoption of the final version of the WCS. It is not possible to say whether the WCS is in line with Government policy until these revisions are published.</p> <p>2. The assumptions and targets for growth and recycling of Municipal Solid Waste (MSW) in the WCS are carried forward from the work done for the Joint Municipal Waste Management Strategy (JMWMS) adopted by the county council and all the district councils in April 2008. The underlying analysis was based on trends up to 2006. Much has changed in the economic and waste environment since then. The key assumptions upon which forecasts are based are the generation of waste per capita, growth in the economy and population growth. Each of these assumptions is now open to great uncertainty. In particular:</p> <ul style="list-style-type: none"> · MSW arisings in Gloucestershire have fallen since 2007. There is no analysis in the WCS or supporting data of the causes for this fall but it means that waste per capita was reduced. The national trend is of MSW declining at an annual average rate of 2.2% pa over the five years to 2009/2010 and indications that it has continued to fall (Defra Statistical Release 4th November 2010 and 3rd February 2011) mean that there are clear indications that there are underlying trends of reducing generation of waste per capita. This is not surprising given the pressures on commercial concerns to reduce for instance packaging on consumer goods and the promotion to households of less wasteful consumption such as not 	<p>Comment noted. In relation to MSW arisings, it is acknowledged that municipal waste arisings have fallen in recent years. There are several reasons for this. Service changes introduced in Cotswold District, Gloucester City and Tewkesbury Borough have all reduced MSW arisings. In addition the recession has undoubtedly had an effect. It is however wrong to assume that service changes lead to year on year waste reduction. The WDA has carried out modelling to forecast residual waste tonnages many times and have considered many factors in that modelling including population growth, District service changes, policy, Government forecasts and existing waste arisings. Table 3I of the Waste Data Paper Update (2010) is based on information provided by the WDA at that time and forecasts that MSW arisings will increase to 359,612 tonnes/year by 2027/28. On this basis the WCS identifies a residual MSW requirement of 150,000 tonnes/year. More recent modelling carried out for the review of the residual project, based on 60% recycling by 2020 and 70% recycling by 2030, showed an annual forecast of approximately 155,000 tonnes of residual waste by 2040. A number of scenarios combining varying growth and recycling rates were also modelled. These show the projected levels of residual waste in 2030 to be between 125,000 tonnes (70% recycling and composting) and 165,000 (60%</p>
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			<p>discarding food. Despite this evidence, the WCS takes the assumptions set out in the JMWMS which are based on trends to 2006 and are stated to be conservative on the prevention of waste (JMWMS Strategic Options Paper paragraph 2.3).</p> <ul style="list-style-type: none"> · The WCS has updated the forecast of MSW arisings to take into account the reduction since 2007 and the forecast for this to continue to 2011, it then uses a growth rate of 1.6% pa till 2020. This growth rate comes from the analysis done for the JMWMS on data to 2006 and specifically assumes a continuation of past trends in population growth and no change in economic growth. · It is stated that the population of Gloucestershire will grow to 674,000 by 2033. This number comes from a paper published by the Gloucestershire County Council's Research Unit in June 2010. This paper identifies that of the average growth of 3000 per year only 200 is from growth in the existing population. The balance is from in-migration with the majority from within the UK and most of this to Gloucester and Cheltenham. It also notes that in-migration is critically dependent on economic growth. There is great uncertainty about the level of economic growth up to 2020. It follows that there is great uncertainty about the future population and its living standards. The research team recommends that any service using these projections builds in flexibility into their planning. · The papers supporting the WCS note that while a 	<p>recycling and composting). The WDA has had discussions with DEFRA on the latest national waste growth trends and has also reviewed the Swedish Sustainable Waste Management Programme, which predicts that waste will grow at 2.2% per annum over the next 25 years, aligning closely to the DEFRA scenarios and the WDA's own modelling. On the basis of the above, the residual MSW requirement of 150,000 tonnes/year identified in the WCS is considered to be robust.</p> <p>No Change.</p> <p>Comment noted. The population estimate of 674,000 has been included in the WCS simply to provide context within the spatial portrait and to illustrate the fact that the population of Gloucestershire will increase over the next 20 years. It is acknowledged that population estimates must be used with caution because of uncertainties.</p> <p>Notably the forecast of 674,000 by 2033 is 11,000 lower than the forecast provided by the Office of National Statistics over the same period.</p> <p>In any case, as explained above the residual requirement of 150,000 tonnes/year is based on data provided by the WDA which factors in a number of different variables not just population growth.</p> <p>Disagree. In line with national policy, the WCS</p>
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		<p>period up to 2027 is appropriate, uncertainties are much greater for the later years and the strategy should deal in detail up to 2020 with flexibility thereafter (Technical Paper WCS-A update 2010 paragraphs 1.6.1 and 1.6.2). We believe the strategy should always quote the 2020 figure followed by the 2027 number. We also note that in Key Issue 1 the population number given refers to 2033; why a figure outside the period of strategy is quoted is not explained.</p> <p>We further note from the Technical Paper WCS-A Data (update 2010) Table 31 that MSW arisings are estimated to increase by 0.8% from 2020 to 2027 and gives rise to the figure of 359,600 tons used to justify a need for 150,000 tons of Residual Waste Treatment Capacity. The WCS has a target of zero growth from 2020 and this would mean that MSW was some 19,000 t.p.a lower than the figure quoted.</p> <p>· The recycling rate proposed as a target for 2020 is 60%. This again is a repeat of the target set in the</p>	<p>covers the fifteen- year period 2012 – 2027. MSW arisings are estimated up until the end of the plan period based on data provided by the WDA. However, for C&I and C&D waste targets to 2020 are included reflecting the RSS which remains a valid material consideration at this time. There is no national or regional target for hazardous waste. This approach is considered appropriate. In relation to the population forecast to 2033, as explained above this has simply been included to provide context and to demonstrate that the population of Gloucestershire is forecast to increase over the next 20 years.</p> <p>In relation to the target of zero-growth by 2020 this is an aspiration derived from the Joint Municipal Waste Management Strategy (JMWMS). In terms of working out future capacity requirements for municipal waste it is considered more appropriate to use the data provided by the WDA which shows modest growth after 2020. It is also important to note that the target of zero-growth is assumed to be at a household level. Therefore even if the aspiration for zero-growth were to be achieved, the anticipated growth in population and the number of households would still mean an overall increase in waste arisings. The supporting text has however been amended to clarify that notwithstanding the aspiration for zero-growth, forecasts suggest a modest increase in arisings up to 2027/8.</p> <p>See Focused Change 8.</p> <p>The WCS seeks to ensure that at least 60% of household waste is recycled or composted by 2020</p>
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			<p>JMWMS. Since that strategy was produced higher levels than 60% have been achieved in Cotswold District and waste recycling centres. Furthermore, over 90% of domestic waste is suitable for either composting or recycling (table 3.6 of the Gloucestershire Baseline Report for the JMWMS). We know that other areas are aiming for more ambitious reuse/ composting/recycling rates than 60%. We see no reason why a combination of greater incentives/penalties and a better coordinated approach across the districts to collection should not yield a faster increase in recycling and eventually a rate much closer to 80%.</p>	<p>with an aspiration for 70%. This target is derived from the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS). The national target set out in the Waste Strategy for England (2007) is 50% by 2020. The revised EU Waste Framework Directive also has a target of 50% by 2020. The Council's target cannot therefore be described as unambitious. Whilst it is the case that 60% recycling/composting has already been exceeded in Cotswold District and at the Household Recycling Centres (HRCs) it is not correct to extrapolate this to mean that a much higher rate than 60% is achievable across Gloucestershire. The HRCs for example have consistently achieved a higher rate of recycling because it is easier to engage with the public at these sites. This is very different to collecting waste door to door where opportunities to engage are much more limited. Based on information set out in the report 'The Composition of Kerbside Collected Household Waste in Gloucestershire' (October 2008) it is estimated that about 77% of the waste stream is recyclable. To achieve a countywide recycling rate of 60% would mean capturing around 75% of the available recyclable waste at the kerbside and to achieve the 70% target would mean capturing 92% of the available recyclables. This is much higher than is currently being achieved (about 50% on average). It is also the case that some communities achieve higher rates than others. For example it is anticipated that for 2010/11, Tewkesbury Borough Council will achieve a recycling and composting rate of 54% and Gloucester City 46% despite having broadly similar systems to Cotswold District which is achieving over 60%. For these reasons the WCS</p>
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			<p>· From the above we conclude that the forecast of the amount of MSW arisings up to 2020 is fraught with uncertainty and could range from zero growth (i.e. remaining at today's level) through to the levels stated in the WCS of 340,000 tons in 2020. With the possibility of higher recycling rates this means that the Residual Waste could be considerably less than the 134,000 tons per annum forecast in the WCS for 2020. The range we calculate is from 60,000 to 134,000.</p> <p>2) The strategy for major waste treatment facilities is inappropriate. PPS10 paragraph 3 states that "All planning authorities should prepare and deliver planning strategies thatprovide a framework in which communities take more responsibility for their own waste...". The WCS does not provide that framework and we believe would inhibit communities taking local responsibility for waste management.</p> <p>The WCS appears to be based on the premise that a major investment in one very large or two/three medium large facilities for treating residual waste</p>	<p>target of at least 60% recycling/composting by 2020 is considered to be both appropriate and challenging. No change to the recycling target is therefore proposed, however the text of the WCS has been amended to clarify that the aspiration for 70% recycling/composting is to be achieved by the year 2030. This has arisen through the Council's review of its residual waste project.</p> <p>See Focused Change 11.</p> <p>See response above in relation to MSW forecast arisings and recycling targets.</p> <p>The comments relating to strategic facilities are noted. Providing large-scale facilities does not mean communities will fail to take responsibility for their waste. The WCS emphasises the importance of waste reduction, re-use, recycling and composting in line with the waste hierarchy. These all require communities taking more responsibility.</p> <p>Core Policy WCS4 allocates four strategic sites in order to provide certainty for the waste industry and general public. However, it also includes</p>
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			<p>from MSW will be required. We support the need on environmental as well as economic grounds for diverting waste from landfill. However, given the large uncertainties over the forecasts of MSW arisings and residual waste, the WCS should encourage a more flexible strategic approach. This is reinforced in Key Driver 4 para 3.21 of the WCS which notes that technology is changing fast and a flexible approach should therefore be adopted; commitment to a single large unit locks out flexibility to respond to developing technology.</p> <p>The first plank of a flexible strategy should be to require all significant new housing development to include facilities for treating residual waste. This would ensure that facilities track the increase in households and thus hedges the risk inherent in the uncertainty in the forecasts of population and household growth. These local facilities should be sized to allow flexibility to take in residual waste from adjoining areas. This approach has the benefit of reducing traffic associated with major central facilities and is less damaging in landscape terms and could generate electricity for local consumption.</p> <p>The strategy should also encourage smaller local facilities at the other major centres such as Stroud or Cirencester as joint facilities for MSW Residual Waste and Commercial and Industrial (C&I) waste.</p>	<p>criteria to allow smaller-scale facilities to come forward in appropriate locations should there prove to be a demand for such facilities. This approach provides both flexibility and certainty and is considered entirely appropriate.</p> <p>Whilst this is a laudable aspiration, requiring all new major housing developments to include residual waste treatment facilities would be unreasonable and would quickly lead to over-provision. For municipal waste the residual requirement (i.e. the waste that needs to be managed after recycling and composting) is around 150,000 tonnes per year. This is a relatively modest amount and does not need hundreds of waste sites to manage it. As stated in the WCS, the residual requirement is likely to be met through one large site or a limited number of smaller sites. Core Policy WCS1 will however help to ensure that new developments incorporate small-scale recycling facilities etc.</p> <p>As stated above Core Policy WCS4 adopts a criteria-based approach to small-scale facilities (<50,000 tonnes/year) to allow for speculative proposals to come forward in appropriate locations. These may include proposals that manage both municipal and commercial and industrial waste. The similarities between the two waste streams and the potential</p>
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			<p>Finally, allowance should be made for larger facilities at the key strategic sites. It is however our view that these larger facilities should be smaller than the 50,000 ton limit on strategic facilities (say down to 30,000 t.p.a).</p> <p>Policies WCS1 and WCS4 inhibit rather than encourage such outcomes.</p> <p>We believe all the evidence shows that the WCS over-estimates the requirement for MSW residual waste treatment facilities. Conversely it under-estimates the amount of recycling/composting facilities which could be required. Paragraph 3.8.2 of the supporting Data paper notes that figures for recycling and composting capacity should be taken as minima rather than maxima. We are concerned that Policy WCS 2 does not properly reflect this sentiment and will restrain the capacity of facilities.</p> <p>3) The strategy on dealing with C&I waste is neither clear nor is it integrated with the handling of MSW. We support the objective of diverting 143,000 to 193,000 t.p.a of C&I waste from landfill. However, how this is to be achieved is not made clear so the target remains just an aspiration. As we understand it there is little difference in the composition of commercial and domestic waste. It makes sense therefore for the waste to be treated in common facilities. This would be achieved</p>	<p>for them to be managed at 'shared' facilities are recognised in the WCS.</p> <p>The support for the use of strategic sites is noted. As explained in the publication WCS, the 50,000 tonnes/year threshold is based on other planned and existing waste facilities in the UK, the definition of strategic in the adopted Waste Local Plan and a number of studies on potential facilities requirements for different types of waste technologies. The respondent provides no justification for the use of a 30,000 tonnes/year threshold. This appears to be an arbitrary figure.</p> <p>See previous response in relation to MSW growth and residual capacity requirements. In relation to recycling/composting, paragraph 4.40 of the publication WCS clearly states that '<i>there is no upper limit as such for recycling and composting</i>'. This makes it quite clear that the additional capacity identified for recycling/composting (19,000 tonnes) is <u>not</u> a maximum requirement.</p> <p>Disagree. The publication WCS identifies a requirement to divert between 143,000 – 193,000 tonnes/year from landfill. This is based on the recycling /re-use and recovery targets set out in the Regional Spatial Strategy (RSS). The WCS explains that this requirement relates to waste recovery in the broadest sense and could include various forms of residual recovery, composting and recycling. The target will therefore be met through a combination of the core policies and proposals</p>
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			<p>through partnership between the commercial sector and the Waste Disposal Authority (WDA).</p> <p>4) We object strongly to the implications in the WCS that reliance will be put on fundamental strategic choices being made by the waste industry particularly for MSW.</p> <p>5) We are concerned that allowing facilities up to 50,000 tons outside the key strategic sites in Zone C could end up with applications for facilities totally out of scale to the local environment outside Zone C. This supports our suggestion that the dividing line between strategic and other facilities be set at 30,000 tons.</p> <p>6) The WCS quite rightly looks to protect the AONBs and their settings. However PPS7, which applies to all development in open countryside, makes it quite clear that all landscape is to be protected for its intrinsic beauty (PPS7, paragraph 15). As Policy WCS 11 concentrates on the AONBs there is no provision for protection of landscapes in general. Furthermore, our own analysis of the landscape and the landscape character studies suggest that the tall stacks associated with large</p>	<p>relating to recovery, composting and recycling. Policy WCS4 clarifies that there is scope within the four strategic allocations to manage both municipal and commercial and industrial waste at the same facilities. The spatial vision has however been amended to emphasise that the allocations are intended to address both municipal and commercial waste.</p> <p>See Focused Change 10.</p> <p>It is acknowledged that paragraph 4.81 should be amended in relation to the role of the County Council.</p> <p>See Focused Change 17.</p> <p>Comment noted. See response above in relation to the threshold of 50,000 tonnes/year. The criteria set out in Policy WCS4, including the need to demonstrate compliance with other plan policies, will help to ensure that 'non-strategic' (i.e. small-scale) proposals outside Zone C do not have an unacceptable impact.</p> <p>Comment noted. No separate 'landscape analysis' has been provided in support of the representation however, it is acknowledged that reference could usefully be made to the protection of the landscape in more general terms. Paragraph 4.223 has therefore been amended accordingly.</p> <p>See Focused Change 32.</p>
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		<p>incineration units would be damaging at any of the sites in Zone C.</p> <p>7) The WCS contains no policy on the phasing of release of the 4 strategic sites for development. In line with normal planning practice we would expect that it would be made clear that development will first go to those sites already developed for waste. Only when they have been fully developed, taking into account the capacity of the local road system would at present undeveloped sites be released for development.</p> <p>We address specific changes required to meet the concerns expressed above in the following 17 separate representation forms. However a number of our concerns relate to the overall weakness in the strategy. For these a radical redrafting will be required. As drafted all numbers in the WCS are given as firm quantities. We believe that the uncertainty in the forecasts of future waste arisings should be explained in the WCS. All quantities referring to waste or future required waste treatment capacity should be given as a range with an explanation that this is a range of uncertainty.</p>	<p>Comment noted. A phasing policy is not considered to be necessary. The four strategic site allocations have all been identified as being suitable in principle for accommodating a waste recovery facility. Whilst national policy supports the use of existing waste sites there is nothing to suggest that these should be prioritised over other suitable sites e.g. previously developed land or industrial sites. In relation to MSW it will be a matter for the WDA and the waste industry to determine which sites come forward and in relation to C&I waste it will be a matter for the waste industry only. The residual waste project anticipates MSW residual waste recovery to be operational by 2014/15. In terms of C&I it is anticipated that there will be a gradual increase in diversion from landfill over time. In many respects the economic climate will need to be right for the industry to make the necessary investment.</p> <p>The footnote to the MSW forecast set out in the WCS clearly states that 'This is an <u>approximate</u> requirement (own emphasis) based on the latest available waste flow forecast produced by the WDA...' For C&I waste, a range of between 143,000 – 193,000 tonnes/year is given having regard to regional targets to 2020.</p> <p>No Change.</p>
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			The lower end of the range should reflect slow economic and therefore population and household growth and high recycling rates. Further all quantities should be given for 2020 and 2027.	
Nick Dummett Campaign to Protect Rural England (CPRE)	365	365/2	<p>Core Policy WCS 1. The concentration of this policy is on minimising and management of waste during construction. We support this approach but believe that the policy is not strong enough on the obligation to install facilities as part of a major development to manage waste once it is occupied.</p> <p>This could include Mechanical Biological Treatment (MBT) plant to separate addition material for composting and recycling and/or anaerobic digestion or incineration to generate heat and power for local consumption.</p> <p>This would be totally consistent with the principle of proximity. We accept that it would only be appropriate for large development of over 100 dwellings but this can be overcome if it were part of a small scale commercial plant to service local business and neighbouring communities. The policy should be redrafted to require that the waste management statement include facilities for composting/recycling and use of residual waste to service the needs of the new development and neighbouring areas.</p>	<p>Support noted. Core Policy WCS1 – Waste Reduction requires all 'major' development to be supported by a Waste Minimisation Statement (WMS) including measures to minimise, re-use and recycle waste. However, requiring all significant new housing developments to include residual waste treatment facilities would not be reasonable and would quickly lead to over-provision/capacity.</p> <p>The criteria-based approach set out in Core Policy WCS4 does however support small-scale development in appropriate locations.</p> <p>Therefore if a housing or employment development was to come forward with a waste treatment facility as part of the proposals, this would be considered on its merits having regard to Core Policy WCS4 and other relevant core policies and material considerations.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Nick Dummett Campaign to Protect Rural England (CPRE)	365	365/3	<p>Core Policy WCS 2. Overall we support the drafting of this policy provided the capacity requirements for composting and recycling in Key Driver 5 are much increased so that the context for this policy is not quantity constrained. We do have three concerns on the drafting;</p> <ul style="list-style-type: none"> · it does not set out a high enough aspiration for recycling/composting. · It should mention MBT as well as anaerobic digestion as they are often used in combination. · We believe that strategic sites should be for 30,000 tonnes/year not 50,000 tonnes/year. <p>Conversely the policy as drafted can be interpreted to mean that only facilities for composting/recycling of greater than strategic size should be on the strategic sites in Zone C. It is quite possible that smaller composting/recycling facilities would be best located in Zone C as part of an integrated site including residual waste disposal.</p> <p>We believe that minor changes to the wording would deal with these concerns. Minor changes to wording to accommodate the concerns expressed above.</p>	<p>Support for Core Policy WCS2 noted. See previous response in relation to composting/recycling targets and capacity requirements. The identified capacity requirement of 19,000 tonnes/year is not a maximum ceiling/target.</p> <p>See previous response in relation to the recycling/composting target.</p> <p>MBT as a form of residual waste recovery is dealt with under Core Policy WCS4.</p> <p>See previous response in relation to the 50,000 tonnes/year threshold.</p> <p>Disagree. The strategic sites are intended to deliver waste treatment facilities rather than recycling/composting facilities. Having said that if a proposal for recycling/composting were to come forward on one of the allocations this would need to be considered on its merits having regard to relevant core policies and other material considerations. Small-scale recycling and composting proposals (<50,000 tonnes) can come forward within or outside Zone C subject to the criteria set out in the policy.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Nick Dummett Campaign to Protect Rural England (CPRE)	365	365/4	<p>Core Policy WCS 3. We support this policy except the provision that strategic sized facilities may be in existing or disused minerals workings. This implies considerable transfers of materials from demolition/construction sites to either the Cotswolds or Forest of Dean which are the quarrying centres in the county. Firstly a 50,000 tonnes/year facility is about 60% of the total target and implies a concentration on a single rural location which would have totally unacceptable HGV traffic and other environmental impacts. Secondly as written even for smaller quantities the particular traffic effects are not adequately dealt with in the policy or in Policy WCS 5.</p> <p>We suggest that the reference to use of minerals workings is deleted and substituted by a separate bullet point along the lines:</p> <p>“Use of existing or disused minerals working will be considered acceptable only if it can be shown that the impacts on the local environment in terms of HGV traffic, the ecology of the site and the landscape are not significant”.</p>	<p>Support for Core Policy WCS3 noted. It is the case that a lot of inert waste is disposed of as part of quarry restoration schemes and other similar operations. These operations often involve large tonnages of waste.</p> <p>As is stated in the respondent's representation, much of Gloucestershire's quarry activity is located outside Zone C. As such, it is considered appropriate to highlight mineral working as a particular exception to the general rule that strategic scale facilities for inert recycling and recovery (i.e. >50,000 tonnes/year) must be located in Zone C.</p> <p>The criteria within Core Policy WCS3 and other core policies will provide an adequate safeguard in relation to issues of traffic, ecology and landscape.</p> <p>No Change.</p>
Nick Dummett Campaign to Protect Rural England (CPRE)	365	365/5	<p>Core Policy WCS 4. We support the choice of focusing on Zone C for the major facilities and identifying the strategic sites. We agree with the selection of Wingmoor Farm East and West and Moreton Valence and believe they should be developed in preference to Javelin Park.</p>	<p>The support for locating major facilities within Zone C is noted. The comments relating to the sites including the support expressed for Wingmoor Farm East and West and Moreton Valence are also noted. In relation to which site comes forward first, in relation to municipal waste, this is essentially a matter for the WDA and the waste</p>

			<p>We are also concerned at the landscape effect of tall stacks on any of the sites; this concern is supported by Appendix 5 in which all the sites are seen to be sensitive tall stacks. Given the importance of this factor in landscape terms we suggest it warrants being highlighted explicitly in Core Policy WCS 4.</p> <p>The context set out in paragraphs 4.58 to 4.74 on available technology need to be qualified firstly because DEFRA has commissioned a study into a framework for A.D. and secondly because the strategy is for the period up to 2027 and technologies will undoubtedly develop over this period.</p> <p>Paragraph 4.79 needs qualifying to reflect the uncertainties over future quantities. We suggest this is best done with a range of 60,000 to 150,000</p>	<p>industry. With specific regard to Javelin Park it is pertinent to note that the site has previously been allocated for waste management use in the adopted Waste Local Plan (2004). There is nothing in national policy to suggest that priority should be given to existing waste sites over other suitable sites such as previously developed land.</p> <p>Clearly any large-scale facility including waste management has the potential to have an impact in landscape terms. The potential impacts associated with the site allocations are clearly set out in the general and key development criteria attached at Appendix 5. There is no need to repeat these issues within the body of Core Policy WCS4 itself.</p> <p>Section 4.0 of the revised publication WCS includes a new policy and supporting text on Anaerobic Digestion (AD) including the Government's 2010 implementation plan. The potential benefits of AD and limitations with regard to the nature of the source waste required are fully explained.</p> <p>See Focused Change 13.</p> <p>Whilst paragraphs 4.58 – 4.74 outline the main types of waste recovery facilities available it is made clear that the Council is technology neutral and has no preference for one process over another.</p> <p>See previous response in relation to MSW growth.</p>
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		<p>tonnes per annum.</p> <p>Paragraph 4.80 could be read to mean that the only solution to MSW residual waste disposal is one large or 2/3 medium large facilities.</p> <p>We welcome the statement in paragraph 4.82 that there needs to be sufficient flexibility identifying a range of possible sites to allow for smaller local facilities.</p> <p>We however disagree with the way this is effectively qualified in paragraph 4.84 implying as it does that it will be solely up to the waste industry to come forward with proposals for smaller facilities. In practice smaller facilities could come forward from local communities, or in cooperation with district councils or as part of the waste management plans required under Core Policy WCS1 for new developments. 4.84 should be redrafted to allow for a wider set of possible sponsors.</p> <p>Paragraphs 4.58. Extend this paragraph along the lines: "The following paragraphs outline the available technologies today. However both these technologies are developing rapidly, new technologies will come forward and government policy towards specific technologies such as anaerobic digestion are emerging. For these</p>	<p>Paragraph 4.80 explains that the capacity requirements for MSW <u>could</u> be met either on one large strategic site or on 2-3 smaller sites (own emphasis). This is a guide, not a rigid requirement. Furthermore, it does not mean that alternative small-scale proposals cannot come forward under the criteria-based approach set out in Core Policy WCS4.</p> <p>Support for paragraph 4.82 noted.</p> <p>Comment noted. It is assumed that the respondent is in fact referring to paragraph 4.81. The wording of this paragraph has been amended.</p> <p>See Focused Change 17.</p> <p>As explained above, additional reference including a new Core Policy has been included in Section 4.0 dealing with the issue of anaerobic digestion (AD). The need for flexibility due to changing technologies is already recognised elsewhere in the strategy. See Focused Change 13.</p>
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		<p>reasons the WDA recognises that a flexible approach is required."</p> <p>Paragraph 4.79. Replace the figure of 150,000 tonnes per year with a range of 60,000 to 150,000 tonnes per year.</p> <p>Paragraph 4.80. Start the paragraph with "A significant proportion or all of the capacity requirement for MSW could...."</p> <p>Paragraph 4.89. We suggest the following redraft of this paragraph:</p> <p>"Notably, our proposed approach (see Core Policy WCS4 below) whilst focusing strategic facilities into Zone C would still allow for smaller-scale facilities to come forward outside Zone C, subject to criteria. The WPA and WDA will encourage a wide variety of sponsors such as developers, communities, district councils and the waste industry to come forward either singly or in partnership with proposals for such smaller facilities."</p> <p>We support the Core Policy WCS4 as drafted because it allows a flexible approach (in contrast to the context setting paragraphs). The only changes we suggest are that:</p> <ul style="list-style-type: none"> - the MSW quantity be put at not less than 60,000 and up to 150,000 tonnes/year. - the size of strategic sites be changed from 50,000 to 30,000 tonnes /year. - The order of the sites be changed with Moreton Valence at number 3 and Javelin Park at number 4. 	<p>See previous response relation to MSW growth.</p> <p>It is considered that the suggested amendment to paragraph 4.80 would add no value and therefore no change is proposed.</p> <p>Agree in part. Paragraph 4.89 has been amended to include reference to developers, the local community and stakeholders as well as the waste industry.</p> <p>See Focused Change 19.</p> <p>Support for Core Policy WCS4 noted.</p> <p>See previous response in relation to MSW forecast.</p> <p>See previous response in relation to site size threshold.</p> <p>See previous response in relation to phasing and priority being given to existing waste sites. It will</p>
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			<p>Followed by a statement that the sites will be developed in this order.</p> <p>Furthermore the rather arbitrary allocation of waste streams to each site should be deleted and a note be inserted to state that all the sites can be developed to treat both MSW and C&I singly or through partnership facilities.</p> <p>- an additional bullet point be added along the lines “in assessing any development particular care should be taken to mitigate, or where mitigation is not possible avoid, the detrimental effects on the landscape and traffic flows identified in Appendix 5”</p> <p>- An additional criteria for smaller sites should be introduced “The facility has been identified as part of a waste management statement for an approved new residential or commercial development”. This will ensure Core Policies WCS1 and WCS4 are not in conflict.</p>	<p>essentially be for the waste industry to decide which of the allocations come forward and when. The role of the WCS is simply to allocate suitable sites that may or may not come forward.</p> <p>The policy as worded identifies that the sites are suitable for both MSW and C&I and indicates which is likely to be the primary use having regard to a number of factors. Some of the sites for example currently take mainly C&I waste. Javelin Park has been recognised as the reference site in the residual waste project and is therefore identified as taking primarily MSW although could potentially take a proportion of C&I waste as well.</p> <p>The suggested wording is considered superfluous. These issues are already adequately covered elsewhere in the strategy including the general and site-specific development criteria attached at Appendix 5.</p> <p>It would be unreasonable to include the suggested criterion as it would suggest that any small-scale waste facility must be part of a residential or commercial development which is not the case. Separate proposals may also come forward and would be considered on their merits having regard to relevant policies and material considerations.</p> <p>No Change.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Nick Dummett Campaign to Protect Rural England (CPRE)	365	365/6	<p>We object strongly to the reliance being put on fundamental choices being made by the waste industry.</p> <p>Paragraph 4.80 implies that the only solutions for treating MSW residual waste will be one large or 2/3 smaller (but still large) facilities. This is contrary to the flexible approach described in paragraph 4.82.</p> <p>Paragraphs 4.81 and 4.88 imply that the waste industry will decide on capacity of facilities and on whether a dispersed or large centralised facility strategy will be adopted. In our view this is quite wrong. The County Council has an absolute responsibility to determine what it wants for MSW and to set the limitations on the commercial plant for handling C&I waste. Clearly the County Council has to work with the waste industry but at the end of the day the Council will decide upon the balance between cost and other environmental benefits.</p> <p>Paragraph 4.80 should be redrafted to make clear that some MSW may be treated in smaller facilities. This would be achieved by the paragraph starting with "A significant proportion or all of the capacity requirement for MSW could....."</p>	<p>Comment noted. Paragraph 4.81 has been amended for clarity.</p> <p>See Focused Change 17.</p> <p>Paragraph 4.80 explains that the capacity requirements for MSW <u>could</u> be met either on one strategic site or several. It does not preclude the possibility of small-scale proposals coming forward under the criteria-based approach set out in Core Policy WCS4. The WCS strikes a balance between providing certainty and flexibility.</p> <p>Comment noted. Paragraph 4.81 has been reworded accordingly.</p> <p>See Focused Change 17.</p> <p>Paragraph 4.88 simply states that at the site options consultation stage there was little support from industry for a small-scale dispersed approach. This is factually correct. The consultation responses received are set out in the response schedule made available at publication.</p> <p>Paragraph 4.80 explains that the capacity requirements for MSW <u>could</u> be met either on one large strategic site or on 2-3 smaller sites (own emphasis). It does not preclude the possibility of small-scale proposals coming forward under the criteria-based approach set out in Core Policy WCS4.</p>

			<p>Paragraph 4.81 should be redrafted along the following lines: "For MSW this will be a matter for the WDA to decide with input from the Waste Industry on the technical and economic benefits of different options. During this process the WDA will be taking a view of what will be in Gloucestershire's overall best interest balancing cost and environmental/community factors. For C&I it will be for the waste industry to decide what projects they wish to bring forward within the framework of this WCS. The WDA will work with the waste industry to maximise partnership on joint MSW / C&I facilities."</p>	<p>Comment noted. It is acknowledged that the wording of paragraph 4.81 could be improved and it has therefore been revised to better reflect the input of the WDA and waste industry.</p> <p>See Focused Change 17.</p>
<p>Nick Dummett</p> <p>Campaign to Protect Rural England (CPRE)</p>	365	365/7	<p>Core Policy WCS 7. It is stated in Paragraph 4.162 that reliance will be put on Core Policy 37 of the Waste Local Plan (2004) and that WCS7 will therefore only deal with cumulative effects. This is totally unsatisfactory. Policy 37 of the Local Waste Plan simply consists of a list of matters which should be taken into account when determining a waste facility planning application. It is usual practice for policies to include criteria for judging the acceptability of impacts. We suggest that as this is so important it should not be delayed until a DPD is produced as suggested in the text.</p> <p>A full policy should be drafted setting out the matters of concern and the criteria to be used. Similarly Core Policy WCS 7 is very weak on criteria and as they will be similar to those for a stand alone facility we suggest that they can be brought together into one redrafted policy.</p>	<p>Comment noted. Policy 37 of the adopted Waste Local Plan has been saved under transitional arrangements and it is entirely appropriate for the Council to continue to rely on the policy until it is replaced. Indeed Policy 37 is often an important consideration in the determination of planning applications and has been used both as reasons for approval and refusal</p> <p>The intention is to replace the policy through a separate DPD to follow the WCS. This is clearly explained in paragraph 4.185 of the WCS.</p> <p>Core Policy WCS7 is based on previous stakeholder input received during the Regulation 25 consultation on the WCS. It is acknowledged that the wording could be clarified and the policy has therefore been revised.</p> <p>See Focused Change 28.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Nick Dummett Campaign to Protect Rural England (CPRE)	365	365/8	<p>Core Policy WCS11. We welcome this policy but suggest two amendments. Firstly it should cover not just the setting of the AONB but also views out of the AONB. Secondly it should be judged not just against the policies of the Management Plan but also any Landscape Character Assessment including its related Strategies and Guidelines.</p> <p>The second bullet point of WCS Policy 11 should be redrafted as follows:</p> <p>'The impact on the special qualities of the AONB as defined by the relevant management plan, landscape character assessment and related strategies and guidelines (including the landscape setting, views into and out of the AONB and recreational opportunities) can be satisfactorily mitigated;'</p>	<p>Support for Core Policy WCS11 noted. However, it is considered that reference to the 'setting' of the AONB is considered to offer an adequate degree of safeguarding as this is likely to include a consideration of views from the AONB.</p> <p>Core Policy WCS11 is geared towards proposals within or affecting the setting of an AONB therefore reference to the AONB management plan is considered appropriate.</p> <p>Whilst landscape character assessments may be relevant in some cases, it is not possible to refer to all material considerations within the body of Core Policy WCS11.</p> <p>No Change.</p>
Nick Dummett Campaign to Protect Rural England (CPRE)	365	365/9	<p>Core Policy WCS 14 Sustainable Transport. We welcome the support for non-road transport but believe that in practice the effect will be limited and the majority of waste movement will continue to be by HGVs. We consider that this policy is inadequate in addressing the potential effects largely because a transport assessment is only triggered at 100 two way movements per day or a peak of 30 per hour. Such a level is probably much higher than any of the facilities being considered many of which will be approached by minor roads where even a modest level of HGV traffic can have a disproportionate effect.</p>	<p>Support for Core Policy WCS14 noted. It is acknowledged that road transport will continue to be the primary means of transporting waste in Gloucestershire. This fact is recognised in paragraph 4.283 of the WCS. However, in line with national policy, Core Policy WCS14 seeks to encourage the use of more sustainable alternatives.</p> <p>In relation to the point at which the need for a Transport Assessment (TA) is triggered, Core Policy WCS14 has been amended to include reference to the location of development also being a</p>

			<p>We recognize that Core Policy WCS7 mentions traffic but without any criteria for judging acceptability. We feel it would be better if all transport matters were brought together in one policy and a new paragraph added to Core Policy WCS 14 along the following lines:</p> <p>'For those developments not requiring a Transport Assessment approval will be given provided the level of traffic generated is consistent with the capacity of the local road network taking into account all other proposed developments in the area and would not constitute a significant change to the tranquillity of the area'.</p>	<p>determining factor.</p> <p>See Focused Change 37.</p>
<p>Nick Dummett</p> <p>Campaign to Protect Rural England (CPRE)</p>	365	365/10	<p>Missing policies. We believe that there are serious omissions in the policies.</p> <p>a) There is no reference in Appendix 2 to PPS7. This leads to no policy covering protection of the countryside in general.</p> <p>While important, Core Policy WCS 13 is not sufficient as design does not deal with whether a location is appropriate for development in the first place nor does it deal with damage to the tranquillity of an area.</p>	<p>Whilst PPS7 is of relevance to the Waste Core Strategy and a rural area such as Gloucestershire it is not possible to refer to every single planning policy statement within Appendix 2. For example no reference is made to Planning Policy Statement 9: Biodiversity and Geological Conservation or PPG13: Transport although the importance of these is fully acknowledged. To summarise all of these would make Appendix 2 too lengthy. It is also pertinent to note in any case that the Government intends to consolidate the existing set of planning policy guidance notes and statements into a single concise national planning policy framework.</p> <p>The comments regarding Core Policy WCS13 are noted. The policy does refer to location stating that consideration will be given to how the proposal 'reflects, responds and is appropriate to its local environment and surroundings'.</p>

			<p>Appendix 5 is also not sufficient as it only refers to strategic sites under Core Policy WCS4.</p> <p>We also note that the Local Waste Plan (2004) Policy 27 covering Special Landscape Areas has not been saved.</p> <p>b) Policy 32 of the Local Waste Plan (2004) is not retained in the new Core Strategy as published for consultation. It is important to indicate appropriate protection for the best and most versatile agricultural land, which is a strategic natural resource for the long term.</p> <p>a) A policy along the following lines is necessary:</p> <p>'Development will be permitted provided it does not have a significant adverse effect on the key characteristics of the landscape as described in a local landscape character assessment or on the tranquillity of an area as defined in the appropriate CPRE tranquillity map or on an area designated as a Special Landscape Area.'</p> <p>b) Policy 32 of the Local Waste Plan 2004 was suitable for the purpose and we propose that it</p>	<p>Appendix 5 applies to the strategic site allocations. The remaining core policies will provide adequate safeguards against inappropriate speculative development. It would be inappropriate and potentially contrary to national policy to apply all of the criteria in Appendix 5 to small-scale proposals e.g. requiring a flood risk assessment for a small-scale proposal of less than 1 hectare in Flood Zone 1.</p> <p>Policy 27 of the Waste Local Plan was not saved under transitional arrangements. It was therefore not possible to save it through the Waste Core Strategy.</p> <p>Policy 32 of the Waste Local Plan was not saved under transitional arrangements. It was therefore not possible to retain the policy in the Waste Core Strategy.</p> <p>It is considered that the core policies as drafted provide adequate protection for the local landscape.</p> <p>Policy 32 was not saved under transitional arrangements. It was therefore not possible to</p>
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			should be inserted as a policy in the new Waste Core Strategy or stated to be saved.	<p>retain the policy in the Waste Core Strategy.</p> <p>In general terms, the relative merits of whether Waste Local Plan policies have been saved retained or reviewed through the WCS takes account of Government policy and in particular tries to strike a balance between not merely repeating Government policy and dealing with issues that have a local context.</p> <p>No Change.</p>
Nick Dummett Campaign to Protect Rural England (CPRE)	365	365/11	See our first representation form covering why we think the numerical forecasts are subject to great uncertainty. Key Issue 1 should be redrafted to make clear that continued economic growth in line with past experience is uncertain in the period up to 2020 and this will have a direct effect on the population and generation of household waste. The number of 674,000 should be removed and replaced by a range forecast for 2020 and 2027.	<p>As stated previously, the capacity requirements of the WCS are based on the latest available data provided by the WDA.</p> <p>Key Issue 1 does not need to be amended, it simply states that future population and economic growth will influence the amount of waste produced in Gloucestershire. This is factually correct.</p> <p>With specific regard to the population forecast of 674,000 as explained previously, this is taken from a report produced by the GCC research and intelligence team in June 2010. It has been included simply to provide context and to demonstrate the fact that the population of Gloucestershire will increase in the future. It is accepted that this is a forecast only however it is considered to a reasonable estimate. Notably, the ONS forecast population over the same period is 11,000 higher (source: 2008 based sub-national population projections).</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Nick Dummett Campaign to Protect Rural England (CPRE)	365	365/12	Please see our first representation form concerning our view that the WCS is unduly conservative on the rate of recycling which should be achievable and that the target set in the JMWMS is now out of date and does not reflect current best practice and experience. Key Issue 6 should be redrafted to reflect a determination to do better than the target set in 2008. We suggest 'experience has shown that it should be possible to exceed the target set in the JMWMS of 60% recycling by 2020 but strategies need to be developed to do so'.	Comment noted. The WCS seeks to ensure that at least 60% of household waste is recycled or composted by 2020 with an aspiration for 70%. This target is derived from the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS). The national target set out in the Waste Strategy for England (2007) is 50% by 2020. The revised EU Waste Framework Directive also has a target of 50% by 2020. The Council's target cannot therefore be described as unambitious. Whilst it is the case that 60% recycling/composting has already been exceeded in Cotswold District and at the Household Recycling Centres (HRCs) it is not correct to extrapolate this to mean that a much higher rate than 60% is achievable across Gloucestershire. The HRCs for example have consistently achieved a higher rate of recycling because it is easier to engage with the public at these sites. This is very different to collecting waste door to door where opportunities to engage are much more limited. Based on information set out in the report 'The Composition of Kerbside Collected Household Waste in Gloucestershire' (October 2008) it is estimated that about 77% of the waste stream is recyclable. To achieve a countywide recycling rate of 60% would mean capturing around 75% of the available recyclable waste at the kerbside and to achieve the 70% target would mean capturing 92% of the available recyclables. This is much higher than is currently being achieved (about 50% on average). It is also the case that some communities achieve higher

				<p>rates than others. For example it is anticipated that for 2010/11, Tewkesbury Borough Council will achieve a recycling and composting rate of 54% and Gloucester City 46% despite having broadly similar systems to Cotswold District which is achieving over 60%. For these reasons the WCS target of at least 60% recycling/composting by 2020 is considered to be both appropriate and challenging. No change to the recycling target is therefore proposed, however the text of the WCS has been amended to clarify that the aspiration for 70% recycling/composting is to be achieved by the year 2030. This has arisen through the Council's review of its residual waste project.</p> <p>See Focused Change 11.</p>
<p>Nick Dummett</p> <p>Campaign to Protect Rural England (CPRE)</p>	365	365/13	<p>Please see our first representation form expressing our view that the WCS is unduly conservative on the growth of MSW per capita and pessimistic therefore on the growth of total MSW. Key Issue 7 should be redrafted to state that MSW per capita had been falling over the last three years and that given the Council's determination to promote waste prevention and uncertainties over economic and population growth future MSW could lie within a wide range.</p>	<p>Comment noted. See previous response in relation to future MSW growth. Key Issue 7 as drafted already makes it clear that MSW in the last 3 years has decreased but overall there has been a steady increase. This is factually correct. Detailed information on waste arisings is set out in the Waste Data Paper (2010) available separately.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Nick Dummett Campaign to Protect Rural England (CPRE)	365	365/14	Our first representation form sets out our views as to why the numerical forecasts in the WCS are subject to great uncertainty. The increase in capacity numbers in paragraph 3.14 are stated to be a firm number. Paragraph 3.14 should be redrafted to state that the JMWMS was based on estimates made before the financial crisis and that though the strategies are directionally correct the quantification of capacity requirements now represents the upper range of the likely outcomes.	<p>Comment noted. Paragraph 3.14 identifies the capacity requirement set out in the Joint Municipal Waste Management Strategy (JMWMS). The strategy has been adopted by partners through an agreed process. Importantly, national policy and best practice requires the WCS to identify linkages with key plans and programmes such as the JMWMS.</p> <p>Notably the level of provision proposed in the WCS (150,000 tonnes/year) lies at the bottom end of the range identified in the JMWMS (150,000 – 270,000 tonnes/year). Whilst more recent modelling has been carried out in support of the residual waste project, this still suggests there is a need to provide around 150,000 tonnes/year capacity for MSW recovery.</p> <p>If the recycling target of 60% by 2020 is not achieved the residual requirement may be higher than 150,000 tonnes/year.</p> <p>No Change.</p>
Nick Dummett Campaign to Protect Rural England (CPRE)	365	365/15	We believe paragraphs 3.15 and 3.16 are inappropriate in that they are outcomes and not drivers of strategy. To be clear we do not doubt that some residual waste treatment capacity is necessary – it is the capacity and number of facilities which is uncertain; the WCS should not be pre-empting this. The WCS should be neutral and enable and encourage a wide range of possible	<p>Disagree. The 'Key Driver' is the Joint Municipal Waste Management Strategy (JMWMS).</p> <p>Paragraphs 3.15 and 3.16 simply explain that in order to deliver the requirements of the JMWMS, the WDA is in the process of procuring a residual waste solution and that the facility is likely to be operational by 2015. This is factually correct and at</p>

			<p>outcomes.</p> <p>Paragraphs 3.15 and 3.16 should be deleted from this section. It might be appropriate for this information to be given in the introduction to the WCS but not as a key driver to the spatial strategy. In any event they should be redrafted to reflect the current situation and the uncertainty which exists as to whether a contract will be let and if so for what capacity.</p>	<p>the time of writing the WDA is still engaged in this process. The forecast residual requirement for MSW is based on information provided by the WDA. The WCS provides flexibility to allow one or more facilities to come forward in appropriate locations.</p> <p>These statements are factually correct and do not need to be revised. There is no uncertainty. The WDA is in the process of awarding the contract based on the forecast residual municipal waste requirement of approximately 150,000 tonnes per year.</p> <p>No Change.</p>
<p>Nick Dummett</p> <p>Campaign to Protect Rural England (CPRE)</p>	365	365/16	<p>Our first representation form expresses our view that all numerical forecasts in the WCS are subject to great uncertainty.</p> <p>We suggest that there should be an explicit commitment to partnership working with the commercial sector handling C&I waste to both gain from economies of scale and minimise proliferation of sites doing essentially the same job.</p> <p>Paragraph 3.23 seriously underestimates the</p>	<p>See previous response in relation to forecast growth in waste arisings.</p> <p>With regard to C&I waste, paragraph 2.16 explains that the biodegradable element of C&I waste is similar to MSW and can be managed at the same facilities. Core Policy WCS4 makes it clear that the four strategic site allocations are likely to deal with a proportion of both MSW and C&I wastes. Section 5.0 also identifies the waste industry as a key partner in delivering the WCS. The spatial vision has been amended to emphasise more clearly that the strategic site allocations are intended to manage both municipal and commercial waste.</p> <p>See Focused Change 10.</p> <p>Disagree. The WCS and Waste Data Paper do not</p>

			<p>potential requirement for recycling /composting facilities for MSW. The amounts foreseen of 10,000 and 9,000 tons respectively could be as much as 50,000 tons short of the requirement if the council are really successful in promoting high recycle rate. This is a completely different spatial requirement and the WCS need to be redrafted to address it. It could be that the capacity could be placed on the 4 strategic sites in Zone C given that the majority of the waste will arise in or adjacent to the vale.</p> <p>Conversely the requirement for 150,000 tpa of residual waste facilities needs to be redrafted to envisage a requirement as low as 60,000 t.p.a. Paragraph 3.22 should be redrafted to reflect the uncertainty there is over future MSW quantities.</p> <p>Paragraph 3.23 should be redrafted to reflect the possibility that up to 70,000 tonnes per year of composting/recycling capacity could be needed and that this would be distributed across a number of sites including the strategic sites in Zone C.</p> <p>Paragraph 3.23 should be redrafted to show the requirement for residual waste to be in a range of</p>	<p>underestimate the amount of recycling / composting facilities which could be required. In fact on the advice of the WDA, reflecting contractual issues, the Waste Data Paper has only factored in 50% of the potential MSW composting capacity at the New Earth Solutions IVC facility at Sharpness Docks. If the full capacity of this facility was to be utilised for Gloucestershire's food and green waste, then even more existing capacity would be available. In any case the WCS clearly states that the additional capacity requirement (19,000 tonnes) is not a maximum target/ceiling.</p> <p>If a recycling/composting proposal were to come forward on one of the strategic site allocations, this would be considered on its merits having regard to relevant core policies.</p> <p>See previous response in relation to MSW growth and why the forecast residual requirement of approximately 150,000 tonnes per year is considered to be appropriate.</p> <p>The publication WCS clearly identifies the amount of additional composting/recycling capacity required over and above existing provision. As stated above, this is not a maximum ceiling and additional capacity may come forward. It is pertinent to note however that there is already a significant amount of recycling and composting capacity available in Gloucestershire.</p> <p>See previous response in relation to MSW growth.</p>
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			<p>60,000 to 150,000 tonnes per year.</p> <p>Paragraph 3.25 should be redrafted to suggest that encouragement will be given for the increased facilities for treating C&I waste to be constructed in partnership with the WDA.</p> <p>The table in paragraph 3.26 should be omitted as it is clearly misleading in its sense of certainty.</p>	<p>Comment noted. The suggested amendment is considered to add little value. The integration of MSW and C&I waste and partnership working are already addressed elsewhere in the document.</p> <p>Disagree. Table 3 (paragraph 3.26) has been prepared having regard to advice and best practice on preparing Waste Core Strategies which recommend identifying likely future capacity requirements and the number of sites that may be needed. Importantly, Table 3 provides a guide rather than a rigid set of requirements.</p> <p>The assumptions made in the figures used are clearly set out both in the WCS and the supporting evidence paper on data.</p> <p>No Change.</p>
<p>Nick Dummett</p> <p>Campaign to Protect Rural England (CPRE)</p>	365	365/17	<p>Please see our first representation form which sets out our view that the WCS strategy is not right for the uncertain future. "Our Vision for 2027" contained in paragraph 3.33 should be redrafted to reflect higher aspirations on waste minimisation and recycling and a more flexible approach to residual waste treatment facilities. As drafted it reads that residual waste can only be processed at large facilities in Zone C.</p> <p>We show below our suggested redrafting of the Vision. Much is unaltered but we feel that by quoting the whole it is easier to see the significance of the changes we suggest.</p>	<p>Comment noted. See previous response in relation to recycling targets. With regard to large facilities in Zone C, the vision emphasises that strategic facilities will be located in Zone C whilst smaller-scale facilities will be located both within and outside Zone C. This is consistent with responses received during previous stakeholder consultation and provides maximum flexibility.</p> <p>Core Policy WCS4 amplifies this approach by allocating four strategic sites within Zone C and adopting a criteria-based approach towards smaller-scale proposals.</p>

			<p>'By 2027 Gloucestershire is a clean, green, healthy and safe place in which to live, work and visit. Residents and businesses are fully aware of the economic and environmental importance of waste management, including its impact on climate change and proactively minimise their waste production so that the amount per head of population in Gloucestershire declines continuously over the period to 2020 and household waste growth has been reduced to zero well before 2020.</p> <p>Opportunities for re-using, recycling and composting waste are maximised across all waste streams. Effective joint working through the Gloucestershire Waste Partnership (GWP) has led to a more consistent and co-ordinated approach towards municipal waste collection across the county with everyone able to recycle and compost a broad range of materials easily and conveniently.</p> <p>Recycling/composting rates have risen year on year towards accepted best practice of 80% in all districts.</p> <p>The 'residual' waste that cannot be re-used, recycled or composted is seen as a valuable resource. Local communities have been encouraged to take responsibility for the management of their waste and residual waste is therefore managed through a variety of facilities both in size and technology appropriate to the location. The largest facilities (strategic facilities of greater than 30,000 tonnes/year) are located in the</p>	<p>See previous response in relation to the recycling/composting target and why the target of at least 60% is considered to be appropriate.</p> <p>Support for centrally located strategic sites noted. See previous response in relation to the strategic site-size threshold of 50,000 tonnes/year.</p>
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			<p>central area of the county, proximate to the main urban areas along the M5 corridor including Gloucester and Cheltenham.</p> <p>All residual waste treatment sites will be located so as to maximise the potential use of heat and power and give priority first to further development of those sites already developed for waste treatment and secondly to the re-use of previously developed land and buildings .</p> <p>‘Local’ facilities (less than 30,000 tonnes/year) including supporting infrastructure such as waste transfer and bulking are dispersed more widely around the county including those more distant rural areas such as the Forest of Dean and the Cotswolds.</p> <p>These strategic, local and existing waste facilities will form an integrated sustainable waste management system for Gloucestershire.</p> <p>Gloucestershire’s communities, landscape/environmental assets and land liable to current and future potential flood risk, are safeguarded from the adverse impacts of waste management activities.</p> <p>The continuing role of landfill is recognised but increasingly seen as a last resort’.</p>	<p>Whilst national policy (PPS10) supports the use of existing waste sites, there is nothing to suggest they should be given priority over previously developed land. The four strategic site allocations involve a mixture of previously developed land and existing waste management facilities and are all considered suitable for residual waste recovery (treatment) processes. Which sites come forward will depend on the waste industry and in relation to municipal waste the WDA.</p> <p>See previous response in relation to the threshold of 50,000 tonnes/year.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Nick Dummett Campaign to Protect Rural England (CPRE)	365	365/18	<p>The strategic objectives should be redrafted to be consistent with the amendments to 'Our Vision for 2027' which we have suggested in the previous representation form. They should also be redrafted to reflect the great uncertainty to which numerical forecasts are subject.</p> <p>Strategic Objectives should be redrafted to reflect the above vision. In particular:</p> <ul style="list-style-type: none"> · Strategic objective 1 should be redrafted to reflect a target of reducing per capita waste. Furthermore the target is zero growth for MSW. · Strategic objective 2 should be redrafted to reflect an aspiration of 80% achieved in the best districts well before 2020. · Strategic objective 3 should be redrafted to reflect the uncertainty over future amounts of residual MSW waste. We suggest that the first bullet point states "between 60,000 and 150,000 tonnes/year of residual waste recovery capacity for municipal waste by 2027. · Strategic objective 5. We suggest the following amended version : <p>'To ensure the environmental and social impacts of waste management particularly climate change and risks to human health are minimised by; managing waste close to where it arises, promoting</p>	<p>See previous response in relation to the suggested vision amendments above. In relation to future forecasts for MSW these are based on information provided by the WDA.</p> <p>Disagree. The strategic objective applies to all waste streams, not just MSW and it already refers to waste reduction.</p> <p>See previous response in relation to recycling and composting target.</p> <p>See previous response in relation to MSW growth.</p> <p>Comment noted. The existing reference to areas of national and local landscape importance is considered adequate and appropriate.</p>

			the use of sustainable transport, avoiding current and potential flood risk areas, safeguarding existing and proposed waste sites, promoting high quality sustainable design, protecting the countryside for the sake of its intrinsic character, beauty and tranquillity and nature conservation areas of importance, and prioritising the co-location of similar or related facilities firstly on existing waste sites and secondly on previously developed sites in preference to Greenfield locations where appropriate and where the cumulative impact is not unacceptable to the host location.'	Reference to the issue of the general landscape has been included in paragraph 4.223 of the revised publication WCS. See Focused Change 32.
Barbara Morgan Network Rail (Bristol)	723	723/1	No comment.	Noted. No Change.
Diane Mautterer Gloucestershire VCS Environment Strategy Group	67	67/1	'The WCS has been subject to extensive and continuous engagement with stakeholders. This has helped to ensure that the policies and proposals are fully justified, effective and consistent with National Policy'. A large proportion of consultees who responded to the Waste Core Strategy sites consultation in 2009 expressed the view that: a. The County Council should not be technology neutral and that waste incineration should be opposed.	It is acknowledged that a large number of responses were received at site options in relation to the issue of technology including incineration despite the fact that it was made clear the proposed sites were capable of accommodating a range of different waste recovery processes. Importantly, the four strategic site allocations identified in the publication WCS are capable of accommodating a range of different processes. These are described in the supporting text. It would be contrary to national policy if the document were to be overly prescriptive about what should be

			<p>b. The Waste Core Strategy should favour dispersal of small sites rather than of large, strategic sites.</p> <p>These views, which were widely held and well justified, are not reflected within the WCS. The views of the large waste industry, however, are well noted (see 4.88 and 4.89. These paragraphs assume that the waste industry would only be interested in large facilities - this is untrue since many smaller companies are building smaller, profitable facilities. The view reflects the interests of larger companies). This is despite the fact that, as shown by Table 2 in the Site Options Consultation 2009 Summary Response Report, there were many more responses from individuals and organisations than from the waste industry. This is illustrated by this extract of figures:</p> <ul style="list-style-type: none"> - Individual members of the public 339 responses = 74.3% of all responses - Town/Parish Councils 38 responses = 8.3% - Interest/Amenity Groups 13 responses = 2.9% - Other Organisation responses 13 responses = 2.9% - Waste Industry 12 responses = 2.6% 	<p>built where.</p> <p>With regard to the dispersal of small sites it is pertinent to note that the majority of respondents at site options (49%) favoured focusing the search for strategic sites into the central area of the county (Zone C) whereas fewer people (43%) supported a more dispersed approach.</p> <p>Furthermore, 59% of respondents supported a combination of sites within and outside Zone C and this is reflected in Core Policy WCS4.</p> <p>Paragraph 4.88 simply states that there was little waste industry support for a dispersed small-scale approach during the site options consultation. This is factually correct. Notwithstanding this, Core Policy WCS4 allows for small-scale facilities to come forward in appropriate locations subject to relevant criteria should there prove to be interest from the waste industry, the local community or any other stakeholder.</p>
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			<p>The summary document mentions incineration only once, despite the fact that the full version of consultation responses shows that it was mentioned many times.</p> <p>It would therefore appear that the consultation was a biased exercise, with only comments from large players in the waste industry or that support the position held by the County Council being taken into consideration. The WCS is based on what the large waste industry wants to deliver, rather than on what is best for Gloucestershire and its residents. This therefore means that the WCS is unsound, because it is based on biased evidence that leads to inappropriate conclusions.</p> <p>Page 61 of the Site Options Consultation 2009 Summary Response Report states "The issue of technology is dealt with in broad terms as the site options consultation was based on each site being capable of accommodating a range of different technologies. This approach is consistent with national policy which emphasises that local authorities should avoid any detailed prescription of waste management techniques or technology that would stifle innovation in line with the waste hierarchy."</p>	<p>As outlined above, the strategic site allocations are capable of accommodating a range of different waste recovery technologies including incineration. Paragraph 4.91 has been amended to clarify the fact that the strategic site allocations are capable of accommodating a range of different waste recovery processes.</p> <p>See Focused Change 20.</p> <p>The WPA does not accept that the consultation was a biased exercise. A broad range of stakeholders have been engaged. Whilst the WPA cannot compel anyone to reply it does all it can to seek a wide range of views.</p> <p>The majority of respondents (49%) favoured a 'Zone C' focus and this has been taken forward as the preferred spatial strategy within the publication WCS. Smaller-scale proposals can come forward under the various criteria-based policies set out in the strategy.</p> <p>The technology neutral approach is not 'unsound' it is entirely consistent with national policy which advises local authorities not to be overly prescriptive so as to avoid stifling innovation. The publication WCS is fully aligned with the waste hierarchy, which importantly makes no distinction between different forms of 'other recovery' e.g. incineration, pyrolysis, gasification etc. These should all be promoted ahead of disposal to landfill.</p>
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			<p>However, the 'technology neutral' stance is in fact unsound and unjustified precisely because it fails to distinguish between approaches at the top of the waste hierarchy and those at the bottom, and therefore it is not in line with the waste hierarchy.</p> <p>These points affect the underlying assumptions of the whole strategy. The WCS should take a position on technology, and should favour a dispersed solution with smaller facilities rather than a few large facilities located in Zone C.</p>	<p>See response above in relation to technology. In relation to a dispersed solution, the centralised 'Zone C' approach has gained good support throughout the regulation 25 consultation stage and has therefore been taken forward into the publication WCS as the proposed spatial strategy.</p> <p>Notwithstanding this, the criteria-based approach set out in Core Policy WCS4 will allow for smaller-scale proposals to come forward in locations within and outside Zone C subject to compliance with relevant criteria.</p> <p>No Change.</p>
<p>Diane Mautterer</p> <p>Gloucestershire VCS Environment Strategy Group</p>	67	67/2	<p>Table 3 states that MSW waste will be between 136,000 to 148,000 tpa by 2026, and then rounds this up to 150,00 tpa, a figure which is then used throughout the WCS. There are many reasons why this figure is wrong.</p> <p>1. There is no justification given for planning at 2,000 tonnes/year above the upper limit of predicted MSW.</p> <p>2. The Technical Paper WCS-A Data (update 2010) table 31 shows that the calculation for MSW is based on an estimate of an annual increase of 0.8% between 2020 and 2026, generating an extra 19,000 tonnes/year. Yet the strategy itself is committed to zero growth by 2020. Thus even if one accepts the logic of the WCS itself the calculations for 2026 are 19,000 too high.</p>	<p>Comment noted.</p> <p>As stated in the publication WCS, the residual MSW requirement of 150,000 tonnes/year has been provided by the WDA and is an approximate requirement based on future waste modelling forecasts.</p> <p>The vision refers to achieving zero-growth by 2020. This is an aspiration only and for the purposes of identifying future waste capacity requirements within the WCS, it is considered appropriate to use data provided by the WDA. Furthermore, the target of zero-growth is assumed to be at a household level and as such even if it is achieved, future population increases will lead to an overall increase</p>

			<p>3. Trends in MSW are already reducing. In fact UK total MSW has been stable/decreasing since 2004, even though there has been a significant rise in population and economic growth. Over the same period MSW in Gloucestershire grew at an average of 3.4% from 2004 to 2007 and has declined every year since then and is now at the same level as in 2004. The estimate figure for 2026 is based on the assumption that MSW will grow by 1.6% per annum. This is based on outdated work done for the Joint Municipal Waste Management Strategy in 2006, before the clear downward trend was evident.</p> <p>4. Public opinion, political and economic pressures (such as the rising cost of packaging) are likely to drive down waste trends even further. Combined with higher recycling rates (see response form on Vision) the MSW tonnes per annum will likely be considerably lower than predicted.</p> <p>5. Population and economic growth predictions ignore the huge uncertainty over figures used. The Council's research team recommend that any service using these predictions builds in flexibility into their planning. There is no evidence of such flexibility in the WCS. Predictions of increased MSW based on these figures are therefore unsound.</p>	<p>in waste arisings. Paragraph 3.23 has been amended accordingly.</p> <p>See Focused Change 8.</p> <p>It is acknowledged that municipal waste arisings have fallen in recent years. There are several reasons for this. Service changes introduced in Cotswold District, Gloucester City and Tewkesbury Borough have all reduced MSW arisings. In addition the recession has undoubtedly had an effect. It is however wrong to assume that service changes lead to year on year waste reduction. The WDA has carried out modelling to forecast residual waste tonnages many times and have considered many factors in that modelling including population growth, District service changes, policy, Government forecasts and existing waste arisings. Table 3I of the Waste Data Paper Update (2010) is based on information provided by the WDA at that time and forecasts that MSW arisings will increase to 359,612 tonnes/year by 2027/28. On this basis the WCS identifies a residual MSW requirement of 150,000 tonnes/year. More recent modelling carried out for the review of the residual project, based on 60% recycling by 2020 and 70% recycling by 2030, showed an annual forecast of approximately 155,000 tonnes of residual waste by 2040.</p> <p>A number of scenarios combining varying growth and recycling rates were also modelled. These show the projected levels of residual waste in 2030 to be between 125,000 tonnes (70% recycling and composting) and 165,000 (60% recycling and</p>
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			<p>To conclude, the WCS is unsound because it is based on outdated and inaccurate assumptions. Based on the above factors, it is likely that MSW figures are more likely to be between 60,000 - 134,000 by 2020. Plans based on the higher figure of 150,000 tpa will lead to over capacity.</p> <p>Adjust all predictions for MSW rates by 2020 to a range between 60,000 - 134,000 tpa, and adjust other predictions based on this assumption accordingly.</p>	<p>composting). The WDA has had discussions with DEFRA on the latest national waste growth trends and has also reviewed the Swedish Sustainable Waste Management Programme, which predicts that waste will grow at 2.2% per annum over the next 25 years, aligning closely to the DEFRA scenarios and the WDA's own modelling.</p> <p>On the basis of the above, the residual MSW requirement of 150,000 tonnes/year identified in the WCS is considered to be robust.</p> <p>No Change.</p>
<p>Diane Mautterer</p> <p>Gloucestershire VCS Environment Strategy Group</p>	67	67/3	<p>The WCS Vision on page 36 is unsound for the following reasons:</p> <p>1. Its aims 'to achieve zero growth by 2020'. This is not justified because evidence shows that trends in MSW are already reducing. In fact UK total MSW has been stable/decreasing since 2004 even though there has been a significant rise in population and economic growth. Over the same period MSW in Gloucestershire grew at an average of 3.4% from 2004 to 2007 and has declined every year since then and is now at the same level as in 2004.</p> <p>'The total amount of municipal waste generated (nationally) has decreased by 2.9 per cent from 27.3 million tonnes in 2008/09 to 26.5 million</p>	<p>Comment noted. It is acknowledged that municipal waste arisings have fallen in recent years. There are several reasons for this. Service changes introduced in Cotswold District, Gloucester City and Tewkesbury Borough have all reduced MSW arisings. In addition the recession has undoubtedly had an effect. It is however wrong to assume that service changes lead to year on year waste reduction. The WDA has carried out modelling to forecast residual waste tonnages many times and have considered many factors in that modelling including population growth, District service changes, policy, Government forecasts and existing waste arisings. Table 3I of the Waste Data Paper Update (2010) is based on information provided by the WDA at that time and forecasts that MSW arisings will increase to 359,612 tonnes/year by</p>

		<p>tonnes in 2009/10. The average annual change in municipal waste over the five years to 2009/10 was a decrease of 2.2 per cent.'(Municipal waste Management Statistics for England 2009/10: Defra November 2010)</p> <p>Public opinion, political and economic pressures (such as the rising cost of packaging) are likely to drive down waste trends even further. The WCS vision is unsound because it is based on outdated and inaccurate assumptions. The ambition of zero-growth is a backwards step since growth in MSW has already stopped and waste is already declining. The WCS should have a vision of zero waste, with significant reduction by 2020 of at least 15%.</p> <p>2. Its aim that "at least 60% of household waste is recycled and composted by 2020". This target for recycling is inadequate and higher rates could easily be achieved. For example Cotswold District Council are already recycling and composting more than 60% of their waste. Higher recycling/composting rates are proven to be achievable: the Defra Municipal Waste League Table for 2008/9 shows that, if you add together the top-performing recycling rate (Worcester City Council 36.1%) with the top-performing composting rate (Staffordshire Morelands DC 40.81%) a recycling/composting rate of 76.82% could be achieved.</p> <p>It is also likely that an increase to 70% or 80% recycling could be achieved at lower cost than dealing with this waste through residual waste facilities and therefore this is not the most</p>	<p>2027/28. On this basis the WCS identifies a residual MSW requirement of 150,000 tonnes/year. More recent modelling carried out for the review of the residual project, based on 60% recycling by 2020 and 70% recycling by 2030, showed an annual forecast of approximately 155,000 tonnes of residual waste by 2040. A number of scenarios combining varying growth and recycling rates were also modelled. These show the projected levels of residual waste in 2030 to be between 125,000 tonnes (70% recycling and composting) and 165,000 (60% recycling and composting). The WDA has had discussions with DEFRA on the latest national waste growth trends and has also reviewed the Swedish Sustainable Waste Management Programme, which predicts that waste will grow at 2.2% per annum over the next 25 years, aligning closely to the DEFRA scenarios and the WDA's own modelling. On the basis of the above, the residual MSW requirement of 150,000 tonnes/year identified in the WCS is considered to be robust.</p> <p>With specific regard to the zero-growth target, the target is assumed to be at a household level. Therefore even if it were to be achieved, the anticipated growth in population and the number of households would still mean an overall increase in waste arisings. Paragraph 3.23 has been amended to clarify that notwithstanding the aspiration for zero-growth forecasts suggest an increase in waste arisings.</p> <p>See Focused Change 8.</p>
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			<p>appropriate strategy, there are better alternatives.</p> <p>The 60% rate is unsound, unjustified and ineffective as evidence shows that a target of at least 70% is realistic and deliverable.</p> <p>3. The WCS vision proposes to deal with residual waste "through a number of strategic waste recovery sites (>50,000 tonnes/year) located in the central area of the county". This is not sound because it does not deliver an effective, flexible solution. Large strategic sites require high levels of capital investment and therefore long term contracts, whereas small, dispersed local facilities are cheaper, more flexible, involve the community more and are therefore the most appropriate solution in the light of a rapidly changing waste context.</p> <p>Point 4.85 the Regional Waste Strategy 'from rubbish to resource' states that 'waste should be disposed of as close as possible to where it is produced'. The vision of large strategic waste facilities in Zone C is not consistent with this regional policy.</p> <p>4. The vision has no ambition to coordinate MSW with C&I waste. The evidence shows that there is much commonality between MSW and C&I waste, therefore it would appropriate, reasonable and cost effective to integrate approaches to dealing with these waste streams.</p>	<p>The WCS seeks to ensure that at least 60% of household waste is recycled or composted by 2020 with an aspiration for 70%. This target is derived from the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS). The national target set out in the Waste Strategy for England (2007) is 50% by 2020. The revised EU Waste Framework Directive also has a target of 50% by 2020. The Council's target cannot therefore be described as unambitious. Whilst it is the case that 60% recycling/composting has already been exceeded in Cotswold District and at the Household Recycling Centres (HRCs) it is not correct to extrapolate this to mean that a much higher rate than 60% is achievable across Gloucestershire. The HRCs for example have consistently achieved a higher rate of recycling because it is easier to engage with the public at these sites. This is very different to collecting waste door to door where opportunities to engage are much more limited. Based on information set out in the report 'The Composition of Kerbside Collected Household Waste in Gloucestershire' (October 2008) it is estimated that about 77% of the waste stream is recyclable. To achieve a countywide recycling rate of 60% would mean capturing around 75% of the available recyclable waste at the kerbside and to achieve the 70% target would mean capturing 92% of the available recyclables. This is much higher than is currently being achieved (about 50% on average). It is also the case that some communities achieve higher rates than others. For example it is anticipated that for 2010/11, Tewkesbury Borough Council will achieve a recycling and composting rate of 54% and Gloucester City 46% despite having</p>
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				<p>broadly similar systems to Cotswold District which is achieving over 60%. For these reasons the WCS target of at least 60% recycling/composting by 2020 is considered to be both appropriate and challenging. No change to the recycling target is therefore proposed, however the text of the WCS has been amended to clarify that the aspiration for 70% recycling/composting is to be achieved by the year 2030. This has arisen through the Council's review of its residual waste project.</p> <p>See Focused Change 11.</p> <p>The spatial strategy is based on the provision of strategic-scale facilities within 'Zone C'. This approach has received good support during the preparation of the WCS. It is acknowledged that there is also support for a more dispersed, small-scale approach to residual waste recovery and Core Policy WCS4 therefore includes criteria against which speculative, small-scale proposals may be considered. The strategic site allocations have been identified to provide certainty and deliverability, whilst the criteria allow for other small-scale proposals to come forward where there is interest from the waste industry the local community or other stakeholders.</p> <p>The majority of Gloucestershire's waste is generated within the centre of the County at Gloucester, Cheltenham and to a lesser extent Tewkesbury and Stroud. The focus on Zone C is therefore entirely consistent with the Regional Waste Strategy.</p>
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			<p>We propose the following changes to the Vision (changes in capitals):</p> <p>Our Vision for 2027</p> <p>By 2027 Gloucestershire is a clean, green, healthy and safe place in which to live, work and visit. Residents and businesses are fully aware of the economic and environmental importance of waste management, including its impact on climate change and proactively minimise their waste production to achieve 20% REDUCTION IN WASTE BY 2020, MOVING AS NEAR AS POSSIBLE TO ZERO-WASTE BY 2027.</p> <p>Opportunities for re-using, recycling and composting waste are maximised across all waste streams. Effective joint working through the Gloucestershire Waste Partnership (GWP) has led to a more consistent and co-ordinated approach towards municipal waste collection across the county with everyone able to recycle and compost a broad range of materials easily and conveniently. AT LEAST 70% of household waste is recycled and composted by 2020 AND AT LEAST 80% BY 2027.</p> <p>The 'residual' waste that cannot be re-used, recycled or composted is seen as a valuable</p>	<p>The spatial vision has been amended to refer to residual municipal and commercial waste in order to clarify that the strategic site allocations are intended to deal with both waste streams.</p> <p>See Focused Change 10.</p> <p>See previous response in relation to MSW forecast growth.</p> <p>See previous response in relation to the recycling/composting target.</p> <p>See previous response in relation to Zone C and the use of criteria to facilitate the delivery of small-</p>
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			<p>resource and is managed through a number of DISPERSED waste recovery sites (<50,000 tonnes/year) INCLUDING SUPPORTING INFRASTRUCTURE SUCH AS WASTE TRANSFER AND BULKING, located ACROSS the county INCLUDING THOSE MORE DISTANT RURAL AREAS SUCH AS THE FOREST OF DEAN AND THE COTSWOLDS. SITES will be located so as to maximise the potential use of heat and power and give priority to the re-use of previously developed land and buildings.</p> <p>These local and existing waste facilities will form an integrated sustainable waste management system for Gloucestershire, LINKING TOGETHER THE DIFFERENT WASTE STREAMS TO ENSURE EFFICIENCY AND EFFECTIVENESS.</p> <p>Gloucestershire's communities, key landscape/environmental assets and land liable to current and future potential flood risk, are safeguarded from the adverse impacts of waste management activities, AND COMMUNITIES ARE ACTIVELY INVOLVED IN DELIVERING THIS VISION.</p> <p>The continuing role of landfill is recognised but increasingly seen as a last resort</p>	<p>scale facilities under a more dispersed approach.</p> <p>The vision has been amended to include reference to both municipal and commercial waste.</p> <p>See Focused Change 10.</p> <p>The vision already refers to the role of residents and businesses and ensuring everyone is able to recycle and compost a broad range of materials easily and conveniently.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Diane Mautterer Gloucestershire VCS Environment Strategy Group	67	67/4	<p>Strategic Objective 1 - Waste Reduction "....with zero-growth achieved across all waste streams by 2020" See response form 2 on Vision for reasons why we object to this.</p> <p>Strategic Objective 2 - Reuse, Recycling and Composting "...at least 60% household waste recycled/composted by 2020 with an aspiration for 70%" See response form 2 on Vision for reasons why we object to this.</p> <p>This objective should also contain a target for re-using, recycling and composting of C&I waste.</p> <p>This objective should explicitly include Anaerobic Digestion and the energy recovery associated with it. See response form 5 on WCS 2 for reasons for this.</p> <p>Strategic Objective 3 - Other Recovery (including energy recovery) "..around 150,000 tonnes/year residual waste recovery capacity by 2027" See response form ... for reasons why we object to this.</p>	<p>See previous response in relation to MSW forecasts and the aspiration for zero-growth.</p> <p>See previous response in relation to the recycling/composting target.</p> <p>The MSW target is derived from the Joint Municipal Waste Management Strategy. There is no local target for C&I waste although Strategic Objective 3 does identify the amount of C&I waste to be diverted from landfill.</p> <p>The new supporting text and core policy relating to AD clearly explain the potential energy recovery associated with this type of process.</p> <p>See Focused Change 13.</p> <p>See previous response in relation to MSW forecast growth.</p>

			<p>Strategic Objective 4 - Waste Disposal</p> <p>The aim should be to only landfill inert waste which does not emit methane.</p> <p>Strategic Objective 5 - Minimising Impact</p> <p>Objective omits any mention of working with communities to achieve these aims. This makes it unsound, and ineffective, as the WCS will only be effectively delivered with the active participation of communities.</p> <p><i>Suggested amendment:</i></p> <p>Strategic Objective 1 – Waste Reduction</p> <p>To raise awareness of waste issues amongst Gloucestershire residents and businesses in order to generate collective responsibility for waste, ensure it is seen as a potential resource and to reduce the amount of waste produced, with 20% REDUCTION achieved across all waste streams by 2020.</p> <p>Strategic Objective 2 – Re-use, Recycling and Composting (INCLUDING ENERGY RECOVERY)</p> <p>To make the best use of Gloucestershire’s waste by ensuring that residents and businesses re-use as much of their waste as possible and that if waste cannot be reused, it can easily be recycled or composted to achieve the following:</p>	<p>Strategic Objective 4 clearly emphasises the need to move away from landfill whilst recognising that it will continue to play a role for certain wastes. This approach is considered appropriate and consistent with regional and national policy.</p> <p>Strategic Objective 5 deals with minimising the impact of waste management on local communities. Community involvement is dealt with elsewhere in the strategy.</p> <p>See response above in relation to the MSW forecast and the aim of achieving zero-growth by 2020.</p> <p>Energy recovery is already addressed through Strategic Objective 3.</p>
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			<p>To ensure the environmental and social impacts of waste management particularly climate change and risks to human health are minimised by;</p> <p>WORKING IN ACTIVE PARTNERSHIP WITH COMMUNITIES, managing waste close to where it arises, promoting the use of sustainable transport, avoiding current and potential flood risk areas, safeguarding existing and proposed waste sites, promoting high quality sustainable design, protecting national and local areas of landscape and nature conservation importance, and prioritising the co-location of similar or related facilities on existing waste sites or previously developed sites in preference to greenfield locations where appropriate and where the cumulative impact is not unacceptable to the host location.</p>	<p>The issue of community involvement is already addressed elsewhere in the strategy.</p> <p>No Change.</p>
<p>Diane Mautterer</p> <p>Gloucestershire VCS Environment Strategy Group</p>	67	67/5	<p>The WCS fails to address the role of communities, voluntary and community organisations and parish and town councils in delivering its ambitions. This is particularly evident in Core Policy WCS 1, where various partners are mentioned but not these. After "including" add - "communities, voluntary and community organisations and parish and town councils".</p>	<p>It is acknowledged that Core Policy WCS1 could usefully refer to the County Council working in partnership with local communities. The policy has therefore been amended accordingly.</p> <p>See Focused Change 12.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Diane Mautterer Gloucestershire VCS Environment Strategy Group	67	67/6	<p>This core policy (WCS2) is unsound because it fails to mention that AD delivers energy recovery. Therefore the strategy appears to provide bias to WCS 4 where energy recovery and contribution to energy generation are listed as benefits.</p> <p>In addition, point 4.154 dismisses incorporation of agricultural waste into the strategy, thus undermining the potential for this waste to contribute to the viability of AD.</p> <p><i>Suggested Change:</i></p> <p>WSC 2 - Recycling & Composting/Anaerobic Digestion INCLUDING ENERGY RECOVERY (including Bulking and Transfer</p> <p>After "Particular support will be given to proposals that "add:</p> <p>"will contribute to energy generation"</p>	<p>Comment noted. Anaerobic Digestion (AD) has been separated out from Core Policy WCS2 and a new policy and supporting text have been drafted. This clearly highlights the potential scope for energy recovery associated with this type of process.</p> <p>See Focused Change 13.</p> <p>The publication WCS does not 'dismiss' the issue of agricultural waste rather it explains that due to the relatively modest amount of waste involved and the availability of existing capacity within the county, there is no need to make specific policy provision within the WCS. This approach is considered reasonable and is clearly explained within the strategy. Any agricultural proposal incorporating AD will be considered under the new core policy on AD as well as any other relevant core policies and material considerations.</p> <p>For the reasons set out above it is not considered necessary to amend Core Policy WCS2 other than the changes which have been made to remove AD and bulking and transfer from the policy.</p> <p>See Focused Change 13.</p>

			"involve combining with agricultural waste and/or waste from water treatment plants for Anaerobic Digestion"	
Diane Mautterer Gloucestershire VCS Environment Strategy Group	67	67/7	<p>4.56 assumes that energy recovery facilities will deliver environmental benefits. There is no analysis of technologies, the WCS being 'technology neutral' there is no proper analysis of the benefits and dis-benefits of possible energy recovery facilities. In particular there is no analysis of Co2 emissions. National and local policy as summarized in Appendix 2 calls for a reduction in Co2 emissions in order to mitigate climate change. The WCS, because it is technology neutral, does not evaluate Co2 emissions from different waste approaches. Therefore, it does not help to deliver these national and local policy drivers.</p> <p>4.69 states that "Modern incinerators generate heat and power which may be used on or off site thereby contributing to renewable energy targets". This statement is disingenuous, since much of the waste burnt in incinerators is derived from fossil fuels (e.g. plastic) and is in no way renewable. Anaerobic digestion, on the other hand, is an entirely renewable form of energy production, yet little is said about it in this strategy. The WCS is biased and inaccurate and therefore not justified.</p> <p>4.77 states that "A criteria-based approach whilst offering greater flexibility would inevitably be coupled with less certainty, particularly for larger schemes". As our response form 2 - MSW predictions - shows, there is very little certainty on predictions, and any waste strategy therefore</p>	<p>Section 4.0 outlines a range of waste recovery technologies including MBT, autoclaving, incineration, pyrolysis and gasification. The main features of each technology are described in broad terms. This level of detail is considered appropriate for a Waste Core Strategy. To go into the level of detail suggested would be impractical and inconsistent with national policy which advises against being overly-prescriptive in relation to technology.</p> <p>No Change.</p> <p>The footnote to paragraph 4.69 clearly explains that the degree to which renewable energy is generated through incineration will depend to a large extent on the nature of the waste being treated. The new policy and text on AD explain the potential for renewable energy production associated with that process.</p> <p>See Focused Change 13.</p> <p>See previous response in relation to MSW forecast growth. The support for a criteria-based approach is noted. Notably, the criteria-based approach set out in Core Policy WCS4 will allow for small-scale facilities to come forward in appropriate locations where this is demand.</p>

		<p>should make flexibility paramount. Waste figures could be as little as 60,000 tpa by 2020, making larger schemes inappropriate. Indeed, larger schemes require higher levels of initial investment and longer contract periods, reducing flexibility and responsiveness to changing circumstances. The site-based approach therefore is very ill-conceived and likely to tie the county into expensive over-provision. This is therefore not an effective approach. A criteria-based approach would be justified and effective.</p> <p>4.78 The need for sites "to handle at least 50,000 tonnes of waste per year" is not required - see response from 2 - MSW predictions. Instead the county should seek to develop smaller dispersed facilities with high community involvement. The Cwym Harry scheme in Wales is an example of a small-scale social enterprise which ploughs benefit back into the community – see http://www.cwmharrylandtrust.org.uk/about.html.</p> <p>The emphasis should be on small MBT/AD facilities at District level.</p> <p>4.79 Capacity requirement at 150,000 tpa is dealt with in our response form 2 - MSW predictions.</p> <p>4.85 Zone C is clearly visible from key view points in the AONB, impacting significantly upon them</p>	<p>See previous response in relation to MSW forecast growth. With regard to smaller-scale facilities, the criteria set out in Core Policy WCS4 will allow facilities of the type referred to in this example to come forward in appropriate locations.</p> <p>See previous response in relation to MSW forecast growth.</p> <p>The bullet points set out under Paragraph 4.85 state that Zone C avoids the AONB which is true. It does not imply that Zone C cannot be seen from the AONB. Clearly there will be viewpoints within the AONB from which Zone C can be seen. The degree of visual impact will be a matter for the planning application process, should a detailed</p>
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			<p>4.88 & 4.89 - see our response form 1 - consultation</p> <p>WCS 4 - is unsound because of the above points and should be rewritten as suggested below.</p> <p>Core Policy WCS4 – Other Recovery (including energy recovery)</p> <p>In order to divert waste from landfill, in particular biodegradable waste, in the period to 2027, the WPA will make provision for the following residual waste recovery capacity:</p> <ul style="list-style-type: none"> - MSW between 60,000 - 134,000 TONNES/YEAR - C&I 143,000 – 193,000 tonnes/year <p>'Non-strategic' residual waste recovery facilities (<50,000 tonnes/year) will be permitted both within and outside Zone C where the facility forms part of a sustainable waste management system and would be subject to the following criteria:</p> <ul style="list-style-type: none"> - The proposal is located on an industrial estate or employment land permitted or allocated for B2 general industrial use; and/or - The proposal is located on previously developed land; and/or - The proposal involves the development of an existing waste management 	<p>proposal come forward. It is not possible or practical to safeguard the AONB from all forms of development nor is it the purpose of the designation to prevent all forms of development.</p> <p>See previous response in relation to the issue of dispersed small-scale facilities.</p> <p>See previous response in relation to MSW forecast growth.</p>
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			<p>facility or mineral site; and</p> <ul style="list-style-type: none"> - The facility would meet the relevant policies and criteria of the development plan. - THE PROPOSAL WILL REDUCE GREENHOUSE GAS EMISSIONS FROM WASTE <p>IN ADDITION THE PLANNING CRITERIA IN WCS 2 AND 3 SHOULD BE REPLICATED HERE FOR CONSISTENCY</p>	<p>See previous response in relation to technology and the need to avoid being overly prescriptive about waste treatment types.</p> <p>Comment noted. The criteria in Core Policy WCS4 are considered to be adequate and appropriate.</p> <p>No Change.</p>
<p>Diane Mautterer</p> <p>Gloucestershire VCS Environment Strategy Group</p>	67	67/8	<p>4.136 "The Council is currently considering a planning application to extend the life of the landfill. This is likely to be determined in spring 2011. If planning permission is granted there will continue to be significant capacity available for hazardous waste in Gloucestershire (around 22 years)". We believe that the inclusion of this statement in the WCS will unfairly influence the outcome of the planning application, against the wishes of residents.</p> <p>The WCS consistently assumes that planning permission will be granted for the hazardous waste landfill at Wingmoor Farm East. Indeed, there is no Plan B.</p> <p>In the Delivery Plan (page 97), the delivery of WCS 6 is stated as being 'through the granting of planning permission in relation to proposals for hazardous waste development'. The planning application is being vigorously contested and the WCS should not make assumptions as to its</p>	<p>Comments noted. The WCS does not assume that planning permission will be granted at Wingmoor Farm (East) rather it states that if permission is granted, there will be enough landfill capacity for most of the plan period with a review likely to be started around 2017/2018. The future development of the site in relation to the waste handled, any particular conditions and subsequent monitoring will be addressed through the planning application process.</p> <p>It is acknowledged however that the WCS could more clearly explain the implications of planning permission not being granted.</p> <p>Paragraph 4.129 has therefore been amended to reflect the fact that if planning permission is not granted at Wingmoor Farm (East) additional landfill provision will need to be considered earlier through a review of the WCS or preparation of a separate development plan document.</p>

			<p>outcome.</p> <p>This is neither credible nor deliverable (since planning permission is not certain). All reference to the possibility of planning permission being granted to be removed from the WCS.</p>	<p>See Focused Change 26.</p>
<p>Diane Mautterer</p> <p>Gloucestershire VCS Environment Strategy Group</p>	67	67/9	<p>We endorse the sentiments of WCS14 on using other forms of transport other than roads.</p> <p>However, we note that none of the 'strategic' sites put forward in the WCS comply with WCS14 because none of them will utilize alternative modes of transport such as rail or water. Indeed they will all contribute to additional road traffic and Co2 emissions.</p> <p>None of the sites also provide an opportunity to maximise CHP.</p> <p>This shows that tokenistic regard is being paid to these Core Policies and that the WCS is unsound because it is being ignored. This provides another reason for disputing the inclusion of the 4 'strategic' sites in the WCS - they should be removed.</p>	<p>The support for Core Policy WCS14 is noted. The strategic site allocations have been identified having regard to a number of factors including availability and deliverability.</p> <p>The Wingmoor sites present some opportunity for movement of waste by rail, Javelin Park and Moreton Valence less so. It is pertinent to note however that Core Policy WCS14 applies to speculative development as well as the strategic site allocations.</p> <p>The strategic site allocations do present the opportunity for CHP to be utilised. The site schedules provide further commentary in this regard. A separate evidence paper has also been made available alongside the WCS.</p> <p>The sites have been identified based on a range of factors, not solely their ability to deliver CHP. Finding the perfect site which is available, suitable and provides the opportunity for sustainable transport and maximum use of CHP is potentially impossible. The strategic sites are those which performed best on balance when considered against a range of factors.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Holly Jones Tewkesbury Borough Council	24	24/1	Tewkesbury Borough Council supports the Waste Core Strategy.	Support noted. No Change.
Holly Jones Tewkesbury Borough Council	24	24/2	Policy WCS4 should be expanded to ensure that appropriate waste transfer facilities are provided in the event that a one site solution to residual waste recovery be pursued.	Comment noted. The issue of bulking and transfer is addressed through a new core policy and supporting text. See Focused Change 13. It is important to note that whilst there may currently be adequate transfer capacity there are a number of reasons why new or expanded facilities or a different spatial arrangement might be required in the future including contractual changes, different collection arrangements and commercial changes.
Holly Jones Tewkesbury Borough Council	24	24/3	Tewkesbury Borough Council reserves the right to further comment at the planning application stage of the strategic sites identified by the Waste Core Strategy.	Comment noted. No Change.

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Holly Jones Tewkesbury Borough Council	24	24/4	Gloucestershire County Council must afford careful consideration in respect of issues of noise, dust, air quality and congestion when determining any planning application for strategic waste facilities.	Comment noted. These are all issues that would be taken into account in the determination of any planning application for a strategic waste management facility. No Change.
Adam Neil New Earth Solutions Group Ltd.	543	725/1	<p>Not Legally Compliant - the draft Waste Core Strategy (WCS) does not adequately differentiate between 'disposal' operations, as set out in Annex I of the revised Waste Framework Directive (WFD) (2008/98/EC) and 'recovery' operations, as set out in Annex II of the WFD.</p> <p>In as much, the WCS has not had adequate regard to European and national waste management policy, which seeks to drive the management of waste up the waste hierarchy.</p> <p>It is recommended that the WCS is redrafted to set out the position as to what technologies constitute recovery, and those that do (landfill) and may (conventional incineration) constitute disposal. This should form the redrafting of Strategic Objective 4 'Waste Disposal' which currently only refers to landfill as a disposal operation.</p> <p>DEFRA's Draft Guidance on Applying the Waste Hierarchy, July 2010, sets out the government's approach to transposing the Directive. DEFRA's approach identifies that new conventional incineration that do not operate at the 0.65 co-</p>	<p>Comment noted however it is not considered necessary to go into this level of detail within the WCS.</p> <p>Furthermore, it is considered that modern incinerators are unlikely to fall into the category of disposal by virtue of their efficiency.</p> <p>In any case the waste hierarchy is a set of guiding principles rather than a rigid framework.</p> <p>No Change.</p>

			<p>efficient (0.6 for existing incinerators) for efficiency are to be deemed disposal operations. As illustrated on pp.9 and 10 of the guidance, Advanced Thermal Conversion (ATC) technologies such as gasification and pyrolysis, as well as anaerobic digestion, are classed as recovery operations.</p> <p>This confers with Annex II of the WFD, which states that ATC processes fall within the definition of recovery operations: "gasification and pyrolysis using the components as chemicals" is included as part of the definition of R3 recovery operations "recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)"</p> <p>Further references to the above omission, including in particular between paragraphs 3.6 and 3.18, should also be redrafted. It is evident that the Council has had regard to the revised WFD (para 3.6), however, it has failed to soundly apply the approach to driving waste up the waste hierarchy, which has direct implications on the WCS' approach to delivering 'recovery' operations, as planned for by Policy WCS4.</p> <p>Following the laying down of policy in the revised WFD, New Earth recommends that para 2.52, and other similarly worded paragraphs, should distinguish that only new conventional incineration operations meeting the 0.65 co-efficient are classed as 'recovery' operations. This would ensure the WCS is legally compliant in demonstrating its objectives to drive waste from</p>	
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			<p>disposal to recovery operations.</p> <p>This should also be reflected in Strategic Objective 4, which currently excludes any reference to the WFD's definitions of disposal operations.</p> <p>Para 2.54 may also be reworded to identify that non-qualifying incineration operations, below the 0.6 (for existing incinerators) and 0.65 (for new incinerators), are disposal operations akin to landfill in the waste hierarchy.</p> <p>Subsequent paragraphs, including paragraph 3.10, should be rephrased.</p> <p>The accurate defining of recovery and disposal operations will have a significant outcome for the spatial delivery of the Gloucestershire Joint Municipal Waste Management Strategy's (JMWMS) objective to "provide between 150,000 - 270,000 tonnes of residual waste recovery capacity for MSW by 2014/2015" (paragraph 3.14).</p> <p>Rewording of Policy WCS4 should ensure that GCC correctly interpret the requirements of the revised WFD.</p> <p>To fulfill the objective of the JMWMS to deliver residual waste recovery capacity, driving the management of waste from disposal, planning applications for conventional incinerators will have to demonstrate how they will fulfil the requirements of the 0.65 co-efficient if they are to be considered recovery, rather than disposal, operations. A suitable planning framework should</p>	
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			be in place to ensure such delivery, ensuring appropriate policy to achieve the driving of waste up the waste hierarchy.	
Adam Neil New Earth Solutions Group Ltd.	543	725/2	<p>The WCS has sought to identify the suitability of sites for the delivery of strategic residual waste management facilities based on site sizes required for typical waste management facility types. This has primarily been referenced from the 'Key Planning Criteria Matrix' as set out in the Regional Waste Management Strategy 2004-2020, Appendix D and the ODPM's 'Planning for Waste Management Facilities', 2004. The WCS contains no further explanation of how the size of sites was defined. Consideration of PPS10 and other national planning policy does not identify any other source for defining land requirements for waste management facilities. The WCS states that the "minimum" suitable site area for waste management facilities capable of processing 50,000tpa or more of waste is 2 hectares. Consideration of the Key Planning Criteria Matrix of the Regional Waste Management Strategy, however, identifies that 'Composting (closed)', 'AD', 'MBT', 'Advanced Thermal' and 'Incineration (small)' facilities, capable of processing 50,000 tonnes per annum, are capable of being sited on sites of between '1 and 2 hectares'. This does not imply that a 2ha site size should be a minimum requirement for throughput tonnages, although, regrettably, this is how it has been interpreted throughout the development of the WCS. Consideration of the ODPM's 'Planning for Waste Management Facilities (2004)' also does not conclusively indicate that the capacity of a site is a</p>	<p>The decision was taken to use a 50,000 tonne/year threshold to define strategic sites for the reasons set out in the publication WCS.</p> <p>As part of this process it was determined that a facility of this scale would typically come forward on a site of 2 hectares or more. The respondent accepts that this threshold is a <i>'reasonable indicative guide for the identification of sites suitable for allocation for strategic facilities'</i>.</p> <p>To have adopted a lower site-size threshold of say 1 hectare would have meant that the site-selection process was unmanageable with tens of thousands of potential sites having to be subjected to a site appraisal.</p> <p>With specific regard to the New Earth Solutions site at Sharpness, this site has been ruled out for a number of reasons including both site size and deliverability.</p> <p>As stated by the respondent, the main New Earth site is 1.6 hectares. Whilst there is an adjoining 0.8 hectare parcel of land, this is not available. Indeed the Council has received written correspondence from the landowner British Waterways who have confirmed that they do not wish to see a strategic waste facility come forward in this area (see representation 127/1 below).</p>

			<p>direct function of land area, with a typical 50,000tpa MBT plant capable of operating on a <1-2ha site, with a building footprint of 100m X 30m or less. Whilst New Earth considers that the '2ha / 50,000tpa' is a reasonable indicative guide for the identification of sites suitable for allocation for strategic facilities, we do not consider that it should have been set as a "minimum", whereby any sites smaller than this were automatically dismissed. New Earth's existing site at Sharpness Docks is 1.6ha in size, with an additional 0.8ha of land available from British Waterways. Excluding the "minimum" 2ha requirement, which new Earth considers should not have been used to arbitrarily omit sites, the Sharpness Docks site is capable of delivering a strategic sized residual waste management facility, within the preferred Zone C of the WCS. New Earth considers the WCS is unsound in not having adequately justified its approach to strategic site selection by excluding sites based on the setting of a 'minimum' site size requirement of 2ha, rather than assessing sites on other merits. This approach has provided inflexibility in the allocation of strategic sites, resulting in the production of the WCS failing to meet the tests of soundness. Having received positive consideration, in land use planning terms, from GCC, subsequent to the Site Option consultation in 2010, New Earth wishes to seek the Inspector's judgment as to the suitability of this site for allocation in the WCS. As an existing site with the potential to operate as a strategic residual waste management facility, New Earth considers that the discounting of its Sharpness Docks site, on the basis of site size, is questionable, particularly as</p>	<p>If New Earth Solutions wishes to promote a waste recovery operation at their site this would be considered as a speculative proposal against the criteria set out in Core Policy WCS4.</p> <p>No Change.</p>
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			<p>the site is within GCC's identified Zone C and contains an existing operational waste management operation. Allocation of the site and subsequent delivery of a strategic recovery treatment facility could promote the use of sustainable transport, being located adjacent to the Gloucester-Sharpness Canal, prioritise co-location of waste management operations and reduce impact by developing non Green Belt, previously developed land, before other such sites. New Earth considers the WCS is unsound in having omitted this, and potentially other, sites which may have as much or more potential as strategic waste management sites, than the four identified sites. This is particularly relevant as Wingmoor Farm East and Wingmoor Farm West are located in the Green Belt, where 'very special circumstances' would be required to overcome such 'inappropriate development' in the Green Belt. Such demonstration, at the strategic stage of the WCS and latterly if a planning application is submitted, would be likely to require demonstration that alternative sites are not available. New Earth would query the likelihood that this could be demonstrated, if the "minimum" 2ha site size requirement had not been set, as this would have included other submitted sites within Zone C, such as that at Sharpness Docks. New Earth recommends that in order that the WCS is soundly justified, its site at Sharpness Docks should be reconsidered as a strategic site for residual waste recovery, if deemed, at examination, to be suitable. This would provide greater 'flexibility' in the allocation of sufficient sites, particularly those on previously developed land, beyond the Green</p>	
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			Belt, to ensure that the WCS is 'effective', as required by PPS12.	
Adam Neil New Earth Solutions Group Ltd.	543	725/3	<p>New Earth responded to the previous Site Options Consultation on 10 November 2010. This representation recommended GCC to identify New Earth's Sharpness Docks site as a strategic site for the co-location of waste management operations.</p> <p>The site was previously allocated in the Gloucestershire Waste Local Plan as a 'preferred site' (the only reason that this policy was not saved was due to an outdated reference to BPEO, which had been removed at the national level by revision from PPG10 to PPS10).</p> <p>The site is occupied currently by an In Vessel Composting facility, with a designed throughput capacity of 48,000tpa of waste. This facility could be converted to accept residual waste streams or could be remodelled to enable co-location of waste management treatment. This could be achieved either through intensification of the existing facility or through expansion onto adjacent vacant land. The site has potential to increase throughput capacity in excess of 50,000tpa.</p> <p>New Earth's existing lease area, including the existing In Vessel Composting facility, at Sharpness Docks is 1.6ha in size, with 0.8ha of additional expansion land available. GCC has understandably given weight to the deliverability of potential sites for allocation in the WCS, but New Earth is concerned that in this instance this has resulted in an incorrect assessment, leading to the premature</p>	<p>Comment noted. The New Earth site was considered as part of the WCS site selection process however it was excluded from further consideration primarily because the landowner British Waterways indicated that the land was not available.</p> <p>British Waterways has responded to the publication WCS (see representation 127/1 below) and has confirmed that they do not support the designation of any land at Sharpness as a municipal solid waste site.</p> <p>If New Earth Solutions wish to promote a waste recovery operation at their site this would be considered as a speculative proposal against the criteria set out in Core Policy WCS4.</p> <p>No Change.</p>

			<p>dismissal of a suitable site.</p> <p>New Earth has agreed terms with British Waterways to lease 0.8ha of adjacent developable land for 21 years (beyond the 2027 plan period of the WCS). The site therefore meets the requirements of 'deliverability' for its allocation to deliver a strategic recovery facility.</p> <p>The WCS confirms support for development in 'Zone C' (paragraphs 4.83 & 4.84), which resulted in identification of four proposed 'strategic sites', based on their "strong prospect of delivery of waste facilities on them" (paragraph 4.90).</p> <p>New Earth sought allocation of its Sharpness Docks site in November 2010, as part of the Site Options consultation; however, this was subsequently omitted by GCC.</p> <p>Given the greater certainty as to the deliverability of a residual waste management facility at either the existing or extended site at Sharpness Docks, New Earth recommends that in order that the WCS is soundly justified, its site at Sharpness Docks should be reconsidered for its suitability, with subsequent allocation as a strategic site for residual waste recovery, if deemed at examination to be suitable.</p> <p>The site meets many of the strategic objectives for Minimising Impact, as set out in SO5 of the WCS. Allocation of the site and subsequent delivery of a strategic recovery treatment facility could promote the use of sustainable transport, being located</p>	
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			<p>adjacent to the Gloucester-Sharpness Canal, prioritise co-location of waste management operations and reduce impact by developing non Green Belt, previously developed land, before other such sites.</p> <p>This would provide greater 'flexibility' in the allocation of sufficient sites, particularly those on previously developed land, beyond the Green Belt, to ensure that the WCS is 'effective', as required by PPS12.</p>	
Adam Neil New Earth Solutions Group Ltd.	543	725/4	<p>New Earth supports the latter part of WCS4, which supports the development of non-strategic waste management facilities (<50,000tpa capacity) that meet the criteria as set out in Policy WCS4.</p>	<p>Support noted.</p> <p>No Change.</p>
Adam Neil New Earth Solutions Group Ltd.	543	725/5	<p>The WCS is not consistent with national and European policy - as set out in the 2008 revised waste Framework Directive (WFD) 2008/98/EC - through identifying Anaerobic Digestion (AD) as akin to a recycling / composting operation, rather than a recovery operation, as it is defined in the WFD.</p> <p>AD falls within R3 of Annex II of the WFD: "Recycling/reclamation of organic substances which are not used as solvents (including composting and other biological transformation processes)"</p> <p>DEFRA's draft 'Guidance on Applying the Waste Hierarchy', July 2010, identifies that all processes that recover energy from waste are 'recovery' rather than recycling operations. This tier of the</p>	<p>Comment noted. AD has been separated out from Core Policy WCS2 to more clearly explain the potential energy recovery benefits associated with this type of process. AD is still however considered alongside recycling and composting due to the similarities between AD and IVC. The differences between the two processes including the potential generation of renewable energy in the form of biogas are however clearly acknowledged in the supporting text.</p> <p>It is however made clear that AD may be classed as 'other recovery' or 'energy recovery'.</p> <p>See Focused Change 13.</p>

		<p>hierarchy includes "combustion with energy recovery, anaerobic digestion, processes including gasification and pyrolysis which can produce energy (fuels, heat and power) and materials from waste, etc." (pp. 9 & 10)</p> <p>AD should therefore not be considered to occupy the same level of the waste hierarchy as recycling / composting operations.</p> <p>New Earth does, however, support GCC's approach to ensuring AD is undertaken on source segregated biowaste only, rather than the biological fraction of mixed, residual MSW paragraph 4.31). This is based on the premise of the use of digestate outputs, which are not readily useable if derived from mixed, residual MSW.</p> <p>Where digestate is applied to agricultural land, New Earth does consider this 'output' of AD to be a composting operation, however, the 'inputs' to a AD plant should not be counted as recycling / composting.</p> <p>Application to agricultural land for beneficial purposes requires the digestate to pass the 'end of waste protocol', known as PAS110. As AD is not in its own right a 'waste treatment operation', instead it is a 'biogas liberation process', digestate must pass a number of detailed testing regimes before it can be spread to agricultural land. The WCS should make it clear that only outputs spread to agricultural land should be counted as having been 'composted'.</p>	<p>Support for approach towards source segregated organic waste noted.</p> <p>The WCS makes an adequate distinction between composting activities and AD.</p> <p>See Focused Change 13.</p>
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Adam Neil New Earth Solutions Group Ltd.	543	725/6	<p>The current wording of paragraph 4.69 is considered misleading, stating: "Modern incinerators generate and capture heat and power which may be used on or NS-site thereby contributing to renewable energy targets."</p> <p>In fact, the majority of built incinerators in the UK, and also those in the planning pipeline, do not capture 'heat and power' but rather generate power and dissipate heat via their exhaust. The majority of incinerators in the UK operate at very low efficiencies of around 20% to 25%, primarily based on the fact that they do not recover heat in the form of CHP for use by a specific industrial user or as part of a distributed heat network.</p>	<p>Comment noted. Paragraph 4.69 has been amended to reflect the fact that not all incinerators generate and capture heat and power.</p> <p>See Focused Change 16.</p>

			<p>New Earth considers that this is the primary reason why the 2008 WFD considers inefficient incinerators, operating below the 0.6 co-efficient, as 'disposal', rather than 'recovery', operations, and is direct call to industry, and planning authorities, to maximise current efficiencies.</p> <p>New Earth therefore considers it misleading to state modern incinerators capture heat and power, when the majority of facilities operational ad in the planning pipeline, only recovery power (electricity) from waste.</p> <p>With respect to the assertion that incinerators generate renewable energy (paragraph 4.69 of the WCS), this again is considered misleading, as the reporting of the generation of renewable energy is set out by the Renewables Obligations Order 2009, rather than "the degree to which 'renewable energy' is generated will depend to a large extent on the nature of the waste being incinerated." The Order identifies that only 'energy from waste with CHP' facilities can report that they generate renewable energy.</p> <p>The Order states "'energy from waste with CHP' means electricity generated from the combustion of waste (other than a fuel produced by means of anaerobic digestion, gasification or pyrolysis) in a qualifying combined heat and power generating station in a month in which the station generates electricity only from renewable sources and those renewable sources include waste which is not biomass"</p>	<p>The footnote to paragraph 4.69 clearly states that 'the degree to which 'renewable energy' is generated will depend to a large extent on the nature of the waste being incinerated'. This is considered sufficient.</p> <p>Paragraph 4.71 clearly states that one of the outputs of pyrolysis (syngas) has the potential to be used as a liquid fuel or to produce electricity. Similarly, Paragraph 4.72 explains that gasification also produces syngas.</p> <p>No Change.</p>
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			<p>To qualify as an 'energy from waste with CHP' plant an incinerator must be accredited to DECC's Good Quality CHP standard (GQCHP). Similar to the revised WFD, this sets standards for the efficiency of an incinerator.</p> <p>As such, for an incinerator to be able to report that it generates renewable energy, it is required to achieve GQCHP status, which requires it to generate heat and power efficiently.</p> <p>New Earth considers it misleading, and not in conformity with national policy, to state that all incinerators contribute 'to renewable energy targets' (paragraph 4.69), where only those meeting the GQCHP standard are able to contribute to such targets.</p> <p>In contrast, paragraphs 4.71 and 4.72 do not make any reference to the generation of renewable energy from ATC processes. The Renewables Obligation Order states that the energy from biological material in both 'standard' pyrolysis and gasification plants and 'advanced' pyrolysis and gasification plants meets the definition of renewable energy generation (importantly without a requirement to meet the GQCHP standard, as for incinerators).</p> <p>The potential for pyrolysis and gasification processes to contribute to renewable energy targets should be reflected in the WCS, for it to be sound.</p> <p>New Earth recommends that that the WCS should</p>	
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			<p>be redrafted, where appropriate, to ensure that the correct interpretation of national policy related to incineration, pyrolysis and gasification is made clear.</p> <p>The current descriptions of incineration, pyrolysis and gasification in the WCS do not accurately reflect national policy, and therefore the WCS is currently neither legally compliant or sound.</p>	
<p>Adam Neil</p> <p>New Earth Solutions Group Ltd.</p>	543	725/7	<p>Whilst New Earth recognises the approach to Flood Risk sought by the WCS seeks to minimise the risk of flooding by or on future development in Gloucestershire, the policy is not consistent with national flood policy.</p> <p>Whilst parts of Gloucestershire were subject to an exceptional flood risk in 2007, this is not considered sufficient justification to implement local policy that will have considerable knock on effects on the delivery of sustainable waste management facilities in Gloucestershire. This is particularly relevant where waste management facilities (excluding landfill and hazardous waste facilities) are defined as 'less vulnerable uses' in PPS25: Development and Flood Risk.</p> <p>The proposed policy in the WCS will restrict the development of 'all waste-related development' to areas of lowest flood risk (Flood Zone 1), unless no sites in FZ1 are available. This policy runs counter to the principles of sustainable development to balance differing objectives.</p> <p>PPS25 permits "water-compatible, less vulnerable</p>	<p>Disagree. Core Policy WCS9 is entirely consistent with national policy. Importantly the Environment Agency (EA) in their representations on the publication WCS have indicated support for the policy, subject to it including reference to all sources of flooding (see response below).</p> <p>The sequential approach adopted in Core Policy WCS9 whereby priority is given to sites in low-risk flood areas is entirely consistent with PPS25 which states at paragraph 14 that 'A sequential risk-based approach to determining the suitability of land for development in flood risk areas is central to the policy statement and should be applied at all levels of the planning process.'</p> <p>It is acknowledged that PPS25 permits certain types of development within Zones 2, 3a and even 3b, however it also adopts an overall sequential approach whereby priority is given to Flood Zone 1.</p> <p>The policy is therefore not inconsistent with national policy set out in PPS25.</p> <p>Flood risk will be one of a number of factors to be</p>

		<p>and more vulnerable uses of land and essential infrastructure" in FZ2 (medium risk) and "water-compatible and less vulnerable uses of land" in FZ3a (high flood risk).</p> <p>The WCS is seeking to restrict all waste-related development to FZ1 (unless no suitable sites are available), which runs counter to the provisions of national planning policy, as set out in PPS25.</p> <p>The potential outcome of this policy could be the development of waste related facilities in unsuitable locations in FZ1 because other, potentially more suitable, sites are located in FZ2 and / or FZ3a.</p> <p>New Earth does not consider that a single exceptional flooding event in 2007 should be sufficient reason for the WCS to set such flood risk policy that is considerably more stringent than national planning policy. The result of such policy may be the development of facilities in inappropriate locations in FZ1, rather than facilities in more appropriate locations in FZ2 or FZ3a.</p> <p>New Earth has good experience of developing 'less vulnerable' waste management sites within FZ2 and FZ3a, which has resulted in appropriate measures, such as raising internal floor levels, to bring such operations out of areas of greatest flood risk. Such measures, particularly where the development would otherwise be appropriate (accessibility, previously developed land, proximate to waste sources, proximate to heat users, etc), should be supported by the WCS, rather than</p>	<p>taken into account in determining the suitability of proposals for waste management.</p> <p>PPS25 states that local planning authorities should help manage flood risk by only permitting development in areas of flood risk when there are no reasonably available sites in areas of lower flood risk. PPS25 goes on to state that the sequential risk-based approach is central to the policy statement and should be applied at all levels of the planning process.</p> <p>Core Policy WCS9 is entirely consistent with this advice.</p> <p>Notwithstanding the above, Core Policy WCS9 has been amended in relation to less vulnerable uses, essential infrastructure and sources of flood risk.</p> <p>See Focused Change 30.</p>
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			<p>seeking a near blanket ban on waste development outside of FZ1, which does not conform with national planning policy.</p> <p>New Earth does not consider there are sufficiently strong local issues to warrant inclusion of a specific policy in the WCS, related to flood risk; therefore Policy WCS9 should be deleted from the WCS, to make it sound.</p> <p>If not deleted, revisions to the Policy should be made to remove the onerous sequential test for development of all waste related development defined in PPS25 as being a 'less vulnerable' use. Such a policy should be based on the assessment of risk and should support the implementation of appropriate mitigation measures, such as increasing internal floor levels.</p>	
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Ben Stansfield Cory Environmental (Gloucestershire) Ltd.	60	60/1	Cory is supportive of Core Policy WCS10 and the reference to joint working between local authorities in any subsequent revisions of the Green Belt. Any review of the Green Belt should recognize current activities including waste facilities as well as allocated sites for waste development during the Plan Period of the WCS. It is considered unnecessary, however, for Policy WCS10 to make direct reference to Policy WCS 13 since this Policy will be a material consideration in all planning submissions in any case. There is no discernable reason as to why reference should be made to Policy WCS13 in Policy WCS10 as opposed to any other Policy in the Plan. Delete reference to Core Policy WCS 13 in Policy WCS 10 as this Policy will be a material consideration in any planning submission in its own right.	Support noted. It is accepted that Core Policy WCS10 does not necessarily need to include a cross-reference to Core Policy WCS13. Policy WCS10 has therefore been amended accordingly. See Focused Change 31.
Ben Stansfield Cory Environmental (Gloucestershire) Ltd.	60	60/2	Comments on Policy WCS11 of the Waste Core Strategy (WCS) are made in order to clarify and improve the robustness and appropriateness of the overall strategy of the WCS. The text within the first bullet point within Core Policy WCS11 is considered ambiguous and hence its meaning is not clear. Firstly, the statement refers to 'a lack of alternative sites' which is considered subjective, whilst secondly the statement and makes use of the term 'market need' that is not defined. The first bullet point within Core Policy WCS 11 should be amended to give better definition and clarity to the point being made. Proposed amended text is: "There are no more suitable	Disagree. The reference to 'lack of alternative sites' clearly means that for planning permission to be granted for development in the AONB, an applicant will need to demonstrate that there are no other sites available that would not affect the AONB. 'Market need' refers to the fact that the alternative site must be located so as to serve the same market. This wording has been developed having regard to stakeholder consultation during the Regulation 25 plan preparation stage. The proposed additional bullet point would potentially give too much latitude with regard to

			<p>alternative sites in the County".</p> <p>It is also considered necessary for an additional bullet point to be added in order to reflect both the wider environmental benefits that can arise from sustainable waste management practices as well as the significant proportion of County covered by AONB designations. The proposed additional bullet point would state that: "The development provides wider environmental benefits to the County that outweigh the impact on the AONB having regard to the relevant management plan".</p>	<p>development in or affecting the setting of the AONB. The criteria as currently drafted reflect previous stakeholder comments and are considered appropriate.</p> <p>No Change.</p>
<p>Ben Stansfield</p> <p>Cory Environmental (Gloucestershire) Ltd.</p>	60	60/3	<p>Comments on Policy WCS14 of the Waste Core Strategy (WCS) are made in order to clarify and improve the robustness and appropriateness of the overall strategy of the WCS. The test set in the penultimate paragraph of Core Policy WCS14 is considered to be unreasonable. This is on the basis that the wording suggests that any development that has any adverse impact on the highway network that cannot be mitigated will not be permitted. It is not considered sound for a policy to indicate that permission will be refused on the basis of a subjective term such as 'mitigation'. The current saved policies relating to transportation within the adopted Waste Local Plan (Policies 39 and 40) refer to terms such as practicable measures and unacceptable harm, which are considered more appropriate than a blanket ban on development that has any adverse impact which cannot be mitigated to an unspecified degree. It is also considered necessary for a review to be undertaken of the wording contained</p>	<p>Disagree. The term 'mitigation' is not subjective and is a common planning term used to refer to potential measures that may be introduced in order to overcome adverse impacts. For example highway impacts which may be mitigated through measures such as junction improvements.</p> <p>In relation to the requirement for a Transport Assessment (TA) and Travel Plan, the current wording of the policy is considered acceptable.</p> <p>The policy states that development exceeding Department of Transport thresholds must be supported by a Transport Assessment (TA) and Travel Plan and that where a Travel Plan is required, the developer will be expected to enter into a Section 106 or unilateral legal agreement to secure its development and implementation.</p> <p>This does not imply that a developer will be required to enter into an agreement prior to a</p>

		<p>in the last paragraph of Policy WCS 14. This paragraph as currently worded suggests that the developer is to enter into a Section 106 or unilateral legal agreement in order to develop a Travel Plan. However, according to the second paragraph of this Policy the Travel Plan would be required to be developed as part of an application that exceeded certain thresholds. It would therefore suggest that this Policy is seeking for a developer to enter into a Section 106 or unilateral legal agreement prior to an application for development being made. This is considered unjustifiable.</p> <p>For clarity it would be suggested that the penultimate sentence of Policy WCS 14 be amended to state 'The Waste Planning Authority (WPA) will oppose proposals for waste development that generates additional traffic that cannot be safely accommodated on the adjacent highway network or would cause unacceptable harm to the local environment'. It is also considered necessary to delete the last paragraph of Policy WCS14 as currently worded it is unjustifiable, inflexible and unnecessary.</p>	<p>planning application being submitted (although broad terms of agreement are often reached at this stage).</p> <p>No Change.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Ben Stansfield Cory Environmental (Gloucestershire) Ltd.	60	60/4	<p>Comments on paragraph 2.36 of the Waste Core Strategy (WCS) are made in order to improve the robustness of the evidence base through the provision of updated factual data.</p> <p>Paragraph 2.36 of the WCS and the WCS-A Waste Data (update 2010) report sets out the capacity of existing transfer stations. It is considered necessary for the data used to calculate this capacity to be updated and amended.</p> <p>Firstly, the capacity of the transfer station at Love Lane, Cirencester (operated by Cory) as set out in Table Ap.A.4 of the WCS-A Waste Data (update 2010) report, should be amended to 74,999 tpa as opposed to 66,999 tpa. The capacity of the facility as being 74,999 tpa is set out in Condition 5 of planning permission reference OS/0043/CWMAJW. Secondly, the total MSW capacity of the transfer stations in the County as set out in paragraph 2.36 of the WCS should correlate with the totals provided in Table Ap. AA of the WCS-A Waste Data (update 2010) report. Currently Table Ap.A.4 provides a total capacity level of 121,749 tpa whilst the total capacity provided in paragraph 2.36 is 107,000 tpa.</p> <p>In order to improve the robustness of the evidence base of the WCS it is proposed that the data in Table Ap.A.4 of the WCS-A Waste Data (update 2010) report is updated to reflect the consented level of transfer capacity at Love Lane, Cirencester</p>	<p>Agree in part. Paragraph 2.36 has been amended to refer to reflect the capacities set out in the Waste Data paper.</p> <p>However, the facility at Love Lane has been assigned a capacity of 66,999 tonnes/year because it is calculated that some of the total capacity of 74,999 tonnes/year is used for C&I transfer, not MSW transfer.</p> <p>See Focused Change 4.</p>

			(74,999 tpa). Furthermore, it is considered necessary that the capacity figure for the transfer stations in the County provided in paragraph 2.36 of the WCS is updated to reflect the revised totals set out in the waste data report. These changes will improve the robustness of the evidence base of the WCS.	
Ben Stansfield Cory Environmental (Gloucestershire) Ltd.	60	60/5	<p>Comments on paragraph 2.46 of the Waste Core Strategy (WCS) are made in order to improve the robustness of the evidence base through the provision of updated factual data.</p> <p>Paragraph 2.46 of the WCS and the WCS-A Waste Data (update 2010) report set out the scale of commercial composting facilities in the County. Table Ap.A.3 of the WCS-A Waste Data (update 2010) report sets out the specific estimates of the different composting facilities in the County. The following data contained within Table Ap.A.3 and hence the figure provided in paragraph 2.46 of the WCS is considered in need of being amended.</p> <p>Gloucester, Hempsted site - This site is operated by Cory. The 10,000 tpa capacity identified relates to a green waste transfer facility with the waste from this facility currently being taken to the Wingmoor Farm West site where it is composted. To avoid double counting of this treatment capacity it is proposed that this capacity is deleted from the composting capacity estimates.</p> <p>Wingmoor Farm West site - This site is operated by Cory. The 5,000 tpa capacity identified for food waste relates to a transfer facility with the waste</p>	<p>Comment noted. The 10,000 tpa capacity at Hempsted has <u>not</u> been included in the total MSW composting capacity of 79,000 tonnes.</p> <p>It is acknowledged that the 5,000 tpa for food waste is for transfer, but none the less it is transfer that facilitates IVC composting and thus arguably it</p>

			<p>from this facility currently being taken to the County's in vessel composting (IVC) plants. To avoid double counting of this treatment capacity it is proposed that this capacity is deleted from the composting capacity estimates.</p> <p>The 20,000 tpa capacity identified for green waste (windrow) composting was the figure originally set out in the waste management license for the site (ref: 48037) this has subsequently been amended by environmental permit reference AP3396LR which has amended the green waste composting capacity to 30,000 tonnes at anyone time with an overall level for this composting area including other recyclables of 75,000 tpa.</p> <p>With no specific annual limit set within the permit for green waste composting (other than being within the 75,000 tpa limit) it is difficult to provide an estimated annual capacity. However, the green waste composting operations are by far the most significant element of waste managed under this permit.</p> <p>In addition to these factual data changes it is also considered necessary to sub-divide the waste and treatment capacity data relating to composting / AD. Currently the waste and composting / AD facility requirements as set out in Table 31 of the WCS-A Waste Data (update 2010) report are combined. This approach is considered unsound. This is because the waste streams included in these figures (i.e. green waste only, mixed green and food wastes and food only wastes) are generally</p>	<p>could count towards composting capacity. This capacity was based on the Planning Consent REF: (09/0084/TWMAJW) 26th March 2010.</p> <p>20,000 tpa capacity was used as a reasonable reflection of the amount of green waste likely to be received at the site on an annual basis for window composting. It is noted from the applicant that the actual amount of green waste stored at anyone time might be more through the licence. The WDA advise that over the last 2 years around 28,000 tonnes of waste has been managed at Wingmoor Farm West. However the operator does point to difficulties estimating the annual capacity therefore at this stage the County Council does not propose to alter this figure for Wingmoor Farm but will monitor the situation with the EA and the operator through any future updates of waste data for the County. The key Issues report acknowledges that the capacity at Wingmoor Farm West for windrow composting could be greater than the 20,000 tonnes estimate.</p> <p>It is acknowledged that further clarification could be provided. Paragraph 2.46 of the WCS has been amended to identify what proportion of the total permitted composting capacity is for IVC and what proportion is for windrow composting. AD is dealt with separately through a new core policy and supporting text.</p> <p>See Focused Changes 5 and 13.</p>
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		<p>treated by different waste treatment options. For example, windrow composting as undertaken at the Wingmoor Farm West composting site can only manage green only wastes. It is therefore inaccurate to have regard to this treatment capacity as being available when considering future treatment capacity requirements for mixed green and food wastes and / or food only wastes.</p> <p>On this basis the evidence base behind the waste capacity requirements for composting /AD, as calculated in Table 31 of the WCS-A waste data (update 2010) report and as set out in Section 3.8 of this report and paragraph 3.23 of the WCS, is questioned. It is considered more credible and robust for the future MSW treatment capacity requirements to be set out in Table 31 of the WCS-A waste data (update 2010) report having regard to the different waste types i.e. green waste only, mixed green and food wastes and food only wastes. It is noted that in the earlier waste data report (WCS-A Waste Data (2007)) the table dealing with MSW facility requirements (Table 7) provided separate figures for both composting and IVC.</p> <p>To make the evidence base behind the WCS sound it is considered necessary for the factual data both in Paragraph 2.46 of the WCS and Table Ap.A.3 of the WCS-A Waste Data (update 2010) report to be updated. These factual changes include:</p> <p>Gloucester, Hempsted site -The 10,000 tpa capacity identified in Table Ap.A.3 of the WCS-A Waste Data (update 2010) report should be deleted from the</p>	<p>In terms of the actual issues surrounding a formal break-down of both existing capacity and the future requirements this is covered in the Key Issues report (available separately). This demonstrates that there are no capacity gap issues with either windrow composting or IVC/AD at the present and possibly a small capacity gap at the end of the WCS period.</p> <p>See response above.</p> <p>See response above.</p>
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		<p>capacity estimates.</p> <p>Wingmoor Farm West site - This site is operated by Cory. The 5,000 tpa capacity identified for food waste in Table Ap.A.3 of the WCS-A Waste Data (update 2010) report should be deleted from the capacity estimates.</p> <p>The 20,000 tpa capacity identified for green waste in Table Ap.A.3 of the WCS-A Waste Data (update 2010) report should be amended to reflect the revised permit level of 30,000 tonnes at anyone time with an overall level for the wider composting area including other recyclables of 75,000 tpa.</p> <p>In addition, it is considered necessary for the future capacity requirements and the capacity gap requirements for MSW to have regard to the different waste streams i.e. green waste only, mixed green and food wastes and food only wastes. This change will improve the evidence base of the WCS and avoid the treatment capacity gap estimates having regard to existing treatment capacity that could be unsuitable for the required waste stream i.e. by taking this approach it will avoid regard being given to say windrow composting capacity for managing food wastes.</p> <p>In consequence, Table 31 and section 3.8 of the WCS-A waste data (update 2010) report as well as paragraph 3.23 of the WCS should be updated with separate consideration given to the levels of waste requiring treatment and the treatment capacity of facilities associated with green only wastes, mixed green and food wastes and food only wastes.</p>	<p>See response above.</p> <p>See response above.</p> <p>See response above.</p> <p>See response above.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Ben Stansfield Cory Environmental (Gloucestershire) Ltd.	60	60/6	<p>Comments on paragraphs 2.55, 4.121 and 4.169 of the Waste Core Strategy (WCS) are made seeking minor amendments to the text in order to avoid inaccuracies and or misrepresentation.</p> <p>Although support is provided to paragraph 2.55 of the WCS in that it clarifies the future role of landfill the unsubstantiated comment about landfills generally being bad for the environment is considered both subjective and inaccurate.</p> <p>Modern engineered landfills are closely controlled by statutory authorities in terms of their design, development and operation. Landfills form an essential part of the waste hierarchy and as required by Environment Agency guidance LFE1 - Our Approach to Landfill Engineering "all new landfills are designed, operated and decommissioned in accordance with the general principle of sustainability".</p> <p>Paragraph 4.121 of the WCS recognises that landfill gas is captured and used to generate electricity, however, it then states that landfill is not a genuinely sustainable option. This assertion is also considered to be subjective and inaccurate for the reasons provided above.</p> <p>Furthermore, the assertion appears to fail to recognize that none of the waste management treatment options is 100% efficient in converting energy from waste.</p>	<p>Support for paragraph 2.55 noted. The paragraph has been reworded to clarify the potential environmental impacts of landfill which are well-documented.</p> <p>See Focused Change 6.</p> <p>Paragraph 4.121 acknowledges that energy can be captured from landfill methane, however for this to happen, biodegradable waste must be buried in the first instance which is a less sustainable option than alternatives which help to divert waste from landfill such as energy recovery as reflected in the waste hierarchy where disposal is recognised as a last resort.</p> <p>No Change.</p>

			<p>The wording in the penultimate sentence in this paragraph is also considered misleading having regard to the very high specifications of modern landfills as recognised in paragraph 4.120 of the WCS.</p> <p>Paragraphs 4.121 and 4.169 of the WCS are vague in terms of the level of capture of landfill gases and to improve the accuracy of this sentence it is proposed that reference is made to the Environment Agency's Landfill Technical Guidance Note (LFTGN) 3 which indicates a benchmark annual collection efficiency of 85% of the methane generated from the breakdown of biodegradable waste in landfills.</p> <p>With regard to paragraph 2.55 of the WCS it is considered necessary that the statement "Whilst generally speaking landfill is bad for the environment" is deleted from the first sentence in order to remove subjectivity and provide accuracy in the text.</p> <p>It is also considered necessary to improve the accuracy of the text that paragraph 4.121 of the WCS is amended. Proposed revised text for paragraph 4.121 is provided below:</p> <p>"Biodegradable waste produces methane as it breaks down. Modern landfills capture over 85% of the methane generated and most landfills use this methane as a source of energy, for example to</p>	<p>The comment in relation to paragraph 4.121 is noted. The paragraph is not misleading and simply states that leachate <u>can</u> (own emphasis) percolate from landfills, particularly <u>more historic</u> sites (own emphasis) which is factually correct.</p> <p>No Change.</p> <p>Reference to EA technical guidance notes would represent excessive detail for inclusion within the WCS.</p> <p>No Change.</p> <p>Comment noted.</p> <p>See Focused Change 6.</p> <p>See response above.</p> <p>No Change.</p>
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		<p>generate renewable electricity that can be exported to the national grid. Leachate, which is water contaminated by waste is also generated within a landfill. Modern landfills are designed and operated to contain this leachate within the site, where it can then be treated either on or off-site. The gases and leachate produced in a landfill are carefully monitored and controlled."</p> <p>It is also considered necessary to improve the accuracy of the text that paragraph 4.169 of the WCS is amended.</p> <p>Proposed revised text for paragraph 4.169 is provided below:</p> <p>"Like other forms of industry, waste management has a direct impact on climate change. Sending biodegradable waste to landfill for example produces methane, one of the main greenhouse gases. Modern landfills capture over 85% of the methane generated and most landfills use this methane as a source of energy, for example to generate renewable electricity that can be exported to the national grid."</p>	<p>See response above.</p> <p>No Change.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Ben Stansfield Cory Environmental (Gloucestershire) Ltd.	60	60/7	<p>Inset Map 2 is considered unsound on the basis of it being unjustified. Inset Map 2 is considered unjustified on the basis of the evidence base not being robust. The two sites (A and B) at Wing moor Farm West are considered in Inset Map 2 and Policy WCS4 as well as in other parts of the Waste Core Strategy (WCS) as a single site (Site 2). However, it is considered that both the Wing moor Farm West landfill site (Site A) and The Park site (Site B) are suitable strategic sites in their own right.</p> <p>The evidence base for the identification of the strategic sites within the WCS is centered upon factual information on the sites, the submissions made and representations received on the sites. In all these respects the land at Wingmoor Farm West and The Park were considered separately. For example, the Site Options Consultations undertaken in 2009 during the development of the WCS consulted on three different areas around Wingmoor Farm West (Site 2) and separately consulted on The Park site (Site 10). Since both land at Wingmoor Farm West and The Park are considered suitable for inclusion in the publication version of the WCS there is no credible or robust evidence as to why only at this stage these two separate areas have been combined on a single inset map, site schedule and / or listed in Policy WCS4 as just one of four not five separate strategic sites.</p>	<p>It is acknowledged that the two Wingmoor Farm (West) sites are suitable strategic sites in their own right. The fact they are listed as Sites A and B does not mean they cannot come forward independently of one another.</p> <p>Technical evidence paper WCS N: Site Selection which supported the Site Option consultation in October 2009 considered the two sites together as part of a larger cluster site. However, in the Site Option consultation in 2009 the two sites were identified separately.</p> <p>The two sites have been included on a single inset map and site schedule because of their proximity to each other. However, their particular characteristics and differences are clearly explained both within the site schedule and the supporting text to Policy WCS4.</p> <p>Paragraphs 4.95 and 4.96 for example clearly identify the characteristics and ownership of each site as well as the type of waste each site is likely to manage. There is nothing to suggest that the two sites cannot come forward independently of one another.</p>

			<p>Furthermore, it is considered appropriate for the site boundary illustrated in any Inset Map associated with Site B to be considered indicative. This is on the basis that the site boundary for Site B forms part of the consented landfill and unlike the other allocated sites has no additional development constraints within the wider area of the consented landfill. The potential for the site boundary to alter slightly from that shown in inset map 2 was discussed with the County Planning Authority in June 2010.</p> <p>Although at that stage it was agreed not to amend the boundary of the proposed site the possibility of reconfiguring this boundary at a later stage in the WCS process was discussed. Due to the lack of any site determining factors, i.e. hedges, a future reconfiguration of the site boundary of Site B as illustrated in inset map 2 is considered appropriate. This would be considered suitable on the basis that the material aspects of the site would not be amended i.e. the site area and the environmental considerations or key development criteria related to the site. An example of such a reconfiguration to the site boundary was presented to the County Planning Authority during a meeting held in June 2010.</p> <p>In order to make the WCS sound it is considered necessary for separate Inset Maps to be created in relation both The Park site and the Wingmoor Farm West landfill site.</p> <p>The total number of sites allocated for strategic</p>	<p>It is acknowledged that in reality development proposals that come forward do not always 'marry up' precisely with site boundaries identified in local development plans. It is not however considered necessary to explicitly state within the WCS that the site boundaries are 'indicative' only.</p> <p>If a proposal comes forward that is significantly different from the site boundary shown on Inset Map 2 this would have to be considered on its merits having regard to relevant material considerations (landscape impact etc).</p> <p>No Change.</p> <p>See response above.</p> <p>See response above.</p>
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			<p>residual waste facilities should be amended to five from four. This change is considered necessary to accurately reflect the evidence base in terms of submissions made and consultation responses received.</p> <p>The Inset Map for the Wingmoor Farm West landfill site profile should also make reference to the site boundary being indicative and may be subject to reconfiguration depending on any specific development proposals. It could be clarified that any amendment to the site boundary as shown will be non material in terms of both the site area and key development criteria.</p>	See response above.
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Ben Stansfield Cory Environmental (Gloucestershire) Ltd.	60	60/8	<p>The recognition in Key Issue 10 that landfill is always likely to have a role to play is supported. However, the identification of non-hazardous landfill capacity being in the order of 10-13 years as stated in Key Issue 10 as well as in paragraphs 2.56 and 4.125 is misrepresentative of the real position. The evidence base used to generate this estimate of landfill life is not considered credible or robust.</p> <p>Although later sentences in Key Issue 10 and both paragraphs 2.56 and 4.125 refer to the estimates of non-hazardous landfill life being conservative this does not mitigate either errors in the evidence base or the key statements made in these parts of the WCS of their being 10-13 years remaining life at the County's non-hazardous landfill sites. The Waste Core Strategy (WCS) is therefore considered unsound on the basis of the lack of credibility and robustness of the evidence base relating to both the landfill void estimates and the estimated annual landfill waste input figures set out in the WCS and the WCS-A Waste Data (update 2010) report. These are considered in more detail below.</p> <p><u>Landfill Void</u></p> <p>The evidence base behind the estimate of the remaining non-hazardous landfill void for the Hempsted and Wing moor Farm West landfill sites that has been used in the WCS to calculate remaining non-hazardous landfill life is not considered robust. The remaining void at the Cory</p>	<p>Support for Key Issue 10 noted. In relation to the concerns expressed relating to landfill capacity the following response is made.</p> <p>In relation to landfill void Cory state that the landfill void at their two sites amount to 3,205,000 m³ as at 31st December 2009 as opposed to 31st March 2009. In effect a nine month difference. This would provide around 5.5 years at Hempsted and around 17 years at Wingmoor Farm West from 1st January 2010. The WPA has looked at the potential impact on the life of landfill in the WCS and considered that the need to alter the overall lifetime of landfill capacity seems rather marginal.</p> <p>This doesn't alter the fact that Cory consider that of the two sites they believe that Hempsted will be complete in 5 – 6 years and around 17 years at Wingmoor Farm West. In subsequent discussions with Cory post-publication regarding their representations they are firmly of the belief that Wingmoor Farm West will last through the period of the Waste Core Strategy even taking into account the impact of Hempsted being completed around 2016 and the impact that Wingmoor Farm East doesn't receive planning permission.</p> <p>In relation to an overestimation of future residual MSW to landfill the WPA is advised by the WDA as to what future requirements are for MSW.</p> <p>In addition Table 3m of the WCS – A Waste Data</p>

		<p>owned landfill facilities (Hempsted and Wingmoor Farm West) as set out in Section 11 of the WCS-A Waste Data (update 2010) report was provided to the Council in a letter dated 15 February 2010 as part of Cory's waste survey return. The remaining void at these sites was based on the void remaining at 31 December 2009 and not 31 March 2009 as indicated in Section 11 of the WCS-A Waste Data (update 2010) report. This factual error has implications on the calculations of remaining landfill life set out in other sections of the WCS-A Waste Data (update 2010) report such as Section 3.8 as well as the conclusions made in Key Issue 10 and paragraphs 2.56 and 4.125 of the WCS. An additional representation on this point is made by Cory in relation to paragraphs 2.56 and 4.124 of the WCS.</p> <p><u>Waste Arisings / Inputs</u></p> <p>The evidence base, set out predominately in Section 11 of the WCS-A Waste Data (update 2010) report, behind the two sets of assumptions (Dataset 1 and Dataset 2) used by the Council to calculate annual input rates to non-hazardous landfills in the County, which has then been used in the WCS to calculate remaining non-hazardous landfill life, is not considered either credible or robust.</p> <p>The reasons why the credibility and robustness of the assumptions used in both Dataset 1 and Dataset 2 are considered unsound are set out below.</p>	<p>(2010) Update clearly identifies that there is 3,205,000 m³ of landfill void remaining at the Cory landfill site sufficient to meet the potential future requirements of residual MSW for over 20 years including the amount of both C&I and C&D which is also tipped. In Table 3n the MSW requirement at 2009/10 – 2020/21 is 2,107,264 m³ which again is sufficient to meet the requirements well beyond the MSW LATS target date. Further the MSW requirement over the WCS timeframe is identified in Table 3o of 2,894,479 m³. Therefore there is also sufficient capacity to meet those requirements.</p> <p>The WPA has met with Cory Environmental to try and clarify the response and if possible to reach some consensus. The WPA has suggested to Cory to present some alternative data if they consider that WCS – A (Update) 2010 to be incorrect.</p> <p>However Cory still reiterate that they consider the use of the data regarding MSW in its current form is wrong along with the advice of the WDA to the WPA. The fundamental plank appears that they wish the WDA to provide some alternative advice. The WDA have provided a revised projection but it doesn't have a significant overall effect on the provision required in the WCS in relation to landfill.</p> <p>The WPA suggests that some of the concern might stem from the final column of Table 3l of WCS –A (Update) 2010. These totals do provide the basis of the possible landfill capacity requirements given in Table 3n and 3o as referred to above. For example in Table 3l year 2006/07. MSW arisings are 324,143 tonnes. 32% of the arising is 103,726 tonnes. That</p>
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			<p><u>Dataset 1</u></p> <p>MSW inputs - this data comes from Table 31 of the WCS-A Waste Data (update 2010) report. This table suggests (using these assumptions) that the landfill input for 2008/09 would have been 246,661 tonnes whereas the actual MSW inputs to landfill in 2008/09 as provided in Section 11 of the WCS-A Waste Data (update 2010) report was 206,000 tonnes. This clearly raises questions as to the credibility of using this data as the evidence base for the WCS. Furthermore, the Council provided on its website in December 2010 a waste flow model as part of its strategic waste review. This waste flow model shows a lower level of MSW requiring treatment 1 disposal (residual waste) for each and every year covering the period 2010/11 to 2020/21 than the assumptions made in Dataset 1.</p> <p>This apparent discrepancy in the Council's own estimates of potential MSW inputs to landfill further questions the credibility and robustness of the evidence base of the WCS used to calculate the remaining life of non-hazardous landfill in the County.</p> <p>C&I inputs - the data used by the Council relates to the 2008 landfill return data from the Environment Agency (EA) and equals 286,000 tonnes. This level is then assumed by the Council to remain constant throughout the Plan period. This approach is not considered either credible or robust in light of the landfill return data for 2008/09 as set out in Section 11 of the WCS-A Waste Data (update 2010)</p>	<p>is the maximum inert which can be landfilled on top of the LATS allowance. Therefore the possible landfill capacity allowing for both the Government set allowance (LATS) and inert waste is 262,360. However actual landfill for that year was 214,969 tonnes. Following a further audit of these figures a confusion may have occurred as for year 2008/09 it would appear that a calculation error has occurred and the capacity should be 237,047 rather than 246,661 tonnes. The remaining years are correct. However around 10,000 tonnes error over the total landfill capacity of the WCS isn't profound.</p> <p>However there are alternative scenarios which could be derived using the residual waste totals after treatment rather than possible capacity required. This would result in a projection of 792,994 tonnes of MSW waste to landfill between 2009-2014. From 2015 this is around 7,000 – 8,000 tpa following treatment assuming MSW recovery capacity comes on line. This would mean that the requirement for landfill of MSW would be 845,953 tonnes to 2020/21 and 901,814 tonnes to 2027/28. There would still be requirements for landfill of some C&I and C&D waste on top of that. Clearly in this eventuality this could also result in current landfill void lasting much longer than the conservative 10- 13 years range.</p> <p>With specific regard to the Council's strategic waste review, it is correct that as part of the review further modelling was carried out to estimate waste arisings for the county. This modelling used a similar methodology as applied by DEFRA during their evaluation of PFI funding (Spending Review</p>
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		<p>Waste Data (update 2010) report, This level is then assumed by the Council to remain constant throughout the Plan period. This approach is not considered either credible or robust in light of both the identified national, regional and local targets to increase recycling and composting of MSW (I.e. Strategic Objective 2 of the WCS) as well as the European targets to reduce biodegradable waste to landfill as set out in Table 3f of the WCS-A Waste Data (update 2010) report. Furthermore, the assumption by the Council that the MSW input level will remain constant during the Plan period is at significant odds with the Council's own MSW residual waste estimates set out in Table 31 of the WCS-A Waste Data (update 2010) report as well as the waste flow model the Council provided on its website in December 2010 as part of its strategic waste review.</p> <p>C&D inputs - this data comes from the 2008/09 landfill inputs as set out in Section 11 of the WCS-A Waste Data (update 2010) report. This level is then assumed by the Council to remain constant throughout the Plan period. This approach is not considered either credible or robust.</p> <p>This is because of the National Target to reduce C&D waste to landfill by 50% by 2012 (paragraph 3.27 of the WCS) and Strategic Objective 2 and Policy WCS3 of the WCS that both propose to divert and additional 85,000 tpa of C&D waste from landfill.</p> <p><u>Conclusions</u></p>	<p>used the evidence base correctly in terms of current baseline data and the future capacity requirement ranges from the SW RSS to provide a guide to future C&I capacity waste management and hence landfill requirements. These all show a much lower future landfill requirement for C&I landfill than Cory claims the paper is identifying. Whist the overall growth in C&I waste in WCS- A Waste Data (2010) Update is 0% the potential scenarios for landfill of this waste stream is declining. This is recognised in para 11.4.20 that landfill will last longer if inputs decline further.</p> <p>This theme from Cory is continued with regards Construction and Demolition waste. The WPA assume again 0% growth in arisings but that the target to landfill should reduce by 50% and what will potentially be sent to landfill. Therefore there is a clear projection of declining inputs. However it should be remembered that some other operators specialising in the management of this waste stream consider that greater requirements need to be identified for future disposal requirements.</p> <p>In relation to criticism regarding the different datasets used the differences and the issues or assumptions are all listed in the paper WCS – A Waste Data (Update) 2010. However the following discussion might assist in clarifying matters. With regards dataset 1 this uses a combination of WDI data information (the main data discs provided to the WPA from the EA) and the assumptions made by the WDA for MSW. The WDA have provided an updated position from 2011 but it is not hugely different from that contained in Table 3l. The</p>
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			<p>The evidence base used to determine the remaining life of the non-hazardous landfills in the County is considered unsound. The evidence underestimates the available void and overestimates the likely annual waste inputs to these sites, regardless of any potential future reductions to landfill as a result of mechanisms such as the landfill Tax. Amendments are required to the evidence base to correct inaccurate data and assumptions. It is considered that the impact of these changes will have a significant impact on the predicted remaining life of the non-hazardous landfills in the County. This in turn could impact the Plan's waste capacity requirements as set out in Key Driver 5 of the WCS.</p> <p>In order for the WCS to be sound it is considered necessary for the evidence base relating to remaining landfill void and projected waste inputs to landfill to be both credible and robust. It is considered necessary for the current estimate of non-hazardous landfill life in the County as set out in Key Issue 10 and paragraphs 2.56 and 4.125 of the WCS to be changed in order to provide a more realistic estimate of available landfill capacity during the Plan period. This will assist decision makers both in developing an appropriate waste management strategy and in the determination of future waste management proposals. In order to re-calculate the non-hazardous landfill life in the County the following changes are considered necessary:</p> <p><u>Landfill void</u></p>	<p>conclusion contained in the paragraph 11.4.15 of WCS-A Waste Data (Update) 2010 is that this would provide for around 10 years (2019/20) although the caveat is that this is a conservative figure. As indicated elsewhere above there are any number of scenarios with alternative assumptions which can be made. Quite clearly if the majority of residual MSW is recovered from 2015 and diversion of other waste streams occurs the landfill will last much longer. Dataset two is provided directly from the operators and would indicate that landfill would last around 13 years (2022/23) based on current throughputs WCS-A Waste Data (Update) 2010. Clearly this could again be much longer assuming greater recycling and diversion from landfill. What should be remembered in this is that the WPA has presented both datasets which influence the range of landfill capacities required. Overall it should be stressed the range is broadly accurate to the satisfaction of the EA and the Companion Guide to PPS 10 warns against 'spurious precision'.</p> <p>As demonstrated elsewhere above there are a number of alternative scenarios that can be projected, some suggesting the 10 – 13 year range for landfill to be a starting point but with caveats that this could be conservative. Void space should last until the 2020 LATS allowance milestone and there is a good chance that it is more likely that there is sufficient void space to last the WCS timeframe to 2027. On review of the position the WPA considers that the 10 – 13 years range can be justified although it is acknowledged that it is very conservative and could last longer.</p>
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			<p>considered sound it needs to make use of the most recent and reliable data and be consistent with Government guidance and policy. C&I inputs -It is considered necessary, in order to make the evidence base credible and robust, for the assumptions made by the Council in at least Dataset 1 relating to C&I inputs over the Plan period to be changed.</p> <p>The assumed inputs used by the Council need to change to reflect the drop in C&I wastes being sent to landfill as reflected in both the 2008/09 figures from the operators as well as the 2009 input figures provided by DEFRA Projections over the Plan period should also reflect regional targets to be consistent with the regional data that went into the formulation of the RSS.</p> <p>C&D inputs - It is considered necessary, in order to make the evidence base credible and robust, for the assumptions made by the Council in both Dataset 1 and Dataset 2 relating to C&D inputs over the Plan period to be changed. The assumed inputs used by the Council need to change to reflect the National Target to reduce C&D waste to landfill by 50% by 2012 as well as the WCS's own policies and objectives to divert an additional 85,000 tpa of C&D waste from landfill.</p> <p><u>Conclusions</u></p> <p>In order for the WCS to be considered sound it is considered necessary for the evidence base used to determine the remaining life of the non-hazardous landfills in the County to be changed so</p>	
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			<p>as to make it both credible and robust. The changes required to the evidence base include the estimates of current available void at the non-hazardous landfills in the County as well as the assumptions used by the Council in relation to waste inputs during the Plan period. Currently the evidence base underestimates the available void and overestimates the likely annual waste inputs to these sites, regardless of any potential future reductions to landfill as a result of mechanisms such as the Landfill Tax. It is considered that the impact of these changes will significantly increase the predicted remaining life of the non-hazardous landfills in the County. These necessary changes to the waste forecasts will help make the evidence base credible and robust.</p> <p>These changes to the waste forecasts may also require the Council to review the Plan's waste capacity requirements as summarised in Key Driver 5 of the WCS.</p>	
Ben Stansfield Cory Environmental (Gloucestershire) Ltd.	60	60/9	<p>The identification of the overall non-hazardous landfill capacity being 6,029,500m³ as at March 2009, as stated in paragraphs 2.56 and 4.124 of the WCS, and the non-hazardous landfill capacity of the Hempsted and Wingmoor Farm West landfill sites being 990,000m³ and 2,215,000m³ respectively at March 2009, as stated in Sections 3.5.9, 3.8, 11 and Appendix A of the WCS-A Waste Data (update 2010) report, is misrepresentative of the real position.</p> <p>The evidence base is not considered credible or robust. The Waste Core Strategy (WCS) is therefore</p>	<p>The comments are noted and have been addressed in the response above.</p> <p>With specific regard to the nine-month discrepancy this is acknowledged and was a result of incorrect information provided by Cory in the first instance.</p> <p>In any case the error it is not considered great enough to have a significant overall effect on the calculation of remaining landfill capacity (10-13 years) set out in the WCS, which in any case is a conservative estimate and could last longer depending on various factors.</p>

		<p>considered unsound on the basis of the lack of credibility and robustness of the evidence base relating to the landfill void estimates for the Hempsted and Wing moor Farm West sites. The remaining void at the Cory owned landfill facilities (Hempsted and Wingmoor Farm West) as set out in Section 11 of the WCS-A Waste Data (update 2010) report was provided to the Council in a letter dated 15 February 2010 as part of Cory's waste survey return. The remaining void at these sites was based on the void remaining at 31 December 2009 and not 31 March 2009 as indicated in Section 11 of the WCS-A Waste Data (update 2010) report. In addition to the error impacting the evidence base relating to remaining landfill capacity this factual error also has implications on the calculations of remaining landfill life set out in other sections of the WCS-A Waste Data (update 2010) report, such as Section 3.8, as well as the conclusions made in Key Issue 10 and paragraphs 2.56 and 4.125 of the WCS. An additional representation on this point is made by Cory in relation to Key Issue 10 and paragraphs 2.56 and 4.125 of the WCS.</p> <p>In order for the WCS to be sound it is considered necessary for the evidence base relating to remaining non-hazardous landfill void to be both credible and robust. A factual correction is required to be made to the remaining voidspace available at the non-hazardous landfill sites in the County. As a result it is also considered necessary for the current estimate of non-hazardous landfill life in the County as set out in Key Issue 10 and paragraphs 2.56 and 4.125 of the WCS to be</p>	<p>Paragraph 4.125 has been amended to more fully reflect this fact.</p> <p>See Focused Change 25.</p>
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			<p>changed in order to provide a more realistic estimate of available landfill capacity during the Plan period. These changes will assist decision makers both in developing an appropriate waste management strategy and in the determination of future waste management proposals.</p> <p>The following changes to paragraphs 2.56 and 4.124 as well as relevant sections of the WCS-A Waste Data (update 2010) report are considered necessary.</p> <p>It is considered necessary, in order to make the evidence base credible and robust, for the estimates of landfill void to be updated to 31 December 2009. This change would involve amending the landfill capacity figures set out in Section 11 of the WCS-A Waste Data (update 2010) report. The capacity figures for both the Hempsted and Wingmoor Farm West landfill sites that are contained in Section 11 of this report are correct as at 31 December 2009.</p> <p>The non-hazardous waste capacity figures for the Wingmoor Farm East landfill site needs to be changed to account for actual or estimated inputs for the period 1 April 2009 to 31 December 2009. These revised figures should then be used, as required, in the rest of the WCS-A Waste Data (update 2010) report, such as Section 3.8, as well as in paragraphs 2.56 and 4.124 of the WCS to provide the remaining non-hazardous landfill capacity at 31 December 2009. The revision of the non-hazardous landfill capacity figure to 31 December 2009 will also require amendments to</p>	
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			<p>be made to the estimate of the remaining landfill life in the County.</p> <p>In order for the WCS to be considered sound it is considered necessary for the evidence base used to determine the remaining capacity and life of the non-hazardous landfills in the County to be changed so as to make it both credible and robust. The changes required to the evidence base relate to the estimates of the current available void at the non-hazardous landfills in the County. Currently the evidence base underestimates the available void. It is considered that the impact of these changes will on its own slightly increase the predicted remaining life of the non-hazardous landfills in the County. These necessary changes to the waste forecasts will help make the evidence base credible and robust.</p>	
<p>Ben Stansfield</p> <p>Cory Environmental (Gloucestershire) Ltd.</p>	60	60/10	<p>The main theme of 'Key Driver 3 - Rising Costs' is generally supported. However, the last sentence in paragraph 3.20 of the Waste Core Strategy (WCS) is considered inaccurate and misleading. This sentence suggests that a move to other waste management options other than landfill will cost the County less. This perception of landfill costs being necessarily higher than other waste treatment options is also made in paragraph 4.55 of the WCS. The last sentence in paragraph 4.55 of the WCS is therefore also considered inaccurate and misleading.</p> <p>The perception given in these sentences is considered contrary to robust and credible evidence and hence the evidence base for these</p>	<p>Support for Key Driver 3 noted. However it is not accepted that paragraph 3.20 is inaccurate or misleading. It states that due to landfill tax there are financial implications associated with continuing to send waste to landfill. The paragraph makes no mention of other forms of waste management or attempt to compare the relative costs.</p> <p>Paragraph 4.55 states that there are financial and environmental reasons why an alternative to landfill needs to be found. This is factually correct. Again, no mention is made of other waste treatment options.</p> <p>No Change.</p>

		<p>sentences in the WCS is questioned. For example, in July 2010 the Waste & Resources Action Programme (WRAP) produced a report entitled 'Comparing the cost of alternative waste treatment options'. This report shows that the costs of landfill can be cheaper than other waste treatment options.</p> <p>The following changes are considered necessary. Paragraph 3.20 of the WCS - delete the last sentence of this paragraph. A further paragraph after 3.20 of the WCS could be added to provide an indication of the range of costs associated with other waste management options.</p> <p>Paragraph 4.55 of the WCS - amend the last sentence to state " ... At the moment most of this ends up in landfill and as we have described through the key issues and drivers although landfill is always likely to have a role to play a move away from landfill up the waste hierarchy is proposed". These changes are considered necessary in order to improve the credibility and robustness of the evidence base of the WCS. The changes could also assist decision makers both in developing an appropriate waste management strategy and in the determination of future waste management proposals.</p>	<p>See response above.</p> <p>See response above.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Ben Stansfield Cory Environmental (Gloucestershire) Ltd.	60	60/11	<p>Comments on paragraphs 3.33 'The Spatial Vision' and 3.34 the 'Strategic Objectives' of the Waste Core Strategy (WCS) are made in order to clarify and improve the robustness and appropriateness of the overall strategy of the WCS.</p> <p>The 'Spatial Vision' for the County as well as Strategic Objective 1 makes reference to 'zero-growth' by 2020. The term 'zero-growth' is not defined and it is unclear if the vision and therefore the strategy for the WCS relates to zero-growth in waste arisings or to zero-growth in the level of residual wastes requiring treatment or disposal. If the vision 1 objective relates to zero-growth in arisings it is noted that the assumptions in the WCS as set out in Table 31 of the WCS-A Waste Data (update 2010) report projects a steadily increasing level of MSW arisings in the period 2020/21 to 2027/28. These assumptions could therefore appear at odds with the stated vision objectives. As such clarification is considered necessary to ensure the credibility and robustness of the WCS's proposed approach.</p> <p>The 'Spatial Vision' also makes no reference to the level or capacity of waste management infrastructure the County is seeking to deliver through the WCS. During the recent Examination in Public conducted into the West of England Partnerships Joint WCS the issue of clarity over the capacity of waste management infrastructure proposed to be provided through the WCS was</p>	<p>The term 'zero-growth' refers to waste arisings. The aspiration is derived from the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS) which the WCS is required to integrate with and help deliver. Whilst the aspiration is to achieve zero-growth by 2020 it is considered appropriate to use waste data forecasts provided by the WDA in order to calculate future capacity requirements. It is also important to note that the target of zero-growth from 2020 is assumed to be at a household level. Therefore even if the aspiration for zero-growth were to be achieved, the anticipated growth in population and the number of households would still mean an overall increase in waste arisings. Paragraph 3.23 has been amended to clarify that notwithstanding the aspiration for zero-growth by 2020, waste data forecasts provided by the WDA suggest that MSW will increase beyond 2020 in the period to 2027/8 by around 0.8%.</p> <p>See Focused Change 8.</p> <p>It is accepted that the spatial vision could more clearly emphasise the need to provide sufficient waste management capacity to allow Gloucestershire to manage its own waste. The vision has therefore been amended accordingly.</p> <p>See Focused Change 10.</p>

			<p>raised on a number of occasions. As a result included within the changes to the WCS proposed by the Councils', comprising the West of England Partnership, were a number of clarifications to the text of the Joint WCS stating that the purpose of the Joint WCS was to provide the policy framework necessary to deliver sufficient waste management infrastructure to meet the needs of the WCS plan area. The Vision Statement of the West of England Partnerships Joint WCS was also proposed to be amended to include the text " ... with sufficient capacity to deal with the amount of waste generated in the West of England". In accordance with other WCS's it is proposed that the Spatial Vision set out in paragraph 3.33 should be amended to make reference to the aim of the County being to provide the waste management infrastructure capacity necessary to manage its own wastes.</p> <p>It is considered necessary for reasons of clarity and robustness for the WCS to clarify the term 'zero-growth' as described in both the Spatial Vision (paragraph 3.33) and Strategic Objective 1 (paragraph 3.34) of the WCS. In the event that the definition of zero-growth relates to waste arisings further clarification should also be provided in the WCS. This further clarification is also considered necessary for reasons of clarity and robustness in order to explain the apparent discrepancy that would exist between the stated vision and strategic objective and the assumptions for MSW arisings growth beyond 2020 as set out in Table 31 of the WCS-A Waste Data (update 2010) report.</p>	
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			<p>It is considered necessary, for reasons of robustness and appropriateness of the overall strategy, that the Spatial Vision of the WCS (paragraph 3.33) is amended in order to reference the level and / or capacity of waste management infrastructure that the County is seeking to deliver through the WCS. Paragraph 6 of the Spatial Vision could be amended to state:</p> <p>'These strategic, local and existing waste facilities will form an integrated sustainable waste management system with sufficient capacity to deal with the amount of waste generated in Gloucestershire'.</p>	
Ben Stansfield Cory Environmental (Gloucestershire) Ltd.	60	60/12	<p>Policy WCS2 is considered unsound. The evidence base behind this policy is not considered credible or robust. Furthermore, the policy seeks to encompass four different activities namely: recycling, composting, anaerobic digestion (AD) and the bulking up and transfer of waste. These activities involve different activities and have different impacts on land and their surroundings. The proposed single policy encompassing all these separate activities is therefore also considered both complex and ineffective. In addition to which the policy is considered to be inconsistent with national policy guidance.</p> <p>Policy WCS2 also sets a buffer of 250m from sensitive land uses for both composting and AD activities. The evidence base for the setting of a 250m buffer zone is not considered robust. The footnote to the policy indicates the buffer zone has been set for reasons of bioaerosols.</p>	<p>Comments noted. The potential complexity of Core Policy WCS2 is accepted and it has been decided to split the policy into three (recycling and composting, anaerobic digestion and bulking and transfer). New policies and supporting text have been provided as appropriate.</p> <p>See Focused Change 13.</p> <p>With specific regard to the 250m buffer for bio-aerosols, the new AD and bulking and transfer policies do not include this requirement. It is however considered appropriate to continue to specify the use of a 250m buffer in relation to composting activities due to potential issues</p>

			<p>The environment Agency has adopted a recent position statement on bioaerosols dated 1 November 2010. This position statement makes reference to an area of 250m from sensitive receptors within which any composting proposals will require a site specific bioaerosol assessment to be undertaken. The position statement is clear that composting is the biological decomposition of biodegradable waste under conditions that are predominately aerobic and that this position statement would not include situations where the composting operation was undertaken inside a building. The AD process is anaerobic and undertaken inside a building as such there is considered to be no credible or robust evidence for requiring a 250m buffer from AD proposals.</p> <p>Furthermore, the guidance from the Environment Agency relating to a 250m buffer only relates to a proposal then requiring site specific assessments to be undertaken in support of a permit application and does not, unlike Policy WCS2, indicate that any such proposals may be unsuitable in principle.</p>	<p>associated with bio-aerosols.</p> <p>The EA guidance states that if a composting operation is within 250m of a sensitive receptor e.g. housing, a risk assessment will be required before a permit is granted. Permits will be granted where the maximum amount of waste handled at any one time does not exceed 500 tonnes and if it does exceed 500 tonnes, that operations are carried out in such a way so as to ensure it does not result in uncontrolled release of high levels of bio-aerosols.</p> <p>The reference to composting proposals being at least 250m from sensitive land uses in Policy WCS2 is therefore entirely appropriate. Notably this requirement is supported by the caveat 'unless it can be demonstrated that it can operate in closer proximity without adverse impact'. This approach is</p>
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			<p>Policy WCS2 also indicates that particular support will be given to proposals that meet certain specified criteria. The criteria are considered unjustified, ineffective and not totally consistent with national policy in the form of PPS10. Firstly, although the criteria includes for the location of proposals within or close to an urban area it fails to make any explicit reference to existing and / or allocated waste sites. This omission would appear to be inconsistent with PPS10 and make the policy inflexible. For example, the existing waste facility at Wing moor Farm West site is located away from urban areas but has consent for recycling, composting and transfer activities that it would appear may not necessarily be supported under this Policy.</p> <p>In addition, the criteria states that support will be given where proposals involve the re-use of previously developed land and redundant rural buildings. This would suggest that support would not be given if proposals were submitted just proposing the re-use of previously developed land, which would still be in accordance with the suitability criteria set out in PPS 10.</p> <p>In order for the WCS to be sound it is considered necessary for Policy WCS2 to be simplified and sub-divided into three separate policies. One Policy should relate to recycling and composting only. This would tie in the Council's targets for recycling</p>	<p>considered to be consistent with EA guidance.</p> <p>No Change.</p> <p>Core Policy WCS2 as set out in the publication WCS states that particular support will be given to proposals that 'involve co-location with an existing operation of a similar or complimentary nature'. This adequately addresses the issue of existing/allocated waste sites.</p> <p>No Change.</p> <p>As part of the revisions to Core Policy WCS2 the policy has been amended to refer to the re-use of previously developed land and/or redundant rural buildings.</p> <p>See Focused Change 13.</p> <p>Policy WCS2 has been split into three policies.</p> <p>See Focused Change 13.</p>
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		<p>and composting as set out in Strategic Objective 2.</p> <p>A second Policy should relate to AD with a third Policy relating to the bulking and transfer of wastes. The further sub-division of these policies reflects the different characteristics of these waste management options and impacts on land use and surrounding uses. It also enables a more focused policy on AD to be provided in line with emerging National policy.</p> <p>Reference to a 250m buffer should be deleted from any Policy this is to reflect a robust evidence base. The County's existing Local List already sets out the requirement as to when bio-aerosol assessments are required to support a planning application and as such any additional requirement imposed by composting or AD policies are considered unnecessary.</p> <p>The criteria specified as to when support will be given to proposals should be consistent with National policy such as the criteria specified at the end of Policy WCS4.</p> <p>Specific reference to existing and allocated waste sites should be included in any criteria as well as the amendment of the criteria relating to the re-use of previously developed land. This criteria should be amended to:</p> <p>" .. Involve the re-use of previously developed land and / or redundant rural buildings including farm diversification opportunities; and / or".</p>	<p>It is acknowledged that the Council's validation checklist includes reference to bio-aerosol assessments being needed for biodegradable waste proposals within 250m of sensitive receptors however the wording of the policy supports this requirement rather than duplicates it.</p> <p>No Change.</p> <p>Comment noted.</p> <p>See Focused Change 13.</p> <p>The issue of existing and allocated sites is already addressed through reference to co-location with existing operations of a similar nature. In relation to the re-use of previously developed land, it is accepted that the policy could be clarified by referring to previously developed land <u>and/or</u> redundant rural buildings.</p> <p>See Focused Change 13.</p>
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<p>Ben Stansfield</p> <p>Cory Environmental (Gloucestershire) Ltd.</p>	<p>60</p>	<p>60/13</p>	<p>Policy WCS4 is considered unsound on the basis of it being both unjustified and not being in conformity with national policy guidance. Policy WCS4 is considered unjustified on the basis of the evidence base not being robust. The two sites (A and B) at Wing moor Farm West are considered in Policy WCS4 as well as in parts of the Waste Core Strategy (WCS), such as paragraph 4.90 and within the Monitoring Framework's consideration of this Policy where reference is made to their being four strategic sites, as a single site (Site 2). However, it is considered that both the Wingmoor Farm West Landfill site (Site A) and The Park site (Site B) are suitable strategic sites in their own right.</p> <p>The evidence base for the identification of the strategic sites within the WCS is centered upon factual information on the sites, the submissions made and representations received on the sites. In all these respects the land at Wingmoor Farm West and The Park were considered separately.</p> <p>These two areas are factually different in that they have different current land uses and are in different land ownership. The two sites have also been promoted, had submissions made and consultations undertaken on the basis of these being separate sites. For example, the Site Options Consultations undertaken in 2009 during the development of the WCS consulted on three different areas around Wingmoor Farm West (Site 2) and separately consulted on The Park site (Site 10). Since both land at Wingmoor Farm West and The Park are considered suitable for inclusion in the publication version of the WCS there is no</p>	<p>It is acknowledged that the two Wingmoor Farm (West) sites are suitable strategic sites in their own right.</p> <p>Technical evidence paper WCS N: Site Selection which supported the Site Option consultation in October 2009 considered the two sites together as part of a larger cluster site. However, in the Site Option consultation itself the two sites were identified separately.</p> <p>The two sites have been included on a single inset map and site schedule because of their proximity to each other. However, their particular characteristics and differences are clearly explained both within the site schedule and the supporting text to Policy WCS4.</p> <p>Paragraphs 4.95 and 4.96 for example clearly identify the characteristics and ownership of each site as well as the type of waste each site is likely to manage. There is nothing to suggest that the two sites cannot be considered independently of one another.</p>
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		<p>credible or robust evidence as to why only at this stage these two separate areas have been combined on a single site schedule and it is listed and stated in Policy WCS4 and in the WCS that there are only four not five separate strategic sites.</p> <p>The factual differences between the Wing moor Farm West site and The Park site also creates inaccuracies in the joint Site Schedule (Appendix 5 of the WCS). Since the Site Schedule is referenced within the Policy the inaccuracies reflect a lack of robustness in the evidence base and hence an unsoundness in the Policy.</p> <p>With regard to Appendix 5 a number of factual inaccuracies in the description of the two separate Wingmoor Farm West sites within the same profile are identified. These inaccuracies further undermine the credibility and robustness of the evidence base and further illustrate the need for separate schedules to be produced for both the Wing moor Farm West site as well as The Park site.</p> <p>The inaccuracies are outlined below:</p> <p>Suitable uses - Reference to Area B possibly being too small to deliver a single site solution is inconsistent with the descriptions of other site areas within Appendix 5 that are of similar or smaller size.</p> <p>Both the Wingmoor Farm West site as well as The</p>	<p>The reference to Area B possibly being too small to deliver a single site solution reflects not only the size of the site but also the configuration and the presence of the existing Household Recycling Centre (HRC). If a one-site solution were to come forward, obviously this would be considered on its merits.</p> <p>Policy WCS4 and the strategic site allocations</p>
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			<p>Park site are also considered equally suitable to accept both MSW and C&J wastes, indeed the Wingmoor Farm West landfill currently accepts both MSW and C&I wastes.</p> <p>Site Area - Area B forms part of the consented landfill and unlike the other allocated sites has no additional development constraints within the wider area of the consented landfill. The potential for the site boundary to alter slightly from that shown in inset map 2 was discussed with the County Planning Authority in June 2010. Although at that stage it was agreed not to amend the boundary of the proposed site the possibility of reconfiguring this boundary at a later stage in the WCS process was discussed.</p> <p>Due to the lack of any site determining factors, i.e. hedges, a future reconfiguration of the site boundary of Area B as illustrated in inset map 2 is considered possible. This would only be considered suitable on the basis that the material aspects of the site would not be amended i.e. the site area and description of the environmental considerations would remain as set out in Appendix 5. It is therefore sought for the site</p>	<p>identified therein are geared primarily towards the treatment of residual municipal waste given the pressing need to find an alternative to landfill in Gloucestershire. Given the similarities between MSW and C&I waste the strategic allocations are considered suitable for managing both waste streams. Whilst the site schedule for Wingmoor Farm West (Areas A & B) states that the sites are primarily suitable for MSW with some C&I any proposal will be considered on its merits. The schedule does not for example preclude the possibility of a predominantly C&I based scheme coming forward.</p> <p>As stated previously, in reality development proposals do not always 'marry up' precisely with site boundaries identified in local development plans. It is not however considered necessary to explicitly state within the WCS that the site boundaries are 'indicative' only. If a proposal comes forward that is significantly different from the site boundary shown on Inset Map 2 this would have to be considered on its merits having regard to relevant material considerations (landscape impact etc).</p>
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		<p>schedule for Wingmoor Farm West B to recognize that the site boundary specified in inset map 2 could be reconfigured on the basis that the overall site area remained at c.4.0ha and that no material amendment to tile environmental considerations or key development criteria occurred. An example of such a reconfiguration to the site boundary was presented to the County Planning Authority during a meeting held in June 2010.</p> <p>Planning status - For reasons of robustness the references to the currently unimplemented planning permissions at The Park should relate to the land and not the applicant. The Wingmoor Farm West Site (Area B) is currently permitted for landfilling, recycling, composting, transfer activities by Cory Environmental and a Household Recycling Centre operated by May Gurney.</p> <p><u>Environmental Considerations</u></p> <p>Access/Highways - Reference should be made to the existing traffic generated from the consented activities at these sites. The assumption made that any new proposals would generate additional traffic is not considered credible.</p> <p>Archaeology - The description given does not accurately relate to both separate areas, hence the requirement for separate site schedules to be provided.</p>	<p>The planning status in the site schedule attached at Appendix 5 has been updated and amended to refer to the land not the applicant.</p> <p>See Focused Change 43.</p> <p>The site schedule makes no reference to additional traffic. It is acknowledged that the existing uses on both sites will clearly generate an existing degree of traffic. The impact of any future proposal will be assessed through a Transport Assessment (TA) as specified in the site schedule.</p> <p>The archaeological comments contained in the site schedule are of a general nature. If a detailed proposal comes forward, any potential archaeological constraints and issues would be considered in detail as part of the planning application process.</p>
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		<p>Contaminated Land - The contaminated land assessment undertaken as part of the Waste Core Strategy (Appendix C.30: Site 272 - Wingmoor Farm West) waste site assessment in October 2009 stated that the site is not classified as "Contaminated Land" under Section 2a of the Environmental Protection Act 1990. The information presented in this earlier site assessment is at odds with the contaminated assessment provided in this site schedule.</p> <p>Flood Risk/Water Protection - The reference to the water bodies on the Wingmoor Farm West site should be clarified since they relate to the consented landfill activities i.e. surface water ponds.</p> <p>Landscape/Visual Impact - Reference in this section is made to substantial adverse impacts being experienced by residents to the south west of the landfill. This is strongly contested by Cory who actively participate in local liaison meetings with local residents and councillors and have no evidence of complaints being made relating to adverse landscape impacts from the landfill.</p> <p>Furthermore, it should be noted that the landfill is consented and is still being filled. In terms of the evidence base, regard needs to be given to the consented final landform as the baseline position.</p> <p><u>Key Development Criteria</u></p> <p>Green Belt - Reference is made that any development on Area B may require demountable</p>	<p>The original comments referred to by the respondent were based on a much larger cluster of sites. Further to the site boundaries being refined through the site options consultation, Tewkesbury Borough Council were re-consulted in 2010 and the information contained in the site schedule is based on the response received.</p> <p>The site schedule simply refers to the presence of water bodies on the site. Further clarification is not considered necessary. Any proposal of more than 1 hectare would need to be supported by a Flood Risk Assessment (FRA).</p> <p>The information provided in the landscape/visual impact section of the site schedule has been provided by independent landscape consultants.</p> <p>See previous response in relation to landfill capacity. Notwithstanding the debate about the</p>
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		<p>buildings. The justification for this statement is questioned on the basis of the expected long life of the landfill.</p> <p>Ecology/HRA - The latest survey for Great Crested Newts undertaken in April I May 2009 failed to identify any Great Crested Newts on or around the Wing moor Farm West sites. Following four survey visits the consultants SLR confirmed with the County ecologist that no further visits were required to inform a population assessment. On this basis it is no longer considered that Great Crested Newts are located in the vicinity of either of the Wing moor Farm West site or The Park site.</p> <p>Landscape/Visual Impact - Reference in this section is made to incongruous landforms associated with the landfill. As stated above, it should be noted that the landfill including its final form has been consented by the County Council.</p> <p>Policy WCS4 is also considered inconsistent with national policy. This is in relation to the criteria set out at the end of this policy relating to non-strategic residual waste facilities. The first of these criteria restricts the suitability of industrial or employment land to land permitted or allocated for B2 use. This is considered inconsistent with national policy set out in PPS10 and its companion</p>	<p>remaining life of the landfill, the fact is that the site is located within the Green Belt and that any additional waste activity on the site should be tied to the use of the landfill. The use of demountable buildings will therefore be a matter for the planning application stage should detailed proposals come forward.</p> <p>Whilst Great Crested Newts (GCN) have not recently been recorded at Wingmoor Farm (West) the view of the County Ecologist has been sought and in his opinion a re-survey of the site is due in 2012. It is therefore considered appropriate to retain reference to GCN in the site schedule. In any case it is a historic fact that GCN have been recorded on the site.</p> <p>The information provided in the landscape/visual impact section of the site schedule has been provided by independent landscape consultants. It is acknowledged that the County Council has permitted the landfill including its final form however no change to the site schedule is considered necessary.</p> <p>It is acknowledged that the criteria in Core Policy WCS4 could usefully be amended to refer to permitted/allocated employment land.</p> <p>See Focused Change 21.</p>
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		<p>guide which makes reference to 'industrial land' and to '82/88 uses'. It is considered that restricting potential suitable sites to B2 only uses would be contrary to national policy.</p> <p>To assist clarity it is also proposed that reference within the third bullet point of the criteria relating to non-strategic waste management facilities, as set out in Policy WCS4, is expanded to include reference to existing waste management sites as well as facilities.</p> <p>In order to make the WCS sound it is considered necessary for Policy WCS4 and associated text, such as paragraph 4.90, to be amended to make explicit separate reference to The Park and the Wing moor Farm West landfill site. The total number of sites allocated for strategic residual waste facilities should be amended to five from four. This change is considered necessary to reflect the factual differences between these sites as well as to accurately reflect the evidence base in terms of submissions made and consultation responses received.</p> <p>The Wingmoor Farm West Strategic Site Schedule at Appendix 5 referenced in Policy WCS4 also needs to be altered with separate versions provided for both The Park and Wingmoor Farm West landfill site. The following changes to the existing text contained within the site schedule are proposed:</p> <p>Suitable uses - For both profiles the text should read 'Suitable for managing MSW and/or C&I</p>	<p>The suggested amendment is considered superfluous.</p> <p>No Change.</p> <p>See response above. The factual differences between the two sites are recognised in paragraphs 4.95 and 4.96 as well as the site schedule. Whilst the two sites are considered under the same schedule there is nothing to suggest that development cannot come forward on each site independently of the other. For this reason no amendment to Policy WCS4 is considered necessary.</p> <p>See previous response above.</p> <p>See previous response above.</p>
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			<p>wastes'.</p> <p>Reference to Area A being too small for a single site solution to be deleted or similar text to be added to other relevant site profiles.</p> <p>Site Area - The Wing moor Farm West landfill site profile should make reference that the site boundary shown on inset map is illustrative and may be subject to reconfiguration depending on any specific development proposals.</p> <p>Any amendment to the site boundary as shown will be considered non material in terms of both the site area and key development criteria. The Inset Map for the Wingmoor Farm West landfill site profile should also make reference to the site boundary being indicative.</p> <p>Planning status - Within The Park profile reference to the applicants of the permissions still to be implemented is to be deleted. The text for the Wingmoor Farm West landfill site profile will be amended to state that this site is currently permitted for landfilling, recycling, composting, transfer activities by Cory Environmental and a Household Recycling Centre operated by May Gurney.</p> <p><u>Environmental Considerations</u></p> <p>Access/Highways - In both new site profiles reference is to be made to the existing traffic generated from consented activities and that this will form the baseline position for any subsequent</p>	<p>See previous response above.</p> <p>See previous response above.</p> <p>See previous response above.</p> <p>The planning status has been updated.</p> <p>See Focused Change 43.</p> <p>See previous response above.</p>
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			<p>development proposals.</p> <p>Archaeology - The Park site profile to make reference to the site being part of a former WWII airfield. The Wing moor Farm West landfill site profile to make reference to the landfilling undertaken and consented at this site.</p> <p>Contaminated Land - The contaminated land assessment for both sites to be revisited and confirmed by the County Council I Tewkesbury Borough Council.</p> <p>Flood Risk/Water Protection - The reference to the water bodies on the Wingmoor Farm West landfill site profile should be clarified as being related to the consented landfill activities i.e. surface water ponds.</p> <p>Landscape/Visual Impact - Reference to substantial adverse impacts being experienced by residents to the south west of the landfill is to be deleted.</p> <p>Reference to the visual impact of the landfill should recognize the consented final landform and confirm that this will form the baseline for any subsequent assessment.</p> <p><u>Key Development Criteria</u></p> <p>Green Belt - The possible need for demountable buildings as part of any development on the Wing moor Farm West landfill site should be deleted having regard to the expected long life of the landfill.</p>	<p>See previous response above.</p> <p>See previous response above.</p> <p>See previous response above.</p> <p>See previous response above.</p> <p>See previous response above.</p> <p>See previous response above.</p>
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			<p>Ecology/HRA - The reference to Great Crested Newts should be deleted from both site profiles having regard to the latest survey for this species that found no evidence in the vicinity of these sites.</p> <p>Landscape/Visual Impact - Reference to incongruous landforms associated with the landfill should be deleted.</p> <p>The following changes should also be made in relation to the criteria set out at the end of Policy WCS4 relating to non-strategic residual waste facilities.</p> <p>The first bullet point of these criteria should be amended to "The proposal is located on a permitted or allocated industrial estate or on employment land; and/or".</p> <p>The third bullet point of these criteria should be amended to "The proposal involves the development of an existing waste management facility site or mineral site; and".</p>	<p>See previous response above.</p> <p>See previous response above.</p> <p>Agree in part.</p> <p>See Focused Change 21.</p> <p>See previous response above.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Ben Stansfield Cory Environmental (Gloucestershire) Ltd.	60	60/14	<p>Support is given to the reference within Core Policy WCS7 to the regard that the Council will have to the potential benefits of co-locating complimentary facilities together.</p> <p>Core Policy WCS7 relates to all 'waste related development'. Currently any proposals on existing waste sites are considered as waste related development. Since a number of consented waste sites have had some permitted development restrictions imposed through conditions the scope of development that can / could be considered waste related development is extensive and will include minor works.</p> <p>In the penultimate paragraph Policy WCS7 appears to prescribe a number of assessments that will be required to be considered by the decision makers. It is not clear at what stage in the planning process the need for / content of these assessments would be considered. However, in the event that the Policy prescribes the need for all waste related development applications to be accompanied by the assessments listed this would be considered to make the policy unsound.</p> <p>Such a requirement would not be considered either to be founded on credible evidence or be flexible. As indicated above the scope and scale of waste related developments is wide and to prescribe the need for assessments for applications without consideration of the merits of the</p>	<p>Support for Core Policy WCS7 noted.</p> <p>In relation to the scale of development and the consideration that will be required, it is acknowledged that Policy WCS7 could usefully make a distinction between proposals of different scales.</p> <p>The policy has therefore been amended to include reference to the scale and nature of the proposal being taken into account.</p> <p>See Focused Change 28.</p> <p>The role of the Council's validation checklist is recognised. Part 2 of the checklist: the Local List sets out the information that may be required in support of a planning application for waste development. The precise nature of the information to be supplied will be agreed through pre-application discussions between the applicant and the Council. Policy WCS7 supports rather than conflicts with the requirements of the local list and therefore no amendment is considered necessary.</p> <p>Notwithstanding this, the policy has been amended to include reference to the scale and nature of the proposal being taken into account.</p> <p>See Focused Change 28.</p>

			<p>application would be contrary to one of the key tenants of planning.</p> <p>The adopted Local List requirements is considered appropriate for determining the scope of supporting information required to accompany a planning application. The specification of required assessments as well as the inclusion of additional assessments such as health assessments within Policy WCS7 is considered unsound.</p> <p>This is because such requirements go above and beyond the set information requirements of the adopted list and there exists no credible evidence base behind such a requirement. The scope of Core Policy WCS7 needs to be defined. As currently worded this policy relates to all waste proposals. Some distinction between minor and major waste proposals should be provided to avoid the implementation of this Policy being considered inflexible.</p> <p>The final two paragraphs of Policy WCS7 should be deleted with the requirements and scope of supporting information to accompany planning applications being informed by the Council's Local List having regard to the merits of each application.</p>	
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Ben Stansfield Cory Environmental (Gloucestershire) Ltd.	60	60/15	Cory support the principle of Policy WCS8 that seeks to safeguard sites for waste management. For clarity it would be suggested that the last sentence of the policy be amended to state "The Waste Planning Authority (WPA) will oppose proposals for development that would prejudice the use of existing or allocated sites for waste management".	Support for Core Policy WCS8 noted. The suggested change is however considered to be unnecessary because the first paragraph of the policy already makes it clear that the policy applies to both 'existing and allocated sites for waste management use'. No Change.
Ben Stansfield Cory Environmental (Gloucestershire) Ltd.	60	60/16	Core Policy WCS9 is considered unsound on the basis that the policy is not consistent with national policy guidance. In the second paragraph of this policy reference is only made to sewage treatment works as being suitable to come forward in flood zones 1, 2 and 3a. This statement is not consistent with the advice in PPS25. Table D2 of PPS25 lists the types of development suitable in the different flood risk vulnerability classifications. With respect to the 'less vulnerable' category the forms of development considered suitable include 'waste treatment (except landfill and hazardous waste facilities)' i.e. all waste treatment facilities. Specific reference to only sewage treatment works as being suitable to come forward in flood zones 1, 2 and 3a therefore requires amendment in order to be consistent with national policy. The third from last paragraph of Policy WCS9 is also considered to be inconsistent with national policy. This paragraph suggests that only 'water compatible' proposals will be permitted in flood zone 3b. However, in Table D3 of PPS25 it clearly	Comments noted. It is accepted that it is not just sewage treatment works which are classified as 'less vulnerable'. Policy WCS9 has therefore been amended accordingly. It is also acknowledged that reference should be made to 'essential infrastructure' within the policy. See Focused Change 30.

			<p>indicates that 'Essential Infrastructure' can also be considered suitable within Flood Zone 3b.</p> <p>Infrastructure such as landfill leachate treatment works and landfill gas engines that are essential infrastructure for a landfill and must remain operational during times of flood should be considered within this category. As a result specific reference to essential infrastructure should also be included within Policy WCS9 in order to maintain consistency with national policy.</p> <p>In order for Policy WCS9 to be considered sound it needs to be consistent with PPS25.</p> <p>In consequence, the last sentence of the second paragraph should be amended to:</p> <p>" Proposals relating to development classified as 'less vulnerable' may come forward in Flood Zones 1, 2 and 3a although the sequential approach will still apply".</p> <p>Furthermore, the third paragraph from the end of Policy WCS9 should be amended to: "Proposals for waste related development within Flood Zone 3b (the functional floodplain) will not be permitted other than for 'water compatible' proposals such as sewage transmission infrastructure and pumping stations or, subject to the exceptions test, 'essential infrastructure' such as leachate treatment works or landfill gas engines'.</p>	
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Robert Purton David Lock Associates on behalf of Lichen Renewal	1852	1852/1	<p>The document over emphasises the role of composting in dealing with green waste, which should not be a long term strategic goal. Composting sequesters compost for less than 10 years. Whereas Gasification and Pyrolysis whilst able to produce renewable energy from waste it also sequesters the carbon, in the form of Biochar for hundreds of years. The Document is not sound as it fails to consider other alternatives available and places too much emphasis on composting as the approach to dealing with green waste.</p> <p>The document should reduce the emphasis on composting as there are more efficient and effective approaches to dealing with green waste.</p> <p>Gasification and pyrolysis should be prioritised above composting as they have greater environmental benefits. The document should specify a target for the percentage of green waste to be dealt with by gasification and pyrolysis, by</p>	<p>Comments noted. In line with national policy and the waste hierarchy, the publication WCS highlights the role of recycling and composting in helping to reduce residual waste.</p> <p>The strategy also highlights 'other recovery' techniques including gasification and pyrolysis. AD is highlighted as a potential alternative to composting in dealing with organic waste with the added benefit of renewable energy generation.</p> <p>Importantly, the strategic site allocations that have been identified are capable of accommodating a range of different waste recovery technologies. Paragraph 4.91 has been amended to clarify the fact that the strategic site allocations are capable of accommodating a range of different waste recovery processes.</p> <p>See Focused Change 20.</p> <p>It is not accepted that the document should reduce its emphasis on composting as this would be contrary to established national policy and contrary to the Council's objective of achieving at least 60% recycling and composting by 2020.</p> <p>Gasification and pyrolysis are still relatively unproven technologies on a commercial-scale and it would be inappropriate and inflexible if the WCS were to specify how much green waste should be managed through such processes. If any such</p>

			doing so it will have considered and employed alternative approaches and will be sound.	proposals comes forward these will be considered against relevant policies of the WCS and any other material considerations. No Change.
Robert Purton David Lock Associates on behalf of Lichen Renewal	1852	1852/2	<p>The document correctly identifies the problems associated with the pollutant effect of landfill sites in paragraph 4.121, however it fails to fully consider how these issues can be addressed and how to minimise the climate change implications of landfill, both operational and historic. In not considering the options available to address these issues and how the climate change implications can be minimised the document is unsound and does not explore every opportunity to meet national policy targets.</p> <p>The document needs to provide a greater emphasis in looking at the climate change implications of former landfill sites within the county. Such sites can continue to produce landfill gas for many decades following the closure of those sites. They also represent a potential liability in the form of landfill gas migration and pollution of surface waters and groundwater.</p> <p>The document should consider the use of such sites for renewable energy as this can offset the cost of environmental monitoring and control measures through the introduction of renewable energy in the form of gasification of green waste, photovoltaics (solar) and the utilisation of landfill gas.</p>	<p>The publication WCS clearly sets out the current position in relation to landfill and the proposed way forward. The thrust of the entire strategy is on diverting waste from landfill in order to address climate change in line with national and international policy.</p> <p>Paragraph 4.121 of the publication WCS highlights the climate change implications of landfill including the potential capture of methane which may be used as a source of energy.</p> <p>Any proposals for gasification would be dealt with under Core Policy WCS4. Photovoltaic (solar) renewable energy proposals fall outside the scope of the WCS and would be considered under the District Local Development Framework. The utilisation of landfill gas is already highlighted in paragraph 4.121 of the WCS.</p>

			<p>The latter often becoming economical because of the shared infrastructure provision of the other two elements e.g. shared cost of a connection to the grid. The document must consider the alternative options available to make it sound. Thoroughly exploring all options for the restoration and remediation of historic landfill is essential to help the Council meet National Policy targets.</p>	No Change.
<p>Robert Purton</p> <p>David Lock Associates on behalf of Lichen Renewal</p>	1852	1852/3	<p>Policy WCS4 is unsound as it limits the opportunities available for waste recovery operations. In failing to consider the opportunities presented by former landfill sites for waste recovery, the document is unsound in its ability to consider all the alternatives. The restoration and remediation scheme proposed by Lichen Renewal has multiple environmental benefits and currently WCS4 does not account for the high value activities that could take place at former landfill sites across the county. In restricting such opportunities within the Waste Core Strategy it is clear that the Council could go a lot further to helping meet the national policy targets.</p> <p>The document should provide greater flexibility to allow the recovery of green waste on former landfills. The limitations set out on page 57 of the Waste Core Strategy should be expanded to allow higher value activities on former landfills. A higher value activity that can serve to off set on-going environmental costs to the authority. For example the Hempstead and Sudmeadow sites to the west of Gloucester, or any other former landfill that accepted biodegradable waste and in need of, or enhancement, of remediation and restoration should be included.</p>	<p>Policy WCS4 does not limit the opportunities for waste recovery rather it seeks to encourage such provision.</p> <p>Four strategic sites have been allocated for waste recovery. Two of these relate to existing landfill operations.</p> <p>If a speculative waste recovery proposal were to come forward at a former landfill within the county, this would be considered having regard to Policy WCS4 and any other relevant policies and material considerations.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Mary Newton Forest of Dean Friends of the Earth	1743	1743/1	<p>The vision for sustainable waste management in Gloucestershire provides the direction for the WCS. It is therefore fundamental to the balance of content within the WCS. The vision in the Preferred Options Stage January 2008 has a 70% recycling and composting target, provide everyone with localised access to recycling facilities, thus reducing the environmental impacts of transport, supports markets for recyclable materials and implicit in the vision is active community involvement, a strategic objective being “to encourage “residents” to view any waste they generate as a resource for which they must take communal responsibility.”</p> <p>With the advent of the residual waste PFI project and the sites public consultation development of the waste strategy has focused onto the issue of a strategic waste facility as being a fundamental “need” whereas many supportive of local community facilities do not see this as a “need” that must be met and regard it as detracting from the development of a zero waste society.</p> <p>The year on year percentage of waste is not rising as stated is falling in Gloucestershire and across England whilst recycling rates are increasing. Active community action in Powys by the Cwm Harry Land Trust has achieved a 67% recycling rate in just six months. For the last 5 years they have also established a separate food waste collection system composting for food production. Kerbside separation of food is a key element to meet the EU</p>	<p>Comments noted. Dealing with each of the main issues in turn.</p> <p>The WCS seeks to ensure that at least 60% of household waste is recycled or composted by 2020 with an aspiration for 70%. This target is derived from the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS). The national target set out in the Waste Strategy for England (2007) is 50% by 2020. The revised EU Waste Framework Directive also has a target of 50% by 2020. The Council's target cannot therefore be described as unambitious. Whilst it is the case that 60% recycling/composting has already been exceeded in Cotswold District and at the Household Recycling Centres (HRCs) it is not correct to extrapolate this to mean that a much higher rate than 60% is achievable across Gloucestershire. The HRCs for example have consistently achieved a higher rate of recycling because it is easier to engage with the public at these sites. This is very different to collecting waste door to door where opportunities to engage are much more limited. Based on information set out in the report 'The Composition of Kerbside Collected Household Waste in Gloucestershire' (October 2008) it is estimated that about 77% of the waste stream is recyclable. To achieve a countywide recycling rate of 60% would mean capturing around 75% of the available recyclable waste at the kerbside and to achieve the 70% target would mean capturing 92% of the available recyclables. This is much higher</p>

		<p>Waste Directive and to combat climate change. www.cwmharrylandtrust.org.uk</p> <p>The study 'Benefits of Third Sector Involvement in Waste Management' (DEFRA Waste and Resources R & D Project WR050) contains a series of case studies of the Voluntary and Community Sector (here called TSO) working in the field of waste, including waste collection and uses Social Return on Investment (SROI) methodology as a systematic method for uncovering and monetising the extra value to society of VCS delivering waste management services and actively involving the local community. The Government has expressed commitment to the strategy of Zero Waste and its desire to involve local communities through the Localism Bill and in the review of the Government's Waste strategy.</p> <p>Today's world is a rapidly changing world of fast expanding populations, of businesses and technologies changing rapidly and the demand from new industrialising nations forcing up the cost of raw materials, making waste a valuable resource. The field of waste is constantly changing, what may be regarded as useless rubbish today is likely to be a vital resource for a new business tomorrow. This is a Zero Waste Society in which flexibility, short term contracts and the involvement of local communities are key factors</p> <p>Britain is good at innovation and developing new technologies, this is an expanding market for new businesses and new jobs but dependent on high quality kerbside separated recyclates. These are</p>	<p>than is currently being achieved (about 50% on average). It is also the case that some communities achieve higher rates than others. For example it is anticipated that for 2010/11, Tewkesbury Borough Council will achieve a recycling and composting rate of 54% and Gloucester City 46% despite having broadly similar systems to Cotswold District which is achieving over 60%. For these reasons the WCS target of at least 60% recycling/composting by 2020 is considered to be both appropriate and challenging. No change to the recycling target is therefore proposed, however the text of the WCS has been amended to clarify that the aspiration for 70% recycling/composting is to be achieved by the year 2030. This has arisen through the Council's review of its residual waste project.</p> <p>See Focused Change 11.</p> <p>With specific regard to the example of the Cwm Harry Land Trust, notably this has not reported on its findings yet so the assertions being made that it is a very cost-effective and efficient approach have not been demonstrated.</p> <p>In relation to the provision of small-scale, dispersed local waste management facilities, these comments are noted and have been raised by a number of other respondents both in response to the site options consultation in 2009 and in response to the publication draft WCS.</p> <p>Taking such views into account, Core Policy WCS4 is worded so as to allow for small-scale facilities to come forward in appropriate locations through a</p>
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		<p>still being imported from Europe because of shortages in Britain as co-mingled collections polluted by cross contamination are difficult or impossible to use. www.realrecycling.org.uk</p> <p>With the demise of Government PFI funding the County Council now has an opportunity to reassess and revitalise the community approach by actively involving local communities in increasing recycling targets and any remaining waste treated in small, local facilities preferably MBT and AD, which do not produce toxic fly ash. Local facilities dispersed around the county reduce the environmental and climate change effects of transportation and are likely to include supporting infrastructure such as waste transfer and bulking. Because of their small scale, the capital cost is likely to be met by the residual waste developer. This sustainable approach is affordable, low risk and financially manageable on short term contracts.</p> <p>A strategic facility, especially an incinerator, because of capital build costs would require a long term contract and a continual supply of waste setting an artificial ceiling on how much local waste could be recycled and thus preclude the development of small local facilities. It would be inflexible and dominate our waste market until 2040 with no competition, no choice and no chance of change. In the Joint Municipal Waste Management Strategy, Volume 2 “High Level Action Plan” 4.6, it states that “The affordability of the selected waste treatment technology is a huge risk. These are large scale, specialist and capital intensive facilities”. It would be a high risk, long</p>	<p>criteria-based approach.</p> <p>The four strategic allocations have been allocated to provide certainty and to ensure that the majority of Gloucestershire's waste, which is generated in the central area of the county, is able to be managed close to source. They do not however preclude the possibility of small-scale proposals coming forward in other, appropriate locations. Therefore Policy WCS4 provides a balanced approach to making provision in Gloucestershire. Matters concerning the PFI funding have been addressed through the WDA strategic review from which the County Council has made a decision to continue with the MSW residual waste contract process.</p> <p>With regard to stakeholder engagement it is not true that there has been 'no public consultation since preferred options in 2008'. In fact a thorough site-options consultation was carried out in 2009 providing the opportunity for people to comment on the proposed overall strategy as well as the individual merits of 13 potential sites. The Regulation 25 public participation statement published alongside the WCS sets out who has been engaged in the preparation of the WCS, the main issues raised and how these have been taken into account.</p> <p>Notably, in response to the consultation the majority of respondents supported the proposed approach of focusing waste facilities into the central area of the county defined as Zone C.</p>
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		<p>term contractual expense for the local taxpayer who would be paying at least £646 million on a long term contract of 25 years. (EU PFI contract costs)</p> <p>The WCS has not been subject to “extensive and continuous engagement with stakeholders. This has helped to ensure that the policies and proposals are fully justified, effective and consistent with National Policy.” (1.9)</p> <p>Since the Preferred Options Stage January 2008 there has been no public consultation on waste strategy or incineration. Because there had been no public consultation on whether it was acceptable for the strategic facility to be a large scale incinerator, Gloucestershire Friends of the Earth Network organised a petition subsequently signed by 5,154 people. It requested Gloucestershire County Council (GCC) not to accept a large scale incinerator as the solution for dealing with residual waste in Gloucestershire, because tackling climate change is a priority and better technologies are available, it produces toxic fly ash, it reduces the incentive to reduce, reuse, recycle and compost thus wasting resources, it could be a high risk, long term, contractual expense for the local taxpayer and if needed, residual waste should be treated under short term contracts by small local facilities. In the EU Landfill Directive Member States are to reduce biodegradable municipal waste (BMW) to landfill to minimise negative effects on the environment, including Climate Change and are required by 2020 to reduce BMW to 35% of 1995 levels. All the District Councils in</p>	<p>With regard to the social importance of waste management this is considered to be already adequately addressed within the spatial vision.</p> <p>No Change.</p>
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			<p>goal of 80% at least 70% of household waste is recycled and composted by 2020.</p> <p>During the period when recycling rates are increasing towards "zero waste" the residual' waste that cannot be reduced, re-used, recycled or composted will be treated in short term contract 'Local' facilities (<50,000 tonnes/year) which do not produce toxic fly ash. Local facilities are dispersed around the county reducing the environmental effects of transportation and are likely to include supporting infrastructure such as waste transfer and bulking.</p> <p>These local community and existing waste facilities will form an integrated sustainable waste management system for Gloucestershire. Gloucestershire's communities, key landscape/environmental assets and land liable to current and future potential flood risk, are safeguarded from the adverse impacts of waste management activities.</p> <p>The continuing role of landfill is recognised but increasingly seen as temporary storage for stabilised and inert materials which are studied from the viewpoint of redesigning manufactured goods for complete recycling.</p>	
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Mary Newton Forest of Dean Friends of the Earth	1743	1743/2	<p>The WCS has not been subject to 'extensive and continuous engagement with stakeholders'. Since the Preferred Options Stage January 2008 there has been no public consultation on updating waste strategy or incineration. Because there had been no public consultation on whether it was acceptable for the strategic facility to be a large scale incinerator, Gloucestershire Friends of the Earth Network organised a petition subsequently signed by 5,154 people. It requested Gloucestershire County Council (GCC) not to accept a large scale incinerator as the solution for dealing with residual waste in Gloucestershire, because tackling climate change is a priority and better technologies are available, it produces toxic fly ash, it reduces the incentive to reduce, reuse, recycle and compost thus wasting resources, it could be a high risk, long term, contractual expense for the local taxpayer and if needed, residual waste should be treated under short term contracts by small local facilities.</p> <p>As far as it can be ascertained there has been no overt and obvious public consultation conducted by the GCC on the provision of strategic facilities to deal with 142,000 to 193,000tpa of Commercial and Industrial waste to be included in the Waste Core Strategy. The public consultation document Preferred Options Stage makes no obvious reference to this provision. To bring in such a significant change at this Submission Stage which deals with the soundness of the WCS would appear</p>	<p>It is not true that there has been no public consultation since preferred options in 2008. The Regulation 25 public participation statement published alongside the WCS sets out who has been engaged in the preparation of the WCS, the main issues raised and how these have been taken into account.</p> <p>A thorough site-options consultation was carried out in 2009 providing the opportunity for people to comment on the proposed overall locational strategy as well as the individual merits of 13 potential sites.</p> <p>The 2009 site options consultation made it clear that the potential sites identified could be used for both municipal waste and potentially a proportion of commercial and industrial waste.</p> <p>The strategic site allocations identified in the publication WCS do not therefore introduce a significant change.</p> <p>There is currently very little permitted waste recovery capacity in Gloucestershire for municipal and commercial waste and the strategic site allocations will help to ensure that new facilities come forward to meet the capacity gap.</p> <p>No Change.</p>

			<p>to be in conflict with the vision, aims and key principles of the Statement of Community Involvement. In the statement of Community Involvement it states</p> <p>Vision for Community Involvement 3.1 Our vision for engaging with the community is: Enabling people to make a difference by providing them with an opportunity to actively participate in the development of options and proposals for minerals and waste planning.</p> <p>Aims 3.2 Our aims for community involvement are: To improve decision making through community involvement; To build consensus in minerals and waste planning; To allow those who wish to participate to do so, and for their views to be considered prior to determining policy; To further the Council's values of openness, fairness and diversity, sustainability and social inclusion; To make Gloucestershire a better place in which to live, learn and work.</p> <p>Key Principles 3.3 Following on from this vision, the key principles for effective involvement, as identified by community respondents/representatives, include: 'Appropriate' e.g. using appropriate approaches and communicating information at an appropriate level; 'Relevant' e.g. providing information that is relevant to the audience and highlights personal</p>	
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			<p>relevance; 'Genuine' e.g. only involve people when they can influence the outcome; 'Open' e.g. provide feedback to demonstrate that being involved is worthwhile; 'Proactive' e.g. where possible and appropriate involve people more actively/via more innovative methods; 'Efficient' e.g. use and build on existing mechanisms and networks; and 'Timely' e.g. gaining early involvement in plan preparation, choosing appropriate times for activities and allowing appropriate timeframes for responses; 'Clarity' - clearly articulated opportunities for continuous involvement.</p> <p>Delete 1.9</p>	
<p>Mary Newton</p> <p>Forest of Dean Friends of the Earth</p>	1743	1743/3	<p>As far as it can be ascertained there has been no overt and obvious public consultation conducted by the GCC on the provision of strategic facilities to deal with 142,000 to 193,000tpa of Commercial and Industrial (C &I) waste to be included in the Waste Core Strategy. The public consultation document Preferred Options Stage makes no obvious reference to this provision. To bring in such a significant change at this Submission Stage which deals with the soundness of the WCS would appear to be in conflict with the vision, aims and key principles of the Statement of Community Involvement. In the statement of Community Involvement it states</p> <p>Vision for Community Involvement</p>	<p>The 2009 site options consultation made it clear that the potential sites identified could be used for both municipal waste and potentially a proportion of commercial and industrial waste. The strategic site allocations identified in the publication WCS do not therefore introduce a significant change.</p> <p>No Change.</p>

			<p>3.1 Our vision for engaging with the community is: Enabling people to make a difference by providing them with an opportunity to actively participate in the development of options and proposals for minerals and waste planning.</p> <p>Aims</p> <p>3.2 Our aims for community involvement are: To improve decision making through community involvement; To build consensus in minerals and waste planning; To allow those who wish to participate to do so, and for their views to be considered prior to determining policy; To further the Council's values of openness, fairness and diversity, sustainability and social inclusion; To make Gloucestershire a better place in which to live, learn and work.</p> <p>Key Principles</p> <p>3.3 Following on from this vision, the key principles for effective involvement, as identified by community respondents/representatives, include: 'Appropriate' e.g. using appropriate approaches and communicating information at an appropriate level; 'Relevant' e.g. providing information that is relevant to the audience and highlights personal relevance; 'Genuine' e.g. only involve people when they can influence the outcome;</p>	
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		<p>'Open' e.g. provide feedback to demonstrate that being involved is worthwhile;</p> <p>'Proactive' e.g. where possible and appropriate involve people more actively/via more innovative methods;</p> <p>'Efficient' e.g. use and build on existing mechanisms and networks; and</p> <p>'Timely' e.g. gaining early involvement in plan preparation, choosing appropriate times for activities and allowing appropriate timeframes for responses;</p> <p>'Clarity' - clearly articulated opportunities for continuous involvement.</p> <p>In this Submission Stage Document it states 2.32 In simple terms, responsibility for disposing of MSW rests with Gloucestershire County Council which is designated as the Waste Disposal Authority (WDA), whilst responsibility or disposing of other wastes lies with the private sector. Both have access to a range of waste management facilities across the county. Private companies will also use facilities outside Gloucestershire.</p> <p>To have in the Waste Core Strategy the provision for strategic facilities for C & I waste would seem to conflict with 2.23. The tonnage provision itself is questionable in the light of a reported 29% drop in C&I waste. Industry and retail have realised the economic efficiency value in reducing, reusing, recycling and composting waste. A good example is 2 sites belonging to Caterpillar that have achieved zero waste to landfill in 2010. All the major supermarkets are committed to reducing and recycling waste.</p>	<p>It is acknowledged that trends in the amount of C&I waste managed have been variable. Because of this it is not possible to forecast future trends with any degree of certainty and hence a 0% growth assumption has been assumed. This approach is considered reasonable and appropriate.</p>
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			<p>Please include in this section as read all the comments made on 3.33 vision on the advantages of local facilities in contrast to strategic facilities.</p> <p>The issue of facilities for strategic sites is a significant issue that should go out to public consultation.</p> <p>Wingmoor Farm East to be deleted because this site no longer has planning permission and should be restored as per the previous planning conditions.</p> <p>Suggestion:</p> <p>Core Policy WCS4 Other Recovery (including energy recovery)</p> <p>In order to divert waste from landfill, in particular biodegradable waste, in the period to 2027, the WPA will make provision. Delete all in black italics for the following residual waste recovery capacity:</p> <ul style="list-style-type: none"> - MSW 150,000 tonnes/year1 - C&I 143,000 193,000 tonnes/year2 <p>All 'strategic' residual waste recovery facilities (>50,000 tonnes/year) will be located in the central area of Gloucestershire, close to the main urban areas along the M5 corridor including Gloucester and Cheltenham. This area is designated 'Zone C' and is shown on the Key Diagram. Within 'Zone C'</p> <p>The following sites are allocated for residual waste recovery:</p>	<p>In relation to the issue of strategic facilities, as stated in the responses given previously, Core Policy WCS4, whilst allocating four strategic sites for certainty and deliverability, allows for smaller-scale proposals to come forward in appropriate locations subject to compliance with relevant criteria.</p> <p>The publication WCS clearly explains that Wingmoor Farm (East) is the subject of a current planning application which is yet to be determined. The future development of the site in relation to the waste handled, any particular conditions and subsequent monitoring will be addressed through the planning application process.</p> <p>The wording at paragraph 4.129 has however been amended however to clarify the implications of planning permission not being granted.</p> <p>See Focused Change 26.</p>
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		<p>- The proposal involves the development of an existing waste management facility or mineral site; and</p> <p>- The facility would meet the relevant policies and criteria of the development plan.</p> <p>Amended Core Policy WCS4 - Other Recovery (including energy recovery)</p> <p>In order to divert waste from landfill, in particular biodegradable waste, in the period to 2027, the WPA will make provision of the following sites are allocated for local residual waste recovery:</p> <p>2. Wingmoor Farm West Sites A & B (primarily MSW, but with C&I potential)</p> <p>3. Javelin Park (primarily MSW, but with C&I potential)</p> <p>4. Land at Moreton Valence (primarily C&I, but with MSW potential)</p> <p>Local residual waste recovery facilities (<50,000 tonnes/year) will be permitted where the facility forms part of a sustainable waste management system and would be subject to the following criteria:</p> <p>- The proposal is located on an industrial estate or employment land permitted or allocated for B2 general industrial use; and/or</p> <p>- The proposal is located on previously developed land; and/or</p> <p>- The proposal involves the development of an existing waste management facility or mineral site;</p>	
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			<p>and</p> <ul style="list-style-type: none"> - The facility would meet the relevant policies and criteria of the development plan. <p>The issue of facilities for strategic sites is a significant issue that should go out to public consultation.</p>	Adequate public consultation on the strategic sites has already been carried out.
<p>Mary Newton</p> <p>Forest of Dean Friends of the Earth</p>	1743	1743/4	<p>"Importantly the Council is 'technology neutral' and therefore has no preference for one technology/process over another."</p> <p>Today's world is a rapidly changing world of fast expanding populations, of businesses and technologies changing rapidly and the demand from new industrialising nations forcing up the cost of raw materials, making waste a valuable resource. The field of waste is constantly changing, what may be regarded as useless rubbish today is likely to be a vital resource for a new business tomorrow.</p> <p>This is a Zero Waste Society in which flexibility, short term contracts and the involvement of local communities are key factors. Technologies and their size need to be assessed in this light. There is no point spending millions on a large scale facility which could be out of date before it comes into use.</p> <p>At the present time the most flexible residual waste technology is a small MBT plant (technically to maximise recycling rates BMT) with an Anaerobic Digester. By being "small" it has an inherent flexibility. From planning permission it</p>	<p>It is acknowledged that waste management is a rapidly evolving field. Importantly the publication WCS is technology neutral. The strategy identifies a number of different waste recovery techniques including MBT and AD explaining in broad terms the processes involved with each.</p> <p>The four strategic site allocations are all capable of accommodating a range of different waste recovery technologies. It would be contrary to national policy if the strategy were to be overly-prescriptive about what should be built and where.</p> <p>If a proposal for MBT with AD were to come forward either on a small or a large-scale, this would be considered against Core Policy WCS4 and other relevant plan policies and material considerations.</p> <p>No Change.</p>

			<p>takes only 9 months to install an MBT plant and at a relatively low cost, in comparison to a large scale facility like an incinerator, capital costs are often met by the operator. New Earth Solutions met the cost of building a 5,000 tpa MBT plant in Poole on a 5 year contract and later further extended it to 20,000 tpa. www.newearthsolutions.co.uk</p> <p>MBT has a flexible hall system to meet variable requirements in tonnage as need arises year by year, all within a short term 5 year contract. The new MBT's (technically BMT) can reduce residual waste tonnage by 80% by further removal of dry recyclables and composting to ABPR standard for mixed residual waste to brownfield landscaping projects whilst stabilising residue for landfill which does not attract LATS payments. They also have an inbuilt variability year by year and could easily expand/contract as needed. From source segregated biodegradable waste e.g. kitchen waste, AD composts to PAS 110 standard for agricultural use and produces biogas for CHP or fuel cell h2 vehicles or gas for National grid.</p> <p>In assessing this new approach heavy weighting should be given to it's flexibility and value in stimulating the local economy with the creation of new businesses and ensuring that financially, local communities directly benefit from their efforts to reduce, reuse and recycle, and in doing so also benefit their communities socially and environmentally. These efforts would also reduce landfill and landfill costs.</p> <p>Please include in this section as read all the</p>	See previous response in relation to the spatial
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		<p>comments made on 3.33 Vision on the advantages of local facilities in contrast to strategic facilities and of increasing recycling rates through greater involvement of local communities. By moving the focus to the front end of the waste stream by increasing recycling rates the question arises as to whether residual waste facilities would be needed particularly in the long term.</p> <p>If there is a proven need in a local area, then it should be met following the basic principles of the responsibility of decision making and action to be within local communities, small, local facilities of a size, scale and form more acceptable to local people (5,000-35,000tpa size dependent on proven need) - flexibility, short term contracts of about five years and maximising recycling. Development should be staggered to allow recycling rates to increase over a period of time covered by LATS purchase and brought on line, if proven need, with population growth.</p> <p>In the Joint Municipal Waste Management Strategy, Volume 2 "High Level Action Plan" 4.6, it states that "The affordability of the selected waste treatment technology is a huge risk. These are large scale, specialist and capital intensive facilities". The size of the offered EU contract of £646,000,000 over a 25 year period demonstrates this statement. This type of contract would have inbuilt into it compound interest payments as well as often punitive conditions which have to be met by the County Council should the circumstances arise. Because of the sophisticated nature of the contract consultants are brought in for advice at</p>	<p>vision, recycling targets and the development of small-scale facilities.</p> <p>As stated previously the criteria-based approach set out in Core Policy WCS4 allows for small-scale proposals to come forward in appropriate locations. The strategic site allocations have been identified to provide certainty and are based on typical site size thresholds for waste recovery operations.</p> <p>Contract issues are outside the scope of the WCS and fall within the remit of the Council's residual waste project in relation to municipal waste.</p>
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			<p>great expense adding to the cost of this approach.</p> <p>In contrast the small scale and flexibility of the new approach is affordable, low risk and financially manageable by officers through short term contracts, particularly as the capital plant costs of a residual waste facility is likely to be met by the waste contractor. The increased recycling by the Districts and County Council has already achieved an under spend over the last 2/3 years.</p> <p>4.59 Delete: Importantly the Council is 'technology neutral' and therefore has no preference for one technology/process over another.</p> <p>Reasons as stated above in 6</p>	<p>There is nothing to suggest that paragraph 4.59 should be deleted. The paragraph simply states that the Council is technology neutral. As set out previously this approach is considered to be flexible and consistent with national policy.</p> <p>No Change.</p>
<p>Mary Newton</p> <p>Forest of Dean Friends of the Earth</p>	1743	1743/5	<p>Core Policy WCS10 Green Belt Proposals for waste related development within the Gloucester - Cheltenham Green Belt that do not involve the re-use of an existing building will be permitted where it can be demonstrated that there are 'very specialcircumstances' including:</p> <ul style="list-style-type: none"> - The site is allocated in the WCS; or - The proposal would contribute towards a sustainable waste management system for Gloucestershire; and - There is a particular, identified need for the facility to be located where it is proposed (e.g. proximity to main waste arisings, relationship to anexisting waste management facility); and - The proposal would not conflict with the five main purposes of the Green Belt designation; and 	<p>It is considered that favouring only those proposals involving existing buildings would be unreasonable and inflexible.</p> <p>The criteria set out in the policy relating to proposals that do not involve the use of an existing building will provide an adequate degree of safeguarding against inappropriate development in the Green Belt.</p> <p>It is important to note that PPS10 which is more recent than PPG2 emphasises that local authorities should 'recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications'.</p>

		<p>- The proposal would be consistent with other relevant development plan policies.</p> <p>In Planning Policy 2 it states</p> <p>2.6 Once the general extent of a Green Belt has been approved it should be altered only in exceptional circumstances. If such an alteration is proposed the Secretary of State will wish to be satisfied that the authority has considered opportunities for development within the urban areas contained by and beyond the Green Belt. Similarly, detailed Green Belt boundaries defined in adopted local plans or earlier approved development plans should be altered only exceptionally. Detailed boundaries should not be altered or development allowed merely because the land has become derelict.</p> <p>And</p> <p>3.1 The general policies controlling development in the countryside apply with equal force in Green Belts but there is, in addition, a general presumption against inappropriate development within them. Such development should not be approved, except in very special circumstances.</p> <p>3.2 Inappropriate development is, by definition, harmful to the Green Belt. It is for the applicant to show why permission should be granted. Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In</p>	<p>No Change.</p>
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			<p>view of the presumption against inappropriate development, the Secretary of State will attach substantial weight to the harm to the Green Belt when considering any planning application or appeal concerning such development.</p> <p>3.3 Green Belt policies in development plans should ensure that any planning applications for inappropriate development would not be in accord with the plan. These exceptional cases would thus be treated as departures from the development plan, to be referred to the Secretary of State under the Town and Country Planning (Development Plans and Consultation) Directions 1992 (see DOE Circular 19/92).</p> <p>Green Belt plays a vital role in conserving the landscape character of an area from erosion by piecemeal development and should be regarded as protecting a key landscape which needs to be safeguarded from the adverse impacts of waste management activities.</p> <p>To bring the policy in line with PPG2 amend WCS 10 to</p> <ul style="list-style-type: none"> - Proposals for waste related development within the Gloucester - Cheltenham Green Belt where the proposal involves the re-use of an existing building: - It must not have a materially greater impact than the existing building on the openness of the Green Belt and the purpose of including land within it; and - The building must be of permanent and substantial construction and be capable of 	
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			<p>conversion without major or complete reconstruction; and</p> <ul style="list-style-type: none"> - The form, bulk and design of the buildings is in keeping with its surroundings; and - The proposal would be consistent with other relevant development plan policies. <p>In accordance with Core Policy WCS13 poor design will be rejected.</p>	
Anne Griffiths	65	65/1	<p>Thank you for letting us participate in the consultation for the production for the Waste Core Strategy for Gloucestershire. I have great difficulty in understanding your consultation form, so I wish to make the following comments. Throughout the document there is mention of conditions applying to new applications coming forward, and the constraints and monitoring associated with those proposed sites. However, there is no mention of the monitoring of complaints about the existing sites, and the effect on the surrounding communities.</p> <p>This comment particularly applies to measuring progress, waste minimization statement, and monitoring frameworks, transport assessments and travel plans. Nowhere is there a record of where the waste is coming from, and the total length of its journey from its rising to its final destination.</p> <p>I do not agree with the Strategic Sites being contained within Zone C, to avoid sensitive areas, when the Wingmoor Farm Complex has been allowed to expand with various processes, other than landfill, over many years within the Green</p>	<p>Monitoring the operation of existing waste sites and compliance with planning conditions etc. is outside the scope of the WCS and falls within the scope of development management and enforcement through the checking of planning conditions and complaints etc.</p> <p>Section 106 legal agreements or planning conditions will be used to ensure that waste minimisation statements are prepared in line with Core Policy WCS1 and that Travel Plans are prepared in line with Core Policy WCS13. Policy WCS13 sets out the circumstances in which a Transport Assessment will be required.</p> <p>As stated in the publication WCS, the area defined as Zone C avoids the AONB and areas most prone to flood risk but does include areas of Green Belt including the existing waste management facilities at Wingmoor Farm.</p>

		<p>Belt. Making certain 'sensitive areas' 'special circumstances' in unfair.</p> <p>The projected figures for the reduction of waste arising means that processing can take place by small scale and local facilities, with the benefits of long term sustainability being achieved by taking full account of the increasing environmental costs associated with transport costs and the carbon footprint.</p> <p>There should be a target/objective to look for small scale facilities closer to source. PPS10 is clear about the responsibilities of housing developers, to make provision for integrated waste management facilities within the proposed new developments. All communities, no matter how sensitive the locality, must be made responsible for processing their waste, namely Cirencester and the Cotswolds, and the Forest of Dean.</p> <p>It is vital to protect and restore the existing Green Belt, as well as protecting the AONB.</p> <p>Throughout the whole document there is an emphasis on using existing sites, without applying the monitoring conditions to the existing activities, only to new sites.</p> <p>Wingmoor Farm has become a huge collection of waste activities by default, through incremental</p>	<p>Whilst Core Policy WCS4 identifies four strategic site allocations, the criteria within the policy allow for smaller-scale proposals to come forward in appropriate locations should there prove to be interest in developing such facilities. This provides certainty and flexibility.</p> <p>With regard to the provision of waste facilities within housing developments, Core Policy WCS1 requires all development to incorporate the principles of waste minimisation. Major development must be supported by a waste minimisation statement which will include measures such as recycling facilities. It would not be appropriate to require <u>all</u> housing developments to include other forms of waste management e.g. recovery (treatment). Such cases will be considered on their merits.</p> <p>Core Policy WCS10 and the supporting text sets out the proposed approach towards the Green Belt. The proposed focus on Zone C helps to safeguard the Cotswold AONB.</p> <p>See previous response in relation to the monitoring of existing waste management activities.</p> <p>In relation to cumulative impact, future waste management proposals including those at</p>
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			<p>development, resulting in a major impact on the surrounding communities and countryside. To date, the cumulative effects on the surrounding communities have not been monitored over the live time of these sites.</p> <p>If the amount of waste going to landfill reduces until 2010, then Wingmoor Farm site will not be needed. Landfill is seen as a last resort, then the size and cumulative activities at the Wingmoor Farm sites, should be reduced, and waste processed near the source of its rising. The EU Directive states that ‘a community as a whole must become self-sufficient in waste disposal, in one of the nearest appropriate installations, by means of the most appropriate methods, and technologies, in order to ensure a high level of protection for the environment and public health.</p>	<p>Wingmoor Farm will be assessed having regard to Core Policy WCS7. Ongoing monitoring of existing planning conditions etc. is however outside the scope of the WCS.</p> <p>With regard to landfill, the publication WCS clearly sets out the current position which is that there is 10-13 years remaining capacity for non-hazardous landfill and around 22 years for hazardous capacity although this will be less if the current planning application at Wingmoor Farm (East) is refused.</p> <p>Whilst the intention of the WCS is to move away from landfill, alternatives need to be put into place before this can happen and it will therefore not take place overnight. Landfill is likely to continue to play a role for certain wastes for some time.</p> <p>No Change.</p>
Anne Griffiths	65	65/2	<p>We are particularly disappointed that even more areas of the Green Belt are being put forward in the areas of the Green Belt, especially as it is unsustainable.</p> <p>The access to all these sites at Wingmoor is very vulnerable along the A435, if this road is closed for any reason, there would be no other access available to these sites. The County Council has to prove that there are not enough suitable sites outside of the Green Belt, to proposed new processes and the enlargement at the Wingmoor Farm sites.</p>	<p>Whilst it is acknowledged that the Green Belt should generally be protected, PPS10 – Planning for Sustainable Waste Management, emphasises that local authorities should ‘recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications’. In other words, in some instances there may be a need to locate a waste facility within an area of Green Belt.</p> <p>With regard to access and traffic, an initial highway assessment has been carried out in support of the publication WCS and this has identified a number</p>

			<p>There are already 3 Planning applications for housing in the Bishops Cleeve area, for approx 1,500 houses, which would come right up to the side of the Wingmoor Farm site.</p> <p>There is potential for a further 5000 houses, to the south side of the sites, in the North West Extension.</p> <p>Therefore this site would not meet all the criteria of the EU Waste Directive.</p>	<p>of issues which are highlighted in the strategic site schedules. As stated in the general development criteria, any proposed development on these sites will require a Transport Assessment (TA) which would allow highway issues to be considered in more detail with improvements or mitigation identified as appropriate.</p> <p>With regard to nearby residential development, the companion guide to PPS10 states that, with advancement in mitigation techniques, some waste facilities may also be considered as light industrial in nature and therefore compatible with residential development. Locating waste facilities within or close to urban areas is also consistent with the Regional Waste Strategy From Rubbish to Resource which states that waste should be managed in line with the proximity principle (i.e. managed close to where it was produced).</p> <p>It is also pertinent to note that there is some doubt as to whether the 5,000 homes north west of Cheltenham will come forward. There is no planning application or planning permission.</p> <p>In relation to the waste framework directive, it is unclear what criteria the respondent is referring to. The development of waste recovery facilities and the move away from landfill which the strategic site allocations are seeking to achieve is entirely consistent with the waste framework directive.</p> <p>No Change.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Kit Stokes Aspect 360 on behalf of Hardwick Court Estate	1851	1851/1	<i>No written comment provided although the completed representation form indicates that the respondent considers Policy WCS4 to be both legally compliant and sound.</i>	Support noted. No Change.
Tim Perkins Entec UK Ltd. on behalf of Viridor Waste Management Ltd.	70	70/1	This policy (WCS6) appears to lack a spatial dimension and does not include any guidance on acceptable locations for hazardous waste management. We would recommend that Policy WCS6 provides further guidance on suitable locations and criteria for facilities for the management of hazardous waste.	Core Policy WCS6 has been amended to clarify that hazardous waste should be managed as high up the waste hierarchy and as close to source as possible. It is however not considered appropriate to be more prescriptive in relation to future locations for hazardous waste facilities. The intention of Core Policy WCS6 is to provide the criteria against which proposals can come forward and be judged. See Focused Change 27.
Tim Perkins Entec UK Ltd. on behalf of Viridor Waste Management Ltd.	70	70/2	The statement is ambiguous about whether the new supporting infrastructure would be needed. There would need to be an evidence base to support this presumption to demonstrate that there are sufficient bulking and transfer facilities with spare capacity appropriately distributed to provide an integrated network as required in the spatial vision. In relation to the Waste Disposal Authority's existing municipal waste transfer stations it is not clear whether these will be available to the Authority beyond the current contract period so we consider there may be a need for alternative replacement sites. In addition, there may be a requirement for new bulking and transfer capacity for MSW in areas currently not well served (for example the Tewkesbury District	Comments noted. A new policy and supporting text dealing with bulking and transfer have been included in the revised publication WCS under the 'minimising impact' section. This provides additional clarity in support of paragraph 3.23. It is not however considered necessary to amend the bullet points relating to paragraphs 3.23 and 3.25. See Focused Change 13.

			area) and for additional C&I waste bulking and transfer capacity to enable the Authority to meet its challenging targets. Our concern is that the lack of precision in the statement may make it more difficult for essential replacement capacity or new capacity to secure planning permission on new sites. The second bullet point of paragraph 3.23 should be amended to read 'appropriate supporting infrastructure for the above including bulky waste transfer including potential expanded replacement new facilities'.	
Tim Perkins Entec UK Ltd. on behalf of Viridor Waste Management Ltd.	70	70/3	<p>Table 3 effectively presents 'options' in the third and fourth column i.e. one large strategic site or 2-3 smaller strategic sites. The second row of the table groups MSW contingency and supporting infrastructure together. Supporting infrastructure only features in the multi-site option in Column 4 and it is not clear whether contingency sites and supporting infrastructure constitute an 'either or' situation i.e. if we develop one large or several small contingency sites we will not need any more supporting infrastructure. In practice there is likely to be a requirement for both categories and they are likely to have different locational and site requirements. It is also not clear how the requirement for MSW contingency translates/relates to the sites in Core Policy WCS4 as no further mention is made of 'contingency' in the rest of the plan.</p> <p>We recommend that a separate row is provided in Table 3 for supporting infrastructure for both MSW and C&I. Some reference should be made in the Core Strategy as to whether all of the sites listed in</p>	<p>In relation to comments made on Table 3 the position can be clarified as follows. The WCS makes it clear that the MSW residual waste requirement is around 150,000 tonnes/year. The WCS also makes it clear that this could be met through a single or multi-site solution. The implementation of this is a matter for the WDA through the residual waste contract. The WCS provides the policy framework against which proposals may come forward. In particular, Core Policy WCS4 identifies four strategic allocations and allows for proposals to come forward on other sites subject to certain criteria being met.</p> <p>With regards the MSW 'contingency' this is effectively where the MSW residual waste recovery solution might not be delivered for some reason.</p> <p>The expectation is that a solution can and will be delivered but there is the possibility of problems/delays in obtaining planning permission for a residual waste recovery facility and other options might therefore need to be pursued.</p>

			<p>Policy WCS4 are required to meet the requirement for strategic sites for MSW and C&I capacity or whether the four sites provide an element of contingency.</p>	<p>For example this might include bulking and transfer of residual MSW waste to another location perhaps out of county. As the tonnage of residual waste requiring management would still be the same (c.150,000 tonnes/year) and the site area required for such a site(s) is similar, it seems reasonable for the WCS to provide for that eventuality.</p> <p>The provision of such contingency is consistent with advice set out in paragraph 4.46 of PPS12.</p> <p>Such contingency could be met either on the site allocations or on other sites.</p> <p>In relation to supporting infrastructure for MSW (such as bulking and transfer) whilst there may be sufficient current capacity for bulking and transfer at present, this might change in the future, in particular once the MSW residual waste recovery operation comes on line as is envisaged around 2015/16. The current locations for bulking and transfer might not be appropriate then. In addition the Strategic Waste Partnership (SWP) will in the future be looking at whether the current arrangements for supporting infrastructure are appropriate. However this is not currently known as supporting infrastructure will be addressed once the MSW residual recovery project is completed.</p> <p>Focussed Change 13 identifies the framework for bulking and transfer and outlines the possibilities which might be examined by the SWP.</p> <p>See Focused Change 13.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Tim Perkins Entec UK Ltd. on behalf of Viridor Waste Management Ltd.	70	70/4	This section states, inter alia, that "Strategic sites will be located so as to maximise the potential for use of heat and power." Certain of the strategic sites do not appear to us to be optimally located for use of heat. There is therefore a risk of challenge that the choice of sites is not in conformity with the Authority's Vision. There would need to be an evidence base demonstrating that the chosen strategic sites have the potential for use of both heat and power.	The strategic sites have been identified having regard to a number of factors including CHP potential. This issue is explored in detail in a separate evidence paper and the potential at each site is summarised in the site schedules attached at Appendix 5 of the WCS. It is important to note that modern technology means that surplus heat can be piped several kilometres and it is not always necessary for a heat user to be adjacent to a waste facility. No Change.
Tim Perkins Entec UK Ltd. on behalf of Viridor Waste Management Ltd.	70	70/5	In the supporting text to WCS2 bulking and transfer is dealt with briefly under the general heading of 'Recycling and Composting/Anaerobic Digestion'. Bulking and transfer facilities form an important part of the waste management infrastructure. Such facilities can provide for all types of waste management including to support recovery and disposal facilities as well. As written the text does not give sufficient emphasis to bulking and transfer as part of the infrastructure and this could lead to a lack of flexibility and deliverability in terms of providing the appropriate network of waste facilities. The supporting text does not give sufficient reference to the potential future need for bulking and transfer arrangements which may arise from changes to local authority contracts, differing collection arrangements, or commercial changes which may lead to the requirement for new or replacement facilities. These may be	A new policy and supporting text dealing with bulking and transfer have been included in the revised publication WCS under the 'minimising impact' section. The suggested wording provided by the respondent has been taken into account in preparing the new supporting text. See Focused Change 13.

			<p>required to support waste treatment or disposal facilities within or outside the County.</p> <p>The title of the section should be amended to read 'Recycling, Composting, Anaerobic Digestion and Bulking and Transfer'. Paragraph 4.38 should be replaced as follows:</p> <p><i>'Bulking and transfer facilities form an important part of the waste management infrastructure. The bulking of waste for onward transport to other waste facilities allows for greater efficiency, helps reduce the number of heavy goods vehicle movements and in turn can help reduce traffic impacts. Bulking and transfer facilities can be provided to support all types of waste management including recycling, composting, anaerobic digestion, recovery and final disposal. Our forecasts suggest that sufficient capacity exists for bulking and transfer facilities, however there are a number of reasons why new facilities or a different spatial arrangement might be required in the future. These include changes in local authority contracts, different collection arrangements (for example arising from the shadow Joint Waste Board (JWB)) and commercial changes. This may result in the need for new bulking and transfer facilities either to replace existing ones or to serve other parts of the County not currently covered. Such facilities could provide for the onward transport of waste to treatment or disposal facilities both within and outside the County. It is important therefore for the WCS to be sufficiently flexible. Policy WCS2 provides a criteria based approach for bringing forward new bulking and</i></p>	
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			<i>transfer facilities in appropriate locations across the County'.</i>	
Tim Perkins Entec UK Ltd. on behalf of Viridor Waste Management Ltd.	70	70/6	<p>Core Policy WCS2 heading states: "Core Policy WCS2 - Recycling and Composting/Anaerobic Digestion (including Bulking and Transfer)</p> <p>This introduces a degree of uncertainty as it is not clear whether bulking and transfer only relates to recycling, composting and AD or includes the bulking and transfers of other wastes including untreated and residual waste. In practice bulking and transfer capacity will also be required for untreated and residual waste. Policy WCS4 does not include any reference to bulking and transfer.</p> <p>We note that Point 4 refers to strategic scale facilities being located in Zone C. It is not completely clear if this includes the strategic sites identified in Policy WCS4. As written the policy is uncertain and does not provide the flexibility required to allow for a range of bulking and transfer facilities.</p> <p>We recommend that Core Policy WCS2 title is changed to the following:</p> <p>"Core Policy WCS2 - Recycling and Composting/Anaerobic Digestion and Bulking and Transfer"</p> <p>Point 4 should include for the provision of strategic transfer and bulking facilities at the strategic sites in Policy WCS4.</p>	<p>Comments noted. Core Policy WCS2 has now been split into three separate policies. Policy WCS2 therefore relates to recycling and composting only. AD and bulking and transfer are dealt with elsewhere. This should provide adequate clarification.</p> <p>See Focused Change 13.</p> <p>Core Policy WCS4 is aimed at the delivery of residual waste recovery (treatment) facilities rather than transfer, however should a waste recovery facility come forward including an element of waste transfer (or recycling/composting) this would be considered on its merits.</p> <p>It is not considered necessary however to make specific reference to transfer within Core Policy WCS4.</p> <p>It is acknowledged that Policy WCS2 could usefully refer to the potential use of employment land in more general terms. The policy has therefore been amended. This is also reflected in the new policies on AD and bulking and transfer.</p> <p>See Focused Change 13.</p>

			<p>We would also recommend that the second bullet under "Particular support will be given to proposals that:" should be amended to read:</p> <p>"involve the use of previously developed land and land designated, B2 and B8 uses....."</p> <p>This increases the precision of the policy and allows for facilities to be developed on sites that will be designated in future plans and on existing and future areas where waste uses are likely to be compatible and where there may be suitable vacant premises.</p> <p>Core Policy WCS4 refers to B2 uses in a similar context (we are proposing that reference be extended to include B8) so Core Policy WCS2 and WCS4 would be rendered more consistent.</p>	<p>It is acknowledged that Policy WCS4 could also usefully refer to the potential use of employment land in more general terms. The policy has therefore been amended.</p> <p>See Focused Change 21.</p>
<p>Tim Perkins</p> <p>Entec UK Ltd. on behalf of Viridor Waste Management Ltd.</p>	70	70/7	<p>Strategic residual waste facilities are likely to include an element of bulking and transfer and under some scenarios bulking and transfer may be the predominant function on a strategic site in circumstances involving the bulking and onward transport of residual waste to the nearest appropriate installation.</p> <p>The policy is not consistent in the type of facility it is referring to. It should be amended to refer to 'strategic waste facilities suitable for recovery' thereby recognising that strategic sites could also</p>	<p>Comment noted. A new policy and supporting text on bulking and transfer have been drafted.</p> <p>See Focused Change 13.</p> <p>Should a predominantly bulking and transfer based proposal come forward on one of the strategic site allocations this will be considered on its merits against relevant core policies.</p> <p>It is not however considered necessary to amend the wording or title of Core Policy WCS4 to include specific reference to bulking and transfer. As stated above, should a bulking and transfer proposal</p>

		<p>include other waste management including bulking and transfer.</p> <p>We consider that Policy WCS4 is currently too inflexible in restricting the grant of permission for strategic facilities outside the 4 allocated sites. Relaxing this policy to allow strategic facilities to be developed on other sites within Zone 4 that satisfy all other relevant policies of the Plan would provide greater flexibility and competition and allow for the potential for a robust 'windfall site' to come forward for MSW or C&I waste treatment or transfer.</p> <p>The first bullet point under 'non-strategic' residual waste recovery facilities does not include B8 uses. Sites in use for B8 or allocated for B8 are considered suitable locations for strategic and non strategic waste management facilities and we feel that by not including sites in this category the Plan is unnecessarily limiting the opportunities for the waste industry to identify and bring forward non-strategic (and strategic) sites.</p> <p>The following paragraph should be inserted: 'strategic residual waste facilities are likely to include an element of bulking and transfer and under some scenarios bulking and transfer may be the predominant function on a strategic site in circumstances involving the bulking and onward transport to a strategic recovery facility'.</p> <p>The title of Core Policy WCS4 should be amended</p>	<p>come forward on one of the site allocations this would be considered on its merits.</p> <p>In relation to the granting of permission on unallocated sites, the four strategic allocations have been identified after an extensive search and have been deemed to be the most suitable from a long-list of potential candidates and having regard to a broad range of factors. It is therefore reasonable to prioritise the development of these sites over potential windfall alternatives as per the current wording of Policy WCS4.</p> <p>No Change.</p> <p>Comment noted. It is acknowledged that Core Policy WCS4 could usefully refer to employment land in a broader sense than just B2 general industrial use.</p> <p>See Focused Change 21.</p>
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			<p>to 'Strategic Residual Waste Facilities (suitable for recovery). Other references in the policy should be amended to match the title.</p> <p>The policy should state that planning permission for strategic residual waste facilities will be granted outside the allocated sites subject to the following criteria (repeat the bulleted criteria listed under non-strategic facilities) subject to the inclusion of reference to both B2 and B8 uses.</p>	
<p>Tim Perkins</p> <p>Entec UK Ltd. on behalf of Viridor Waste Management Ltd.</p>	70	70/8	<p>We support the allocation of Javelin Park as a strategic site in WC4.</p> <p>We agree with the analysis of the Javelin Park site at Inset Map 3.</p> <p>See also our other comments on Core Policy WCS4 which are on a separate form.</p>	<p>Support for Javelin Park noted.</p> <p>No Change.</p>
<p>Katy Wallis</p> <p>Grundon Waste Management Ltd.</p>	111	111/1	<p>In relation to Hazardous waste the WCS implies that 90,000 tonnes is produced and managed in the County of which 85,000 tonnes is landfilled at Wingmoor Farm East. Such a quantity is an overestimate as there is double counting of waste, in that some of this waste is imported into the Wingmoor Farm East treatment plant and then landfilled. The Technical Paper on Waste Data attempted to address this issue but makes some errors in doing so. Table 7a states that the amount of waste imported into Gloucestershire is 88,957 tonnes. The EA data has this as being a deposited figure into all operations that manage hazardous waste. This means that the APC is counted twice; as an import into the APC treatment plant and then</p>	<p>The hazardous waste data used by the WPA in the WCS publication document and the supporting Waste Data Paper comes from the EA's Waste Data Interrogator 2008 and is considered to have a good degree of accuracy. The EA have not raised any objections to the data. In fact they have stated: "Your assessment of capacity to manage the disposal of hazardous waste are correct and we welcome the recognition of hazardous waste disposal capacity in the county as important. Hazardous waste disposal should be considered a national issue and the current operational site in Gloucestershire is a significant national resource."</p> <p>Due to this representation the EA have been</p>

			<p>again as part of the 51,000 tonne landfill figure as it is transferred. In 2008 we landfilled around 44,000 tonnes of waste that was brought into the site to which the leachate was added to the APC to give an over landfill figure of 51,000 tonnes. The EA data calculated the movement of hazardous waste and finds that Gloucestershire is a net importer to the amount of 5,499 tonnes.</p> <p>In order to make the WCS sound, it is necessary to ensure that the evidence base is as robust as possible, taking into account all available information, and that information used within the Strategy is not misrepresented; ie. 'waste managed in Gloucestershire' purporting to be 'waste arising in Gloucestershire'. The evidence base therefore needs to take into account information on waste arisings and transfer available through the EA .</p> <p>Furthermore, more information on the nature of those facilities classified as providing transfer capacity is required to clarify the overall numbers managed within the County.</p> <p>Given the nature of the objection which relates to a fundamental element of the plan, namely the evidence base, it is not possible to put forward specific revised wording relating to this objection.</p>	<p>contacted post-publication to provide clarification. They have looked into this matter and can see that some confusion could arise over interpretation of the data.</p> <p>To help explain the issue of potential double counting the EA have provided the following explanation. "Hazardous and non-hazardous waste must be pre-treated under the requirements of the Landfill Directive prior to disposal at landfill. Therefore in terms of the aim of planning for waste management infrastructure capacity, the "double-counting" of the waste arisings is correct; capacity is required for both the treatment and disposal elements. For example in Gloucestershire, Grundons receive waste at their Wingmoor treatment plant, which, following treatment is disposed of at the adjacent landfill."</p> <p>In relation to the comments from Grundons that there are errors in the data the EA clarify that the data is accurate for 2008 and that "the waste is deposited and managed twice and therefore has to be counted twice to provide an accurate measure of likely capacity for both treatment and landfill."</p> <p>In conclusion, the EA broadly agree with the points that have been raised about hazardous waste data. They consider that the Technical Evidence Paper on Waste Data has included/recognised this matter, but this has perhaps not translated across to the Core Strategy document. The EA consider that relatively minor amendments within the Core Strategy would be needed to more accurately reflect the points raised by Grundons and</p>
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				<p>commented upon.</p> <p>It is therefore acknowledged by the WPA that the information set out in Table 1 and Figure 2 could be clarified in relation to hazardous waste. The footnote to Table 1 and the supporting text at paragraph 2.65 have therefore been amended.</p> <p>See Focused Change 2.</p>
<p>Katy Wallis</p> <p>Grundon Waste Management Ltd.</p>	111	111/2	<p>The Plan states in paragraph 2.56 that there should be non-hazardous landfill void space for 10 to 13 years; this though is a conservative estimate and the landfill void could last for significantly longer. There are concerns that the figures for landfill void space requirements are an underestimation given the fact that the figure used in the Core Strategy for C&I waste 'produced and managed' in Gloucestershire of 375,000 tonnes in 2008 is far less than the figure from the 2009 DEFRA study which reveals arisings of 526,188 tonnes. It is considered that the figures used throughout the WCS for C&I waste in Gloucestershire is not founded on a robust and credible evidence base. The underestimation of the C&I waste arisings to be managed in Gloucestershire has direct repercussions on the capacity requirements identified within the Plan, and particularly as they relate to future recovery capacity and landfill void requirements.</p> <p>The future landfill requirement is based on figures for C&I waste managed in Gloucestershire as opposed to arising or produced in Gloucestershire and thus the requirement in the WCS for landfill</p>	<p>It is acknowledged that the DEFRA waste arisings study was published in December 2010 after the WCS had been published and that there is a difference between the C&I figures set out in the WCS and those contained in the DEFRA study. This is because the WCS uses a 'managed' figure whereas the DEFRA study is an estimate of waste 'arisings'. The managed figure for C&I waste in 2008 provided in the WCS is 375,000 tonnes. The DEFRA study provides a figure of 527,000 tonnes for Gloucestershire. However, it is important to note several issues. First, this is an estimate only, whereas the managed figure is a known quantity. Second, a proportion of the estimated waste arising may be managed outside of Gloucestershire and third, the managed figure of 375,000 provided in the WCS excludes metal waste – a major component of the C&I waste stream. When metals are factored in (131,000 tonnes from all waste streams) the figure is closer to the DEFRA estimate.</p> <p>Coupled with these issues is the fact that the DEFRA study itself has a number of limitations including the fact that the survey was voluntary which means it is likely to have captured data from</p>

			<p>void space is considered to be an underestimation.</p> <p>It is not considered realistic to put forward revised figures for future landfill requirements in a representation form.</p>	<p>companies that are progressive in their approach to managing waste, the fact that the survey is for 2009 only, a year within a significant recession, the data provided may be inaccurate or have failed to capture all material streams, the survey only gives a 'one-day' picture of overall arisings and composition of mixed-waste streams and there may be overlap with MSW data. On this basis whilst the revised publication includes reference to the DEFRA study, it uses a managed C&I figure.</p> <p>See Focused Change 3.</p> <p>In light of the above, the estimates of landfill voidspace are considered to be entirely appropriate.</p>
<p>Katy Wallis</p> <p>Grundon Waste Management Ltd.</p>	111	111/3	<p>The Core strategy makes the following statements regarding landfill:</p> <p>Key Issue 10: 'Landfill is always likely to have a role to play in respect of certain types of waste'</p> <p>Our Vision for 2027: 'The continuing role of landfill is recognised but increasingly seen as a last resort'.</p> <p>Strategic Objective 4 - Waste Disposal: To recognise the continuing role of landfill for the disposal of certain residual and hazardous wastes whilst reducing our reliance on landfill as the primary method of waste management in Gloucestershire.</p> <p>However, as stated in paragraph 4.129, there is no policy for the provision of landfill within the WCS.</p> <p>It is stated that there should be non-hazardous</p>	<p>The plan period is 2012-2027 and the level of non-hazardous landfill voidspace/capacity identified covers this meaning at the present time there is no need to find additional landfill space.</p> <p>The publication WCS clearly sets out the fact that the landfill voidspace identified is dependent on planning permission being granted at Wingmoor Farm. The supporting text has been amended to clarify that if the application is refused there will need to be an early review of the WCS or preparation of a separate landfill development plan document.</p> <p>See Focused Change 26.</p> <p>It is not however considered necessary to include a specific policy on landfill. To introduce a policy at</p>

			<p>landfill void space for 10 to 13 years; this though is a conservative estimate and the landfill void could last for significantly longer. As the Plan period extends to 2027/28, it is not considered that this provides sufficient certainty in terms of landfill capacity over the plan period.</p> <p>The fact that there is a current application to extend the life of both the hazardous and non-hazardous landfill sites at Wingmoor Farm East appears to be a factor in avoiding any policy relating to landfill provision. Only in the Technical Paper is it stated that if permission for both landfills were refused, this would 'prompt a rapid review of the WCS or potentially the initiation of a landfill document'. The WCS states that the position will be monitored and is likely to require further consideration through a review of the WCS or preparation of a separate development plan document starting in 2017/18'.</p> <p>There are also concerns that the figures for landfill void space requirements may be an underestimation given the fact that the figure used in the Core Strategy for C&I waste 'produced and managed' in Gloucestershire of 375,000 tonnes in 2008 is far less than the figure from the 2009 DEFRA study which reveals arisings of 526,188 tonnes. With a higher level of C&I waste arisings, the landfill void space would be filled up sooner than the estimated 10 to 13 years. It is considered that the evidence base is not founded on a robust</p>	<p>this late stage without adequate evidence gathering and stakeholder input would be inappropriate.</p> <p>It is acknowledged that the DEFRA waste arisings study was published in December 2010 after the WCS had been published and that there is a difference between the C&I figures set out in the WCS and those contained in the DEFRA study. This is because the WCS uses a 'managed' figure whereas the DEFRA study is an estimate of waste 'arisings'. The managed figure for C&I waste in 2008 provided in the WCS is 375,000 tonnes. The DEFRA study provides a figure of 527,000 tonnes for Gloucestershire. However, it is important to note several issues. First, this is an estimate only, whereas the managed figure is a known quantity. Second, a proportion of the estimated waste arising may be managed outside of Gloucestershire and third, the managed figure of 375,000 provided in the WCS excludes metal waste – a major component of the C&I waste stream. When metals are factored in (131,000 tonnes from all waste streams) the figure is closer to the DEFRA estimate.</p> <p>Coupled with these issues is the fact that the DEFRA study itself has a number of limitations including the fact that the survey was voluntary which means it is likely to have captured data from companies that are progressive in their approach to managing waste, the fact that the survey is for 2009 only, a year within a significant recession, the data provided may be inaccurate or have failed to capture all material streams, the survey only gives a 'one-day' picture of overall arisings and</p>
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			<p>and credible evidence base. The underestimation of the C&I waste arisings to be managed in Gloucestershire has direct repercussions on the capacity requirements identified within the Plan, and particularly as they relate to future landfill void requirements. The Plan cannot be deemed to be effective as it fails to address future landfill provision, and with no policy for landfill provision, there are no means by which of monitoring whether there is sufficient landfill provision. To make the WCS sound, it is necessary to include a policy on landfill provision across all waste streams to provide guidance on its provision over the Plan period. At this moment in time the permitted non-hazardous void space is less than 5 years. We do not consider that there is sufficient time to allow for a policy review and adoption and for the granting of additional void space to meet such a time frame. Therefore we consider that the inclusion of a policy is essential. Given the nature of the objection which relates to the absence of a fundamental policy, it is not possible to put forward revised wording in this objection. There is also the issue of the landfill requirement being based on figures for C&I waste managed in Gloucestershire as opposed to arising in Gloucestershire. It is not considered realistic to put forward revised figures for landfill provision in a representation form.</p>	<p>composition of mixed-waste streams and there may be overlap with MSW data.</p> <p>On this basis whilst the revised publication includes reference to the DEFRA study, it is considered appropriate to have regard to the managed tonnage.</p> <p>See Focused Change 3.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Katy Wallis Grundon Waste Management Ltd.	111	111/4	<p>Table 1 (Waste in Gloucestershire) and Figure 2 - Waste in Gloucestershire are both contained in Para.2.20. This paragraph states clearly that the figures in both the Table and Figure refer to waste 'produced and managed' in Gloucestershire'.</p> <p>With respect to C&I waste, the figure in fact represents C&I waste inputs into permitted facilities; this is data on where waste is received and managed, and not where it arises or is produced.</p> <p>It is very difficult to obtain a clear picture of waste arisings other than from national surveys carried out by the EA and DEFRA. In 1998/99, the EA survey showed that C&I waste arisings in Gloucestershire were 586,000 tones, and in the 2002/2003 EA survey, the figure was 700,000 tonnes. In the most recent survey for 2009, additional information was obtained specifically for the South West and London; there is therefore an up-to-date figure for C&I waste arisings for Gloucestershire: 526,188 tonnes. It is appreciated though that these results were not available when the Core Strategy was published.</p> <p>However, there is clearly a disparity between the figure used in the Core Strategy for C&I waste 'produced and managed' in Gloucestershire of 375,000 tonnes in 2008, and that from the 2009 DEFRA study which reveals arisings or produced of 526,188 tonnes.</p>	<p>It is acknowledged that the DEFRA waste arisings study was published in December 2010 after the WCS had been published and that there is a difference between the C&I figures set out in the WCS and those contained in the DEFRA study. This is because the WCS uses a 'managed' figure whereas the DEFRA study is an estimate of waste 'arisings'. The managed figure for C&I waste in 2008 provided in the WCS is 375,000 tonnes. The DEFRA study provides a figure of 527,000 tonnes for Gloucestershire. However, it is important to note several issues. First, this is an estimate only, whereas the managed figure is a known quantity. Second, a proportion of the estimated waste arising may be managed outside of Gloucestershire and third, the managed figure of 375,000 provided in the WCS excludes metal waste – a major component of the C&I waste stream. When metals are factored in (131,000 tonnes from all waste streams) the figure is closer to the DEFRA estimate.</p> <p>Coupled with these issues is the fact that the DEFRA study itself has a number of limitations including the fact that the survey was voluntary which means it is likely to have captured data from companies that are progressive in their approach to managing waste, the fact that the survey is for 2009 only, a year within a significant recession, the data provided may be inaccurate or have failed to capture all material streams, the survey only gives a 'one-day' picture of overall arisings and composition of mixed-waste streams and there</p>

			<p>If the WPA considered that there were shortcomings related to the 1998/99 and 2002/2003 surveys and they therefore were not relying on this information, they should have provided justification for this approach. The WPA should state explicitly if they are using a managed approach, and this should then be justified.</p> <p>Given the lack of any reference to the EA surveys, it is considered that the figures used throughout the WCS for C&I waste in Gloucestershire is not founded on a robust and credible evidence base. There are repercussions of this lack of a sound evidence base on the capacity requirements identified within the Plan for both recovery facilities and landfill void space. This matter is addressed in other representations.</p> <p>In order to make the WCS sound, it is necessary to ensure that the evidence base is as robust as possible, taking into account all available information, and that information used within the Strategy is not misrepresented; ie. 'waste managed in Gloucestershire' purporting to be 'waste arising in Gloucestershire'. The evidence base therefore needs to take into account information on waste arisings available through the EA surveys and the recent DEFRA survey. Given the nature of the objection which relates to a fundamental element of the plan, namely the evidence base, it is not possible to put forward specific revised wording relating to this objection.</p>	<p>may be overlap with MSW data.</p> <p>On this basis whilst the revised publication includes reference to the DEFRA study, it is considered appropriate to use the managed figure for C&I waste.</p> <p>See Focused Change 3.</p> <p>It is acknowledged that it could be made clearer within the WCS that Table 1 and Figure 2 include data on both waste arisings and waste managed. Paragraph 2.20 has therefore been amended accordingly.</p> <p>See Focused Change 1.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Katy Wallis Grundon Waste Management Ltd.	111	111/5	<p>Strategic Objective 3 - Other recovery (including energy recovery) refers to recovery facility capacity required to handle C&I waste that needs to be diverted from landfill.</p> <p>It is considered that this capacity figure is not robust as it has been derived using the figure for waste managed in Gloucestershire as opposed to waste arisings or waste produced in Gloucestershire. Is the WPA proposing to provide capacity only for waste currently managed in Gloucestershire rather than waste arising or produced within Gloucestershire? This is not clarified in the WCS.</p> <p>There is clearly a disparity between the figure used in the Core Strategy for C&I waste 'produced and managed' in Gloucestershire of 375,000 tonnes in 2008, and that from the 2009 DEFRA study which reveals arisings of 526,188 tonnes.</p> <p>Use of the figure for waste managed as opposed to waste arisings is not the only issue with respect to the capacity requirements.</p> <p>There is no transparency with respect for the figure of 143,000 to 193,000 tonnes of C&I waste to be diverted from landfill and which could include residual recovery, composting or recycling. In Technical Paper WCS-A Waste Data (Update 2010), Table 4d C&I Capacity Summary provides a list of recycling/reuse and recovery and transfer capacity</p>	<p>See previous response in relation to the limitations of the DEFRA study and why the use of a managed figure for C&I waste is considered to be appropriate.</p> <p>Whilst the assumptions underpinning the range of 143,000-193,000 tonnes are clearly set out in the supporting waste data evidence paper it is acknowledged that they could more clearly explained in the WCS itself.</p> <p>It is therefore proposed to amend paragraph 3.24 to include reference to the targets set out in the south west regional spatial strategy which have been used to derive the C&I target.</p> <p>See Focused Change 9.</p> <p>The MRF at Wingmoor Farm (East) is included in the figures set out in Table 4d. This is consistent with the overall approach taken towards waste data whereby if a facility has planning permission and/or an environmental permit from the Environment Agency it has been counted towards available capacity even if the permission may not have been implemented or the facility is not yet operational.</p> <p>Combining recovery and transfer is consistent with the RSS indicative targets. The WCS and the Waste Data Paper make it very clear that recovery capacity is needed. Anyone looking at the figures in</p>

			<p>by authority area. However, the information in this table does not appear to correspond with the information in Appendix A.</p> <ul style="list-style-type: none"> - The total capacity of the composting facilities is 65,000tpa whilst Table Ap.A.3 gives a total of 79,000tpa. - The total capacity for transfer facilities is 176,000tpa whilst Table Ap.A.4 gives a total of 182,000tpa. - The capacity of recovery facilities is given as 37,000tpa whilst Table Ap.B.3 gives a total of 15,034. <p>There is no table in the Appendices detailing what recycling/reuse facilities provide capacity in Gloucestershire. (In Table 4d, it is assumed that the MRF at Wingmoor Farm East is included; this however does not at this time have the benefit of a planning permission.)</p> <p>Furthermore, there is no indication of whether the capacity stated is available now or not; in Table 4g, it is stated that the majority of the recovery capacity is not implemented yet.</p> <p>There are further concerns in that the figure for existing recovery capacity has been inflated by the inclusion of all transfer capacity. Table 4c C&I capacity summary in Technical paper WCS-A Waste Data (Update 2010) combines recovery and transfer capacity to obtain total capacity. Table Ap.A.3 provides a list of facilities providing transfer capacity but there is no information on the precise nature of waste management carried out on the</p>	<p>detail will see that there is only 37,000 tpa of recovery capacity and most of this in an unimplemented permission on the Smiths site at Moreton Valence. It is very clear that recovery capacity is in short supply and that more is needed in Gloucestershire.</p> <p>The WPA contends that the capacity figure of 143,000 t to 193,000 t for C&I combined is credible and robust. These are realistic figures based on the analysis of:</p> <ul style="list-style-type: none"> - EA WDI data - EA License data, and liaison with the EA Tewkesbury office. - A detailed Gloucestershire Waste Operators Survey conducted in 2010 (with an 80% response rate. - WPA planning permission records. - Meetings with major Gloucestershire operators e.g. Grundon & Cory Environmental. - Advice and information from Development Control and Enforcement Officers with recent knowledge of sites and operations. <p>In any event, it should be stressed that the capacity figure of 143,000 to 193,000 is indicative and is not a ceiling. The aim is to reduce as much waste as possible from going to landfill.</p> <p>The WPA does not consider that C&I waste arisings have been underestimated. The DEFRA study was not available at the time of publication of the WCS and in any case has a number of potential limitations. The use of a managed figure is</p>
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			<p>site.</p> <p>It is stated that recovery and transfer capacity has been combined as this reflects the RSS approach. Transfer capacity though generally includes an element of recycling and/or treatment but the treatment element is likely to be minimal. It is considered that some justification is required to demonstrate why adopting or maintaining this approach is the best alternative.</p> <p>Due to the lack of information to support the capacity figures, little confidence can be attributed to the figure of 143,000 to 193,000 tonnes of C&I waste to be diverted from landfill. The need for recovery capacity in Gloucestershire could well be considerably greater than is indicated by the figures contained in the WCS. There are concerns that the figure for existing recovery capacity has been inflated by the inclusion of all transfer capacity. Table 4d C&I capacity summary in Technical Paper WCS-A Waste Data (Update 2010) combines recovery capacity and transfer capacity to obtain total recovery capacity. Appendix B Table Ap.B.2 provides a list of facilities providing transfer capacity but there is no information on the exact nature of what waste management is carried out at these sites.</p> <p>It is stated that recovery and transfer capacity has been combined as this reflects the RSS approach. Transfer capacity though generally includes an element of recycling and/or treatment but the treatment element is likely to be minimal. It is considered that some justification is required to</p>	<p>considered entirely appropriate. Reference has however been included to the DEFRA study and the difference in the two sets of data.</p> <p>See Focused Change 3.</p> <p>There is no lack of transparency regarding the capacity calculations. The Waste Data evidence paper is considered to be accurate and comprehensive.</p>
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			<p>demonstrate why adopting or maintaining this approach is the best alternative.</p> <p>Due to the lack of information to support the capacity figures, little confidence can be attributed to the figure of 143,000 to 193,000 tonnes of C&I waste to be diverted from landfill. The need for recovery capacity in Gloucestershire could well be considerably greater than is indicated by the figures contained in the WCS.</p> <p>Given the lack of any reference to the EA surveys, it is considered that the figures used throughout the WCS for C&I waste in Gloucestershire is not founded on a robust and credible evidence base. The underestimation of the C&I waste arisings to be managed in Gloucestershire has direct repercussions on the capacity requirements identified within the Plan, and particularly as they relate to future recovery capacity and landfill requirements. The lack of transparency with regard to existing capacity of C&I facilities, the classifying of capacity of transfer facilities as recovery capacity, and the lack of information on the nature of these transfer facilities are further indications of the lack of a robust and credible evidence base.</p> <p>In order to make the WCS sound, it is necessary to ensure that the evidence base is as robust as possible, taking into account all available information, and that information used within the Strategy is not misrepresented; ie. 'waste managed in Gloucestershire' purporting to be 'waste arising in Gloucestershire'. The evidence base therefore</p>	
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			<p>needs to take into account information on waste arisings available through the EA surveys and the recent DEFRA survey.</p> <p>Furthermore, more information on existing facilities providing C&I waste management capacity is required to justify the figure for future recovery capacity requirements.</p> <p>Given the nature of the objection which relates to a fundamental element of the plan, namely the evidence base, it is not possible to put forward specific revised wording relating to this objection.</p>	
<p>Katy Wallis</p> <p>Grundon Waste Management Ltd.</p>	111	111/6	<p>The four paragraphs all refer to recovery facility capacity required to handle C&I waste that needs to be diverted from landfill.</p> <p>It is considered that this capacity figure is not robust as it has been derived using the figure for waste managed in Gloucestershire as opposed to waste arisings or waste produced in Gloucestershire. It is assumed that GCC are proposing to provide capacity for waste arisings within Gloucestershire as opposed to addressing only waste currently managed in Gloucestershire. Using the latter approach could perpetuate a lack of waste management facilities in Gloucestershire were substantial amounts of waste being exported to other waste authorities to be managed. The extent to which C&I waste is imported or exported for transfer, recycling or recovery is not addressed in the WCS.</p> <p>There is clearly a disparity between the figure used</p>	<p>See previous response set out above in relation to limitations of the DEFRA study and why the use of a managed figure for C&I waste is considered to be appropriate.</p> <p>Whilst the assumptions underpinning the range of 143,000-193,000 tonnes is clearly set out in the supporting waste data evidence paper it is acknowledged that they could more clearly explained in the WCS itself. It is therefore proposed to amend paragraph 3.24 to include reference to the requirements of the south west regional spatial strategy which have been used to derive the C&I target.</p> <p>See Focused Change 9.</p> <p>The MRF at Wingmoor Farm (East) is included in the figures set out in Table 4d. This is consistent with the overall approach taken towards waste data whereby if a facility has planning permission</p>

			<p>in the Core Strategy for C&I waste 'produced and managed' in Gloucestershire of 375,000 tonnes in 2008, and that from the 2009 DEFRA study which reveals arisings of 526,188 tonnes.</p> <p>Use of the figure for waste managed as opposed to waste arisings is not the only issue with respect to the capacity requirements.</p> <p>There is no transparency with respect for the figure of 143,000 to 193,000 tonnes of C&I waste to be diverted from landfill and which could include residual recovery, composting or recycling. In Technical Paper WCS-A Waste Data (Update 2010), Table 4d C&I Capacity Summary provides a list of recycling/reuse and recovery and transfer capacity by authority area. However, the information in this table does not appear to correspond with the information in Appendix A.</p> <p>-The total capacity of the composting facilities is 65,000tpa whilst Table Ap.A.3 gives a total of 79,000tpa.</p> <p>-The total capacity for transfer facilities is 176,000tpa whilst Table Ap.AA gives a total of 182,000tpa.</p> <p>-The capacity of recovery facilities is given as 37,000tpa whilst Table Ap.B.3 gives a total of 15,034.</p> <p>There is no table in the Appendices detailing what recycling/reuse facilities provide capacity in Gloucestershire. (In Table 4d, it is assumed that the MRF at Wingmoor Farm East is included; this however does not at this time have the benefit of a</p>	<p>and/or an environmental permit from the Environment Agency it has been counted towards available capacity even if the permission may not have been implemented or the facility is not yet operational.</p> <p>A combination of recovery and transfer is consistent with the RSS indicative targets. The WCS and the Waste Data Paper make it very clear that recovery capacity is needed. Anyone looking at the figures in detail will see that there is only 37,000 tpa of recovery capacity and most of this in an unimplemented permission on the Smiths site at Moreton Valence. It is very clear that recovery capacity is in short supply and that more is needed in Gloucestershire.</p> <p>The WPA contends that the capacity figure of 143,000 t to 193,000 t for C&I combined is credible and robust. These are realistic figures based on the analysis of:</p> <ul style="list-style-type: none"> - EA WDI data - EA License data, and liaison with the EA Tewkesbury office. - A detailed Gloucestershire Waste Operators Survey conducted in 2010 (with an 80% response rate. - WPA planning permission records. - Meetings with major Gloucestershire operators e.g. Grundon & Cory Environmental. - Advice and information from Development Control and Enforcement Officers with recent knowledge of sites and operations.
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			<p>planning permission.)</p> <p>Furthermore, there is no indication of whether the capacity stated is available now or not; in Table 4g, it is stated that the majority of the recovery capacity is not implemented yet.</p> <p>There are further concerns in that the figure for existing recovery capacity has been inflated by the inclusion of all transfer capacity. Table 4c C&I capacity summary in Technical paper WCS-A Waste Data (Update 2010) combines recovery and transfer capacity to obtain total capacity. Table Ap,A,3 provides a list of facilities providing transfer capacity but there is no information on the precise nature of waste management carried out on the site.</p> <p>It is stated that recovery and transfer capacity has been combined as this reflects the RSS approach. Transfer capacity though generally includes an element of recycling and/or treatment but the treatment element is likely to be minimal. It is considered that some justification is required to demonstrate why adopting or maintaining this approach is the best alternative.</p> <p>Due to the lack of information to support the capacity figures, little confidence can be attributed to the figure of 143,000 to 193,000 tonnes of C&I waste to be diverted from landfill. The need for recovery capacity in Gloucestershire could well be considerably greater than is indicated by the figures contained in the WCS.</p> <p>Given the lack of any reference to the EA surveys, it</p>	<p>In any event, it should be stressed that the capacity figure of 143,000 to 193,000 is indicative and is not a ceiling. The aim is to reduce as much waste as possible from going to landfill.</p> <p>The WPA does not consider that C&I waste arisings have been underestimated. The DEFRA study was not available at the time of publication of the WCS and in any case has a number of potential limitations. The use of a managed figure is considered entirely appropriate. Reference has however been included to the DEFRA study and the difference in the two sets of data.</p> <p>See Focused Change 3.</p> <p>There is no lack of transparency regarding the capacity calculations. The Waste Data evidence paper is considered to be accurate and comprehensive.</p>
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			<p>is considered that the figures used throughout the WCS for C&I waste in Gloucestershire is not founded on a robust and credible evidence base. The underestimation of the C&I waste arisings to be managed in Gloucestershire has direct repercussions on the capacity requirements identified within the Plan, and particularly as they relate to future recovery capacity and landfill requirements. The lack of transparency with regard to existing capacity of C&I facilities, the classifying of capacity of transfer facilities as recovery capacity, and the lack of information on the nature of these transfer facilities are further indications of the lack of a robust and credible evidence base.</p> <p>In order to make the WCS sound, it is necessary to ensure that the evidence base is as robust as possible, taking into account all available information, and that information used within the Strategy is not misrepresented; i.e. 'waste managed in Gloucestershire' purporting to be 'waste arising in Gloucestershire'. The evidence base therefore needs to take into account information on waste arisings available through the EA surveys and the recent DEFRA survey.</p> <p>Furthermore, more information on existing facilities providing C&I waste management capacity is required to justify the figure for future recovery capacity requirements. Given the nature of the objection which relates to a fundamental element of the plan, namely the evidence base, it is not possible to put forward specific revised wording relating to this objection.</p>	
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Katy Wallis Grundon Waste Management Ltd.	111	111/7	The identification of the 2.8 hectare site at Wingmoor Farm East for a strategic waste recovery facility is supported. The co-location of such a facility at this site would complement the other waste management activities on the site.	Support noted. No Change.
Katy Wallis Grundon Waste Management Ltd.	111	111/8	<p>I would like to flag up another issue which relates to Appendix 5 in the WCS and the Strategic Site Schedule. Under Wingmoor Farm East, the landscape/visual impact assessment refers to an emission stack of 40 to 80 metres in height as creating 'a significant vertical landmark out of keeping with the surrounding landscape character'.</p> <p>However, the landscape/visual impact assessment for Wingmoor Farm West (Areas A and B) states that the inclusion of a medium or large emission stack (60m+) would 'create a vertical landmark in the surrounding area, however would be of slight to moderate adverse impact due to the frequency of similar structures in the wider area'. As Areas A and B are 500 and 400 metres respectively from the Wingmoor Farm East site, it is difficult to comprehend why 'the frequency of similar structures in the wider area' applies only to Wingmoor Farm West, and not to Wingmoor Farm East. We would be grateful for clarification on this matter.</p>	<p>The landscape/visual impact assessment of the strategic site allocations has been carried out by independent landscape consultants and the text set at Appendix 5 reflects the advice received.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council	1850	1850/1	"The WCS has been subject to extensive and continuous engagement with stakeholders. This has helped to ensure that the policies and proposals are fully justified, effective and consistent with national policy". We do not agree with this statement. The consultation on the waste core sites, as summarised in the Site Options Consultation 2009 Summary Response Report, would only be valid if there had been a genuine chance of it influencing outcomes. In reality, the council announced the 4 shortlisted companies for the Residual Waste PFI Procurement Process in just a matter of days after the close of the consultation, well before the consultation responses were analysed (which took more than a year). All 4 final bidders had based their bids on Javelin Park, making it clear that the site consultation was not genuine and had been pre-empted by the procurement process. The WCS is therefore unsound because it is founded on a discredited consultation process. The policy in the strategy, particularly in relation to sites, cannot be justified because the decision on sites was made before publication of the WCS and before analysis of the consultation. The WCS document, the supporting documentation (around 100 documents in all) and the process by which comments are submitted are so complex and pointlessly cumbersome that they could be construed to be a deliberate barrier and disincentive to respond. Most members of the public, even if they feel strongly about the issues, would not feel competent to respond. The WCS	<p>A number of the comments made by the respondent are matters for the WDA residual waste project. This is a separate process to the WCS and the respondent is incorrect in making a direct linkage.</p> <p>Paragraph 1.9 states that the WCS has been subject to extensive and continuous engagement with stakeholders. This is the case. Consultation has included issues and options (2006) preferred options (2008) and site options (2009). There has also been ongoing engagement in between these stages in the form of forum events. These processes are all outlined in detail in the Regulation 25 statement of public participation published alongside the WCS. The site options consultation was a genuine exercise the results have been used to inform the publication WCS including the overall spatial strategy and choice of strategic site allocations.</p> <p>Notably, of the 201 respondents who commented on Javelin Park at site options, the majority (39%) considered the site to be suitable for waste management, whereas fewer people (28%) considered the site to be unsuitable.</p> <p>No Change.</p> <p>The comments in relation to dispersed, smaller-scale facilities are noted. Notably, the majority of respondents at site options (nearly 50%) supported</p>

			<p>can therefore not be justified, because it cannot show that everyone has had a fair opportunity to input into the process.</p> <p>SCOPE: Throughout the MSW documentation and any associated Waste procurement documentation.</p> <p>CHANGE: These points affect the underlying assumptions and the justification of the whole strategy.</p> <p>For the WCS to follow correct procedure, it should be begun again from scratch in a much simpler form and based on a properly conducted consultation, so as to enable the involvement of all stakeholders, rather than the small subset of stakeholders included in the so-called consultation process carried out thus far.</p> <p>In relation to the core sites, we recommend that the WCS be amended to favour a dispersed solution with smaller facilities rather than a few large facilities located in Zone C as this is more appropriate to the already lower volumes of waste than predicted in the WCS and the existing downward trend.</p>	<p>a more centralised approach focused on the central area of the county defined as Zone C. A significant proportion of other respondents supported a combination of sites within and outside and Zone C.</p> <p>To provide maximum flexibility, Core Policy WCS4 adopts a criteria-based approach whereby small-scale proposals can come forward in appropriate locations both within and outside Zone C should there prove to be demand from the waste industry or other stakeholders.</p> <p>No Change.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council	1850	1850/2	<p>The WCS should not assume that planning permission for the hazardous waste site at Wingmoor Farm (East) will be granted. This site is accepting hazardous waste from around the country, and is so badly managed that toxic incinerator ash is escaping into the surrounding communities. Councillors, by accepting the WCS are implicitly accepting the use of Wingmoor Farm (East) as a hazardous waste site. This means that they have taken a position and cannot be neutral when considering the Planning Application. Any WCS should be based on reducing, with the aspiration of eliminating, hazardous waste yet this approach is conspicuous by its absence. Also the WCS neglects to address the issue of dealing with toxic ash from incineration, or making any links between methods of dealing with residual waste and their impact on volume of hazardous waste. The WCS is unsound because it aspires to have a hazardous waste site at Wingmoor Farm, thus providing support for the planning application pending. Also, it fails to analyse the impact of its own recommendations on levels of toxic waste in the county, or to take any view on this impact.</p> <p>Suggestion:</p> <p>SCOPE: Throughout the MSW documentation and any associated Waste procurement documentation.</p> <p>CHANGE: All reference to the possibility of</p>	<p>The WCS <u>does not</u> assume that planning permission at Wingmoor Farm (East) will be granted. It clearly explains that the site is the subject of a current planning application which is yet to be determined. The future development of the site in relation to the waste handled, any particular conditions and subsequent monitoring will be addressed through the planning application process. The WCS states that if planning permission is granted there will be significant hazardous waste landfill capacity available (around 22 years). The site also provides non-hazardous landfill capacity. If planning permission is not granted however, a review of landfill provision within the county both hazardous and non-hazardous will be needed in the short-term.</p> <p>It is acknowledged that the implications of planning permission not being granted could be clarified in the WCS and additional text has therefore been added to paragraph 4.129.</p> <p>See Focused Change 26.</p> <p>With specific regard to health and the claim that 'toxic ash is escaping into the surrounding communities' it is pertinent to note that the Environment Agency in addition to its ongoing monitoring undertook a monitoring project at the Wingmoor Farm (East) site over a 10-week period (21st September to 30th November). A report was then provided to the Health Protection Agency</p>

			<p>planning permission being granted and to supporting Wingmoor Farm (East) as a hazardous waste site to be removed from the WCS.</p> <p>Incineration should be removed as an option because it would increase the level of toxic waste being generated, and needing disposal, in the county. The WCS should state plans for the reduction of toxic waste.</p> <p>Make amendments throughout document to reflect these changes.</p>	<p>(HPA) for consideration against relevant air quality standards and guidelines. The HPA has now responded and has concluded that airborne concentrations of dioxins, furans, polychlorinated biphenyls (PCBs) and metals are likely to be lower than recognised guideline values and are 'unlikely to be associated with a significant risk to health', and specifically for chromium in its hexavalent form 'at the likely exposure concentrations the risk of cancer is likely to be very small but efforts to reduce exposure would be prudent'.</p> <p>The respondent states that 'any WCS should be based on reducing, with the aspiration of eliminating, hazardous waste yet this approach is conspicuous by its absence'. This is untrue. Whilst the WCS recognises the role played by the hazardous waste landfill at Wingmoor Farm (East) Core Policy WCS6 aims specifically to drive the management of hazardous waste up the waste hierarchy and divert it from landfill. The policy has been amended to ensure that any hazardous waste proposal seeks to manage hazardous waste as high up the waste hierarchy and as close to source as possible.</p> <p>See Focused Change 27.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council	1850	1850/3	<p>By adopting site allocations as opposed to a criteria-based approach, the WCS is increasing risk. There is much uncertainty about trends, future waste requirements and technological development. Flexibility reduces risk caused by uncertainty, whereas identifying sites for strategic development locks us into an approach that may be inappropriate and increases risk.</p> <p>There are however criteria for local sites (less than 50,000 tonnes) which is inconsistent and appears to be biased in favour of strategic sites. Smaller local sites, using less capital-intensive technology, allow for greater flexibility and change.</p> <p>Contracts can be for around 5 years rather than the normal 25 years for large "strategic" facilities. As waste reduces, contracts can end. Large strategic sites are inflexible and lock into disposing of an agreed amount of residual waste for 25 years or more, even if residual waste is reducing. These conditions are enforced through penalty clauses and fines, giving the waste authority no lee-way. They therefore act as a disincentive to delivering the aspirations of the waste hierarchy and the vision in the WCS.</p> <p>In addition, large strategic sites are more likely to result in waste incinerators, creating many environmental drawbacks and producing toxic waste.</p>	<p>Disagree. First, it is unclear what 'risk' the respondent is referring to as this is not explained in the representation.</p> <p>Secondly, PPS12 specifically encourages local authorities to identify strategic allocations where they are <u>central to the delivery of the strategy</u>. In this instance the strategic site allocations are central to the delivery of the WCS because they will help deliver residual waste recovery facilities and provide greater certainty than would be the case with a criteria-based approach alone. The strategic sites have been assessed as being suitable based on a range of factors and importantly they are available and deliverable.</p> <p>To provide maximum flexibility, Core Policy WCS4 allows for smaller-scale facilities to come forward in appropriate locations both within and outside the area defined as Zone C subject to certain criteria. These criteria are not inconsistent and present no bias in favour of strategic sites.</p> <p>In relation to municipal waste, contract length and penalty clauses etc. are matters for the WDA to negotiate and determine through the Council's residual project. The role of the WCS is primarily to identify suitable sites and provide the policy context against which detailed waste management proposals may come forward. It is also important to note that the strategic sites are intended to manage a proportion of commercial waste not just</p>

			<p>The WCS is not effective because it is inconsistent in its approach to sites >50,000 tonnes and sites <50,000 tonnes and because it is not flexible.</p> <p>Suggestion:</p> <p>SCOPE: Throughout the MSW documentation and any associated Waste procurement documentation.</p> <p>CHANGE: Adopt a criteria-based approach throughout, to reduce risk. The WCS should favour small local waste recovery facilities which increase flexibility and reduce risk.</p> <p>Vision to change as follows: " During the period when recycling rates are increasing towards "zero waste" the 'residual' waste that cannot be reduced, re-used, recycled or composted will be treated in 'Local' facilities (<50,000 tonnes/year) which do not produce toxic fly ash. Local facilities are dispersed around the county and are likely to include supporting infrastructure such as waste transfer and bulking."</p>	<p>municipal waste.</p> <p>There is no correlation between site size and technology. The strategic site allocations are capable of accommodating a range of different recovery technologies and in relation to municipal waste the technology that comes forward will be a matter for the WDA in partnership with the waste industry.</p> <p>There is no inconsistency in the approach towards smaller and larger sites. Core Policy WCS4 and the supporting text clearly set out the Council's approach towards small-scale and strategic-scale facilities.</p> <p>The WCS <u>does</u> adopt a criteria-based approach (see Policy WCS4) coupled with the certainty of allocating four strategic sites. This will help to reduce risk, not increase it.</p> <p>No Change.</p>
Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council	1850	1850/4	<p>The Vision aspires to zero-growth in waste by 2020 yet waste is already decreasing. Targets should be aspirational and achievable, but this target is retrograde – going backwards on existing trends. Instead, the aspiration should be for "zero waste", with appropriate annual reductions to achieve this. (By "zero waste" we mean zero residual waste.) This can be achieved at a local level and by community action, an approach not advocated in the WCS, making the WCS out of step with national</p>	<p>Whilst there has been a decline in MSW arisings in the last three years, waste data forecast information provided by the WDA suggests that the amount of MSW will increase over the plan period.</p> <p>The zero-growth aspiration is derived from the Joint Municipal Waste Management Strategy (JMWMS) which the WCS is expected to help deliver. It is therefore considered entirely appropriate to include this target within the WCS.</p>

			<p>policy on Localism.</p> <p>It is very likely that the government will adopt a "zero waste" target nationally and that Gloucestershire will be required to adopt it too – the Secretary of State has already talked about adopting a "zero waste" target and DEFRA are undertaking a review which will be published in Spring 2011. The WCS should be delayed until it can be changed to reflect imminent new national policy.</p> <p>As outlined on other forms, we contest many other points in the Vision: recycling targets are too low,</p>	<p>With specific regard to the zero-waste target, the following quote from the Government's background document to the policy review on waste is relevant; 'The Government's overarching approach to waste is to work towards a zero waste economy. Part of the work of the Review of Waste Policies will be to define more closely what this means, setting clear measurable objectives, and potentially accompanying this with targets in the short, medium and longer terms. As a starting position, the Government has already made clear that a zero waste economy is not where no waste is produced'.</p> <p>It is also important to note that the target of zero-growth from 2020 is assumed to be at a household level. Therefore even if the aspiration for zero-growth were to be achieved, the anticipated growth in population and the number of households would still mean an overall increase in waste arisings.</p> <p>In terms of delaying the WCS, local authorities are being actively encouraged to adopt their waste core strategies as soon as possible. It would therefore be inappropriate to continue to wait until the DEFRA review of waste policy is published as there can be no guarantee when this will happen. In any case it is considered unlikely that the review will necessitate any major changes to the WCS.</p> <p>See previous responses in relation to the other issues raised (recycling, msw growth etc.)</p>
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		<p>residual waste figures too high, the Gloucestershire Waste Partnership is not effective, the approach to dealing with residual waste through strategic sites >50,000 is not supported, the role of landfill is not correctly recognised. We have therefore redrafted the Vision statement.</p> <p>Suggestion:</p> <p>SCOPE: Throughout the MSW documentation and any associated Waste procurement documentation.</p> <p>CHANGE:</p> <p>Change the aspirations of the Vision statement from "zero growth" to "zero waste", with appropriate annual reductions to achieve this. (By "zero waste" we mean zero residual waste.)</p> <p>Change the Vision statement as follows:</p> <p>"Residents and businesses are fully aware of the social, economic and environmental importance of waste management, including its impact on climate change and proactively minimise their waste production to be well on the way to achieving a 'zero-waste' society in which waste is treated as a valuable resource. The target is for a 25% reduction in waste by 2020, with a further move to zero-waste by 2027.</p> <p>Opportunities for reducing, re-using, recycling and composting waste are maximised across all waste streams with everyone able to recycle and compost</p>	<p>See previous response in relation to why zero-growth by 2020 is considered to be an appropriate aspiration.</p> <p>See previous response in relation to the existing recycling/composting target which is considered to be appropriate having regard to current levels and</p>
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		<p>a broad range of materials easily and conveniently. Effective joint working through the Gloucestershire Waste Partnership (GWP) and with communities has led to a more consistent and effective approach towards municipal waste collection across the county. With an aspirational goal of 80% at least 70% of household waste is recycled and composted by 2020.</p> <p>During the period when recycling rates are increasing towards "zero waste" the 'residual' waste that cannot be reduced, re-used, recycled or composted will be treated in 'Local' facilities (<50,000 tonnes/year) which do not produce toxic fly ash. Local facilities are dispersed around the county and are likely to include supporting infrastructure such as waste transfer and bulking.</p> <p>These local and existing waste facilities will form an integrated sustainable waste management system for Gloucestershire. There are effective links between MSW and other waste streams to ensure maximising reuse, recycling and composting. Gloucestershire's communities, key landscape/environmental assets and land liable to current and future potential flood risk, are safeguarded from the adverse impacts of waste management activities, and communities are actively engaged in delivering this vision.</p> <p>The continuing role of landfill is recognised but seen as temporary to medium term storage for stabilised waste, which will be a resource for future use, and which can be studied in order to identify ways of reducing waste further."</p>	<p>the national target of 50% by 2020.</p> <p>The vision already allows for dispersed small-scale facilities to come forward. Reference to fly-ash would be inappropriate given the technology neutral approach adopted through the WCS.</p> <p>The vision has been amended to refer to all waste streams and to clarify that the strategic sites are intended to address both municipal and commercial waste.</p> <p>See Focused Change 10.</p> <p>There is nothing in national policy to suggest that landfill should be regarded as a temporary to medium-term storage facility. The role of landfill is to deal with waste that cannot be re-used, recycled, composted or recovered and it will</p>
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			<p>Make amendments throughout document to reflect this change.</p>	<p>continue to play a role in modern waste management for some time. This is reflected in the WCS which is considered to be entirely consistent with national policy on this matter.</p> <p>With regards the localism agenda, it is important to note that the localism bill is still in the process of being agreed and it is unclear what the final provisions and content will include. In any case the WCS is not considered to be out of step with the localism agenda and the early indications do not suggest sweeping changes to the way in which waste plans are to be prepared. For the reasons set out above, it is important that the WCS is put in place as soon as possible.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council	1850	1850/5	<p>The inclusion of Javelin Park as a Strategic Site is unsound for the following reasons:</p> <p>1. As mentioned in many of our other submissions, the evidence does not demonstrate the need for large strategic sites.</p> <p>Firstly, the waste predictions, especially for MSW are far to high as explained in Form 4. Secondly, large strategic sites will reduce flexibility and tie the waste authority's hands for 25 years, thus preventing flexibility (see Form 3).</p> <p>Thirdly large strategic sites in Zone C will increase transport costs and emissions, because waste in contradiction of WCS14.</p>	<p>Disagree. Javelin Park has been identified as being suitable after an extensive site-selection process. The site fulfils a number of criteria and significantly has been allocated previously in the Waste Local Plan (2004). The site also benefits from planning permission for employment use. The principle of development in this location is therefore well-established.</p> <p>See previous response in relation to forecast MSW growth. It is also important to note that the strategic allocations are intended to manage C&I waste not just MSW. Contractual matters are outside the scope of the WCS and for municipal waste fall within the scope of the WDA and the residual waste procurement process. The role of the WCS is primarily to identify suitable sites and to provide a policy framework against which proposals may be considered.</p> <p>No evidence has been provided by the respondent to support the assertion made in relation to transport costs and emissions. The provision of four strategic sites within Zone C will ensure most of Gloucestershire's waste (which is generated in the central area of the county) is able to be managed close to source. This should help to reduce transport costs and emissions, not increase them. The transport implications of waste generated outside Zone C will be reduced through effective bulking and transfer.</p>

			<p>Fourthly, large strategic sites restrict community ownership and participation, against Government aspirations for a Big Society, whereas small local sites allow for maximum engagement and effective solutions such as social enterprises.</p> <p>Fifthly, large strategic sites are more likely to be developed for incinerators, and here are just a few reasons why this is a bad idea: an incinerator burn valuable natural resources and fossil fuel derived waste; is very inefficient at generating energy; generates high levels of green house gases such as CO2; creates toxic emissions and toxic waste; is very expensive and bad value for the taxpayer; is extremely inflexible; is at the bottom-but-one of the waste hierarchy and acts as a disincentive to improvements higher up the waste hierarchy because it needs feeding with waste 24/365.</p> <p>2. Javelin Park should have been returned to agricultural use after its temporary sequestration for the war effort and never designated as a distribution centre/waste treatment location in the local plan.</p> <p>3. The site sits right on the edge of the AONB and is fully visible from Haresfield Beacon and the Cotswold escarpment and is contrary to WCS11 which states that waste development "affecting the setting of the ...AONB will only be permitted....there is a lack of alternative sites affecting the AONB". The WCS shows that there</p>	<p>Although the WCS allocates four strategic sites, the criteria-based approach set out in Core Policy WCS4 allows for smaller-scale proposals to come forward in appropriate locations where there is demand from the waste industry, developers, the local community and other stakeholders.</p> <p>The strategic site allocations are capable of accommodating a range of different recovery technologies. There is no direct correlation between site size and technology. In any case, incineration is a proven, established and safe form of waste recovery and there is no evidence to suggest that it acts as a disincentive to waste reduction, re-use and recycling.</p> <p>Notwithstanding the view of the respondent, the fact is that Javelin Park has been allocated for both employment and industrial development in adopted development plans and also benefits from planning permission for employment use. The principle of development in this location has therefore already been established.</p> <p>Javelin Park is approximately 1km from the edge of the AONB at the nearest point. The site schedule attached at Appendix 5 acknowledges that consideration would need to be given to the AONB should a detailed proposal come forward on this site. It is worth re-iterating that the site already benefits from planning permission for employment</p>
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			<p>are plenty of identified sites which would be suitable for local facilities such as we are recommending, and which do not affect the AONB.</p> <p>4. The site is likely to increase road traffic because the assessment in Appendix 5 states that 'construction of a new (railway) line....is likely to be prohibitively expensive and could have land ownership issues'.</p> <p>5. The site would create a blot on the landscape, contrary to the assertion in Appendix 5 that "There is the potential to create a landmark facility as a gateway to Gloucester to present a high quality architectural statement". Earlier it is stated that "The erection of an emissions stack (40 - 80m in height) would create a significant vertical landmark out of keeping with the surrounding landscape character" - admitting this will actually be a landscape blot. The site is in view of Haresfield Beacon, one of the most stunning views in the Cotswolds.</p> <p>6. If an incinerator were to be proposed what would happen to the heat produced as Javelin Park is not adjacent to the National Grid and neither to large scale industrial or housing development where a CHP/district heating scheme could be operated.</p> <p>Suggestion:</p> <p>SCOPE: Throughout the MSW documentation and</p>	<p>development, the principle of built development in this location already therefore having been accepted.</p> <p>The site has planning permission for 52,000 m2 of employment land (storage/distribution). The highway assessment for the site (Appendix 5) states that the predicted effect of a new strategic waste facility is likely to be a net decrease in traffic, when balanced against the existing consent.</p> <p>The design and appearance of any facility and the degree to which it impacts upon the local environment including the AONB will be a matter for the planning application stage should a detailed proposal come forward. The initial landscape/visual impact assessment simply highlights some key considerations.</p> <p>The strategic site allocations have been identified having regard to a number of factors including potential for CHP to be utilised. It is acknowledged that some of the sites do not have major heat clients located immediately adjacent, however modern technology is such that surplus heat can be piped several km from source. It is therefore no longer necessary for a heat user to be adjacent to the source of the heat. Javelin Park is however in close proximity to Hunt's Grove a large-scale</p>
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			<p>any associated Waste procurement documentation.</p> <p>CHANGE: Remove all reference to Javelin Park as a strategic site. Remove all references to strategic sites and instead plan for smaller local sites dealing with less than 50,000 tonnes per annum.</p> <p>Make amendments throughout document to reflect these changes.</p>	<p>mixed-use urban extension to Gloucester presenting genuine potential for a CHP district heating scheme.</p> <p>No Change.</p>
Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council	1850	1850/6	<p>Importantly the Council is 'technology neutral' and therefore has no preference for one technology/process over another.</p> <p>The WCS is inconsistent. It is not possible to be technology neutral and at the same time support the waste hierarchy, since the waste hierarchy by its very nature prioritises some technologies over others.</p> <p>The Council has a duty of care to select the best technology for people rather than leaving it to the waste industry to select the most profitable. The GCC has chosen to ask the waste industry for a solution instead of carrying out its own research and consultation drawing on local expertise to find the most flexible way forward that does not lock us into a 25 year/ 150,000 tonnes contract that will require feeding 24/365 , therefore discouraging reduce recycle and reuse. This approach removes the process from the individual and communities, contrary to the Government's Localism Bill.</p> <p>There is little evidence that the Council has</p>	<p>Whilst the waste hierarchy prioritises recycling/composting over other forms of waste recovery and disposal it makes no further distinction. It does not for example favour MBT over pyrolysis, or gasification over incineration. These technologies are all considered under the same category of 'other recovery'.</p> <p>The publication WCS is underpinned by the waste hierarchy and seeks to prioritise waste reduction, re-use, recycling and composting. There will however always be a residual element of waste that must be managed.</p> <p>The four strategic site allocations identified in the WCS are capable of accommodating a range of different waste recovery technologies. This approach is considered to be consistent with national policy.</p> <p>It would be inappropriate and inflexible for the WCS to be overly prescriptive about what should be built and where.</p>

			<p>satisfactorily investigated recent successful strategies by other councils across the country in enough depth to find the best methodology and approach on both environmental and financial criteria.</p> <p>The WCS is therefore unsound and not justified, because it does not identify the most appropriate technology when considered against reasonable alternatives, and because the contradiction in policies means that it is flawed.</p> <p>Suggestion:</p> <p>SCOPE: Throughout the MSW documentation and any associated Waste procurement documentation.</p> <p>CHANGE: The use of "Technology Neutral" should be expunged from all documents relating to the WCS and any related procurements.</p> <p>The strategy should state that the council takes full responsibility for determining the most appropriate technologies and prioritising them based on the waste hierarchy and taking full account of the fact that the Council has a duty of care to select the best technology, both financially and environmentally, for all the people who may be affected having regard to "the precautionary principle".</p> <p>Make amendments throughout document to reflect this change.</p>	<p>Paragraph 4.91 has been amended to clarify the fact that the strategic site allocations are capable of accommodating a range of different waste recovery processes.</p> <p>See Focused Change 20.</p> <p>Contract length in relation to municipal waste is a matter for the Council's residual waste project, not the WCS. The role of the WCS is to identify suitable sites to enable the residual project to come forward.</p> <p>No Change.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council	1850	1850/7	<p>"A residual waste facility (or facilities) able to process around 150,000 tonnes per year of residual municipal waste....This tonnage is likely to require either one large strategic site of about 5 hectares or 2-3 smaller sites of about 2 hectares each" (3.23) and similar statements in many other places throughout document.</p> <p>Where monitoring demonstrates that policies are not achieving their objectives or are having unintended consequences, particularly negative ones, appropriate measures can be put into place to rectify the situation. (6.4)</p> <p>These statements are in direct conflict. Large strategic facilities require long-term contracts of 25-30 years (as is being demonstrated by the present Residual Waste Procurement process) and once the county is committed to this path, it is not possible to change or remedy the approach.</p> <p>It is no good changing the strategy or policies if you cannot change what is being provided.</p> <p>Innovation and new technology is happening rapidly, driven by the reduction in access to landfill and, as said in 3.21 'As the WCS covers a 15-year period, it is important to build in appropriate levels of flexibility'.</p> <p>Long-term contracts are inappropriate when there are so many variables (Residual Waste Volumes,</p>	<p>It is essential that the WCS includes a robust monitoring and implementation framework covering all aspects of the strategy, not just the provision of waste recovery facilities.</p> <p>This does not conflict with the forecast growth in municipal waste which identifies the need for around 150,000 tonnes/year of additional waste recovery capacity.</p> <p>As stated above, the contract length associated with the procurement of any waste recovery facility for municipal waste is not a matter for the WCS it is a matter for the Waste Disposal Authority (WDA). The role of the WCS is to identify suitable sites upon which detailed proposals can come forward.</p> <p>The preferred spatial strategy is a centralised one focusing strategic-scale facilities (>50,000 tonnes/year) into the central area of the county referred to as Zone C. To provide flexibility, Core Policy WCS4 allows for small-scale facilities to come forward both within and outside Zone C subject to certain criteria. This approach is considered appropriate.</p> <p>No Change.</p>

			<p>Reuse percentages, Recycling percentages, Recylate Material Prices, Fuel Costs) associated with processing the different waste streams, so flexibility is a key requirement of any Waste Procurement.</p> <p>The WCS is therefore unsound and not effective, because the contradictions within it make flexibility and effective monitoring impossible to deliver.</p> <p>Suggestion:</p> <p>SCOPE: Throughout the MSW documentation and any associated Waste procurement documentation.</p> <p>CHANGE: Include paragraphs outlining the importance of having small local flexible facilities and processes that can adjust to the significant variability and the massive uncertainties around technology, laws, government directives, costs and prices.</p> <p>Make amendments throughout document to reflect this change.</p>	
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council	1850	1850/8	<p>Forecasts suggest that the amount of MSW will increase to 359.612 tonnes in 2027/28..there is a need to provide.a residual waste facility (or facilities) able to process around 150,000 tonnes per year of residual waste (waste that cannot be recycled or composted). This tonnage is likely to require either one large strategic site of about 5 hectares or 2-3 smaller sites of about 2 hectares each</p> <p>There are many reasons why these figures are wrong:</p> <p>Residual MSW is set at 150,000 for the purposes of the WCS. There is no justification given for planning at 2,000 tpa above the upper limit of predicted MSW.</p> <p>The Technical Paper WCS-A Data (update 2010) table 31 shows that the calculation for MSW is based on an estimate of an annual increase of 0.8% between 2020 and 2026, generating an extra 19,000 tpa. Yet the strategy itself is committed to zero growth by 2020. Thus even if one accepts the logic of the WCS itself, the calculations for 2027/8 are 19,000 too high.</p> <p>Trends in MSW are already reducing. In fact UK total MSW has been stable/decreasing since 2004, even though there has been a significant rise in population and economic growth. Over the same period MSW in Gloucestershire grew at an average</p>	<p>It is acknowledged that municipal waste arisings have fallen in recent years. There are several reasons for this. Service changes introduced in Cotswold District, Gloucester City and Tewkesbury Borough have all reduced MSW arisings. In addition the recession has undoubtedly had an effect. It is however wrong to assume that service changes lead to year on year waste reduction.</p> <p>The WDA has carried out modelling to forecast residual waste tonnages many times and have considered many factors in that modelling including population growth, District service changes, policy, Government forecasts and existing waste arisings.</p> <p>Table 31 of the Waste Data Paper Update (2010) is based on information provided by the WDA at that time and forecasts that MSW arisings will increase to 359,612 tonnes/year by 2027/28. On this basis the WCS identifies a residual MSW requirement of 150,000 tonnes/year.</p> <p>More recent modelling carried out for the review of the residual project, based on 60% recycling by 2020 and 70% recycling by 2030, showed an annual forecast of approximately 155,000 tonnes of residual waste by 2040. A number of scenarios combining varying growth and recycling rates were also modelled. These show the projected levels of residual waste in 2030 to be between 125,000 tonnes (70% recycling and composting) and</p>

		<p>of 3.4% from 2004 to 2007 and has declined every year since then and is now at the same level as in 2004. The estimated figure for 2027/8 is based on the assumption that MSW will grow by 1.6% per annum up to 2020. This is based on outdated work done for the Joint Municipal Waste Management Strategy in 2006, before the clear downward trend was evident.</p> <p>It is likely that waste will continue to reduce. Government incentives and regulation, combined with good industry practice, rising packaging costs and public pressure will all combine to drive the MSW tonnes per down. In addition, better recycling will mean that the figure of 150,000 tonnes residual waste is far too high -the graph in Figure 3 2.49 shows clearly that any increase in recycling leads to a decrease in residual waste.</p> <p>Population and economic growth predictions ignore the huge uncertainty over figures used. The Council's research team recommend that any service using these predictions builds in flexibility into their planning. There is no evidence of such flexibility in the WCS. Predictions of increased MSW based on these figures are therefore unsound.</p> <p>Defra withdrew the PFI funding on the basis that on reasonable assumptions the project is no longer required in order to meet the 2020 landfill diversion targets set by the EU. Yet the WCS is still intent on one large strategic site (or possibly 2/3) with a major contractor on a 25 year contract. Presumably DEFRA are using more up-to-date</p>	<p>165,000 (60% recycling and composting).</p> <p>The WDA has had discussions with DEFRA on the latest national waste growth trends and has also reviewed the Swedish Sustainable Waste Management Programme, which predicts that waste will grow at 2.2% per annum over the next 25 years, aligning closely to the DEFRA scenarios and the WDA's own modelling.</p> <p>On the basis of the above, the residual MSW requirement of 150,000 tonnes/year identified in the WCS is considered to be robust.</p> <p>With regard to the population estimate of 674,000 included at paragraph 2.5 of the WCS this merely provides context and demonstrates that the population of Gloucestershire will increase in the next 20 years. Notably this estimate is lower than the ONS estimate over the same period. The forecast waste arisings provided by the WDA are based on a range of factors not just population growth.</p> <p>Matters concerning the PFI funding have been addressed through the WDA strategic review from which the County Council has made a decision to continue with the MSW residual waste contract process.</p> <p>The primary role of the WCS is to ensure that suitable sites are made available to support any proposals that come forward. Four strategic sites have been allocated. A residual waste recovery facility could come forward on one or more of</p>
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			<p>figures than the WCS.</p> <p>The WCS is unsound because it is based on outdated and inaccurate data and assumptions. Based on the above factors, it is likely that MSW residual waste figures are more likely to be between 50,000 - 134,000 by 2020. Plans based on the higher figure of 150,000 tpa will lead to over capacity. The concentration on strategic facilities of more than 50,000 is unwise and unjustified.</p> <p>Suggestion:</p> <p>SCOPE: Throughout the MSW documentation and any associated Waste procurement documentation.</p> <p>CHANGE: Adjust all predictions for MSW rates by 2020 to a range between 50,000 - 134,000 tpa, and adjust other predictions based on this assumption accordingly.</p>	<p>these or even on a different site altogether. The allocation of strategic sites will help to provide certainty. Importantly the WCS allows for smaller-scale proposals to come forward in appropriate locations subject to relevant criteria.</p> <p>Contractual matters are outside the scope of the WCS.</p> <p>No Change.</p>
Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council	1850	1850/9	<p>The document uses terms like Energy from Waste, Energy Recovery and Heat & Power as a euphemism for thermal treatments such as incineration. Energy can also be produced through Anaerobic Digestion yet this is largely ignored. WCS2 mentions AD but does not mention this benefit, and energy from waste is only mentioned in WCS4. 4.56 asserts that “energy can be recovered in the form of heat and/or power....thereby creating environmental benefits”. Whilst this is true for AD, which creates syngas and beneficial soil conditioner, it is not true for incineration.</p>	<p>Comment noted. As is clearly explained in the WCS, the term 'energy from waste' is a generic term used to describe any waste process that generates and captures energy. It is not limited to thermal treatment processes. Anaerobic Digestion (AD) for example is a form of 'energy from waste' as it creates biogas which can be used to generate heat or converted to bio-methane to be used as a vehicle fuel. AD and the potential benefits of renewable energy generation are acknowledged in the WCS (paragraphs 4.27 – 4.31). However it is accepted that AD could usefully be considered as a process in its own right rather than alongside</p>

			<p>The WCS fails to analyse the impact on climate change from different technologies, which prevents it from putting forward the most appropriate strategy, and also prevents it from meeting legal requirements around reduction of CO2 emissions.</p> <p>4.69 asserts that ‘modern incinerators capture heat and power ...thereby contributing to renewable energy targets.’ It is a fact that electricity from incineration is very inefficient. In addition, burning plastics and other waste derived from fossil fuels and raw materials is not renewable.</p> <p>Incineration creates many environmental disadvantages such as high carbon dioxide emissions and the creation of toxic ash. 4.57 refers to the ‘high organic content’ of MSW. This is precisely the waste which should not be burned because it releases high levels of carbon dioxide. It can be dealt with more sustainably by other methods, in particular AD which will still</p>	<p>recycling and composting.</p> <p>A new policy and supporting text on AD have therefore been drafted.</p> <p>See Focused Change 13.</p> <p>The WCS identifies a range of different waste recovery technologies, outlining in broad terms the processes associated with each. The strategic sites are capable of accommodating a range of different technologies. This approach is consistent with national policy. It would be inappropriate to be overly prescriptive about what should be built and where. It would be beyond the reasonable scope of the WCS evidence base to begin analysing potential impacts on climate change.</p> <p>The footnote to paragraph 4.69 clearly states that 'the degree to which renewable energy is generated will depend to a large extent on the nature of the waste being incinerated. Paragraph 4.69 has however been amended to clarify that not all incinerators capture heat.</p> <p>See Focused Change 16.</p> <p>Incineration or modern thermal treatment as it is otherwise known is identified in the publication WCS as one of a number of different waste recovery technologies that could come forward. It is an established, proven and safe technology. Incineration can also produce energy in the form of heat and power. AD is only generally suitable for source-segregated organic waste, not mixed</p>
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			<p>produce energy.</p> <p>It sidelines Anaerobic Digestion which is the natural partner of Mechanical and Biological Treatment and both together are the environmental and sustainable solution to the issue of minimising non-toxic residual waste that needs to go to landfill. The incineration treatments are not sustainable and are bad for the environment.</p> <p>To sum up, the MSW is unsound and not justified because it is biased towards incineration, and makes unsubstantiated claims as to the environmental benefits of incineration which are not true.</p> <p>Suggestion: Scope: Throughout the documentation and related procurements.</p> <p>Change: Remove incineration-biased terms such as "Energy from Waste", "Heat and Power". Use straightforward terms such as "Energy generation" consistently throughout.</p> <p>Retitle "WSC 2 - Recycling & Composting/Anaerobic Digestion INCLUDING ENERGY RECOVERY (including Bulking and Transfer)"</p> <p>In WCS2 after "Particular support will be given to proposals that "add:</p> <p>"will contribute to energy generation"</p>	<p>residual waste.</p> <p>The WCS does not sideline AD. It is addressed in Core Policy WCS2 and the supporting text. However, it is acknowledged that it could be usefully considered as a separate process in its own right and a new Core Policy and supporting text have been drafted.</p> <p>See Focused Change 13.</p> <p>'Energy from waste' is not an incineration-biased term. It is a generic term that refers to any waste recovery process which generates energy including AD.</p>
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			<p>"involve combining with agricultural waste and/or waste from water treatment plants for Anaerobic Digestion"</p> <p>Make amendments throughout document to reflect this change.</p>	
<p>Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council</p>	1850	1850/10	<p>"The continuing role of landfill is recognised but increasingly seen as a last resort."</p> <p>Whilst it is clear that landfill should be the last resort for organic, methane-producing waste, landfill is in fact currently the FIRST resort nationally for getting rid of toxic flyash.</p> <p>This dependency of incineration on landfill is not acknowledged in the WCS -a convenient omission favouring the advocates of incineration.</p> <p>Whereas thermal treatments destroy waste, landfill stores it for future use.</p> <p>Landfill should be treated as temporary to medium term storage for stabilised waste, rather than as last resort problem, allowing future use of valuable diminishing resources.</p> <p>The WCS is unsound because it does not effectively identify the role of landfill.</p> <p>Suggestion:</p> <p>SCOPE: Throughout the MSW documentation and any associated Waste procurement documentation.</p>	<p>Comment noted. It is acknowledged that the incineration process creates air pollution control (APC) residues (including a proportion of fly ash). It is important to note that not all APC residues are landfilled and that Government policy is to encourage more treatment of these wastes. It is however acknowledged that the linkages between incineration and landfill could be more clearly identified. It is therefore proposed to amend paragraph 4.68 to clarify that incineration results in a proportion of hazardous waste which must be treated and/or landfilled.</p> <p>See Focused Change 15.</p> <p>The WCS clearly identifies the role of landfill, explaining that there are three main types; non-hazardous, hazardous and inert. Given the capacity which is currently available, no specific additional provision is proposed at this time however this situation will be monitored and reviewed as appropriate. There is nothing in national policy which states that landfill should be used as a temporary storage medium for stabilised waste. This is clearly the view of the respondent only.</p> <p>No Change.</p>

			<p>CHANGE: We propose the following changes to the Vision:</p> <p>"The continuing role of landfill is recognised but seen as temporary to medium term storage for stabilised waste, which will be a resource for future use, and which can be studied in order to identify ways of reducing waste further."</p> <p>Make amendments throughout document to reflect this change.</p>	
Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council	1850	1850/11	<p>"At a local level the Gloucestershire Joint Municipal Waste Management Strategy provides a 'route-map' for managing waste in the County between 2007 and 2020" (3.14)</p> <p>The WCS should be more aggressive in its approach with districts to delivering better outcomes/greater reductions. It is not good enough to hide behind difficulties in joint working to allow for the vast differences in approach currently being undertaken by the 6 Districts. Nor is this an excuse for a more centralised approach provided by large strategic sites. What is needed is consistency across districts to recycling and composting of waste; the present system whereby for instance one District collects food waste whilst a neighbouring one does not, is unacceptable.</p> <p>However, the assumption in the WCS is that better co-ordination in delivery mechanisms (see Vision) is the way to do this is, but this is not proven. The better approach is to focus on local, small scale and</p>	<p>Waste collection arrangements do not fall within the remit of the WCS. The WCS cannot directly influence for example whether segregated food waste is collected in all Districts. This is a matter for the Waste Disposal Authority (WDA) and the Waste Collection Authorities (WCA) through the Gloucestershire Waste Partnership (GWP) as is clearly explained in paragraphs 2.26 – 2.28 of the WCS. The role of the WCS is primarily to ensure that suitable sites are made available to facilitate the collection, management and disposal regimes that are introduced through the GWP.</p> <p>Notwithstanding this, it is considered that there is consistency in approach in that all the Gloucestershire Councils have signed the Joint Municipal Waste Management Strategy and four are now delivering the objectives; Cotswold District, Cheltenham Borough, Gloucester City and Tewkesbury Borough. In addition the Forest of Dean District has made a decision to change their service in 2012.</p>

		<p>above all flexible facilities in each District, delivered in close partnership with communities. These can be delivered very cost-effectively and efficiently by social enterprises - see Cwym Harry Land Trust.</p> <p>There is also no reference in the WCS to closer co-ordination between MSW, C&I and C&D waste. Therefore the MSW does not seek to maximise benefits from a joint approach- for instance through supplying organic waste from MSW, C&I and agriculture to the same AD facility.</p> <p>The MSW is unsound because it does not include the coordination of and collaboration with the districts who collect the waste and who feed into the county waste stream. The MSW is unjustified because it ignores the reduction in residual waste resulting from improved recycling by districts if this was incentivised by GCC.</p> <p>Suggestion:</p> <p>SCOPE: Throughout the MSW documentation and any associated Waste procurement documentation.</p> <p>CHANGE: The WCS should have a much more clearly defined plan of how the Gloucestershire Waste Partnership (GWP) (which consists of the County Council and the six District Councils) will incentivise the improved outcomes among the members of the GWP to deliver the enhanced recycling and waste reduction targets as well as the drive towards the Zero Waste approach to residual waste.</p>	<p>The criteria-based approach adopted within Policy WCS4 allows for small-scale facilities to come forward in appropriate locations. Paragraph 4.89 has been amended to clarify that proposals may come forward not only from the waste industry but also from developers, the local community and other stakeholders.</p> <p>See Focused Change 19.</p> <p>With specific regard to the example of the Cwm Harry Land Trust, notably this has not reported on its findings yet so the assertions being made that it is a very cost-effective and efficient approach have not been demonstrated.</p> <p>In terms of the co-ordination of MSW and C&I waste, paragraph 2.16 of the WCS states that the biodegradable element of C&I waste is very similar to municipal waste and can be managed at the same facilities. The strategic site allocations are intended to manage a combination of municipal and commercial waste as set out in Core Policy WCS4. The vision has however been amended to clarify this point and to reinforce the links between MSW and C&I waste.</p> <p>See Focused Change 10.</p> <p>There is however no direct link between C&D waste, which is largely inert and MSW and C&I waste which is composed mainly of biodegradable items. They are therefore generally managed at separate facilities.</p>
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			<p>Vision should read: Effective joint working through the Gloucestershire Waste Partnership (GWP) and with communities has led to a more consistent and effective approach towards municipal waste collection across the county.</p> <p>Make amendments throughout document to reflect this change.</p>	
Sue Oppenheimer on behalf of GlosVAIN, GlosAIN, Standish Parish Council and Haresfield Parish Council	1850	1850/12	<p>At least 60% of household waste is recycled and composted by 2020.</p> <p>This target is inadequate.</p> <p>Cotswold District Council (one of the Gloucestershire Districts) has already exceeded this target, and by 2020 national policy and industry practice will have changed making recycling much more achievable.</p> <p>Many cities and areas across Europe and the world already have recycling and composting rates above 70%. Some are over 85% (see www.glosaing.org.uk)</p> <p>Recycling targets should aspire to 80% by 2020 & 90% by 2027, with a minimum of 70% by 2020.</p> <p>The MSW is unsound and not justified because it does not aim for the most appropriate and reasonable target for recycling and composting.</p> <p>Suggestion:</p>	<p>The WCS seeks to ensure that at least 60% of household waste is recycled or composted by 2020 with an aspiration for 70%. This target is derived from the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS). The national target set out in the Waste Strategy for England (2007) is 50% by 2020. The revised EU Waste Framework Directive also has a target of 50% by 2020. The Council's target cannot therefore be described as unambitious. Whilst it is the case that 60% recycling/composting has already been exceeded in Cotswold District and at the Household Recycling Centres (HRCs) it is not correct to extrapolate this to mean that a much higher rate than 60% is achievable across Gloucestershire. The HRCs for example have consistently achieved a higher rate of recycling because it is easier to engage with the public at these sites. This is very different to collecting waste door to door where opportunities to engage are much more limited. Based on information set out in the report 'The Composition of Kerbside Collected Household Waste in Gloucestershire' (October 2008) it is estimated that about 77% of the waste stream is recyclable. To achieve a countywide recycling rate</p>

			<p>SCOPE: Throughout the MSW documentation and any associated Waste procurement documentation.</p> <p>CHANGE: Reword Vision "Opportunities for reducing, re-using, recycling and composting waste are maximised across all waste streams with everyone able to recycle and compost a broad range of materials easily and conveniently. Effective joint working through the Gloucestershire Waste Partnership (GWP) and with communities has led to a more consistent and effective approach towards municipal waste collection across the county. With an aspirational goal of 80% at least 70% of household waste is recycled and composted by 2020"</p> <p>Make amendments throughout document to reflect this change.</p>	<p>of 60% would mean capturing around 75% of the available recyclable waste at the kerbside and to achieve the 70% target would mean capturing 92% of the available recyclables. This is much higher than is currently being achieved (about 50% on average). It is also the case that some communities achieve higher rates than others. For example it is anticipated that for 2010/11, Tewkesbury Borough Council will achieve a recycling and composting rate of 54% and Gloucester City 46% despite having broadly similar systems to Cotswold District which is achieving over 60%. For these reasons the WCS target of at least 60% recycling/composting by 2020 is considered to be both appropriate and challenging.</p> <p>No change to the recycling target is therefore proposed, however the text of the WCS has been amended to clarify that the aspiration for 70% recycling/composting is to be achieved by the year 2030. This has arisen through the Council's review of its residual waste project.</p> <p>See Focused Change 11.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Thames Water Utilities Ltd.	1796	1796/1	<p>The importance of considering water and sewerage infrastructure provision in the new LDF documents is highlighted by paragraph 4.9 of PPS12, which states that in preparing Local Development Documents:</p> <p>LPA's should ensure that delivery of housing & other strategic and regional requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and resources. Annex B sets out further guidance on resources, utilities and infrastructure provision.</p> <p>Paragraphs B3 to B8 of PPS12 also place specific emphasis on the need to take account of infrastructure such as sewerage early on in preparing Development Framework Documents. Paragraph B3 in particular states: The provision of infrastructure is important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of all local development documents.</p> <p>It will be essential to ensure that the introduction of a portfolio of Local Development Documents (LDDs) does not prejudice adequate planning for water and sewerage infrastructure provision as this is an essential pre-requisite for development.</p> <p>When carrying out the necessary early consultations with TWUL regarding the capacity of</p>	<p>Comments noted.</p> <p>No Change.</p>

			<p>water and sewerage systems, adequate time should be allowed to consider development options and proposals so that an informed response can be formulated. It is not always possible to provide detailed responses within a matter of weeks; for example, the modelling of water and sewerage infrastructure systems will be important to many consultation responses and this can take a long time to carry out (e.g. modelling of sewerage systems can be dependant on waiting for storm periods when the sewers are at peak flows).</p> <p>We also have to consult with the Environment Agency (EA) to obtain a clear picture as to possible water abstraction and waste water discharge consent limits prior to undertaking modeling from a treatment perspective. This process itself can take a considerable period of time, especially if it depends on the EA undertaking its own evaluation exercise. Therefore, realistic consultation periods with water and sewerage undertakers will need to be taken account of in the preparation of the LDDs.</p>	
Thames Water Utilities Ltd.	1796	1796/2	<p>The inclusion of the section on Waste Water Treatment within the Core Strategy (paragraphs 4.102 – 4.114) is supported. Given the uncertainty regarding the level of development proposed for Gloucestershire in the light of the revocation of the Regional Spatial Strategies, the approach set out in Policy WCS5 is supported. The recognition that treated sewage sludge is often recycled to agricultural land (at paragraph 4.111) is accurate.</p> <p>This is the most sustainable means of disposal of treated sewage sludge and is the disposal method</p>	<p>Comment noted. In some instances the disposal or spreading of sewage sludge to agricultural land may require planning permission. The supporting text at Paragraph 4.111 has been amended to reflect this.</p> <p>See Focused Change 23.</p>

			recommended by the Government. We are not aware that the disposal process itself requires planning permission (as stated in the last sentence of paragraph 4.111). New sludge treatment facilities at existing STWs, including for example dewatering and storage buildings, can however require planning permission.	
Thames Water Utilities Ltd.	1796	1796/3	The inclusion of Policy WCS5 within the Core Strategy is supported. In particular the recognition that development or expansion of wastewater treatment facilities will be supported, providing the need for such facilities outweighs any adverse environmental impacts, or such impacts can be mitigated, is strongly supported.	Support noted. No Change.
Thames Water Utilities Ltd.	1796	1796/4	The inclusion of Policy WCS8 within the Core Strategy is supported. We would support the application of this policy to consideration of proposals for developments close to existing STWs in respect of consideration of potential odour impacts.	Support noted. Core Policy WCS8 <u>does</u> apply to STWs and this is clearly stated in the wording of the policy. No Change.
Thames Water Utilities Ltd.	1796	1796/5	The recognition within Policy WCS9 that proposals for STWs may come forward within Flood Zones 1, 2 and 3a is supported. It is important to recognise that it is often necessary for STWs to be located close to a receiving watercourse for treated effluent and this can mean that STWs are often confined to locations within flood plains.	Support noted. Notwithstanding this a number of changes have been made to Core Policy WCS9 to take account of other representations and bring the policy more fully in line with national policy. See Focused Change 30.

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Barbara Farmer SWARD and Bishop's Cleeve Parish Council	154	154/1	<p>4.34we need to consider the provision of larger scale recycling and composting facilities such as bring sites (bottle banks etc) HRCs, MRFs and composting facilities.</p> <p>It is inappropriate to include Material Recycling Facilities (MRFs) in this list since MRFs are designed to deal with co-mingled recyclables. It is now widely accepted that separating recyclables at source is a much more cost effective, sustainable and effective approach to recycling.</p> <p>In order that councils achieve revenue from recycling collections, it is imperative that collections separate resources at source in order to achieve the highest quality recyclate streams to yield the best prices when sold for reprocessing. See WRAP: Choosing the right recycling collection system (web link provided). It is well documented that the UK reprocessing industry is short of good quality recyclate and that markets abroad are also less likely to accept commingled recyclates (web links provided).</p> <p>SWARD believe that the WCS should encourage all recyclables to be separated at source -including those collected by the District Councils. This would result in more effective and more profitable recycling benefitting the county both environmentally and economically.</p> <p>4.34We need to consider the provision of</p>	<p>Notwithstanding the benefits of source-segregated recycling, Materials Recycling Facilities (MRFs) form an established part of waste management infrastructure. The WPA is supportive in principle of any proposal which has the potential to move waste up the waste hierarchy and divert from landfill. MRFs are able to make an important contribution to this aim. It is therefore entirely appropriate for paragraph 4.34 to include reference to such facilities.</p> <p>Waste collection arrangements including the collection of recyclates, falls outside the scope of the Waste Core Strategy and for municipal waste, falls within the scope of the Waste Disposal Authority (WDA) Waste Collection Authorities (WCA) through the Gloucestershire Waste Partnership. For commercial waste, collection arrangements including recyclates are a matter for the waste industry.</p> <p>The role of the WCS is to ensure that sufficient provision is made for new or expanded recycling facilities to come forward where these are needed. Core Policy WCS2 seeks to facilitate this.</p> <p>See Focused Change 13.</p>

			recycling and composting facilities that encourage and facilitate the collection and sorting of segregated not co-mingled recycle.	
Alan Watson Public Interest Consultants on behalf of SWARD and Bishop's Cleeve Parish Council (endorsed by Gloucestershire Friends of the Earth Network)	1853	1853/1	<p>Hazardous Waste Arisings and treatment/disposal facilities (E11, Key Issue 7, 10, E21, WCS6, 2.20, 2.58, 4.124)</p> <p>The more recent data now available indicates that the WCS is incorrect to suggest that hazardous waste arisings are increasing, that the majority of the hazardous wastes are waste/water treatment for the water industry (where other provision has been made and for which landfill is generally unsuitable).</p> <p>The hazardous waste landfill site at Bishop's Cleeve, currently operating without planning permission, is not necessary for the limited and reducing levels of hazardous wastes and serves to encourage long distance transport of wastes to the County from Scotland and other distant areas. This is unsustainable, contrary to the proximity principle and Unsound.</p> <p>Hazardous waste arisings are assessed as 72,000 tonnes in 2004 and by 2009 the Environment Agency reported them as 62,000 tonnes. <i>Table provided in hard copy response page 2.</i></p> <p>1.2 Treatment was available for 38,000 tonnes (or c</p>	<p>Information provided by the Environment Agency (EA) shows that in 2002 the amount of hazardous waste managed in Gloucestershire was 42,000 tonnes whilst in 2008 the amount of hazardous waste managed was 90,000 tonnes. This represents an overall increase of 48,000 tonnes. It is accepted that the trend has been variable and that there was a decrease from 111,000 tonnes in 2006 to 90,000 tonnes in 2008 but overall the trend has been upward. This is clearly set out in Table 7a of the Waste Data Paper Update (2010).</p> <p>The hazardous waste facility at Wingmoor Farm (East) serves an important function locally, regionally and nationally. Whilst planning permission has expired, the operation is the subject of a current planning application and is therefore able to continue whilst the application is determined. The publication WCS clearly sets out the position in relation to Wingmoor Farm (East). Importantly, whilst hazardous wastes are imported into Gloucestershire it is also the case that hazardous waste is exported elsewhere.</p> <p>The figures used in the Waste Data Paper (Section 7, Table 7a) are from the EA's Waste Data Interrogator and relate to inputs in the calendar year 2008. We accept the EA's figure of 62,135 t of hazardous waste managed in Gloucestershire in 2009. We have no reason to question this as this is</p>

			<p>53% of the hazardous waste production in 2004) and more capacity has since been approved. The latest Environment Agency data shows that only 27% of hazardous waste produced in the South West is landfilled. The assessed hazardous waste landfill voidspace in the County of 1,206,200m³ (March 2009) would last for more than 75 years based on the residual wastes being landfilled at the same proportions as the rest of the South West with a density of just 1 tonne/m³. The 2009 Environment Agency data indicates 1,838,000 m³ of hazardous waste landfill capacity in Gloucestershire in 2009.</p> <p>1.3 The hazardous waste treatment market is, in any case, rather specialist and both generation and treatment are largely price driven.</p> <p>1.4 It is clear, therefore, that there is enormous over-capacity for hazardous waste landfill in the County and that this encourages long-distance haulage of hazardous wastes contrary to the proximity principle.</p>	<p>the EA's published estimate.</p> <p>The WPA have calculated the remaining life of the hazardous landfill based on the landfill fill rate / year (1/04/2008 to 31/03/2009) of 45,930 t (50,472 m³) which was supplied by the operator. Table 7a, 7b explain that this figure could be higher e.g. c.85,000 t if the leachate that is mixed with the APC residue is included. Given the Grundon supplied landfill capacity figure of 1,206,200 m³ the calculation of about 23 years landfill life is estimated. The Waste Data Paper does clearly stress that '...the life of the hazardous landfill could potentially be longer, if in future years, inputs are reduced. As has already been suggested the hazardous waste trend (as with general C&D) is very variable from year to year. We do not regard the respondent's estimate of 75 years as an accurate or reasonable estimate of hazardous landfill life in Gloucestershire and it is unclear how this figure has been arrived at.</p> <p>Notably, the EA have not raised any objections to the hazardous waste data. In fact they have stated: 'Your assessment of capacity to manage the disposal of hazardous waste are correct and we welcome the recognition of hazardous waste disposal capacity in the county as important. Hazardous waste disposal should be considered a national issue and the current operational site in Gloucestershire is a significant national resource'.</p> <p>A minor amendment has been made to the footnote to Table 1 to clarify that the 90,000 tonnes/year managed figure is the total managed</p>
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Alan Watson Public Interest Consultants on behalf of SWARD and Bishop's Cleeve Parish Council (endorsed by Gloucestershire Friends of the Earth Network)	1853	1853/2	<p>Recycling Targets and Sustainability (paras E4, E18, 2.48, 3.23):</p> <p>The recycling targets are considered to be unsound because they are ineffective and inconsistent with National Policy – particularly the Government's goal in WS2007 of "One Planet Living". It is noted that there is no reference to this over-arching goal in the WCS.</p> <p>1.7 The WCS proposes targets of "at least 60%</p>	<p>The concept of 'one-planet living' is acknowledged. It has been developed by BioRegional and WWF and is based on 10 key principles including zero-waste (reducing waste, re-using where possible and ultimately sending zero-waste to landfill).</p> <p>Notwithstanding the extensive information provided by the respondent, much of which is anecdotal and not of direct relevance to Gloucestershire (e.g. Welsh Assembly information) it is not considered necessary to revise the</p>

		<p>recycling and composting for household waste by 2020". This, it says, is 10% higher than the national target over the same period.</p> <p>1.8 Strategic Option 2 (E.24) goes slightly further and includes 'with an aspiration for 70%'.</p> <p>1.9 It is disappointing to see the WCS promote such an unambitious target and sustainability obligations require a higher target to be achieved more rapidly than this.</p> <p>1.10 Both the opening paragraph of the Executive Summary of WS2007 and the first paragraph of Chapter 1 emphasise the Government's goal of 'One Planet Living':</p> <p>"Aim</p> <p>i. As a society, we are consuming natural resources at an unsustainable rate. If every country consumed natural resources at the rate the UK does, we would need three planets to live on. The most crucial threat is from dangerous climate change. Our goal is to make the transition towards what the WWF and BioRegional call 'One Planet Living'." [our emphasis]</p> <p>1.11 And as the introduction to Chapter 1: 1. We are living beyond our environmental means. If everyone consumed as many natural resources as we do in England, then WWF suggests we would need three planets to support us. So our goal is 'One Planet Living'. Using the planet's resources within the limits of its eco systems is vital to the survival, health and prosperity of future</p>	<p>recycling target in light of the 'one-planet living' concept.</p> <p>The WCS seeks to ensure that at least 60% of household waste is recycled or composted by 2020 with an aspiration for 70%. This target is derived from the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS). The national target set out in the Waste Strategy for England (2007) is 50% by 2020. The revised EU Waste Framework Directive also has a target of 50% by 2020. The Council's target cannot therefore be described as unambitious. Whilst it is the case that 60% recycling/composting has already been exceeded in Cotswold District and at the Household Recycling Centres (HRCs) it is not correct to extrapolate this to mean that a much higher rate than 60% is achievable across Gloucestershire. The HRCs for example have consistently achieved a higher rate of recycling because it is easier to engage with the public at these sites.</p> <p>This is very different to collecting waste door to door where opportunities to engage are much more limited. Based on information set out in the report 'The Composition of Kerbside Collected Household Waste in Gloucestershire' (October 2008) it is estimated that about 77% of the waste stream is recyclable. To achieve a countywide recycling rate of 60% would mean capturing around 75% of the available recyclable waste at the kerbside and to achieve the 70% target would mean capturing 92% of the available recyclables.</p> <p>This is much higher than is currently being achieved</p>
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			<p>generations. [my emphasis]</p> <p>1.12 The more recent Waste Strategy for Wales includes a similar goal but differs from WS2007 by including a target date of 2050 for “One Planet Living”.</p> <p>1.13 Achieving the “one planet goal” in WS2007 means reducing the ecological footprint of to a ‘fair earthshare’ of 1.82 global hectares/capita from the 2004 level for the South-West of 5.42 global hectares/capita.</p> <p>1.14 The per capita ‘fair earthshare’ obviously reduces with increasing global population thus if a target date is taken for 2050, as proposed for Wales, then it means that not only is it accepted that we will be living unsustainability and inequitably for the next forty years, but also that much lower target should be set that reflect the likely ‘fair earthshare’ at the target date.</p> <p>1.15 Whilst it took from our emergence as a species to about 1820 to reach a population of one billion an additional billion is added to our current total of 6.6 billion every 14 years (Johns 2009). The global population is therefore anticipated to increase to between 7.3 and c.10.7 billion in 2050 (Heinberg 2007). <i>Fig 11 World Population graph provided in hard copy response page 5.</i></p> <p>1.16 The consequence is that rather than a target of 1.8 gha/capita a target level for 2050 should be set at 1.03 to 1.48 gha/capita. Obviously the future target date makes a significant difference to the</p>	<p>(about 50% on average). It is also the case that some communities achieve higher rates than others. For example it is anticipated that for 2010/11, Tewkesbury Borough Council will achieve a recycling and composting rate of 54% and Gloucester City 46% despite having broadly similar systems to Cotswold District which is achieving over 60%. For these reasons the WCS target of at least 60% recycling/composting by 2020 is considered to be both appropriate and challenging.</p> <p>No change to the recycling target is therefore proposed, however the text of the WCS has been amended to clarify that the aspiration for 70% recycling/composting is to be achieved by the year 2030. This has arisen through the Council's review of its residual waste project.</p> <p>See Focused Change 11.</p> <p>With specific regard to the example of the Cwm Harry Land Trust, notably this has not reported on its findings yet so the assertions being made that it is a very cost-effective and efficient approach have not been demonstrated.</p> <p>With regard to waste reduction, this is a central tenet of the WCS as reflected in Core Policy WCS1 – Waste Reduction and the spatial vision which seeks to achieve zero-growth by 2020.</p> <p>No Change.</p>
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			<p>levels of environmental impact and waste reduction required to achieve a 'fair earthshare'.</p> <p>1.17 Whilst this Ecological Footprint approach has been criticised it is included in the strategy as a headline indicator and it provides a useful indication of the scale of the problems related to carrying capacity. The indicator is most effective, meaningful and robust at aggregate levels (as used here) rather than sub-regional breakdowns and it can provide a very useful guide as to how effective policy proposals may be at achieving sustainable outcomes.</p> <p>1.18 A report by consultants Arup assesses the ecological footprint associated with the waste strategy (Arup for Welsh Assembly Government 2009). This report emphasised that to be able to significantly reduce the size of the ecological footprint "it is fundamental that recycling becomes an option for waste management only after reduction and reuse" (emphasis in the original).</p> <p>1.19 The Arup report shows that with recycling alone, even at the relatively high rates proposed in Wales, as noted above, the total impact of waste arising will only be reduced by 10% for municipal waste, 6% for commercial and industrial waste and 14% for construction and demolition waste, based on a 2007 baseline. This is best illustrated graphically and the figure below, taken from the Arup report, shows how even 70% recycling by 2025 fails to meet even the trajectory necessary to achieve the current 2050 ecological footprint target unless accompanied by very significant</p>	
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			<p>waste reduction: <i>Fig 22 graph provided in hardcopy response page 6.</i></p> <p>1.20 Furthermore this report confirms “although the proposed recycling targets will help to reduce the EF [Ecological Footprint] of waste that can be recycled, research suggests that high statutory recycling targets can lead to local authorities focussing on recycling at the expense of waste prevention.</p> <p>1.21 The ARUP report concludes with “numerous recommendations” for WAG and highlights “some overarching themes that need to be addressed” including:</p> <p>i Linking waste policy with policy on design, production and retailing in a coordinated way across particular products.</p> <p>ii Addressing behaviour change and prioritising awareness raising activities that link consumption and purchasing activities to waste</p> <p>iii Making the business case for waste prevention by sharing the limitations on what recycling can achieve. This needs to be coupled with sharing best practice and what can be done in terms of waste prevention.</p> <p>iv Ensuring that recycling is as effective as it can be e.g. by ensuring that waste segregation is carried out and supporting the infrastructure for closed loop recycling.</p>	
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			<p>v The public sector leading by example through procurement policy and action, and supplier development.</p> <p>vi Achieving waste minimisation across all waste streams and materials will not be easy. Monitoring and measuring progress, the report says, will be vital to success and is dependent upon the collection of robust data.</p> <p>vii Current data for C&D and C&I waste is piecemeal and therefore the WAG should consider putting time and effort into developing a consistent methodology for regular and consistent waste data collection.</p> <p>1.22 Crucially the report also recommended:</p> <p>“WAG set targets to reduce both the total volume of waste arising in the municipal waste stream and the total volume of household waste generated per capita” (emphasis in original).</p> <p>1.23 The graph in the report clearly shows the scale of mismatch between a 70% recycling target and the “One Planet” goals without the recommended waste reduction targets: <i>graph provided in hardcopy response page 8.</i></p> <p>1.24 Achieving ‘One Planet’ even by 2050 will certainly be challenging – but this would be a completely inadequate response to the global environmental challenges that we currently face. We have seen large changes in the targets set for waste management since 1995 when the</p>	
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			<p>Government suggested the aspirational 25% in “Making Waste Work”.</p> <p>There is every reason to believe that the targets will change even more profoundly in the near future as the scale of the challenges we face are increasingly recognised and addressed.</p> <p>1.25 The consequences of considering the WS20007 “One Planet Target” in relation to the WCS is that much higher levels of recycling (>70%) than currently envisaged are necessary. Furthermore these recycling levels must be complemented by large waste reduction targets. The Wales waste strategy consultation shows that to reduce the Ecological Footprint to even 1.8 g/ha capita at current population levels will require a further reduction in the footprint, on top of the 70% recycling targets, of:</p> <ul style="list-style-type: none"> i Municipal waste - 34% by 2025 and 65% by 2050. ii Commercial and Industrial waste - 39% by 2025 and 69% by 2050 iii Construction and Demolition waste - 28% by 2025 and 59% by 2050 <p>1.26 Clearly the levels of waste reduction necessary to achieve the Government’s goal will significantly reduce the number and scale of facilities required over the plan period and will have significant impacts on all aspects of the WCS.</p> <p>1.27 The recycling levels which accompany the waste reduction required for ‘One Planet living’ have already been demonstrated in parts of</p>	
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			<p>Europe. Flanders, for example, currently achieves over 70% recycling (Fogarty, Reid et al. 2008).</p> <p>1.28 It is undoubtedly possible for communities to achieve very high recycling targets, sometimes extremely quickly. Examples include:</p> <ul style="list-style-type: none"> • Cwm Harry • Staffordshire Moorlands <p>1.29 In Europe:</p> <ul style="list-style-type: none"> • Novara, a city of 100,000 near Turin achieved 70% diversion in 18 months • Salerno near Naples achieved 70% in just one year, and • Ursubil in Spain, has gone from 28% to 86% in seven months. <p>1.30 Scotland and Wales have also recently set new recycling targets of 70%.</p> <p>1.31 The work for the National Assembly for Wales was by the County's technical consultants, Eunomia (National Assembly for Wales 2007) and showed that the materials that could be recycled make up 93.3% of the municipal waste stream. Crucially recycling 80% was calculated to be cheaper than recycling 60%</p> <p><i>Fig 3 graph provided in hardcopy response page 9.</i></p> <p>1.32 There is no reason why there should be higher</p>	
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			<p>targets just across the border in Wales than in Gloucestershire.</p> <p>1.33 For the reasons outlined above it is clear that the recycling rates in the plan will need to be revised and linked with waste reduction targets. Properly addressing the Government's goal of "One Planet Living" will have a significant impacts on all aspects of the WCS and the failure to incorporate this goal must be seen as a serious omission which renders the current version unsound and unsustainable.</p>	
Alan Watson Public Interest Consultants on behalf of SWARD and Bishop's Cleeve Parish Council (endorsed by Gloucestershire Friends of the Earth Network)	1853	1853/3	<p>Commercial and Industrial Waste Arisings:</p> <p>1.34 The proposals in the WCS include the provision of: Waste recovery facilities with sufficient capacity to divert between 143,000 – 193,000 tonnes/year of C&I waste from landfill. This relates to waste recovery in the broadest sense and could include various forms of residual recovery, composting and recycling.</p> <p>1.35 It is not clear how these capacities have been derived nor which policy objectives the WCS is attempting to satisfy in including these proposals.</p> <p>1.36 The more recently published DEFRA survey of Commercial and Industrial Waste indicates that the total arisings are: <i>(table provided in hardcopy response page 11)</i>.</p> <p>1.37 It is understood that these figures include hazardous waste and metals and thus are about 11% lower than the arisings suggested in the WCS.</p>	<p>The figure of 143,000 – 193,000 tonnes/year for diversion of C&I waste from landfill is based on the requirements of the South West Regional Spatial Strategy (SW-RSS) which remains a valid material consideration at the present time.</p> <p>Current capacity for C&I recycling/re-use and recovery (including transfer) has been identified and compared with the SW-RSS requirement to 2020 to identify the capacity gap of 143,000-193,000 tonnes/year for diversion of C&I waste from landfill including recovery, composting and recycling.</p> <p>Whilst these assumptions are clearly set out in the supporting waste data evidence paper, it is acknowledged that this approach could be more clearly explained within the WCS and additional text has been added to paragraph 3.24 accordingly.</p> <p>See Focused Change 9.</p>

			<p>1.38 Furthermore it is not clear where the purported requirement to provide recovery facilities with the capacity to divert “a proportion of the 143,000 – 193,000 tonnes/year of C&I waste that needs to be diverted from landfill”. The rational for this is presumably the claim in the updated Technical Paper that “of the 375,000 tonnes of C&I waste managed in the County, 314,000 went to landfill”.</p> <p>1.39 The more recent evidence from DEFRA, however, indicates that the total tonnage of C&I waste which is landfilled is only about 114,000 tonnes. A further indication that the WCS data is unreliable is the Environment Agency landfill data for 2009 which shows that a total of 337,000 tpa of household, industrial and commercial waste was landfilled in the County in that year. The WCS figures in the Technical Paper (S4.1) would therefore imply that only 33,000 tonnes of MSW was landfilled in 2009 and this is demonstrably incorrect as 169,023 tonnes of MSW was landfilled in 2009/10 according to WCS-A 2010 (Figure 3a).</p> <p>1.40 It therefore appears that the WCS over-estimates the landfilling of C&I waste by approximately 200,000 tonnes and, on the basis of these old data, proposes making excessive over-provision of capacity.</p> <p>1.41 The WCS proposes that “this sort of tonnage may require up 3 to 4 strategic sites (8 ha of land in total) or possibly 7 to 8 smaller sites”. The over-provision proposed would therefore introduce a</p>	<p>The WCS data is not unreliable. The DEFRA study was published in December 2010 after the publication WCS. It has a number of limitations and we would question the estimation that 114,000 tonnes of C&I waste is sent to landfill. For C&I waste the managed figure of 375,000 t in 2008 is accurate, based on a detailed analysis of the EA Waste Data Interrogator and a detailed survey of waste operators (including Grondon Waste Management) in Gloucestershire conducted in January / February 2010. This is site throughput focused. There is no way of verifying the arising figure of 526,188 from the DEFRA study. The tonnage of 314,000 tonnes of C&I waste sent to landfill is a known managed figure taken from EA data. It has been calculated by subtracting the tonnage of MSW landfilled from the overall total for non-hazardous landfill.</p> <p>It is noted that the respondent refers to both the DEFRA estimate of 114,000 tonnes/year input to landfill and the EA data for 2009 which shows a total of 337,000 tonnes/year landfilled. Therefore there are contradictions in the response. This highlights the fact that the EA is responsible for data collection on waste and is providing a managed figure for C&I landfill. The DEFRA study is an estimate and there are various limitations relating to it.</p> <p>Additionally, the DEFRA arisings data does not factor waste C&I imports & exports, and for C&I this is important as the planning process has little control over these market driven movements.</p>
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			<p>significant risk of blight through the County.</p> <p>1.42 Table 2 of the previous WCS Preferred Options report showed the capacity available as of September 2007 to deal with these wastes.</p> <p>1.43 This table has been redrawn in a clearer format and so that the totals of the relevant capacity can be seen more clearly (<i>table provided in hardcopy response page 12</i>)</p> <p>1.44 It is apparent from this table that the commercial waste treatment capacity available even three years ago was substantially greater than the arisings. The updated version of the Technical Paper has far lower levels of capacity included and no good explanation is given for the difference.</p> <p>1.45 Assuming the figures on which the table in the DPD is based are robust, then the provision proposed in the plan is already available for C&I waste even without consideration of recent increases in C&I treatment capacity. The plan should clarify the breakdown of the 160,000 tpa transfer/ recovery capacity, but even in the extremely unlikely case that this was all transfer capacity then the commercial waste treatment capacity would still significantly exceed arisings.</p> <p>1.46 A significant proportion (41%) of the capacity is for metal recycling and it would be helpful if this was better matched to local arisings by providing a more detailed breakdown and waste analysis of the commercial/ industrial waste arisings from</p>	<p>The WDA reject the suggestion that there is an overestimation of the landfilling of C&I leading to over-provision. The WDA's figure for C&I waste to landfill from WDI 2008 is 314,000 t. We stand by this figure and its calculation is clearly laid out in the Waste Data Paper, Appendix B, Table Ap.B.1.</p> <p>The figures for C&I capacity set out in the Waste Data Paper Update (2010) are taken from information provided by the Environment Agency (EA) and a survey of waste operators. It is considered to be reliable and the best information available. Whilst there are differences between the information set out in the preferred options paper and the Waste Data Paper Update (2010) it is not accepted that these differences are significant, rather they reflect the changing situation between 2007 and 2008. With regard to C&I waste arisings, it is important to note that other than in relation to municipal waste, the WCS makes provision based on the amount of waste managed in Gloucestershire, not the amount of waste arising. This is a known quantity as opposed to an estimate. It also reflects the fact that whilst C&I waste may arise in Gloucestershire, a proportion will be exported and managed elsewhere. When the managed figures are used there is a capacity gap of between 143-193,000 tonnes when compared to the requirements of the South West Regional Spatial Strategy (RSS).</p> <p>Table 4d of the Waste Data Paper Update (2010) clearly sets out the amount of C&I capacity available in Gloucestershire. Having regard to the requirements of the RSS there is a capacity gap of</p>
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			<p>Gloucestershire.</p> <p>1.47 The original Technical Paper WCS-A said that as there are 267 kt of biodegradable C&I waste landfilled each year 'the assumed overprovision is clearly not accurate'. This does not follow. Commercial and industrial waste generation, treatment and disposal is extremely price sensitive and if landfill is cheaper than treatment then that will be the preferred disposal route. As a result of this it is very likely that there will be a major fall in the arisings when landfill tax rises to £ 48/tonne by 2010.</p> <p>1.48 The consequence of the excess capacity is that there may currently be under utilised capacity which could be made available for MSW treatment. At the moment, however, it is more likely that those commercial/ industrial wastes with higher recovery value or higher disposal charges are being imported into the county whilst locally generated wastes are being landfilled. This will certainly change as prices rise and as transport becomes more expensive and thus represents a higher proportion of the treatment/disposal costs.</p> <p>1.49 It is also not realistic to assume, as the DPD does, that there will be no change in arisings in the face of such large increases in disposal taxes. By 2010 it is clear that practically all treatment (apart from perhaps new thermal capacity, see below) will be cheaper than landfill disposal. In these circumstances market forces will ensure that there is little or no residual landfill demand for commercial and industrial wastes.</p>	<p>between 143,000-193,000 tonnes for recycling/re-use and recovery (including transfer). As clearly identified in Table 4d, current C&I 'treatment' capacity in Gloucestershire is extremely limited (28,080 tonnes/year).</p> <p>As explained in Table 1 of the WCS, metals have been counted separately to avoid skewing the data. Furthermore, the WCS uses a managed figure for C&I waste not an estimate of waste arising.</p> <p>As stated previously the WCS makes provision for C&I on the basis of the amount of waste managed rather than the amount of waste arising. In terms of future trends, the impact of factors such as landfill tax is fully recognised both in the publication WCS and the supporting waste data paper. However, to reflect the fact that there is no clear previous trend for C&I waste, an assumption of 0% growth has been used. This approach was used in the adopted Local Plan and the South West Regional Waste Management Strategy.</p> <p>Whilst the potential use of shared facilities for C&I waste and MSW is recognised, there is no currently 'under-utilised' C&I treatment capacity that could be made available for municipal waste. It is this lack of treatment capacity which has generated the identified requirement for MSW of 150,000 tonnes/year.</p> <p>The WCS is not based on the premise of significant increases in C&I waste arisings. Para 4.3.1 of the Waste Data Paper which states that: "The total Gloucestershire managed biodegradable (non-</p>
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			<p>1.50 It is difficult to understand why the WCS Technical Paper WCS-A 2010 has been based on the premise that there will be a significant increase in commercial and industrial wastes arisings at a time when disposal costs are rising at a much faster rate than at any time particularly in the past in the light of these recent dramatic falls in arisings.</p> <p>1.51 It appears that the total existing treatment capacity actually exceeds the claimed combined MSW and C&I arisings of 786,000 tonnes. There is no reason in principle subject to contractual arrangements why some or all of the surplus commercial/industrial waste treatment capacity should not be available for the relevant part of the municipal waste stream. This should be investigated further as the consequence would clearly be to reduce the need for new treatment facilities. This is the approach adopted in relation to landfill and WCSA says:</p> <p>223. For the purposes of making provision for landfill voidspace it is considered prudent to combine the non-hazardous biodegradable and inert MSW and C&I requirements. This is because the two types of waste have a comparable composition, similar site requirements and therefore, unsurprisingly, are currently taken to the same sites in the County.</p> <p>1.52 This is largely true for treatment as well – indeed MSW contains a proportion of commercial waste (about 8-10,000 tpa).</p>	<p>metal) C&I figure for 2005 was 348,000 t. The 2008 figure was up on this to 375,000 t. WCS-A (2007) presented a C&I 'managed in Gloucestershire' range of figures from 1998/99 to 2005. Finding a trend was difficult, as was determining an appropriate growth rate. A 0% growth rate was decided on (as per the South West Regional Waste Management Strategy and Gloucestershire's adopted Waste Local Plan (2004). Tables 1e and 1f and Figures 1b and 1c in Section 1 of this report represent the best available trend data from the EA in terms of Gloucestershire's waste inputs. This data is not just for C&I waste, but it does reflect a broad picture across the waste streams. As mentioned in Section 1, the WDA has not changed its position on the C&I growth rate, but it does note the current downward trends (see Figures 1b. and 1c) and does not underestimate the continued impact of the escalating Landfill tax."</p> <p>There is no 'surplus' C&I treatment capacity available for MSW. There is no overcapacity, only 4 sites have been proposed for allocation and a variety of waste management options could come forward on these sites (Composting, Recycling/Reuse, Recovery, Transfer) all with the specific and focused aim of reducing waste to landfill. It is surprising that this is not welcomed.</p> <p>The concern about blight is not justified. All of the sites apart from Javelin Park are current waste sites or adjacent, and Javelin Park is a previously developed site that has remained unused for many years.</p>
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			<p>1.53 It is not sensible for the DPD to plan for over-provision of capacity as that would tend to depress prices within Gloucestershire and undermine pressures like the landfill tax which is intended to drive wastes up the waste hierarchy. Lower local prices would also promote longer term, and environmentally unsustainable, long distance imports of waste into the Gloucestershire.</p> <p>1.54 Even with the evident over-capacity discussed above there remain doubts that the capacities presented in Table 2 of the WCS Preferred options report fully reflects the current situation. The sites that have been included in the assessment should be listed in order that the changes following new permissions or other changes can easily and transparently be made.</p> <p>1.55 The WCS Preferred options report does not appear to include sites which have either been given planning permission but have not yet come into operation or are in the planning system and are consistent with the existing Development Plan criteria.</p> <p>1.56 It is unclear from the data presentation which other facilities are omitted. It is noted, for example, that Gloucestershire as the Waste Planning Authority made 32 Waste planning decisions in 2006/7 and granted 25 of these. A total of 91 applications have been made in the past three years of which 79 were approved. This is a three fold annual increase compared with the number of applications made in 2001/2. There is</p>	<p>The Waste Data Paper (2010) presents the best available information at the time of writing and factors in all available capacity including schemes that benefit from planning permission but have not yet been implemented.</p> <p>The appendices to the Waste Data Paper clearly set out which facilities have been included as contributing towards existing composting capacity including Sharpness, Wingmoor Farm West and Rose Hill Farm near Dymock.</p> <p>The existing capacity has been compared to future requirements and the result is a modest 'capacity gap'.</p> <p>The provisions of PPS10 are fully acknowledged. The approach taken in the WCS will not undermine or prejudice the movement of waste up the waste hierarchy.</p>
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			<p>no indication in the WCS what contribution these additional facilities are likely to make.</p> <p>1.57 In Gloucestershire recent planning applications and planning permissions for in composting facilities would remove from the wet biodegradable residual waste stream more than 120,000 tons per annum (tpa) :</p> <ul style="list-style-type: none"> • 25,000 tpa initially increasing to 48,000 tpa by Bioganix at Sharpness, Stroud District • 32,000 tpa at Wingmoor Farm, Tewkesbury District • 25,000 tpa at Dymock, Forest of Dean • 22,000 tpa at Sunhill Farm, Cotswolds (subject to planning). <p>1.58 It is also clear from the large number of (successful) applications that the market is already gearing up to meet the increased demands for waste management facilities. Caution should be made against overprovision in these circumstances.</p> <p>1.59 PPS 10, paragraph 25 says: In the case of waste disposal facilities, applicants should be able to demonstrate that the envisaged facility will not undermine the waste planning strategy through prejudicing movement up the waste hierarchy.</p> <p>1.60 PPS 10 similarly warns, at paragraph 4, against over-provision of disposal options where these would undermine movement up the waste hierarchy.</p>	
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Alan Watson Public Interest Consultants on behalf of SWARD and Bishop's Cleeve Parish Council (endorsed by Gloucestershire Friends of the Earth Network)	1853	1853/4	<p>Landfill Capacity:</p> <p>1.61 The demand for landfill has plummeted in the UK since the landfill tax was introduced as can be seen from the latest data from HMRC.</p> <p><i>graph provided in hardcopy response page 15.</i></p> <p>1.62 The slope of the fall in demand is actually increasing probably due to the higher tax burden associated with landfill in recent years and it can be seen that the slope changes in about 2006/7 when the escalator increased from an annual £ 3/tonne to £8/tonne</p> <p><i>table provided in hardcopy response page 16.</i></p> <p>1.63 Predictions of landfill life based on historic linear extrapolations or those which do not take into account the additional deterrent provided by the landfill tax – as is the case in the WCS - are therefore unlikely to be sound.</p> <p>1.64 The WCS says that there is currently capacity for at least 10-13 years of non-hazardous waste at current throughputs. The WCS adds:</p> <p>“this is a conservative estimate and the likelihood is that, due to future reductions to landfill as a result of mechanisms such as the Landfill Tax, landfill void could last for significantly longer”.</p>	<p>Comments noted. It is acknowledged that landfill tax has and will continue to have an impact on landfill demand and that this could extend the life of landfills in Gloucestershire. 10 to 13 years is the estimate but this is, as has been clearly stated, a cautious and conservative estimate. The 10 year estimate is based on EA WDI 2008 inputs for C&I and C&D and Waste Data Flow (from WDA) MSW figures for 2009/10. The 13 year estimate is based on Landfill inputs (MSW, C&I, C&D) direct from the operators for the financial year 2008/09.</p> <p>In relation to Gloucestershire landfill and the EA's high estimation of landfill void remaining see Paragraph 11.4.17 of the Waste Data Paper (2010). In conversation with officers at the EA regional office it was confirmed that the estimate of 10,691,000 m³ for non-hazardous waste was an error and an overestimate on the EA's part. GCC's estimate for non-hazardous voidspace (based on operator data) as at end of March 2009 was 6,029,500 m³. By the end of 2009 this would have dipped to the mid to high 5 million m³ mark. The latest EA estimate for 2009 was 4,541,000 m³. The EA have not questioned the validity of the WPA's estimates.</p> <p>In their response to the WCS publication the EA have stated: "We have reviewed your approach to analysing waste deposit trends in the data report and endorse the broad conclusions. The data analysis you have undertaken is correct to separate</p>

		<p>1.65 It is not clear how the data for landfill voidspace in the WCS has been established but it is almost certain that the capacity will extend for much longer than the headline 10-13 years. Indeed the language in the issues paper is stronger than in the WCS confirming it is “very likely” that the WCS figures are underestimates: “the estimates given are conservative and it is very likely that Gloucestershire's landfill life could be significantly extended”</p> <p>1.66 The previous DPD confirmed that the Environment Agency website state that Gloucestershire has 20 years of landfill capacity remaining as at 31/3/05 (based on a remaining voidspace of 15 million m3 for non inert waste). It also says that “The Environment Agency have advised that these four landfill sites have (at Feb 2007) a combined voidspace capacity of around 8,985,000m³ for non-hazardous waste.” The obvious approach would have been to ask the Environment Agency, upon whose data the voidspace figures depend, to reconcile the differences. If this has been done then where is the explanation? If it has not been done then why not?</p> <p>1.67 There was a similar issue at the previous waste local plan public inquiry. The County evidence on need presented a case in which there was an under reporting of available (and licensed) void space of the order of 9 million cubic metres. This related, I understand to a single landfill site (Wingmoor East) the capacity of which had been recorded as the engineered area and not the total licensed area.</p>	<p>different waste streams and categories of sites, in particular the recognition of the mature and essential separate role that metal recycling plays in overall waste management. We do note some difference in projected life spans of current landfill void from data previously published by the Environment Agency. The estimation of landfill life span from calculations of remaining void and patterns of deposits is not an exact science and we would not object to the methodology and estimates included in the core strategy document."</p> <p>It is difficult to see the direct relevance of material discussed at the previous Local Plan Inquiry. The WPA has brought the position up to date in the 2010 evidence paper including landfill voidspace. The WPA can only deal with what data responses and advice it receives from operators and the EA in presenting the best available data at a point in time. If operators reassess available voidspace through audit or for the purposes of supporting a planning application, it is their prerogative to do so.</p> <p>Paragraph 4.125 has been amended to emphasise the fact that the 10-13 years remaining capacity identified for non-hazardous landfill is a conservative estimate and that capacity could last potentially until the end of the plan period or beyond depending on future diversion rates from landfill.</p> <p>See Focused Change 25.</p>
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			<p>1.68 The 2004 Gloucestershire Waste Local Plan (Gloucestershire County Council 2004) corrected this and says, in relation to landfill void:</p> <p>LANDFILL POSITION</p> <p>3.22 Currently it is estimated that over 17 million cubic metres of permitted and licensed landfill and landraising void space exists in Gloucestershire. In 2002 operators are required to declare the void space to be devoted to hazardous or non-hazardous waste. The Environment Agency estimates that 13 million cubic metres could be assigned to non-hazardous, which includes municipal waste.</p> <p>1.69 It seems exceedingly unlikely that the difference between the WCS and the WLP (representing about 6 million m3 of landfill capacity has been filled in the past five years. Gloucestershire County Council proof WPA 1 indicated that the County was aware of the potential reporting errors in the data :</p> <p>“Figures quoted in the amended section 3.19 (WLP) are for the licensed void space allowed for landfill according to the information provided by Environment Agency records. This may not represent the complete void space that could potentially be available. It is possible that waste contractors operating sites within the County have not declared the full extent of their potential landfill capacity and as such there is likely to be more than adequate landfill space within the</p>	
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			<p>County even at current input rates”</p> <p>1.70 It would appear that the same issues may have arisen again. Clearly this is an important issue – not least because it affects the landfill capacity available, for example, for disposal of MBT residues. Residues from such a facility should be able to be landfilled at 1.5 tonnes/m³ with levels of biological activity little different from soil.</p>	
<p>Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD)</p>	439	439/1	<p>The reliability of the Data upon which the WCS is based (Generic relating to all aspects of the WCS). The waste data relied upon by the WCS does not include the most recent information. This is particularly important for commercial and industrial waste arisings for which there have been only two national surveys in more than a decade. There have been major changes with the new data and these have significant implications for the planning provision proposed by the WCS and without appropriate updating the WCS must be considered unsound.</p> <p>1.3 The WCS is effectively driven by the waste data as this provides the impetus for the provision and the possible scale of new facilities.</p> <p>1.4 The Updated Technical Paper WCS-A 2010 says (2.4.2)</p> <p>'Recent Planning Inspectorate (PINS) guidance states: A waste strategy should indicate what waste management developments and facilities are required, where they are to be located; when they are to be provided; and how they will be</p>	<p>The importance of using robust and up to date waste data is fully acknowledged. In this regard, the WPA considers that the data used is both up-to-date and fit for purpose.</p> <p>In particular, it was the latest available at the time of writing the publication WCS and the updated Waste Data Paper (2010). It is important to note that, the data has to be at a point in time – it is impossible in preparing a strategic planning document for e.g. quarterly Waste Data Flow to be incorporated as soon as it is available. The respondent should recognise this. It is significant that the EA have confirmed the acceptability of the waste data at both the regional and the local level. No significant concerns have been raised.</p> <p>Gloucestershire's waste data is based on managed figures. We consider that this provides the most accurate position and the EA are happy with this approach. The adopted Waste Local Plan uses managed figures and Regional Waste Management Strategy and the South West RSS recognise and accept Gloucestershire's approach.</p>

			<p>delivered'</p> <p>1.5 This is consistent with the advice given in the June 2010 Planning Advisory Service (PAS) document 'Waste Content of Core Strategies' which states that: 'For waste core strategies, essential baseline information includes, the amount of waste being generated in different waste streams, how much is being managed currently, how much needs too be managed in future (to meet targets) and how many facilities are needed to manage this amount" (our emphasis).</p> <p>1.6 The WCS-A 2010 Paper confirms (2.4.3) that "the waste data detailed in this and previous reports will play a key role in meeting these requirements". As the waste data is so fundamental to the plan any serious errors or omissions must have a high likelihood of rendering the plan unsound.</p> <p>1.7 Whilst it is noted that the Authority has updated the Technical Evidence paper on waste arisings from the 2007 version the current paper still only has data to August 2010 and does not include the latest Environment Agency or WasteDataFlow results. Nor does the paper include the results of the recent DEFRA C&I waste survey.</p> <p>1.8 The use of the most recent data, particularly in relation to the C&I waste arisings where the new data includes the results of one of only two surveys in more than a decade is crucial to the Soundness of the WCS. There have been major changes with</p>	<p>With regard to the 2010 DEFRA C&I arisings survey, this was not available at the time of the preparation of the WCS Publication draft and the latest Waste Data Paper, and the WPA would question whether this broad arisings survey is as accurate as the detailed managed figures that have been used. The managed figures are based on actual throughputs at sites, EA license information from weigh bridges etc, whereas the arisings survey is just a broad snapshot of waste that could arise in Gloucestershire but could ultimately be managed / disposed of outside of the County. It has a number of limitations.</p> <p>No Change.</p>
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			the new data and these have significant implications for the planning provision proposed by the WCS.	
Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD)	439	439/2	<p>C&D Waste Arisings (E20, E24, 2.20, 2.21, 3.27)</p> <p>The targets proposed for the diversion of C&D waste are unsound as it is proposed to divert more waste than the total quantity of C&D waste landfilled in 2009.</p> <p>Furthermore sufficient existing capacity exists for the diversion of C&D waste, particularly when licensing exemptions are considered to improve upon the target of a 50% reduction of landfill of C&D waste by 2012 without further planning provision.</p> <p>1.9 The WCS says that as a consequence of the National target to reduce C&D Waste to landfill by 50% by 2012, there is a need to divert an additional 85,000 tonnes (top range) per year from licensed landfill.</p> <p>1.10 The target is more specific in Strategic Object 2 (E.24): By 2012, through inert recycling and recovery to reduce the amount of C&D waste currently going to licensed landfill by 50%.</p> <p>1.11 The updated Technical Paper says (S5.2) "figures from Gloucestershire's landfill operators suggest that about 170,000 t of C&D waste was landfilled in their sites in 2008/09". The 2009 Environment Agency data shows just 71,000 tonnes of C&D waste however. Of this only 3,000 tonnes was landfilled in inert waste landfill sites. It is reasonable to assume that some of the 68,000</p>	<p>The targets for the diversion of C&D to landfill are not unsound. It is acknowledged that estimations of inert C&D waste can be a problematic area due to:</p> <ul style="list-style-type: none"> - The crossovers between licensed and exempt activities (something the EA is currently seeking to address). - Inert C&D that is used in landfill sites for cell engineering and cap and cover purposes. <p>Broad 'headline' EA figures from their website do need some level of interrogation. Importantly, in relation to Gloucestershire's data the EA have stated:</p> <p>'We have reviewed your approach to analysing waste deposit trends in the data report and endorse the broad conclusions. The data analysis you have undertaken is correct to separate different waste streams and categories of sites in particular the recognition of the mature and essential separate role that metal recycling plays in overall waste management. We do note some difference in projected life spans of current landfill void from data previously published by the Environment Agency. The estimation of landfill life span from calculations of remaining void and patterns of deposits is not an exact science and we would not object to the methodology and estimates included in the core strategy document'.</p>

		<p>tonnes of inert waste landfilled non-inert waste sites was used for engineering purposes and was thus contributing towards the National target: <i>(please refer to table provided in hardcopy response pg 4).</i></p> <p>1.12 It is clearly irrational to set a target of diverting from landfill 14,000 tonnes more waste than the total 71,000 tpa of C&D waste landfilled in the county in 2009.</p> <p>footnote -(1.The WCS says at para 2.17 that most C&D waste is inert. In fact C&D waste is not precisely synonymous with the Environment Agency Inert/C&D waste classification but it is close enough for planning purposes (particularly given the range of arisings.)</p> <p>1.13 The WCS does not say so but the baseline for this target is the waste landfilled in 2008.</p> <p>1.14 Assuming the Environment Agency data is correct then this target has already been exceeded by more than 14,000 tpa. The WCS should be updated and the evidential basis for the claims and data in the WCS need to be sound.</p> <p>1.15 Even at the DPD stage with much higher arisings than currently the then existing capacity within Gloucestershire was 25% larger than the arisings. No new capacity is likely to be required and some of the existing capacity may even be available for other related MSW and C&I waste streams as under utilised capacity is likely to be attracting waste imports into the county.</p>	<p>Importantly, the figure of 170,000 t of C&D landfilled in 2008/09 is based on direct returns to the WPA by the County's landfill operators. Policy WCS4 aims to divert 50% of this (85,000 tonnes/year) from landfill.</p> <p>It is therefore incorrect to state that the WCS proposes to divert more C&D waste than was landfilled in 2008/09. In fact it proposes to divert half.</p> <p>No Change.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD)	439	439/3	<p>MSW Arisings and Waste Growth Assumptions (Generic, E3, Key Issues 1, 7, E23, E24, 3.33, WCS1):</p> <p>The assumptions about waste growth are fundamental to the whether the WCS can be considered 'Sound'. The current assumption is that the waste arisings will grow until 2020 but contradictory data, including growth beyond 2020, has been used to justify the need for residual waste facilities.</p> <p>The growth levels do not reflect the best evidence currently available which is that growth has been essentially zero or reducing for a decade. There is no evidence to support a growth scenario and the approach in the WCS would lead to over-provision of facilities at the bottom of the waste hierarchy and unnecessary blight. It is therefore unsound.</p> <p>1.16 The WCS, correctly, notes [Key issue 7]:</p> <p>Future changes in the amount of waste will dictate the number of new facilities required.</p> <p>1.17 The WCS claims (E.11) that:</p> <p>"The amount of municipal and hazardous waste has generally increased in recent years"</p> <p>1.18 It is not clear what evidence is relied upon to support this claim. All the publicly available data indicates just the opposite and this reflects a</p>	<p>The importance of waste growth is fully acknowledged. The extensive information provided by the applicant is essentially seeking to demonstrate that the assumptions made in the WCS relating to future waste growth are flawed in particular the fact that forecast growth is contrary to recent downward trends in municipal waste arisings and that the inclusion of green waste skews the data.</p> <p>In response the WPA does not accept that the data used to inform the publication WCS is flawed.</p> <p>It is acknowledged that municipal waste arisings have fallen in recent years. There are several reasons for this. Service changes introduced in Cotswold District, Gloucester City and Tewkesbury Borough have all reduced MSW arisings. In addition the recession has undoubtedly had an effect. It is however wrong to assume that service changes lead to year on year waste reduction. The WDA has carried out modelling to forecast residual waste tonnages many times and have considered many factors in that modelling including population growth, District service changes, policy, Government forecasts and existing waste arisings.</p> <p>Table 3I of the Waste Data Paper Update (2010) is based on information provided by the WDA at that time and forecasts that MSW arisings will increase to 359,612 tonnes/year by 2027/28.</p>

		<p>national trend over a number of years. Indeed the WCS accepts (Key Issue 7) that the amount of MSW has been falling for the past 3 years. It is demonstrated below that the only reason that it had previously increased was because of short-sighted changes in waste collection.</p> <p>1.19 The total arisings were particularly influenced by the decision to collect green waste in an attempt to increase recycling levels at the expense of an increase in the total tonnage of waste to be managed. This approach was inconsistent with the waste hierarchy and should be reversed.</p> <p>1.20 Clearly the assumptions about waste arisings and growth are absolutely fundamental to the soundness of the plan. At the very least estimates of unrealistic growth introduce the real risk of blight into the planning process together with the expensive and environmentally damaging provision of excessive capacity. Combined with the modest recycling ambition this over-provision is very likely to be at the bottom of the waste hierarchy with landfill and incineration and presents a very real risk of inhibiting or even preventing effective waste management at the top of the hierarchy.</p> <p>1.21 The statistics for the MSW element are significantly more robust than for the commercial and industrial wastes.</p> <p>1.22 The annual figures presented in the updated Waste Technical Paper shows that 2009/10 MSW arisings are at the same level as 2003/4: <i>(please refer to table provided in hard copy response page</i></p>	<p>On this basis the WCS identifies a residual MSW requirement of 150,000 tonnes/year. More recent modelling carried out for the review of the residual project, based on 60% recycling by 2020 and 70% recycling by 2030, showed an annual forecast of approximately 155,000 tonnes of residual waste by 2040.</p> <p>A number of scenarios combining varying growth and recycling rates were also modelled. These show the projected levels of residual waste in 2030 to be between 125,000 tonnes (70% recycling and composting) and 165,000 (60% recycling and composting).</p> <p>The WDA has had discussions with DEFRA on the latest national waste growth trends and has also reviewed the Swedish Sustainable Waste Management Programme, which predicts that waste will grow at 2.2% per annum over the next 25 years, aligning closely to the DEFRA scenarios and the WDA's own modelling.</p> <p>On the basis of the above, the residual MSW requirement of 150,000 tonnes/year identified in the WCS is considered to be robust.</p> <p>No Change.</p> <p>With specific regard to the issue of zero-growth by 2020, there are several issues to raise in response.</p> <p>First, it is important to note that the zero-growth objective set out in the WCS is derived from the Joint Municipal Waste Management Strategy</p>
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			<p>1.27 Another key confounder which needs to be taken into account when considering MSW arisings and growth is the commercial waste collected by the WDA. This is because the commercial wastes are essentially arbitrary and discretionary. They will fluctuate with price and thus distort the long-term trends for the wastes that the authority has an obligation to collect.</p> <p>1.28 The breakdown of the data show, in particular, the high growth in 'green' waste which, being readily compostable, has often been collected in an attempt to present improved 'Best Value' figures for composting/recycling. As the performance indicators did not place weight on the total arisings the corresponding growth in waste was largely ignored.</p> <p>1.29 This has not been a particularly sensible approach to waste management and, as the green waste is practically all "new" waste which would previously have been left in gardens or composted at home. It should not be used as a basis to project overall growth rates. When green waste is removed it can be seen that over the period from 2002-3 through to 2006-7 reduces to just 0.87% - much closer to the national average of c. 0.5% indicated in Waste Strategy 2007.</p> <p>1.30 The increased emphasis on collection of DIY/hardcore wastes at HRCs has also almost certainly generated mainly 'new'. Hardcore would rarely have been put out with residual domestic waste and, if produced and disposed of at all,</p>	
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			<p>would mainly have been collected in skips and would then most likely have been recycled as part of the C&D stream. If hardcore waste growth is removed from the equation then it can be seen that the average growth rate since 2002 is only 0.09%.</p> <p>1.31 The majority of the increase in arisings over the purported period of growth from 2003-2007 has also come from HRCs. The experience in many parts of the country has been that the landfill tax and compounded increases in disposal costs has resulted in some 'bleeding' of trade wastes into the domestic stream as a result of the landfill tax. This includes small traders bringing waste home and leaving their trade waste with their household waste for collection; an increase in waste from the larger numbers of self employed or other full or part-time home workers; traders using Civic amenity sites or tradesmen leaving waste behind on domestic contracts which would previously have been removed. If this is happening in Gloucestershire, as seems likely, then the implication would be that the total household waste is actually decreasing.</p> <p>1.32 The generation of new green waste, as described above, is essentially what Eunomia found in their review for the Authority in 2006 (Eunomia Research & Consulting 2006). The light blue lines on the chart (provided) show the waste with green waste removed. Eunomia obviously did not, at that time, have the benefit of the more recent data for the County.</p>	
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			<p>5.1.1 Bin Waste. Figure 1. Gloucestershire Bin Waste Airisings By Month – <i>(graph provided in hardcopy response pg 9)</i></p> <p>1.33 The changes associated with introducing wheeled bins for green waste are particularly clear in relation to the data for specific authorities such as Cotswold <i>(see graph provided in hard copy response page 9)</i>.</p> <p>1.34 The driver for the collection of green waste was that it was perceived as an easy way to improve performance indicators relating to recycling. As there was no national performance indicator for the total waste generated then the authorities compromised the overall sustainability of waste collection and management for the short-term benefit of appearing to achieve higher recycling performance. This must be recognised as a failure to improve the sustainability of waste management and is a clear example of how focus on a short-term goal can be detrimental to the more important sustainability goals.</p> <p>1.35 The latest contract data for the period from April 2009 to March 2010 shows that 24,671 tonnes of Greenwaste were collected by kerbside collections undertaken by District Councils. This represents approximately 10% of the collected waste.</p> <p>1.36 The assessment upon which the growth rates in the plan are based does not take into account the increased environmental imperatives which follow from the recognition that climate change is</p>	
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			<p>real and requires urgent action; it ignores the huge increases in disposal and treatment costs, which, even though not directly passed to the residents – will have major impacts on the incentives for authorities to promote waste reduction – such as home composting. The higher costs will justify much more significant investment than has historically been the case. It also ignores technological changes. These are inevitable – think, for example, of the demise of video tape and CDs – now largely replaced with almost waste free digital media or the downsizing and dematerialisation of electronic equipment. Also not considered are the increased impacts of extended producer responsibility legislation which not only mandates recovery but provides a powerful incentive for manufacturers to de-materialise their products.</p> <p>1.37 The WCS says:</p> <p>“Forecasts suggest that the amount of MSW will increase to 359,612 tonnes in 2027/8”</p> <p>1.38 No citation is given for which ‘forecasts’ make such projections (which infers an average annual growth rate of >1.2% over the period from 2010/11 to 2027/8). This is reflected in 3k of the updated waste data and is attributed to the WDA. It is assumed that the original source relies on the November 2008 projections from the ill-fated PFI procurement project. Those figures, however, start from a 2009-10 total MSW arisings of 298,694 – already nearly 5,000 tpa more than the actual figures given in the WCS. It appears, therefore, that as the starting point in Table 3k is lower the growth</p>	
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			<p>rate has been increased simply to achieve the same endpoint in an apparent attempt to justify the 'need' for the residual waste facility promoted by the WDA. It is clearly inconsistent to base the future projections on a different starting point from that included, as the current level of arisings in WCS and it is equally unsound to increase the growth rate with no justification. This clearly needs critical assessment.</p> <p>1.39 Furthermore the projections from the PFI contract assume that the waste arisings continue to grow after 2020. This is inconsistent with the WCS which assumes no growth after that date. The consequence is that the total waste arising are projected to be 21,807 tonnes higher than when the zero growth after 2020 assumption is applied. The combined effect of these inconsistencies alone means that the MSW waste arisings for 2027/8 are more than 26,000 tonnes larger than they should be had the data from the WCS been used rather than from the aborted PFI. This represents a significant error.</p> <p>1.40 Whilst the growth rate is lower than that suggested by consultants for the authority as recently as March 2008 in a report which included projections which are now demonstrably inaccurate the proposed growth rate assumptions are still too high in the light of recent trends.</p> <p>Figure 12. Gloucestershire Municipal Solid Waste Arisings Projection. – <i>(graph provided in hardcopy response pg 11)</i></p>	
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			<p>1.41 The most appropriate approach for the WCS is to make assumptions of zero growth for MSW with scenarios for continuing reduction in line with recent trends. The recent developments in the collection of greenwaste should be reversed and such waste left for home composting and mulching to reduce the arising further. There is absolutely no evidence that supports an argument that municipal/household waste arisings in Gloucestershire are growing. Sensitivity bands through to $\pm 1\%$ could be included to ensure a robust outcome.</p> <p>1.42 Maintaining the current target of achieving 'zero-growth' by 2020 is equivalent to a target to increase waste arisings which is clearly unsound in the context of national policy.</p> <p>1.43 It is of some concern not all the relevant waste data and projections are in the public domain – particularly the revisions to landfill capacity assessment and the growth rates used to support the outline business case of the PFI.</p>	
Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD)	439	439/4	<p>Waste Composition (Generic, 2.16, Core Policy WCS4)</p> <p>Waste composition is fundamental to the treatments which may be used and these in turn have land use implications. Furthermore a key driver is compliance with the Landfill Directive and the domestic implementation through LATS targets. The failure of the WCS to consider the changes in composition of waste over time and with higher levels of recycling means that the WCS</p>	<p>Comments noted. The main issue raised by the respondent is the fact that the WCS does not consider the composition of waste and how this might change over time leading to over-provision of residual waste treatment facilities and prejudicing the movement of waste up the waste hierarchy.</p> <p>The following comments are made in response to this issue. First the WCS <u>does</u> seek in broad terms to consider the composition of the different waste</p>

		<p>proposes over-provision of residual waste treatment facilities at the bottom of the waste hierarchy which risks undermining the movement of waste up the hierarchy and risks causing unnecessary blight. The WCS is therefore unsound.</p> <p>1.44 The WCS contains little information about the composition of waste to be treated in spite of this being fundamental to the appropriateness of most treatment options.</p> <p>1.45 The proportion of biodegradable waste, for example, is a key driver in terms of compliance with the Landfill Directive (as 3.11, 3.19). Core Policy WCS4, in particular, emphasises that it is particularly the diversion of this part of the waste stream which drives the provision of the additional 150,000 tpa MSW and 143-193,000 tpa C&I residual waste recovery capacity. Yet nowhere in the WCS or associated supporting documents is there any discussion about how the proportion of the waste stream which is biodegradable is likely to change over the plan period.</p> <p>Furthermore waste for composting or digestion, for example, must be biodegradable waste. Burning such waste in an incinerator would be particularly inefficient given the very high moisture content and high levels of nitrogen which means that emissions of oxides of nitrogen would inevitably be elevated.</p> <p>1.46 Whilst a full waste analysis is required to properly assess the waste management options in practice the key question which must be addressed</p>	<p>streams (see paragraphs 2.15 – 2.19).</p> <p>It is fully recognised that a proportion of waste will be biodegradable and that this type of waste in particular should be diverted from landfill.</p> <p>Provision is therefore made for additional recycling, composting and AD facilities. Residual treatment is proposed through Core Policy WCS4 to take account of the waste that cannot reasonably be recycled or composted.</p> <p>The residual capacity which is proposed (150,000 tonnes/year) is based on information provided by the WDA and is not considered to represent 'over-provision'. There is no evidence to suggest that such provision would in any way prejudice the movement of waste up the waste hierarchy. Any such suggestion is pure speculation.</p> <p>Dealing with some of the specific issues raised.</p> <p>With regard to the similarity between municipal and commercial and industrial waste, it is not accepted that these waste streams are dissimilar.</p> <p>The DEFRA statement of aims and actions for commercial waste (2009) states that 'local authorities will consider the commercial and industrial wastes that arise in their areas and whether there are benefits in dealing with them <u>together with similar household wastes</u> (own emphasis).</p> <p>Furthermore, the Eunomia Report 'Cutting Waste –</p>
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		<p>is therefore what is the biodegradable/biomass content of the waste.</p> <p>1.47 This may be best considered in the light of the 2007 consultation (Department of Trade and Industry 2007) on the review of the Renewables obligation. The Government response to the submissions to the consultation was published in January 2008 (BERR 2008) and said:</p> <p>'Deeming the biomass fraction of waste: we will proceed with the introduction of deeming, but will begin with a lower deemed level of 50% fossil fuel energy content that will increase over time to 65% following a trajectory in line with the Government's waste policy' (3).</p> <p>Footnote (3) The Government propose setting the deemed levels of fossil energy content at: 50% from 2009 to 2013; 60% from 2013 to 2018; 65% from 2018. There is the possibility of producing evidence of different waste analysis but this must be well founded and evidence based: We will allow operators the opportunity to present Ofgem with evidence that the fossil fuel content is lower than the deemed level and look to make the fuel measurement system more flexible.</p> <p>1.48 And warns:</p> <p>'Ofgem will be given powers to withhold ROCs for mixed waste streams where there is reasonable doubt that the biomass energy content reaches the deemed level. This is consistent with the approach currently used under the scheme for issuing</p>	<p>Reducing Costs and Improving Waste and Recycling Services' (December 2010) states in Section 2.4 that commercial waste tends to be similar in nature to local authority controlled waste and that as with local authority waste it has a heterogeneous composition. This is reflected in the European Commission's request that the UK amend its definition of municipal waste to include much of the commercial waste stream.</p> <p>With regard to the emissions associated with incineration it is important to note that these are tightly controlled through the environmental permitting regime. Furthermore the WCS is technology neutral and the strategic site allocations are capable of accommodating a range of different waste recovery processes.</p> <p>The comments relating to small-scale AD facilities are noted. A new core policy and supporting text on AD have been included in the revised publication WCS. This includes criteria to allow such facilities to come forward on vacant or underutilised employment land including industrial sites.</p> <p>See Focused Change 13.</p> <p>It would however be beyond the reasonable scope of the WCS evidence base to ascertain the current waste management arrangements of the private sector and what their future requirements might be.</p> <p>Provision for commercial and industrial waste is</p>
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			<p>Climate Change Levy Exemption Certificates. It should be noted that lowering the deemed level of fossil-fuel energy from 65% to 50% is likely to increase the risk for some stations that a test of reasonable doubt will be met.</p> <p>1.49 This consultation and response considers the carbon levels in the waste that would be burned <u>after</u> the removal of the recyclables that the Government clearly considers should be taken out. Thus even with the limited recycling targets in the WCS the biodegradable element of the residual waste can be expected to fall to 35% by 2018.</p> <p>Annex E: Analysis on Biomass Fraction of Waste for Use in Deeming the Fossil Fuel Fraction of Waste – <i>(table provided in hardcopy response pg 13)</i></p> <p>1.50 The LATs allowance for 2018/19 is 53,139 (note the tables 3f and figure 3d in the WCS-A 2010 report are incorrectly labelled as “waste from landfill” whilst they appear to show the waste that may be landfilled). Thus LATs compliance and any associated penalties cannot be used as an argument to justify additional residual waste capacity if there was less than a total of $53,139/0.35 = 151,825$ tonnes. Even if the MSW is waste growth is 0% rather than the current trend which is a much steeper fall then the residual MSW with 60% recycling would be <120,000 tpa. It is incorrect, therefore, to use the Landfill Directive requirements for the diversion of biodegradable municipal waste as the justification for additional treatment capacity.</p>	<p>made on the basis of the requirements set out in the Regional Spatial Strategy for the South West and this approach is considered appropriate.</p> <p>Paragraph 3.24 has been amended to explain how the RSS has been used to calculate the C&I requirements set out in the WCS.</p> <p>See Focused Change 9.</p> <p>As set out previously, the DEFRA study referred to has a number of limitations and for this reason it is considered appropriate to have regard to the known managed amount of C&I waste in Gloucestershire.</p>
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			<p>1.51 Furthermore if the WCS properly considered the biomass element of residual waste then it would recognise that the disbenefits associated with landfill reduced significantly as much lower levels of odour and greenhouse gases are produced. In these circumstances the external costs of landfill are probably lower than incineration as detailed below.</p> <p>1.52 The WCS at Para 2.16 indicates that Commercial and Industrial waste “consists mainly of metal and biodegradable items. The biodegradable element is very similar to MSW (food, paper, card etc.) and can be managed at the same facilities”. This is an unacceptable simplification and inaccurate characterisation of a complex waste stream.</p> <p>1.53 The latest DEFRA survey shows that the key contributors to the C&I waste stream in Gloucestershire in 2009 after metal manufacturing (112,138 tonnes) were the retail and wholesale operators (78,037 tonnes) food and drink manufacturing industries (74,317 tonnes), machinery and equipment manufacturers (56,539 tonnes). It should be clear to even lay observers that these waste streams are likely to be very different and it is misleading to characterize them as being “very similar to MSW”. Furthermore the waste streams are likely to be far more homogenous at the point of generation than MSW and thus easier to treat appropriately.</p> <p>1.54 A more reasonable approach would therefore be to examine the different sectors to see how</p>	
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			<p>their needs are currently being met and what future treatments may be required. Concentrating on the provision of a small number of anaerobic digestion facilities for the food and drink manufacturing industries is likely to be the most efficient way of reducing environmental impacts and ensuring compliance with Landfill Directive obligations. These facilities may well be on industrial sites particularly for any major operators and not need specific planning provision in any case.</p> <p>1.55 It should be noted that an additional consequence of this change is that any claim that incineration contributes to “renewable” energy targets becomes less true over time as only the biomass element contributes to targets and this is expected to reduce to about 1/3 of the total by 2018. Para 4.69 should therefore be amended to reflect the reality of the small and diminishing contribution that may be made by incineration.</p>	<p>The footnote to paragraph 4.69 clearly explains that in relation to incineration the degree to which renewable energy is generated will depend to a large extent on the nature of the waste being generated. This is considered adequate.</p> <p>No Change.</p>
Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD)	439	439/5	<p>The 'Technology Neutral' approach and Anaerobic Digestion/ CHP (4.59).</p> <p>The plan purports to be technology neutral but the way that it is currently drafted with no waste composition assessment masks an implicit favouring of technologies which can treat both biodegradable and non-biodegradable wastes such as incineration. In fact the Government has made it clear that it is not technology neutral in relation to anaerobic digestion and the WCS should follow this approach. As it stands the plan does not reflect Government policy and is unsound.</p>	<p>The WCS is technology neutral and the four strategic site allocations are capable of accommodating a range of different waste recovery processes. The plan does not favour one process over another. Paragraph 4.91 has been amended to clarify the fact that the strategic site allocations are capable of accommodating a range of different waste recovery processes.</p> <p>See Focused Change 20.</p> <p>With specific regard to Anaerobic Digestion (AD) because this is not generally suitable for managing</p>

			<p>1.56 The WCS says (4.59) 'Importantly the Council is 'technology neutral' and therefore has no preference for one technology/process over another'</p> <p>1.57 The Government's approach, however is that it 'remains technology neutral on energy from waste' with the sole exception that 'Apart from AD, the Government does not generally think it appropriate to express a preference for one technology over another, since local circumstances differ so much'.</p> <p>1.58 Thus the Government and WS2007 seek to 'further promote anaerobic digestion'.</p> <p>1.59 This is consistent with other Ministerial statements emphasising that the best choice of technology for food waste is anaerobic digestion (Ruddock 2007):</p> <p>'Central Government doesn't usually have a preference when it comes to how leftover waste is dealt with as long as all the options higher up the waste hierarchy have been exhausted first. It usually down to each local authority to determine how best to deal with the waste in their area and make decisions that fit their own individual circumstances. But when it comes to food waste we do have a preference. We think anaerobic digestion is the best process to use, and that local authorities need to collect food waste separately for this purpose.'</p>	<p>mixed residual waste it is dealt with separately in the WCS.</p> <p>To further emphasise the potential benefits of AD including renewable energy generation it has now been separated from the recycling and composting policy (WCS2) where it was previously located.</p> <p>The Government's policy approach towards AD is clearly explained in the supporting text of the policy.</p> <p>See Focused Change 13.</p>
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			1.60 It is unusual for the Government to give such emphasis to specific technologies and the WCS should be amended to reflect this particularly as AD is focussed specifically at biodegradable waste – the stream most directly relevant to the Landfill Directive requirements.	
Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD)	439	439/6	<p>Future Population</p> <p>Key issue 1 relates to population growth</p> <p>1.61 Based on current trends, the County population will reach 674,000 by the year 2033. The growth will be mainly driven by inward migration from other parts of the UK. The Local Projection, however, suggests that if the current house building rate is reduced by 20% in the future, for instance, the population forecast would be brought downwards by more than 23,000 people for the County by the year 2031.</p> <p>1.62 The largest increase is expected to be in the number of older people (65+). This group are expected to increase by more than 79% nearly 82,500 people over the next 25 years. By 2033 the number is expected to have increased to a total of 187,600 equivalent to 27.8% of the population.</p> <p>1.63 At the same time the number of children and young people (0-19 yrs) is expected to fall steadily. Numbers are anticipated to reduce by about 7,500 people or 5.3%, over the period 2008-2033.</p> <p>Projected Population Change by Broad Age Gloucestershire – <i>(graph provided in hardcopy</i></p>	<p>The population forecast of 674,000 set out in paragraph 2.5 and Key Issue 1 of the WCS has been included in the WCS to illustrate the fact that the population of the county will increase over the next 20 years. This is of course a forecast only and cannot be taken to be 100% accurate. Notably however it is 11,000 lower than the ONS estimate over the same period.</p> <p>In any case the MSW capacity requirement for municipal waste (150,000 tonnes/year) is derived from the latest available waste flow forecast produced by the WDA not the population projection of 674,000 which has been provided by the Council's research and information team (although clearly population increases will be one of the factors used by the WDA is producing their estimate).</p> <p>With specific regard to changing demographics, there is nothing to suggest that an ageing population will have any discernible impact on the amount of waste produced.</p> <p>The respondent claims that the resource throughput of the average household is 'likely to reduce significantly' but provides no evidence to support this claim and offers only speculation</p>

			<p><i>response pg 16)</i></p> <p>1.64 The implications are that the resource throughput of the average household is likely to reduce significantly. Whilst evidence to quantify this is currently thin it is certainly unlikely to be robust to assume that household waste production would be stable over this period. A more likely scenario is that the reduction in waste generation per household will more than compensate for any population growth.</p>	<p>about what may or may not happen in 20 years time.</p> <p>No Change.</p>
<p>Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD)</p>	439	439/7	<p>The projected requirements for a residual waste facilities (E18, E24 - Strategic Objective 3, 2.53, 3.14, 3.23, 3.26)</p> <p>1.65 The WCS suggests: 'A residual waste recovery facility (or facilities) able to process around 150,000 tonnes per year of residual municipal waste (waste that cannot be recycled or composted).</p> <p>1.66 This is clarified by a footnote as: 'is an approximate requirement based on the latest available waste flow forecast produced by the Waste Disposal Authority and is based on achieving a 60% recycling rate by 2020'.</p> <p>1.67 Again no source is given for this and it appears that it may be based on the projections for the abortive PFI contract as discussed above. These figures and assumptions are inconsistent with the other targets and assumptions in the WCS and cannot be considered robust for the reasons explained in the section on waste growth.</p>	<p>Table 3I of the Waste Data Paper Update (2010) is based on information provided by the WDA at that time and forecasts that MSW arisings will increase to 359,612 tonnes/year by 2027/28. On this basis the WCS identifies a residual MSW requirement of 150,000 tonnes/year. More recent modelling carried out for the review of the residual project, based on 60% recycling by 2020 and 70% recycling by 2030, showed an annual forecast of approximately 155,000 tonnes of residual waste by 2040.</p> <p>A number of scenarios combining varying growth and recycling rates were also modelled. These show the projected levels of residual waste in 2030 to be between 125,000 tonnes (70% recycling and composting) and 165,000 (60% recycling and composting). The WDA has had discussions with DEFRA on the latest national waste growth trends and has also reviewed the Swedish Sustainable Waste Management Programme, which predicts that waste will grow at 2.2% per annum over the next 25 years, aligning closely to the DEFRA</p>

			<p>By 2020, when the WCS assumes waste growth stabilises the residual waste is c 135,000 tpa. As this is based on a starting level nearly 5,000 tonnes higher than the 2009/10 figures in the WCS this really equates to c.130,000 tpa. This still assumes a trend bucking c.1.5% annual growth rate from 2010-2011 which adds c.45,000 tonnes to the total waste and 18,000 tonnes to the residual. Thus a more realistic figure for the residual waste treatment demand by 2020 and beyond would be 112,000 tpa. The WCS therefore overstates the residual waste treatment requirement by at least 33%.</p> <p>1.68 It is unclear why the plan considers that there is any further need for residual treatment facilities in the light of the above. Any additional need would certainly be much less than is currently proposed. This could be met by small scale and local facilities with benefits to the long term sustainability being achieved by taking full account of the increasing environmental costs associated with transport (AEA Technology for DEFRA 2007).</p>	<p>scenarios and the WDA's own modelling. On the basis of the above, the residual MSW requirement of 150,000 tonnes/year identified in the WCS is considered to be robust.</p> <p>Whilst the respondent is seeking to cast doubt over the amount of residual waste there will be in the future, it cannot be disputed that there is a demonstrable need for additional capacity given the complete lack of recovery facilities within the county.</p> <p>In relation to the use of small-scale facilities, Core Policy WCS4 allows for such facilities to come forward in appropriate locations subject to relevant criteria.</p> <p>No Change.</p>
Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD)	439	439/8	<p>The Proposal for an MSW Contingency/ Supporting infrastructure (E18, 3.23, 3.26, 4.84)</p> <p>The Proposal for an MSW Contingency/ Supporting infrastructure is considered unsound because the data upon which the need for the facility which would be supported it unreliable and the WCS proposes excessive provision.</p> <p>Appropriate bulking/transfer capacity is already</p>	<p>In relation to comments made on Table 3 the position can be clarified as follows. The WCS makes it clear that the MSW residual waste requirement is around 150,000 tonnes/year.</p> <p>The WCS also makes it clear that this could be met through a single or multi-site solution. The implementation of this is a matter for the WDA through the residual waste contract. The WCS provides the policy framework against which</p>

			<p>available in any case but the more appropriate approach of smaller more proximate local facilities would be more consistent with reducing transport and would eliminate the need for transfer capacity.</p> <p>1.69 The WCS proposes an MSW Contingency/ Supporting infrastructure of 136,000 to 148,000 (or around 150,000 'according to information from the WDA').</p> <p>1.70 The WCS is very unclear as to what is being proposed here. Whilst the MSW Contingency/ Supporting infrastructure is evidently independent and presumably supplementary to the MSW residual waste facility. The word “contingency” is only used in the WCS in Table 3 (para 3.26). Some indication is given at E18 that some level of supporting infrastructure in terms of transfer stations etc would be required “but not necessarily new facilities”.</p> <p>It appears self-evident that if there is sufficient bulking/transfer capacity for the current centrally located landfill sites there is likely to be sufficient for any residual waste facility also.</p> <p>More fundamentally, however, the capacity of any residual waste facility has clearly been significantly overstated by the WDA and provision could be made for much smaller facilities which do not require ‘strategic’ sites and which eliminate any need for bulking and transfer in any case.</p>	<p>proposals may come forward. In particular, Core Policy WCS4 identifies four strategic allocations and allows for proposals to come forward on other sites subject to certain criteria being met.</p> <p>With regards the MSW 'contingency' this is effectively where the MSW residual waste recovery solution might not be delivered for some reason.</p> <p>The expectation is that a solution can and will be delivered but there is the possibility of problems/delays in obtaining planning permission for a residual waste recovery facility and other options might therefore need to be pursued.</p> <p>For example this might include bulking and transfer of residual MSW waste to another location perhaps out of county. As the tonnage of residual waste requiring management would still be the same (c.150,000 tonnes/year) and the site area required for such a site(s) is similar, it seems reasonable for the WCS to provide for that eventuality.</p> <p>The provision of such contingency is consistent with advice set out in paragraph 4.46 of PPS12.</p> <p>Such contingency could be met either on the site allocations or on other sites.</p> <p>In relation to supporting infrastructure for MSW (such as bulking and transfer) whilst there may be sufficient current capacity for bulking and transfer at present, this might change in the future, in particular once the MSW residual waste recovery operation comes on line as is envisaged around</p>
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				<p>2015/16. The current locations for bulking and transfer might not be appropriate then.</p> <p>In addition the Strategic Waste Partnership (SWP) will in the future be looking at whether the current arrangements for supporting infrastructure are appropriate.</p> <p>However this is not currently known as supporting infrastructure will be addressed once the MSW residual recovery project is completed.</p> <p>Focussed Change 13 identifies the framework for bulking and transfer and outlines the possibilities which might be examined by the SWP.</p> <p>See Focused Change 13.</p> <p>See previous responses in relation to forecast MSW growth and residual capacity and the use of smaller sites.</p>
Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD)	439	439/9	<p>The failure of the siting process to ensure that any large facilities are sustainable (4.90 and Core Policy WCS4)</p> <p>It is essential that CHP suitability is established at the allocation stage if this is ever to be incorporated in any scheme.</p> <p>1.71 None of the sites suggested for allocation have a suitable heat load for CHP. The WCS is therefore unsound and the proposed allocations should be rejected. None of the sites listed in para 4.90 are suited to the need for combined heat and</p>	<p>There are three main strands to this lengthy representation.</p> <p>First it is argued that thermal treatment (i.e. incineration) is economically and environmentally less favourable than other forms of waste recovery (treatment).</p> <p>Second that if an incinerator were to come forward it should capture both heat and power.</p> <p>Third that none of the four strategic allocations identified in Core Policy WCS4 are suitable for</p>

			<p>power which is necessary to make the site at all efficient in climate change terms. This is clearly an important planning consideration (Communities and Local Government 2007).</p> <p>1.72 Furthermore the Waste Incineration Directive (European Commission 2000) says:</p> <p>Article 4 (2)(b) :</p> <p>(b) the heat generated during the incineration and co-incineration process is recovered as far as practicable e.g. through combined heat and power, the generating of process steam or district heating;</p> <p>Article 6 (6):</p> <p>6. Any heat generated by the incineration or the co-incineration process shall be recovered as far as practicable.</p> <p>1.73 These requirements can only be secured at the planning stage and should be addressed in the WCS.</p> <p>1.74 We note also that Defra's Outline Business Case template for PFIs (Department for Environment Food and Rural Affairs (DEFRA) 2008) says:</p> <p>'Combined Heat and Power (CHP) solutions are typically the most efficient outcomes giving a significant climate change benefit. The OBC will therefore be strengthened significantly if developed in a manner that encourages the</p>	<p>Combined Heat and Power (CHP) due to the lack of a suitable heat load nearby.</p> <p>Dealing with each point in turn.</p> <p>It is not the purpose of this schedule to debate or compare the relative merits of thermal treatment (incineration) with other forms of waste management. Suffice to say thermal treatment is an established and proven form of waste recovery both in the UK and in Europe.</p> <p>It is important to emphasise however that the WCS is 'technology neutral' with the strategic site allocations being capable of accommodating a range of different waste recovery operations including but not exclusively limited to, thermal treatment.</p> <p>Secondly if a thermal treatment facility were to come forward, the scope for utilising CHP would be explored in detail at that stage. It is important to note that the Waste Incineration Directive Article 6 (6) states that any heat generated by incineration should be recovered <u>as far as practical</u> (own emphasis).</p> <p>As such it would be inappropriate and inflexible for the WCS to require all thermal treatment proposals to incorporate CHP. This will be a matter for further consideration once the site and technology/process are established.</p> <p>With regard to the third main point raised by the respondent, it is not accepted that the four strategic site allocations have limited potential for</p>
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		<p>delivery of solution Other studies finding similar results include, but are certainly not limited to'.</p> <p>1.75 Without CHP any application must be very much weaker than would otherwise be the case. The reason is again demonstrated by the County's consultants (Hogg and Eunomia Research & Consulting Ltd 2006).</p> <p>Carbon Cost of Residual Waste Treatment – <i>(table provided in hardcopy response pg20)</i></p> <p>1.76 Showing the high carbon costs associated with thermal treatment compared with the options described above of MBT with stabilized output to landfill for residual wastes in the county after the higher recycling rates proposed.</p> <p>1.77 This conclusion is supported by a large body of literature showing that the external costs of thermal treatment are actually very similar to those for landfill. Studies finding similar results include, but are certainly not limited to:</p> <p>1. Eunomia, A Changing Climate for Energy from Waste? Final report for Friends of the Earth, 03/05/2006. (Hogg and Eunomia Research & Consulting Ltd 2006).</p> <p>2. Rabl, A., J. V. Spadaro, et al. (2007). "Environmental Impacts and Costs of Solid Waste: A Comparison of Landfill and Incineration." Waste Management & Research. (Rabl, Spadaro et al. 2007).</p> <p>3. Holmgren, K. and S. Amiri (2007). "Internalising external costs of electricity and heat production in</p>	<p>the use of CHP.</p> <p>A supporting evidence paper on CHP potential has been provided alongside the publication WCS which identifies the extent to which the strategic allocations are likely to deliver heat through CHP.</p> <p>At Javelin Park for example there is a large-scale mixed-use development nearby at Hunt's Grove which offers some potential whilst at Wingmoor Farm there is potential large-scale development coming forward to the north-west of Cheltenham in close proximity.</p> <p>Furthermore, potential heat clients do not need to be located adjacent to the CHP facility to benefit. Modern technology ensures that heat can be piped several kms although it is accepted that heat is lost as it travels.</p> <p>It is also important to emphasise that the strategic site allocations have been identified having regard to a wide range of factors including location, deliverability, flood risk, ecology and landscape etc.</p> <p>The potential for the delivery of heat through combined heat and power (CHP) is one of a number of factors that have been taken into account in determining which sites should come forward.</p> <p>The chances of finding a site that perfectly fulfils all criteria 100% i.e. no landscape impact or flood risk, available and deliverable and located next to a continuous and high heat demand are slim and it is</p>
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		<p>a municipal energy system." Energy Policy 35(10): 5242-5253. (Holmgren and Amiri 2007)</p> <p>4. Eshet, T., O. Ayalon, et al. (2006). "Valuation of externalities of selected waste management alternatives: A comparative review and analysis." Resources, Conservation and Recycling 46(4): 335-364. (Eshet, Ayalon et al. 2006)</p> <p>5. HM Customs & Excise (2004). "Combining the Government's Two Health and Environment Studies to Calculate Estimates for the External Costs of Landfill and Incineration, December 2004." (HM Customs & Excise 2004)</p> <p>6. Turner, G., (Enviros Consulting), D. Handley, (Enviros Consulting), et al. (2004). Valuation of the external costs and benefits to health and environment of waste management options Final report for DEFRA by Enviros Consulting Limited in association with EFTEC, DEFRA. (Turner, Handley et al. 2004)</p> <p>1.78 An independent study by Dijkgraaf (Dijkgraaf and Vollebergh 2004) concluded:</p> <p>'The net private cost of WTE (waste-to-energy) plants is so much higher than for landfilling that it is hard to understand the rational behind the current hierarchical approach towards final waste disposal methods in the EU (European Union). Landfilling with energy recovery is much cheaper, even though its energy efficiency is considerable lower than that of a WTE plant'.</p> <p>1.79 This conclusion is similar to that reached by the OECD (Organisation for Economic Co-operation and Development (OECD) 2007) this year following</p>	<p>a question of taking forward those sites which perform best on balance having regard to a range of factors.</p> <p>No Change.</p>
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			<p>their review of waste Management in the UK and the Netherlands:</p> <p>'In both countries, there is currently a strong preference given to incineration compared to landfilling of waste – as reflected e.g. in the landfill taxes they apply. A similar preference underlies the Landfill Directive of the European Union, which fixes upper limits for the amounts of biodegradable waste member states are allowed to landfill.</p> <p>However, estimates in both countries indicate that the environmental harm caused by a modern landfill and a modern incineration plant are of a similar magnitude, while the costs of building and operating an incinerator are much higher than the similar costs for a landfill. Hence, the total costs to society as a whole of a modern incinerator seem significantly higher than for landfilling - which indicates that some reconsideration of the current preference being given to incineration could be useful.'</p> <p>1.80 And:</p> <p>Analyses of the negative environmental impacts of landfilling and incineration in both countries suggest, however, that the foundation for the present preference for incineration is questionable from the point of view of total social costs'.</p> <p>1.81 It should be noted that the “social costs” of waste management include the respective private costs i.e. the costs to society of building and operating the various management options</p>	
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			<p>together with the external environmental costs.</p> <p>590. A key issue in relation to the balance of environmental costs of landfill and incineration is whether any incinerator is integrated into an effective combined heat and power system. WS 2007 says: 'The Government, while not generally expressing a preference for one type of technology over another for EfW, does believe that any given technology is (where applicable) more beneficial if both heat and electricity can be recovered. The strategy therefore states that particular attention should be given to the siting of plant to maximise opportunities for CHP. Greenhouse gas emissions should be an important criterion for stakeholders developing EfW plant. Some indications of typical emissions patterns are given in the summary guidance, but these will, of course, vary from location to location according to local transport links etc.</p> <p>591. In a 2005 report for DEFRA on extending the Renewable Obligation to include energy from waste with CHP ILEX consulting wrote: We estimate that EfW with CHP will produce a net environmental gain, producing additional carbon savings beyond that from electricity-only EfW plant – of between 120 kg CO₂ and 380kg CO₂ for each MWhth of heat produced.</p> <p>592. They thus estimated that 'a 400kt/yr EfW with CHP facility would create additional carbon savings of between 0.7 and 1.0 million tonnes⁴ of carbon dioxide (CO₂) in total over a 20-year lifetime, over and above those achieved by a conventional EfW</p>	
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		<p>facility without CHP.'</p> <p>593. The graph (provided) from research by Eunomia (Hogg and Eunomia Research & Consulting Ltd 2006) for Friends of the Earth shows how electricity only incinerators produce about twice as much carbon dioxide per kWh as coal fired power stations.</p> <p>Figure 3: Includes CO2 from Biogenic Carbon, Heat=0.4 x Electricity – <i>(graph provided in hardcopy response pg 22)</i></p> <p>1.82 For completeness it should be noted that this graph includes biogenic carbon. This is the appropriate approach to adopt when accounting for incinerator emissions. This element of the emissions is sometimes ignored with the claim that they are 'climate neutral'. That approach would only be valid in an incineration life cycle assessment if the climate change impacts of a biogenic carbon dioxide molecule was different from any other carbon dioxide molecule. A recent editorial in the International Journal of Life Cycle Assessment by Rabl and other leading LCA experts (Rabl, Benoist et al. 2007) confirms the appropriate approach is to include the biogenic component – not doing so Rabl says, would be to act as though the burning down of a rainforest made no difference to climate change.</p> <p>1.83 In these circumstances it is suggested that the WCS should be changed to ensure that any thermal treatment facility provides CHP and was required to demonstrate that the external environmental</p>	
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			<p>and social costs were lower than the alternatives if sustainability criteria are to be satisfied.</p> <p>1.84 Sites should only be allocated for recovery, including energy recovery, if they are clearly matched to a suitable local heat load which allows CHP to be used.</p>	
<p>Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD)</p>	439	439/10	<p>Key Issue 7</p> <p>1.85 Key Issue 7 claims that trends for C&I and C&D waste have been variable. This is inconsistent with the Evidence Paper which confirms that these wastes have been falling: 'it [The Authority] does note current downward trends and does not underestimate the continued impact of the escalating Landfill tax'.</p> <p>1.86 Furthermore the WCS and Evidence paper pre-date the recent DEFRA review of C&I waste arisings.</p>	<p>Comment noted. In relation to C&D waste, Figure 6b within the Waste Data Paper (2010) demonstrates that the trend in C&D waste has been variable since 1999 although the trend by 2005 was downward.</p> <p>There is however no guarantee that this downward trend will continue and for this reason it is considered prudent to use an assumption of 0% growth.</p> <p>C&I waste has shown a similar lack of trend with only recent evidence of a downward trajectory. Again it is considered prudent to assume 0% growth.</p> <p>It is acknowledged that the DEFRA waste arisings study was published in December 2010 after the WCS had been published and that there is a difference between the C&I figures set out in the WCS and those contained in the DEFRA study.</p> <p>This is because the WCS uses a 'managed' figure whereas the DEFRA study is an estimate of waste 'arisings'. The managed figure for C&I waste in 2008 provided in the WCS is 375,000 tonnes. The DEFRA study provides a figure of 527,000 tonnes</p>

				<p>for Gloucestershire. However, it is important to note several issues. First, this is an estimate only, whereas the managed figure is a known quantity. Second, a proportion of the estimated waste arising may be managed outside of Gloucestershire and third, the managed figure of 375,000 provided in the WCS excludes metal waste – a major component of the C&I waste stream. When metals are factored in (131,000 tonnes from all waste streams) the figure is closer to the DEFRA estimate.</p> <p>Coupled with these issues is the fact that the DEFRA study itself has a number of limitations including the fact that the survey was voluntary which means it is likely to have captured data from companies that are progressive in their approach to managing waste, the fact that the survey is for 2009 only, a year within a significant recession, the data provided may be inaccurate or have failed to capture all material streams, the survey only gives a 'one-day' picture of overall arisings and composition of mixed-waste streams and there may be overlap with MSW data.</p> <p>On this basis whilst the revised publication includes reference to the DEFRA study, it continues to make provision on the basis of the managed C&I figure. Paragraph 2.21 has been amended to include reference to the DEFRA study.</p> <p>See Focused Change 3.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Alan Watson Public Interest Consultants on behalf of Gloucestershire Friends of the Earth Network (endorsed by SWARD)	439	439/11	<p>Recycling Targets and Sustainability (paras E4, E18, 2.48, 3.23)</p> <p>The recycling targets are considered to be unsound because they are ineffective and inconsistent with National Policy – particularly the Government’s goal in WS2007 of “One Planet Living”. It is noted that there is no reference to this over-arching goal in the WCS.</p> <p>1.7 The WCS proposes targets of “at least 60% recycling and composting for household waste by 2020”. This, it says, is 10% higher than the national target over the same period.</p> <p>1.8 Strategic Option 2 (E.24) goes slightly further and includes 'with an aspiration for 70%'.</p> <p>1.9 It is disappointing to see the WCS promote such an unambitious target and sustainability obligations require a higher target to be achieved more rapidly than this.</p> <p>1.10 Both the opening paragraph of the Executive Summary of WS2007 and the first paragraph of Chapter 1 emphasise the Government’s goal of 'One Planet Living'.</p> <p>"Aim i. As a society, we are consuming natural resources at an unsustainable rate. If every country consumed natural resources at the rate the UK</p>	<p>The concept of 'one-planet living' is acknowledged. It has been developed by BioRegional and WWF and is based on 10 key principles including zero-waste (reducing waste, re-using where possible and ultimately sending zero-waste to landfill).</p> <p>Notwithstanding the extensive information provided by the respondent, much of which is anecdotal and not of direct relevance to Gloucestershire (e.g. Welsh Assembly information) it is not considered necessary to revise the recycling target in light of the 'one-planet living' concept.</p> <p>The WCS seeks to ensure that at least 60% of household waste is recycled or composted by 2020 with an aspiration for 70%. This target is derived from the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS). The national target set out in the Waste Strategy for England (2007) is 50% by 2020. The revised EU Waste Framework Directive also has a target of 50% by 2020. The Council's target cannot therefore be described as unambitious. Whilst it is the case that 60% recycling/composting has already been exceeded in Cotswold District and at the Household Recycling Centres (HRCs) it is not correct to extrapolate this to mean that a much higher rate than 60% is achievable across Gloucestershire. The HRCs for example have consistently achieved a higher rate of recycling because it is easier to engage with the public at these sites.</p>

		<p>does, we would need three planets to live on. The most crucial threat is from dangerous climate change. Our goal is to make the transition towards what the WWF and BioRegional call 'One Planet Living'." [our emphasis]</p> <p>1.11 And as the introduction to Chapter 1:</p> <p>1. We are living beyond our environmental means. If everyone consumed as many natural resources as we do in England, then WWF suggests we would need three planets to support us. So our goal is 'One Planet Living'. Using the planet's resources within the limits of its eco systems is vital to the survival, health and prosperity of future generations. [my emphasis]</p> <p>1.12 The more recent Waste Strategy for Wales includes a similar goal but differs from WS2007 by including a target date of 2050 for "One Planet Living".</p> <p>1.13 Achieving the "one planet goal" in WS2007 means reducing the ecological footprint of to a 'fair earthshare' of 1.82 global hectares/capita from the 2004 level for the South-West of 5.42 global hectares/capita.</p> <p>1.14 The per capita 'fair earthshare' obviously reduces with increasing global population thus if a target date is taken for 2050, as proposed for Wales, then it means that not only is it accepted that we will be living unsustainability and inequitably for the next forty years, but also that much lower target should be set that reflect the</p>	<p>This is very different to collecting waste door to door where opportunities to engage are much more limited. Based on information set out in the report 'The Composition of Kerbside Collected Household Waste in Gloucestershire' (October 2008) it is estimated that about 77% of the waste stream is recyclable. To achieve a countywide recycling rate of 60% would mean capturing around 75% of the available recyclable waste at the kerbside and to achieve the 70% target would mean capturing 92% of the available recyclables.</p> <p>This is much higher than is currently being achieved (about 50% on average). It is also the case that some communities achieve higher rates than others. For example it is anticipated that for 2010/11, Tewkesbury Borough Council will achieve a recycling and composting rate of 54% and Gloucester City 46% despite having broadly similar systems to Cotswold District which is achieving over 60%. For these reasons the WCS target of at least 60% recycling/composting by 2020 is considered to be both appropriate and challenging.</p> <p>No change to the recycling target is therefore proposed, however the text of the WCS has been amended to clarify that the aspiration for 70% recycling/composting is to be achieved by the year 2030. This has arisen through the Council's review of its residual waste project.</p> <p>See Focused Change 11.</p> <p>With specific regard to the example of the Cwm</p>
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			<p>likely 'fair earthshare' at the target date.</p> <p>1.15 Whilst it took from our emergence as a species to about 1820 to reach a population of one billion an additional billion is added to our current total of 6.6 billion every 14 years (Johns 2009). The global population is therefore anticipated to increase to between 7.3 and c.10.7 billion in 2050 (Heinberg 2007). <i>(Fig 11 World Population graph provided in hard copy response page 5)</i></p> <p>1.16 The consequence is that rather than a target of 1.8 gha/capita a target level for 2050 should be set at 1.03 to 1.48 gha/capita. Obviously the future target date makes a significant difference to the levels of environmental impact and waste reduction required to achieve a 'fair earthshare'.</p> <p>1.17 Whilst this Ecological Footprint approach has been criticised it is included in the strategy as a headline indicator and it provides a useful indication of the scale of the problems related to carrying capacity. The indicator is most effective, meaningful and robust at aggregate levels (as used here) rather than sub-regional breakdowns and it can provide a very useful guide as to how effective policy proposals may be at achieving sustainable outcomes.</p> <p>1.18 A report by consultants Arup assesses the ecological footprint associated with the waste strategy (Arup for Welsh Assembly Government 2009). This report emphasised that to be able to significantly reduce the size of the ecological footprint "it is fundamental that recycling becomes</p>	<p>Harry Land Trust, notably this has not reported on its findings yet so the assertions being made that it is a very cost-effective and efficient approach have not been demonstrated.</p> <p>With regard to waste reduction, this is a central tenet of the WCS as reflected in Core Policy WCS1 – Waste Reduction and the spatial vision which seeks to achieve zero-growth by 2020.</p> <p>No Change.</p>
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			<p>an option for waste management only after reduction and reuse” (emphasis in the original).</p> <p>1.19 The Arup report shows that with recycling alone, even at the relatively high rates proposed in Wales, as noted above, the total impact of waste arising will only be reduced by 10% for municipal waste, 6% for commercial and industrial waste and 14% for construction and demolition waste, based on a 2007 baseline. This is best illustrated graphically and the figure below, taken from the Arup report, shows how even 70% recycling by 2025 fails to meet even the trajectory necessary to achieve the current 2050 ecological footprint target unless accompanied by very significant waste reduction: <i>(Fig 22 graph provided in hardcopy response page 6)</i></p> <p>1.20 Furthermore this report confirms “although the proposed recycling targets will help to reduce the EF [Ecological Footprint] of waste that can be recycled, research suggests that high statutory recycling targets can lead to local authorities focussing on recycling at the expense of waste prevention.</p> <p>1.21 The ARUP report concludes with “numerous recommendations” for WAG and highlights “some overarching themes that need to be addressed” including:</p> <p>i Linking waste policy with policy on design, production and retailing in a coordinated way across particular products.</p>	
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			<p>ii Addressing behaviour change and prioritising awareness raising activities that link consumption and purchasing activities to waste</p> <p>iii Making the business case for waste prevention by sharing the limitations on what recycling can achieve. This needs to be coupled with sharing best practice and what can be done in terms of waste prevention.</p> <p>iv Ensuring that recycling is as effective as it can be e.g. by ensuring that waste segregation is carried out and supporting the infrastructure for closed loop recycling.</p> <p>v The public sector leading by example through procurement policy and action, and supplier development.</p> <p>vi Achieving waste minimisation across all waste streams and materials will not be easy. Monitoring and measuring progress, the report says, will be vital to success and is dependent upon the collection of robust data.</p> <p>vii Current data for C&D and C&I waste is piecemeal and therefore the WAG should consider putting time and effort into developing a consistent methodology for regular and consistent waste data collection.</p> <p>1.22 Crucially the report also recommended : “WAG set targets to reduce both the total volume of waste arising in the municipal waste stream and the total volume of household waste generated per</p>	
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			<p>capita" (emphasis in original).</p> <p>1.23 The graph in the report clearly shows the scale of mismatch between a 70% recycling target and the "One Planet" goals without the recommended waste reduction targets: <i>(graph provided in hardcopy response page 8)</i></p> <p>1.24 Achieving 'One Planet' even by 2050 will certainly be challenging – but this would be a completely inadequate response to the global environmental challenges that we currently face. We have seen large changes in the targets set for waste management since 1995 when the Government suggested the aspirational 25% in "Making Waste Work".</p> <p>There is every reason to believe that the targets will change even more profoundly in the near future as the scale of the challenges we face are increasingly recognised and addressed.</p> <p>1.25 The consequences of considering the WS20007 "One Planet Target" in relation to the WCS is that much higher levels of recycling (>70%) than currently envisaged are necessary. Furthermore these recycling levels must be complemented by large waste reduction targets. The Wales waste strategy consultation shows that to reduce the Ecological Footprint to even 1.8 g/ha capita at current population levels will require a further reduction in the footprint, on top of the 70% recycling targets, of:</p> <p>i Municipal waste - 34% by 2025 and 65% by 2050.</p>	
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			<p>ii Commercial and Industrial waste - 39% by 2025 and 69% by 2050</p> <p>iii Construction and Demolition waste - 28% by 2025 and 59% by 2050</p> <p>1.26 Clearly the levels of waste reduction necessary to achieve the Government's goal will significantly reduce the number and scale of facilities required over the plan period and will have significant impacts on all aspects of the WCS.</p> <p>1.27 The recycling levels which accompany the waste reduction required for 'One Planet living' have already been demonstrated in parts of Europe. Flanders, for example, currently achieves over 70% recycling (Fogarty, Reid et al. 2008).</p> <p>1.28 It is undoubtedly possible for communities to achieve very high recycling targets, sometimes extremely quickly. Examples include:</p> <ul style="list-style-type: none"> • Cwm Harry • Staffordshire Moorlands <p>1.29 In Europe:</p> <ul style="list-style-type: none"> • Novara, a city of 100,000 near Turin achieved 70% diversion in 18 months • Salerno near Naples achieved 70% in just one year, and • Ursubil in Spain, has gone from 28% to 86% in seven months. 	
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			<p>1.30 Scotland and Wales have also recently set new recycling targets of 70%.</p> <p>1.31 The work for the National Assembly for Wales was by the County's technical consultants, Eunomia (National Assembly for Wales 2007) and showed that the materials that could be recycled make up 93.3% of the municipal waste stream. Crucially recycling 80% was calculated to be cheaper than recycling 60%</p> <p><i>(Fig 3 graph provided in hardcopy response page 9)</i></p> <p>1.32 There is no reason why there should be higher targets just across the border in Wales than in Gloucestershire.</p> <p>1.33 For the reasons outlined above it is clear that the recycling rates in the plan will need to be revised and linked with waste reduction targets. Properly addressing the Government's goal of "One Planet Living" will have a significant impacts on all aspects of the WCS and the failure to incorporate this goal must be seen as a serious omission which renders the current version Unsound and unsustainable.</p>	
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Ruth Clare Environment Agency	149	149/1	In general, our previous comments on the Waste Core Strategy (WCS) appear to have been considered and addressed throughout the document. (See our letter dated 25 November 2009, our reference SV/2009/103800/01-L01.) In particular we welcome the removal of the Fosse Cross site (previously considered as site 1a) as we had concerns relating to Groundwater protection about this as a strategic waste site due to the presence of Source Protection Zones.	Support noted. No Change.
Ruth Clare Environment Agency	149	149/2	<p>We have no objections to the Sustainability Appraisal, the Supporting Evidence Papers (for matters within our remit), and the Habitats Regulation Assessment Report (HRA).</p> <p>Please note with regards to the HRA, we have been in recent discussion with Natural England (NE) on this matter. NE has requested that our National Air Quality Unit review the HRA report in further detail to comment on the report methodology, as we understand there may be some concerns from NE on ammonia and other pollutants.</p> <p>As discussed with you, and as previously indicated at the earlier stages of the WCS, we would not normally make a detailed air quality review of such a report at this strategic stage of planning. This is because, with regards to HRA, we lead on matters relating to Environmental Permitting and NE lead on planning matters. However we are happy to review this document in more detail as discussed</p>	Support noted. Also see response below in relation to further submission from EA Air Quality Unit No Change.

			<p>with you. As indicated during our conversation, the review may take some time and we are likely to make high-level comments rather than detailed specifics. We do not consider this to be a soundness issue from our perspective as further detailed assessments will be needed at the planning application and Permitting stage. However the review may help to provide further comfort in terms of NE's concerns.</p>	
<p>Ruth Clare</p> <p>Environment Agency</p>	149	149/3	<p>The number of proposed strategic locations has been reduced to four. We have no objections to the four strategic sites identified at this stage in the planning process. Our previous comments made in regard to these four sites remains relevant. Key among these is that further environmental assessment of the sites will be needed at the planning application stage to manage environmental constraints and to maximise the potential for environmental improvements. In addition, we described the geological setting and the groundwater risks associated with the selected locations is considered to be low. Please note that our aquifer designations have been updated/renamed since our previous response.</p> <p>They are now named as follows:</p> <p>Javelin Park and Moreton Valence sites - Secondary (undifferentiated)</p> <p>Wingmoor Farm East and West sites - Unproductive Strata.</p> <p>This does not alter the groundwater risks associated with the locations which is still</p>	<p>Comments noted. The site schedules attached at Appendix 5 have been updated to reflect the updated aquifer designations.</p> <p>See Focused Change 42.</p> <p>The comments in relation to the additional surface water maps for 2010 are noted. This will be a matter for the planning application stage.</p> <p>Notwithstanding the fact that all of the strategic site allocations are located in Flood Zone 1, any proposal of more than 1 hectare will need to be supported by a Flood Risk Assessment (FRA) which will address the issue of surface water flooding, taking account of relevant information available at that time. This is clearly specified in the general development criteria attached at Appendix 5.</p>

			<p>considered low for these geological settings.</p> <p>Furthermore, since our previous response we have issued additional Surface Water flood maps in 2010 which you should have access to through your Emergency Planning department or the Local Resilience Forum. Whilst the surface water maps should not be used in isolation for strategic planning processes they are useful for identifying whether additional work would be required on surface water flood risk at the planning application stage. As indicated previously, you may wish to review the surface water maps through the Local Resilience Forum.</p>	
<p>Ruth Clare</p> <p>Environment Agency</p>	149	149/4	<p>Policy WCS9 - Flood Risk</p> <p>Policy WCS9 wording is generally good, but a reference to 'considering all sources of flooding' should be included. If Planning Policy Statements are removed then it will be all the more important for local policies to achieve the aims of PPS25, and enhance these where locally relevant. As has been clearly considered throughout the WCS, flooding is a particular issue for Gloucestershire and so this opportunity to enhance the policy to make it stronger is important.</p>	<p>Comment noted. Policy WCS9 has been amended to include reference to all sources of flooding.</p> <p>See Focused Change 30.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Ruth Clare Environment Agency	149	149/5	<p>Policy WCS5 and sections 4.102 - 4.114 on Waste Water Treatment</p> <p>We welcome the reference within this section to the Strategic Infrastructure Delivery Plan (SIDP). We consider this section of the WCS should also make reference to the Water Framework Directive (WFD) in order to be legally compliant, and also policy WCS5 would be enhanced by including reference to the WFD. The reason for this is that waste water treatment facilities can have a direct impact on water quality and the aims of the WFD are for no deterioration in the quality of water bodies and to improve water quality. Hence it is important to make this link clear in the WCS.</p>	<p>Comment noted. The supporting text at paragraph 4.103 and Core Policy WCS5 have been amended to include reference to the Water Framework Directive.</p> <p>See Focused Changes 22 and 24.</p>
Ruth Clare Environment Agency	149	149/6	<p>As a general comment on the policies, we would welcome greater emphasis to environmental enhancement if you consider this appropriate. Currently there are good in dealing with management of impacts and mitigation, but enhancement could be improved if there is scope to do so at this stage.</p>	<p>Comment noted. Without specific examples it is however difficult to consider any policy revisions.</p> <p>No Change.</p>
Ruth Clare Environment Agency	149	149/7	<p>We would welcome more emphasis on the prevention of waste and minimisation of waste arisings within the County. There appears to be more onus on the increasing of recycling rates and the diversion of waste from landfill. Although we obviously support this, there is a need to minimise waste arisings in the first instance, e.g. through home composting schemes and re-use of waste, as</p>	<p>Comment noted, however the publication WCS already places a great emphasis on the issue of waste prevention and reduction. This is reflected in the Spatial Vision, Strategic Objective 1 as well as Core Policy WCS1 and the supporting text.</p> <p>In addition, the overall structure of the WCS reflects the waste hierarchy further reflecting the</p>

			<p>this is the most sustainable environmental option. As highlighted in PPS10, waste should be considered as a resource. The active management of waste should see it pushed up the 'waste hierarchy', with disposal a 'choice' of last resort. Therefore, we would support the diverting of increasing amounts of waste from landfill through increasing recycling, re-use and recovery of materials. Whilst there are many references to complying with the waste hierarchy, efforts must be made to reverse the growth in waste, recover the maximum resource value from the waste produced, and accelerate progress in delivering increased waste management capacity. A useful question to ask would be to focus on whether the use of waste as a resource can be increased within the County. An example indicator for section 4.15 could be the percentage of waste actually fully recovered rather than landfilled or sent through the Civic Amenity sites. This could be further broken down to show how the waste has been put to use, for example for energy generation, or reprocessing into finished products. This would help the Council look at how the waste that is produced is ultimately put to use, although the destination where the waste is finally recovered or put to use might be outside of the County.</p>	<p>priority that the strategy gives to waste reduction, recycling/composting and recovery with landfill identified as the option of last resort.</p> <p>With regard to the suggested indicators on waste recovery, these are addressed elsewhere in the strategy under Core Policies WCS3 and WCS4. Information on the reprocessing of waste into new products is not available and would therefore not be a suitable indicator.</p> <p>No Change.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Ruth Clare Environment Agency	149	149/8	<p>Consideration of commercial and industrial waste is essential. We would particularly welcome a focus on reducing the landfilling of commercial and industrial waste, through new targets and further consideration of restricting the landfilling of biodegradable wastes or recyclable materials.</p> <p>Waste collection systems which aim to minimise waste at source should be adopted throughout the county. Waste minimisation standards should also be incorporated.</p> <p>Work needs to be done to ensure local construction companies are given the support they need to meet prevention/reduction targets and to adapt to new requirements such as Site Waste Management Plans (SWMPs). There is also an opportunity, through SWMPs to gather data on construction waste. We welcome the requirement for Waste Minimisation Statements in section 4.10.</p>	<p>The strategy already highlights the need to divert waste (including commercial and industrial) from landfill. Strategic Objective 3 for example aims to maximise waste recovery in order to divert between 143,000 – 193,000 tonnes of waste per annum from landfill. The spatial vision has been amended to clarify that the strategic site allocations are intended to manage both municipal and commercial and industrial waste.</p> <p>See Focused Change 10.</p> <p>The issue of waste collection is largely outside the scope of the WCS. Waste minimisation is addressed through Core Policy WCS1.</p> <p>Whilst working with local companies would appear to be a sensible proposition it is outside the scope of the WCS and the remit of the Waste Planning Authority (WPA). The role of the WCS is essentially to identify the circumstances in which a Waste Minimisation Statement will be required. This is set out in Core Policy WCS1.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Ruth Clare Environment Agency	149	149/9	<p>The core strategy should seek to deliver the following strategic outcomes for waste:</p> <ul style="list-style-type: none"> -Efficient use of resources -The right waste facilities in the right places at the right time <p><u>Efficient use of Resources</u></p> <p>Efficient use of resources mentioned in sections 4.9-4.11 is welcomed. New developments must demonstrate that the use of sustainable, locally sourced recycled materials have been considered. We support the inclusion of this policy within the core strategy.</p> <p>Other elements which should be addressed include waste minimisation and sustainable management of construction and demolition wastes in line with the waste hierarchy.</p> <p><u>The right Waste Facilities in the right places at the right time</u></p> <p>The Core Strategy recognises the need to provide new waste management facilities. The evidence for the need for new facilities is based on an analysis of the types and quantities of waste being deposited at waste management facilities in the county. The Environment Agency has provided annual data on waste deposits from permitted facilities and notes the use of this data in the</p>	<p>Support for Core Policy WCS1 noted. The issues of waste minimisation and sustainable waste management are considered to be adequately addressed in the publication WCS.</p> <p>No Change.</p> <p>The support expressed for the Council's approach towards waste data and the calculation of landfill voidspace and lifespan is noted and welcomed.</p> <p>No Change.</p>

			<p>strategy document and the supporting waste data report. We have reviewed your approach to analysing waste deposit trends in the data report and endorse the broad conclusions. The data analysis you have undertaken is correct to separate different waste streams and categories of sites in particular the recognition of the mature and essential separate role that metal recycling plays in overall waste management. We do note some difference in projected life spans of current landfill void from data previously published by the Environment Agency. The estimation of landfill life span from calculations of remaining void and patterns of deposits is not an exact science and we would not object to the methodology and estimates included in the core strategy document.</p>	
<p>Ruth Clare Environment Agency</p>	149	149/10	<p>Growth projections provided suggest that the population will increase significantly. This is likely to be accompanied by a corresponding increase in waste production from these extra households and businesses. It is important that sufficient waste management facilities are available to meet the needs of the population.</p> <p>Your estimates for additional waste recovery capacity for both municipal and commercial waste streams, summarised in Table 3 are appropriate based on the amount of wastes currently being landfilled without additional treatment to recover value. Your assessment of capacity to manage the disposal of hazardous waste is correct and we welcome the recognition of hazardous waste disposal capacity in the county as important. Hazardous waste disposal should be considered a</p>	<p>The need to ensure sufficient provision for waste management is made available is acknowledged and is reflected in the spatial vision and elsewhere in the publication WCS.</p> <p>The support expressed for the Council's approach towards waste recovery and hazardous waste capacity is welcomed.</p>

			<p>national issue and the current operational site in Gloucestershire is a significant national resource.</p> <p>We welcome these facilities being integrated alongside other existing and proposed land uses. The timing of delivery of new waste management infrastructure should be synchronised with the phasing of development of residential and employment land so as to ensure that new facilities become available when they are needed.</p>	<p>With specific regard to the timing of new waste facilities being synchronised with the phasing of new residential and employment development, whilst this is a worthwhile aspiration, in reality it will be impossible to deliver.</p> <p>In particular, with the proposed abolition of the RSS there remains considerable doubt over the quantum and location of new housing and employment land to be delivered in Gloucestershire. Furthermore, there was little appetite expressed by the development industry at site options in relation to the potential inclusion of waste facilities within urban extensions.</p> <p>The objective of the WCS is to forecast how much additional waste capacity will be needed in the future, how much exists and what the 'capacity gap' is. To try and phase delivery of new waste facilities precisely with other forms of development would be impossible to deliver in practice.</p> <p>No Change.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Ruth Clare Environment Agency	149	149/11	<p>To conclude, we are generally support of the WCS. Some enhancements to the policies could be made, and we consider reference to the WFD needs to be made in sections 4.102 – 4.114 to make the document legally compliant. Our Air Quality specialists are conducting a further review of the HRA at the request of NE.</p> <p>We have also commented on waste reduction as an area for potential enhancement of the document if possible at this stage.</p>	<p>Support noted. Reference to the Water Framework Directive has been included and Core Policy WCS9 has been amended to refer to all waste streams.</p> <p>See Focused Changes 22, 24 and 30.</p> <p>See separate response to the comments provided by the EA Air Quality team.</p> <p>As set out previously the issue of waste reduction is considered to be already adequately addressed within the WCS.</p> <p>No Change.</p>
Ruth Clare Environment Agency	149	149/12	<p>1. Summary of Work Request</p> <p>1.1 West Area of Midlands Region asked the Air Quality Modelling and Assessment Unit (AQMAU) to review a Habitats Regulations Assessment (HRA) report forming part of the Gloucestershire County Council Core Waste Strategy. The review focussed on the validity of the HIA conclusions in the context of detailed air dispersion modelling report.</p> <p>1.2 No detailed modelling files were audited during this review so AQMAU agreed to provide high-level comments only rather than undertaking our own check modelling to establish sensitivity to any findings.</p> <p>2. Conclusions that lead to AQMAU</p>	<p>Specific issues are dealt with in turn below. In general terms the following response is made.</p> <p>The response from AQMAU forms a fairly narrow view as it has been reviewed from an Environmental Permitting Regulations (EPR) angle which is not the level required for a high level assessment.</p> <p>It is understood that this is acknowledged within the response and that importantly the AQMAU recognise the need for further assessment to be carried out at the planning stage. However it is clear that a number of the comments have arisen due to the difference in the level of detail available at this time and the difference in the approach for a strategic assessment.</p>

			<p>recommendations</p> <p>2.1 Environmental consultant Environmental Resources Management (ERM) carried out a dispersion modelling assessment of impact at European designated habitats sites.</p> <p>2.2 The HRA concludes that two locations will not have an adverse effect on the integrity of European sites and several others will have “no likely significant effect” from Energy from Waste facilities.</p> <p>2.3 In general terms, the HRA was carried out using methodologies we would recognise as following good practice and guidance. We have however identified a number of issues and technical matters:</p> <ul style="list-style-type: none"> • The emissions scenarios are likely to be unrealistic for smaller-scale plant – paragraphs 3.10 to 3.12. • Some assessment criteria used are inconsistent with those we recommend - paragraphs 3.15 to 3.18. • The use of generic meteorological data to site-specific assessments - paragraphs 3.13 to 3.15. • The assessment methodology for acid deposition is simplistic - paragraph 3.23. • Assessments are not made at any Sites of Special Scientific Interest (SSSI) or non-statutory sites habitats - paragraph 3.3. <p>2.4 We take the view that the HRA does not necessarily rule out significant impact at habitats</p>	<p>It is also important to note that whilst the assessment was based upon a generic approach, worst case assumptions were made throughout which, if anything, are likely to overestimate the actual impacts.</p> <p>These worst case assumptions include: assuming that a facility would operate at 100% all year round; of the five years of meteorological data used; the highest impacts from any of the five years was used in the assessment, occurring at the limits set out in the Waste Incineration Directive, whereas in practice emissions will occur substantially below these in most cases.</p> <p>It is acknowledged that the HRA does not rule out potentially significant impact and that as a result,</p>
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		<p>sites due to EfW developments at the proposed locations. Therefore if applications are made under the Environmental Permitting Regulations (EPR), a detailed impact assessment will be required to demonstrate whether appropriate assessments are required.</p> <p>2.5 The comments in this report should not be considered to prejudice or pre-empt any decisions this Agency takes if determining an application for the proposed plant under the Environmental Permitting Regulations.</p> <p>3. Evidence for Recommendations</p> <p>3.1 ERM undertook the HRA by defining the protected sites, scoping study to identify likely impact, screening for significant effects and an in-combination assessment. The assessment involved air dispersion modelling to predict pollution from 13 proposed waste sites in Gloucestershire.</p> <p>3.2 Within a notional 15km, they have identified the European Sites (Special Areas of Conservation and Special Protection Areas) designated under the Habitats Directive as well as Internationally designated sites such as Ramsar Sites. We would expect these categories of sites to be assessed in any HRA.</p> <p>3.3 The consultant has not, however assessed the impact at SSSIs that are protected under the Countryside Rights of Way Act 2000. In addition, the assessment does not take into account the protection of non-statutory sites such as Ancient</p>	<p>more detailed assessment will be required at the planning application stage should a proposal come forward. This is reflected in the general development criteria and strategic site schedules attached at Appendix 5.</p> <p>It is acknowledged that the HRA report does not address potential impacts at SSSI however consideration of SSSI is not specifically a HRA requirement. This fact is recognised in the response received from Natural England (see above). It is</p>
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		<p>Woodlands or Sites of Importance for Nature Conservation that might be listed by Local Authorities. The assessment methodology does not therefore screen out potentially significant impacts at these other sites. We would expect an assessment of the impact at such sites within 2km from any waste plant on application for an EPR permit.</p> <p>3.4 We have not commented on the scoping study (Section 4 of the HRA) because emissions from all 13 potential waste sites were modelled as part of the screening assessment.</p> <p>3.5 The Screening assessments methodology is reported on in Section 5 of the HRA report. ERM refers to the assessment as a “Screening and Appropriate Assessment”. Due to the generic nature of the screening method, we would not consider the assessment to be a very high-level screen and not an appropriate assessment that should be site-specific in its nature.</p> <p>3.6 The air pollution screening method was defined in Section 5.2.1 of the HRA and Annex B. ERM used ADMS and AERMOD modelling software in an attempt to take modelling uncertainties into account. This approach is good practice where modelling uncertainties are likely to be high e.g. using complex terrain.</p> <p>3.7 ERM has modelled emissions of nitrogen oxides</p>	<p>also pertinent to note that SSSI screening has already undertaken as part of the WCS sites work.</p> <p>Importantly, none of the four strategic site allocations identified in Core Policy WCS4 are located within 2km of a SSSI. Further protection to SSSI is afforded by Core Policy WCS12 which states that planning permission within or outside a SSSI or National Nature Reserve will only be granted where it can be demonstrated that certain criteria can be met.</p> <p>The HRA report is a high-level assessment suitable for considering the potential impacts of the WCS. As specified in the general development criteria and strategic site schedules attached at Appendix 5, a further more detailed assessment will be required should a proposal come forward on any of the strategic site allocations.</p> <p>Two different types of modelling were used for the HRA report to ensure robustness of approach.</p>
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		<p>(NO_x), ammonia (NH₃), sulphur dioxide (SO₂), hydrogen chloride (HCl) and hydrogen fluoride (HF). We would expect these pollutants to be modelled in order to assess the impacts of their respective critical levels and critical loads for nutrient nitrogen and acid deposition.</p> <p>3.8 The consultant defines their modelling scenarios in Table B1.3 of Annex B. We have checked the quoted emission rates and they are consistent with the quoted normalised flow rates (Nm³s⁻¹) based on the long-term Emission Limit Values (ELV) in the Waste Incineration Directive (WID).</p> <p>3.9 We could not calculate the normalised flow rates (used to derive the emission rates) from the actual flow rates. Based on the modelled flow conditions and the assumed oxygen (6%) and moisture (18%) concentrations, we calculate emission rates some 13% lower than those quoted by ERM. This would serve to over-predict the impact and as such is not inconsistent with a screening approach.</p> <p>3.10 The consultant defined four modelling scenarios based on the scale of the plant; 50 kilotonnes per year (ktpa), 100 ktpa, 200 ktpa and 400 ktpa. The details of these scenarios are found in Table B1.3. The table describes stack emissions with volumetric flows scaled up proportionately based to the tonnage throughput. The volume flows are plausible for the indicate scale of the plant.</p>	<p>As stated above, worst-case assumptions have been made throughout the HRA report. These are likely to over-estimate actual impacts and thereby help to ensure the report is robust.</p>
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		<p>3.11 However, for theoretical stack has the same effective stack diameter of 2.83 metres for each of the four scenarios despite very different volume flows. This means that the effective emission velocities for the scenarios range from 2.5 to 20 m/s. Modelling emissions at 2.5 m/s for the 50 ktpa scenario would in our opinion be unrealistic and with low momentum would be likely to lead to poor dispersion. This adds considerable uncertainty to predictions made at European Sites up to 15 km from the emission.</p> <p>3.12 As part of the screening methodology, the consultant iteratively increased the stack heights to establish whether certain locations and scenarios screen out under those conditions. However, due to the potential uncertainties referred to in 3.11 above, this approach is likely only to be indicative for lower throughput cases.</p> <p>3.13 ERM used meteorological data observed at RAF Brize Norton between 2005 and 2009. These data are up to 50 km from some of the proposed waste sites and in quite different topographical areas. The specific meteorological conditions in locations of more complex terrain or estuarine locations might lead to significant modelling uncertainties particularly in the precise directionality of predictions.</p> <p>3.14 Using generic meteorological data in this way can be appropriate for high-level screening assessments but extreme caution should be used in interpreting results. For detailed or appropriate site-specific assessments (e.g. those required for</p>	<p>It is acknowledged that the use of the same stack diameter with plants of different capacities is incorrect and may lead to impacts at sensitive habitats being underestimated. To validate the degree of uncertainty introduced as a result of this omission, ERM were asked to undertake additional modelling with a different stack dimension to confirm the likely influence of changing this parameter.</p> <p>This additional modelling run has now been undertaken and ERM have concluded that at most there would be a variation in the order of 2% of the annual mean impact which will have no material bearing on the findings of the assessment. As such, no amendment to the HRA report is considered necessary. A further explanatory statement has been made available alongside the revised publication WCS.</p> <p>The use of Brize Norton meteorological data is considered to be appropriate in this case. Brize Norton is located in an area with similar land use and terrain to the majority of Gloucestershire, and is also in a non-coastal location, again, similar to the majority of Gloucestershire. That some limited areas of Gloucestershire are characterised more by hilly terrain and 'estuarine' terrain where, arguably, Brize Norton is not representative is a limitation inherent in the study methodology that inevitably arises when looking at a large geographical area.</p> <p>However, previous work undertaken by ERM in which two or more alternative meteorological data sets have been used to model EfW plants,</p>
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		<p>EPR applications), we recommend greater justification for the selection of meteorological data. Only detailed audit and sensitivity analysis would enable us to comment on the validity of modelling predictions in this respect.</p> <p>3.15 The consultant refers to the importance of inputting representative surface parameters (such as surface roughness, albedo and bowen ratio) to the modelling domain in Section B1.2.5. No details are given of the precise values used in the modelling study. We cannot therefore rule out high uncertainties due to generic selection of these values.</p> <p>3.16 ERM used air dispersion models to predict ground-level concentrations at European Sites. They have compared their predictions to a range of “critical levels” detailed in Table B1.4 of the report. They have not considered assessment against the NO_x level of 75 µg/m³ as a daily mean detailed in Environment Agency permitting guidance H1. Although in most cases, we would expect compliance with the annual NO_x critical level and nutrient nitrogen critical load to be protective we would consider this assessment to be incomplete from an EPR permitting perspective.</p>	<p>demonstrates that within the context of the UK, unless there is a particular local influence (i.e. coastal, or in a steep sided valley), the variation in impacts is in the order of a few percent. Given the context of the study, the use of Brize Norton, or other data from another site is not considered a particularly important limitation.</p> <p>The surface roughness, albedo and Bowen ratio are landscape characteristics which are particular to the study site in question. These characteristics will vary depending upon the local land use, for example whether a plant is proposed to be located in a town, in agricultural areas, near woodlands etc. The fact that these were not varied in the assessment reflects the generic approach used in the study, and AQMAU rightly acknowledge that there is some uncertainty in the results as a consequence. However, as outlined above, worst case assumptions have been used throughout to ensure that, if anything, impacts are likely to be overestimated not underestimated.</p> <p>ERM have carried out a strategic level assessment and consider that the APIS NO_x critical levels used are adequate to inform at this level. It may be that the further assessment required at the planning application stage will need to consider additional specific values, including those in EA permitting guidance H1. The fact that the short term NO_x criteria is not considered a significant limitation, as locations at which this criteria is exceeded will also be subject to elevated annual mean NO_x and elevated nutrient nitrogen and acid deposition, which are likely to be more significant issues.</p>
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			<p>3.17 In addition, ERM included hourly and daily NH₃ critical levels and monthly and 3-monthly HF critical levels that are not included within H1. These assessments would not be expected on EPR application.</p> <p>3.18 The annual NH₃ critical levels for some sites were selected to be 3 µg/m³; the criterion used for higher plants. No explanation has been given by ERM as to why the more protective value of 1 µg/m³ has not been used due to the presence or otherwise of lichens or bryophytes as part of the designation.</p> <p>3.19 The consultant has used predicted pollutant concentrations at habitats sites to calculate the dry deposition flux of acid and nutrient nitrogen. They have multiplied their predictions with pollutant and vegetation-specific deposition velocities detailed in Table B1.2 of Annex B of the HRA report. ERM then converted the calculated fluxes to the correct units for assessment using conversion factors detailed in Tables B1.3 and B1.4.</p> <p>3.20 This method is consistent with our guidance on detailed modelling for an appropriate assessment for emissions to air.</p> <p>3.21 Details of predictions made using both ADMS and AERMOD are found in Tables 1.1 to 1.4 of Annex B (HRA report). We cannot validate the</p>	<p>In relation to hourly and daily NH₃ critical levels and monthly and 3-monthly HF critical levels, this point is acknowledged, however for the purposes of planning and Environmental Impact Assessment, Natural England would expect to see these substances assessed.</p> <p>The APIS values to be used were confirmed with NE and include very conservative parameters. Use of 1 µg/m³ for further habitats would not change the findings of the assessment. Also see Natural England response above.</p> <p>The EA correctly acknowledge that they were not requested to directly validate the model results, nor re-run models to validate. That EA confirm that</p>
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		<p>modelled concentrations but can confirm that the calculated dry deposition fluxes given in Table 1.3 and 1.4 are consistent with quoted concentrations in Tables 1.2 and 1.2 using the expected methodology.</p> <p>3.22 ERM has compared their predicted deposition fluxes with site relevant critical loads that they claim to have extracted from the air pollution information system (apis). We have checked several of the values used and they are consistent with those we extracted from the same source.</p> <p>3.23 The consultant has compared the total acid deposition (as a product of hydrogen ion disassociation from NO_x, SO₂, HCl and HF) with the MinCLmaxN from apis (part of the critical load for nitrogen-only). We would normally expect the contribution to acidification from both sulphur and nitrogen to be carried out independently and compared with critical load functions from apis (as suggested by ERM in Figure B1.2 of the report.</p> <p>3.24 ERM used the H1 “insignificance criteria” of (1% for long-term impact and 10% for short-term impact) as their screening criteria. The consultant used these thresholds to define whether the “plant is likely to have a significant effect”. Note that the criteria are used to screen out “insignificant” impacts in H1 and above them does not automatically deem an impact “significant”. In this respect the ERM approach and notwithstanding any other observations, this would be considered a</p>	<p>the results are as expected provides confidence that the modelling, and therefore, the results are correct. ERM would not expect the EA to validate the modelling for this type of assessment, as this would only be expected at the very detailed consideration of an EPR or EIA application.</p> <p>The methodology used, in which the comparison is made only to total acid, rather than nitrogen and sulphur independently is considered robust, as the assessment is focussed on the potential effects of total acidification. ERM acknowledge that there is some uncertainty around an appropriate methodology, and have recently sought to clarify this with Natural England. NE has suggested that consideration of acid effect in combination (i.e. sulphur and nitrogen together) is appropriate.</p> <p>ERM consider that there is a difference in the use of terminology however conclusions and findings drawn are essentially correct and the precautionary approach follows NE guidance. This point is acknowledged. However, the 1% threshold is rightly recognised as the point at which impacts can be concluded to be ‘insignificant’, therefore not requiring any further assessment or interpretation of the potential impacts. As the EA acknowledge this approach is conservative and was adopted to</p>
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			<p>conservative approach.</p> <p>3.25 As a result of their modelling predictions, ERM concludes that at two sites (sites 12 and 13) “there will be no adverse effect on the integrity of European sites through the development of any facility types at waste site.”</p> <p>3.26 They have also identified several sites “concluding no likely significant effect”. These are different depending on which modelling software (ADMS or AERMOD) has been used. We would expect the higher or more conservative predictions to be used as a basis for a screening assessment.</p> <p>3.27 There are several aspects of the HRA that can lead to considerable uncertainties in the predictions. For an EPR application, we would expect these issues to be addressed to ensure protection of habitats sites as a whole and to address modelling error and uncertainty. Notwithstanding these issues the report should be considered a high-level instrument to aid Gloucestershire County Council in their decision-making process. However, due to the uncertainties, the report does not rule out significant impacts at local habitats sites. More detailed site-specific assessments will be needed on technical determination of any EPR applications.</p> <p>3.28 ERM have defined their suggested limitations</p>	<p>provide a robust screening criteria upon which a decision making process can be based, with no requirement to consider sites on an individual basis.</p> <p>ERM consider that both model findings have been reported and therefore the worst case scenario has also been reported.</p> <p>As stated previously, the HRA report is a high-level assessment suitable for a Waste Core Strategy where there are inevitably a number of uncertainties in particular the type and scale of waste recovery process that may come forward on the strategic site allocations.</p> <p>As stated in the general development criteria and strategic site-schedules, should a detailed proposal come forward, a further more detailed habitat assessment would be required in support of the planning application.</p>
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			<p>of the HRA in Section 1.3.1 of the HRA. They state “the HRA is limited by the high level nature of the WCS and the assessment is consequently based on a series of assumptions including facility design. For example the modelling of air emissions from thermal treatment facilities has assumed a generic Energy from Waste (EfW) as regulated by the Waste Incineration Directive (WID) as a facility with the highest air emissions as a worst case scenario. The need for more detailed assessment at the development control stage due to the high level capability of this assessment is therefore included within the findings and recommendations.”</p> <p>AQMAU Recommendation</p> <ul style="list-style-type: none"> • Conclusions should be considered indicative only • Detailed assessments will be required for any applications made under EPR <p>Conditions/Noted</p> <ul style="list-style-type: none"> • High-level screening assessment • Potentially high modelling uncertainties • Observed non-standard approaches • Screening approach does not rule out potentially significant impacts at habitats sites 	
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Peter Richmond	263	263/1	<p>I do not believe that your strategy is sound as I believe that it is predicated on the assumption that the Regional Spatial Strategy (RSS) will be delivered whereas it is about to be abolished plus some other matters.</p> <p>The planned levels of waste in your Waste Core Strategy (WCS) are seeking to reflect levels of growth in housing (amongst other things) that I doubt will be achieved between 2012-2027.</p> <p>Given the growth in household recycling achieved by district councils in Gloucestershire it seems quite unnecessary to be expanding/intensifying the capacity of the sites mentioned in your WCS and in particular the Wingmoor Farm area.</p> <p>The latest figures from DEFRA suggest that your WCS is further undermined by the data you are using to justify your plans because they appear to be inaccurate, i.e. the amount of residual waste trend is distinctly downward?</p> <p>Additionally GCC has conspicuously failed to provide any infrastructure appropriate to its existing waste sites in particular the Wingmoor Farm area. The Bishops Cleeve ring road/by-pass was built in 1986/1987 to accommodate the housing developments to its east. This is now laden with refuse vehicles from all over the United Kingdom, north, south, east and west.</p>	<p>The WCS is not predicated on the assumption that the RSS will be delivered, rather it is predicated on the need to ensure sufficient provision is made for managing Gloucestershire's waste in the future. This is entirely consistent with national policy.</p> <p>With specific regard to the RSS, elements of the WCS are based on the regional strategy and this is considered appropriate because whilst it is the Government's intention to abolish the South West Regional Spatial Strategy (SW-RSS) at the present time it remains a material consideration.</p> <p>The planned levels of waste in the publication WCS are based on a number of factors. The forecasts for municipal waste for example are provided by the Waste Disposal Authority (WDA) and are based on various factors including population and economic growth. The planned levels of waste for commercial and industrial waste and construction and demolition waste are based on the RSS targets for recycling/re-use and recovery and assume 0% growth given previous fluctuations and the lack of an obvious trend.</p> <p>Notwithstanding the increases in recycling and composting rates that are happening in the county, there will always be a residual element of waste that must be managed. For municipal waste this means the provision of an additional 150,000 tonnes/year capacity. If the recycling target is not achieved the residual requirement could be higher.</p>

		<p>The strategy appears to have a focus on a single site solution for residual waste whereas it would make more sense economically and from a sustainability point of view to have a number of smaller sites closer to the areas of production of waste be they commercial, or, domestic. This would allow for a greater range of new technologies to be considered as and when they become available to treat the waste.</p> <p>I am unable to determine how you plan to reduce the amount of hazardous waste being deposited at Wingmoor Farm as the site has achieved national significance. The issue of managing hazardous waste in the South West was not properly addressed in the RSS.</p> <p>Following the July 2007 floods it is clear that the Wingmoor Farm area lies directly in the path of surface water that is draining off the Cotswold escarpment towards the River Severn and it is unclear how this will be dealt with by the further expansion of Wingmoor Farm. Blue lias clay does not absorb water!</p> <p>In addition the existing site is very close to large centres of population in the same area which may be expanded further by the Joint Core Strategy.</p> <p>It is unclear how your planned expansion of Wingmoor Farm will accommodate the increased requirement to treat sewage given that historically this has never been adequately provided. I believe that it is still the case that leachate is pumped into the drains.</p>	<p>The four strategic site allocations are intended to deliver this capacity and will also help to divert commercial and industrial waste from landfill. They are needed because there are no operational waste recovery facilities available in Gloucestershire.</p> <p>It is acknowledged that municipal waste arisings have fallen in recent years. There are several reasons for this. Service changes introduced in Cotswold District, Gloucester City and Tewkesbury Borough have all reduced MSW arisings. In addition the recession has undoubtedly had an effect. It is however wrong to assume that service changes lead to year on year waste reduction. The WDA has carried out modelling to forecast residual waste tonnages many times and have considered many factors in that modelling including population growth, District service changes, policy, Government forecasts and existing waste arisings. Table 3I of the Waste Data Paper Update (2010) is based on information provided by the WDA at that time and forecasts that MSW arisings will increase to 359,612 tonnes/year by 2027/28.</p> <p>On this basis the WCS identifies a residual MSW requirement of 150,000 tonnes/year. More recent modelling carried out for the review of the residual project, based on 60% recycling by 2020 and 70% recycling by 2030, showed an annual forecast of approximately 155,000 tonnes of residual waste by 2040. A number of scenarios combining varying growth and recycling rates were also modelled.</p> <p>These show the projected levels of residual waste</p>
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				<p>in 2030 to be between 125,000 tonnes (70% recycling and composting) and 165,000 (60% recycling and composting). The WDA has had discussions with DEFRA on the latest national waste growth trends and has also reviewed the Swedish Sustainable Waste Management Programme, which predicts that waste will grow at 2.2% per annum over the next 25 years, aligning closely to the DEFRA scenarios and the WDA's own modelling. On the basis of the above, the residual MSW requirement of 150,000 tonnes/year identified in the WCS is considered to be robust.</p> <p>No Change.</p> <p>The issue of previous infrastructure provision is largely outside the scope of the WCS. The role of the WCS is to ensure that any new development is supported by necessary infrastructure. In this regard, the site schedules attached at Appendix 5 highlight a number of issues including transport impact that will need to be considered should a detailed proposal come forward on any of the strategic site allocations. Any necessary infrastructure improvements e.g. junction improvements would be secured through the use of planning obligations or conditions.</p> <p>The WCS identifies four strategic sites and states that proposals for residual waste treatment could come forward on one or more of these sites. The intention is to provide sufficient capacity and flexibility. To ensure further flexibility, whilst allocating four strategic sites, Core Policy WCS4 adopts a criteria-based approach allowing for</p>
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				<p>small-scale facilities to come forward in appropriate locations should there be demand from the waste industry or any other stakeholders. The role played by the hazardous waste facility at Wingmoor Farm (East) is acknowledged within the publication WCS. The site is the subject of a current planning application which is yet to be determined. This is clearly explained in the publication WCS. Importantly, Core Policy WCS6 aims to support proposals that will help divert hazardous waste from landfill. The RSS approach towards hazardous waste is outside the scope of the WCS.</p> <p>All of the strategic site allocations have been subjected to a flood risk assessment and are located within Flood Zone 1 (low-risk). The assessment for Wingmoor Farm (East) identifies that there are no records of historic flooding or flooding from sources including groundwater and surface water. In any case, the general development criteria attached at Appendix 5 require any proposal to be supported by a site-specific Flood Risk Assessment (FRA) and surface water mapping to be undertaken.</p> <p>The management of waste close to areas of population (i.e. the source of the waste) is entirely consistent with national policy. With regard to the Joint Core Strategy (JCS), the quantum and location of development is yet to be determined and it would be inappropriate to delay the WCS until these matters are determined.</p> <p>Core Policy WCS5 sets out the Council's approach towards the treatment of sewage. The proposal for</p>
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				<p>Wingmoor Farm relates to residual waste recovery and there is no direct relationship with sewage treatment.</p> <p>No Change.</p>
<p>Tim Quinton</p> <p>Natural England</p>	244	244/1	<p>Section 2.6 considers insufficient information on the areas of Biodiversity and Geodiversity in Gloucestershire. Natural England appreciates this section of the WCS is only to broadly define the general characteristics of the County, but the fact that other characteristics (Landscape, population, heritage assets etc) are quantified, while the details of designated protected areas of Biodiversity and Geodiversity are absent, has the effect of making it appear as if these assets are considered of lesser significance. This is clearly unintentional, but nonetheless requires amending.</p>	<p>Paragraph 2.6 forms part of the spatial portrait which is intended to provide a <u>brief</u> outline of Gloucestershire's key characteristics and forms the starting point for identifying the key issues to be addressed through the strategy. It is not possible to include a detailed reference to all of the county's key assets and areas of designated importance.</p> <p>Paragraph 2.6 as drafted highlights the AONB and Green Belt as two key areas and states that '<u>there are a number of sites of international, national and local interest in relation to nature conservation, biodiversity and geology across the county</u>'. </p> <p>This level of information is considered appropriate.</p> <p>To provide further detail would result in too much text. Further information on these designated areas is provided in Section 4.0 of the publication WCS and the supporting evidence base including the HRA report and biodiversity evidence paper.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Tim Quinton Natural England	244	244/2	<p>Section 2.45 and 2.46 outline the types of commercial scale composting and the current status of facilities in the county. Unfortunately, while clearly outlining that windrow and In-Vessel Composting (IVC) have very different requirements and capabilities, the four facilities that exist in the county are not detailed as being one or the other. The appropriate level of consideration of the type of biological waste i.e. “green” waste such garden waste, and food waste, which includes animal matter and as such is subject to the Animal By-Product Regulations 2003 (ABPR), and their collection and recovery is lacking throughout the strategy. The waste hierarchy principle, outlined in national policy and adopted in the WCS through the 5 strategic objectives, needs to be utilised across the whole waste stream, and as such, it is necessary to clearly identify the difference between garden waste, food waste and MSW.</p> <p>Once this principle were acknowledged, it would clearly indicate that it would be preferable that “compostable” food waste (both municipal and commercial) should be separated and treated using IVC, AD or TAD facilities, and that waste that cannot be separated should be recovered via the next “tier” of MBT facilities (autoclave, gasification etc).</p> <p>Given that Gloucestershire currently has no facilities of either type, the opportunity exists to</p>	<p>Comment noted. It is acknowledged that the WCS could usefully be amended to correct the factual error on total permitted composting capacity and also to explain how much of this capacity is used for IVC and windrow, MSW and C&I. Paragraph 2.46 has therefore been amended accordingly.</p> <p>See Focused Change 5.</p> <p>With regard to the collection of waste according to the waste hierarchy, this is largely outside the scope of the WCS and is essentially a contractual matter for the Council in its role as Waste Disposal Authority (WDA). The role of the WCS is primarily to ensure sufficient land is made available for waste management as well as providing the overall policy context against which proposals may be considered.</p> <p>The waste hierarchy is a general set of principles rather than a rigid framework to be adhered to and it would be overly-prescriptive for the WCS to specify how food waste should be dealt with. The WCS provides the policy framework for AD and IVC proposals and this is considered appropriate. The Key Issues report provides more detail on this including a break-down of current capacity for IVC/AD.</p> <p>It is incorrect to state that Gloucestershire 'currently has no facilities of either type'. There are</p>

			<p>prioritise the promotion of appropriate collection systems and creation of facilities that allow for the waste hierarchy to be implemented with regard to “compostable” waste.</p>	<p>two operational IVC facilities in Gloucestershire, New Earth Solutions at Sharpness Docks and Rose Hill Farm, Dymock. The facility at Dymock has planning permission for AD. There is also permitted but not operational capacity at The Park. In total this provides for 113,000 tonnes of capacity.</p> <p>AD facilities exist at Netheridge and Hayden major Sewage Treatment Works, Stanley's Quarry (for agricultural waste) and the Unilever ice cream factory in Gloucester (for factory waste only).</p> <p>No Change.</p>
<p>Tim Quinton</p> <p>Natural England</p>	244	244/3	<p>The Key Issues, summarizing the background data will require some minor amendments on the basis of the above comments. Key Issue 3 should specify not just AONB, but European Sites (the Severn Estuary being a singularly significant Habitat in both complexity and size), and Key Issues 8 and 9 need to be modified to clarify the need for collection and treatment of waste according to the waste hierarchy.</p>	<p>Comment noted. Key Issue 3 has been amended to include reference to sites of international, national and local nature conservation importance.</p> <p>See Focused Change 7.</p> <p>Collection arrangements are outside the scope of the WCS. The treatment of waste according to the waste hierarchy is already adequately addressed throughout the WCS and no further change is considered necessary.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Tim Quinton Natural England	244	244/4	Section 3.23 needs some further clarification, as it is not clear how a combined process ability of 19,000 tpa for both recycling and composting is supposed to meet the targets of 60% diversion from landfill, when there is expected to be 359,612 tpa of MSW. The expectation of a residual waste processing facility with the capacity to manage 150,000 tpa will certainly help with the 60% target, but does little to show that the waste hierarchy has been given due consideration.	It is important to emphasise that the 19,000 tonnes/year figure (9,000 tonnes/year for composting and 10,000 tonnes/year for recycling) is not total capacity rather it is the amount of <u>additional</u> capacity required over and above that which already exists in the county. In any case the 19,000 tonnes/year level of capacity that has been identified is not a maximum ceiling. No Change.
Tim Quinton Natural England	244	244/5	The Spatial Vision on the other hand, clearly states that the 60% target is to be met through recycling and composting opportunities. Unfortunately, the Spatial Vision does not mention Commercial and Industrial (C&I), Construction and Demolition (C&D) or any other waste stream. The wording of the Vision is strong, but Natural England would recommend that include consideration of all waste streams.	The spatial vision has been amended to include reference to all waste streams. See Focused Change 10.
Tim Quinton Natural England	244	244/6	The Strategic Objectives are generally well written, and again reiterate most of the targets, but unfortunately, there is no metric for the diversion of C&I waste to recycling or composting after waste reduction and prior to waste recovery. Strategic Objective 2 will therefore require amending.	The support expressed for the strategic objectives is noted. It is recognised that there is no direct target for recycling and composting C&I waste within the WCS. Whilst there is a target for MSW this is derived from the Gloucestershire Joint Municipal Waste Management Strategy (JMWMS) and has been the subject of debate through the Regulation 25 consultation stage.

				<p>No targets for recycling and composting C&I waste have been consulted upon and to introduce a target at this late stage in the plan preparation process would be inappropriate.</p> <p>Strategic Objective 3 does state that recovery facilities for C&I will be needed to divert between 143,000 and 193,000 tonnes/year from landfill. This relates to recovery in its broadest sense and may include a degree of recycling and composting.</p> <p>No Change.</p>
<p>Tim Quinton</p> <p>Natural England</p>	244	244/7	<p>Spatial Strategy; It would be there were consideration in section 4.10 of how a Waste Minimisation Statement would be expected to effect a planning application.</p>	<p>Paragraph 4.11 sets out the general principles of waste minimisation. To provide additional explanatory text over and above that already set out in support of Core Policy WCS1 would lead to excessive detail and an unnecessarily lengthy section within the WCS.</p> <p>Further information on waste minimisation statements is provided in the Council's Supplementary Planning Document 'Waste Minimisation in Development Projects' (2006) available separately.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Tim Quinton Natural England	244	244/8	The Recycling and Composting / Anaerobic Digestion section is a significant improvement on earlier considerations of this tier in the Strategy. In particular, this is the first time it is explained that there is already a recycling / composting rate of domestic waste of approximately 42%. This goes some way to explaining Section 3.0, however, even at present rates, 19,000 tpa still appears to be insufficient to raise the 42% to 60%. If we use the forecasting figures (even assuming a continued baseline of 42%, that leaves a shortfall of some 64,730 tpa.	As stated previously the figure of 19,000 tonnes/year is the level of <u>additional</u> capacity needed for recycling and composting over and above that which is already in place within the county. No Change.
Tim Quinton Natural England	244	244/9	The section on Amenity and Cumulative Impact (pg 69) raises some serious concerns. This practice of “carrying over” a policy from the Waste Local Plan (2004 – 2012) has some significant shortcomings, not least of which is that they are not considered in the assessment (SA, HRA, EIA etc) of the new document – and though it would be argued that they were already assessed as part of the adoption of the WCP, this does not hold water, as it is the efficacy of the new plan in its totality that needs to be assessed, not to mention that legislation has changed in the time since the previous assessment (such as the Habitats Regulations 2010 and possibly, considering the adoption date, the Planning and Compulsory Purchase Act 2004). Also, given that there is an end date on the period of adoption (2004 – 2012) it could be argued that there is no legal basis for the consideration of these policies post 2012. As the adoption of	Disagree for a number of reasons. First, Policy 37 of the adopted Waste Local Plan has been saved under transitional arrangements, forms part of the development plan and therefore remains a valid material consideration. In terms of SA, HRA etc. the policy has previously been subjected to Strategic Environmental Assessment (SEA) as part of the local plan preparation process. Importantly, there is nothing in national policy or best practice to suggest that saved local plan policies such as this should be subject to 're-appraisal' through Sustainability Appraisal (SA). In relation to HRA, the generic nature of Policy 37 means that it would not be directly applicable in any case. Furthermore, Environmental Impact

			<p>specific DPD to replace some of these policies, as cited in the section on Amenity and Cumulative Impact is unlikely to happen before 2012/2013, this leaves a period when there is no policy regarding these areas.</p>	<p>Assessment (EIA) does not apply to development plan preparation it is relevant at the planning application stage.</p> <p>As stated in the publication WCS, Policy 37 will be updated/replaced through the preparation of a separate development management waste development plan document to be prepared following adoption of the WCS. It is not possible to address every single issue within the core strategy and this approach is considered reasonable.</p> <p>No Change.</p>
<p>Tim Quinton</p> <p>Natural England</p>	244	244/10	<p>Of greatest concern to Natural England is the fact that one of these policies pertains to important Landscapes outside of protected areas. Natural England considers the WCS without the retained policies from the WLP to be incomplete. Natural England considers the wording of the Policy re; internationally and nationally protected sites to be weaker than that of the Waste Plan 2004. It is recommended that the wording be re-considered.</p> <p>Biodiversity and geodiversity are not the preserve of dedicated sites, but a resource, like any other, that needs protecting. No mention of NERC duty. Or PPS9. This is a serious down-grading of quality from the Waste Plan.</p> <p>This is an important point, and worth re-iterating in</p>	<p>It is not accepted that Core Policy WCS12 – Nature Conservation (Biodiversity and Geodiversity) is weaker than the policies set out in the Waste Local Plan.</p> <p>In line with best practice the policy adopts a permissive approach towards new development provided certain criteria are complied with, but this does not mean the policy is weak.</p> <p>With specific regard to international sites, national policy (PPS9 paragraph 6) states that policies for international sites should <u>not</u> be included in development plan documents.</p> <p>Paragraph 4.233 has been amended to include reference to the Natural Environment and Rural Communities (NERC) Act 2006.</p> <p>See Focused Change 33.</p>

		<p>the policy.</p> <p>As the need to be mindful of biodiversity is a requirement of all public bodies under the NERC Act 2006, and PPS 9 states that all policies should aim to conserve and enhance biodiversity, Natural England considers the Strategy incomplete without specific mention in the definition of character of biodiversity and of the need to ensure no net loss. If that is not achievable on site, then off site mitigation must be sought.</p> <p>The following amendment to the policy must be made;</p> <p>“Local nature conservation designations will also be safeguarded from inappropriate development and planning permission will only be granted for development affecting such designations where it can be demonstrated that the impact of the development can be satisfactorily mitigated or and that the benefit of the development clearly outweighs any impact. Proposals shall be required to that incorporate beneficial biodiversity or geological features into their design and layout will be favourably considered particularly where the proposal would result in a positive contribution to a Strategic Nature Area (SNA) as identified on the Nature Map for Gloucestershire.” i.e. If a development is in an area covered by an SNA it is effectively taking potential resource from bio/geodiversity, and this must be required to be mitigated against.</p> <p>Natural England would also strongly recommend</p>	<p>The comments in relation to Core Policy WCS12 are accepted in part. The policy has been amended to include reference to development being mitigated <u>and</u> the benefit of development outweighing any impact. The policy has also been amended to require all development proposals to assess their impact on the natural environment and make a contribution to local nature conservation targets.</p> <p>See Focused Change 34.</p> <p>It is not accepted that proposals should be required to incorporate beneficial biodiversity or geological features into their design and layout. No further amendments to the policy are therefore proposed.</p> <p>Protected species are already addressed through separate legislation and there is no need to repeat this within Core Policy WCS10.</p>
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			that this policy includes a section regarding the legal requirements of protected species.	
Tim Quinton Natural England	244	244/11	Sustainability Appraisal. Natural England has attempted to consider the Sustainability Assessment, but without the consideration of the 14 saved policies within the SA, consider the whole process to be flawed and have therefore to return to the whole document. To submit something at this time Natural England can only advise that, within its limited context it is a well written document, but that cannot consider the sustainability of the WCS to have been adequately Assessed. Natural England will be submitting further comment after the submission date.	<p>It is assumed that the respondent is referring to the saved policies from the Waste Local Plan (although in fact there are more than 14 of these). The SA report addresses only the Core Policies within the WCS, it does not address the Local Plan policies which have already been subject to Strategic Environmental Assessment (SEA) and have been formally adopted.</p> <p>Importantly, there is nothing in national policy or best practice to suggest that saved local plan policies should be subject to 're-appraisal' through Sustainability Appraisal (SA). If any of the saved policies are taken forward into subsequent Development Plan Documents (DPDs) they will be subject to SA and stakeholder consultation and refined as necessary.</p> <p>It is not accepted that the SA process is flawed. The purpose of the SA is to test the sustainability of the WCS not the adopted Local Plan.</p> <p>It has been prepared by independent consultants in accordance with established best practice and is considered to be adequate.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Tim Quinton Natural England	244	244/12	<p>Habitats Regulation Assessment. Regulation 61 requires your authority, before deciding to give any consent to a LDF Document which is (a) likely to have a significant effect on a European site (either alone or in combination with other plans or projects), and (b) not directly connected with or necessary to the management of the site, to make an appropriate assessment of the implications for the site in view of its conservation objectives.</p> <p>In this case the proposal is not directly connected with or necessary to the management of a site. However, for Natural England to advise whether it is likely to have a significant effect on a European site the Waste Planning Authority (WPA) should consider the following points.</p> <p>While not specifically an HRA requirement (but a requirement nonetheless under CRoW Act), All SSSIs within 2km of all the proposed facilities should have been/will need to be screened and if necessary, assessed. Reference to this process being undertaken should be made and the results confirmed even if it is thought that there are not any relevant sites/features in the 2km screening distance. However, this appears to not be the case, there are definitely SSSIs within 2km of some of the proposed locations e.g. Severn Estuary SSSI.</p> <p>It should be noted that the Environment Agency (EA) are the statutory regulators on Air Quality (AQ), and the Competent Authority responsible for</p>	<p>The respondent notes that a consideration of SSSI is not specifically an HRA requirement. In any case the SSSI screening has already been done as part of the WCS sites work and importantly there are no SSSI within 2km of the four strategic site allocations. The outcomes of the HRA, SSSI and other biodiversity assessment work is summarised in the Strategic Site Schedules at Appendix 5 of the WCS</p> <p>The WPA note that further technical comment will be supplied by the EA. This was subsequently provided by the EA to NE and the WPA in late</p>

			<p>issuing of the PPC permits which will be required alongside planning permission for these developments to operate. Natural England are not in a position to comment on the appropriateness of some of the more detailed technical areas of the assessment such as model assumptions, model conditions etc. These comments are made without prejudice to the EA's PPC consultation process with Natural England or the specific and more detailed planning consultation when a formal planning application is submitted containing full details of the specific plan.</p> <p>As has been acknowledged in the report, the HRA is limited by the high level nature of the WCS and the assessment is consequently based on a series of assumptions including facility design. The need for more detailed assessment at the development control stage due to the high level capability of this assessment is therefore mentioned as a requirement within the findings and recommendations. This is correct, this is a high level screening and Natural England's comments are made here without prejudice to more detailed consultations at the planning application/EP permit stages.</p> <p>It should be noted that at the moment, NE do not recommend applying an NH3 critical Level (CLe) for the protection of saltmarsh due to tidal inundation and uncertainties in sensitivity. However, there is a Nutrient N critical load for saltmarsh provided on APIS.</p> <p>However, of greater concern is that there appears</p>	<p>March 2011. The discussion of that report and the WPA response to it is addressed in detail in the key issues summary paper. However it is fair to say that much of these issues are outside of the HRA report on the WCS which should be considered a high level instrument to aid the WPA in its decision-making.</p> <p>The overall conclusion is that as significant impacts are not totally ruled out, more site-specific assessments will be needed at the planning application stage.</p> <p>The recognition from NE that the HRA report is a high-level screening only and that further, more detailed assessment will be needed at the planning application stage is welcomed.</p> <p>Saltmarsh has been used to represent habitats at the Severn Estuary. The correct critical loads are provided in Annex B, Appendix 1, Table 1.4 – page 130 of the pdf). This table states 30-40 kg N ha-1 yr-1 for Nutrient N critical load for saltmarsh which was used in the modelling runs.</p> <p>The latest Gloucestershire Baseline Report was</p>
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			<p>to be some confusion as to what constitutes a qualifying feature of the Severn Estuary SPA, Ramsar and SSSI. Pg19 fails to correctly identify the features of the Ramsar, which must include as a minimum estuaries and fish as well as birds. Also in the air pollution report Table B1.4 the Ramsar and SAC estuarine habitats and fish species and are not mentioned at all, not even the saltmarsh, although it seems to be covered by the assessment later on so there is some confusion, which requires clarifying. (assuming the assessment was made the data needs to be amended in Table B1.4)</p> <p>There are several possible reasons for this, including the amendment of the Habitats Regulations pertaining to the Estuary since the publication of the Baseline Report.</p> <p>Natural England has therefore included the Regulation 33 package for the European Marine Site. It is important to emphasise that if the qualifying features are not correctly identified at this stage it could affect the whole of the HRA process and outcome.</p>	<p>HRA Evidence Gathering / Baseline Report (Update 2 – August 2009) At the request of Charlotte Pagenham from NE, this report included all the latest information on the Severn Estuary from: The Severn Estuary / Môr Hafren European Marine Site comprising: The Severn Estuary / Môr Hafren Special Area of Conservation (SAC). The Severn Estuary Special Protection Area (SPA). The Severn Estuary / Ramsar Site 39 Natural England & the Countryside Council for Wales' advice given under Regulation 33(2)(a) of the Conservation (Natural Habitats, &c.) Regulations 1994, as amended. June 2009</p> <p>This comprehensive HRA Baseline Report was signed off by Natural England following the WCS site options consultation. On this occasion it was stated: "Natural England is aware that the full details of the sites are contained in the HRA Baseline report (Update 2), and are happy with the quality of data used in screening task A, and that the reasons for notification and sensitivities of each site within the plan area have been accurately recorded."</p> <p>The HRA (Update 2) Report is available as a download via the following web link: http://www.gloucestershire.gov.uk/hra Pages 37 to 46 of the GCC Baseline Report (Update 2) clearly outlines the qualifying features of the Estuary under the EU Habitats and Birds Directives and the Convention on Wetlands of International Importance.</p> <p>The ERM report: Waste Core Strategy Habitats</p>
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			<p>The section on air pollution from MBT (pg22) assumes no emissions from MBT facilities, due primarily to the lack of a point source rather than a consideration of other pollution instances. Natural England national air quality guidance on MBT facilities states that "The EA recognise that an MBT plant can generate significant amounts of ammonia, although emissions have not been quantified. The amount of ammonia produced largely depends on the type of waste (green or mixed), and the proportions of materials rich in nitrogen (the carbon:nitrogen (C:N) ratio)." Therefore it is reasonable to expect that those proposed MBT sites close to designated sites where there are sensitive features, should be considered for potential NH3 emissions. Which means that the following assumption appears to be inappropriate.</p>	<p>Regulations Assessment Final Report December 2010 clearly states (Page 8) that: "The identification of baseline information relating to European sites has largely been covered by a series of regularly updated 'Evidence gathering / Baseline Reports' by GCC. Natural England and the Environment Agency were consulted as part of the progression of these documents and approved the final baseline report in August 2009. This assessment report uses the baseline information held within those baseline documents at the request of GCC."</p> <p>The ERM report correctly asserts that "All GCC HRA Reports have been consulted on and verified by Natural England."</p> <p>In relation to emissions from MBT facilities, the first comment to make is that, NH₃ emissions from thermal facilities are extensively covered in numerous sections of ERM's report e.g. in Table B2.1. and in many other places</p> <p>The only waste sites <u>actually proposed</u> to be included in the publication WCS are sites where the nearest European Site is over 5km away.</p> <p>For Wingmoor Farm (East) and Wingmoor Farm (West) the nearest European site is Dixon Wood at 5.2km and 5.8km respectively. For Javelin Park and Moreton Valence the nearest European site is the Severn Estuary at 6.3km and 5.3km respectively.</p> <p>Given these distances, would NE expect a proposed MBT facility to affect the sensitive features of</p>
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			<p>“Given that waste site 13 is the closest at 200 metres, when considering the above, it is considered unlikely that there would be any potential effects from air pollution arising from an MBT facility. Therefore air pollution impacts from non-combustion related waste facilities are ruled out of the assessment.”</p> <p>As AERMOD and ADMS models have both been run and both sets of data are available, we would expect the more precautionary results of the two models to be used when undertaking any of the individual assessments whichever that may be on a case by case basis.</p> <p>Where a range of Critical Loads/Levels is provided on APIS, applying the precautionary principle, we would expect judgements to be based on the lower (more stringent) end of the range to be used in all assessments. Pg 39/40 Tables 6.2/6.3 The Assessment does not contain sufficient data to be able to confirm whether we would agree with the conclusions presented in this table.</p>	<p>Dixton Wood and the Severn Estuary as a result of potential NH₃ emissions? Given the massive variables (waste type, mixing process, internal vs. external and no quantification by the EA) should this not be dealt with at the DC application stage?</p> <p>The Council's consultants ERM consider that pollution effects from MBT are only likely to occur in close proximity to the facility. At 200m, the closest waste site included in the assessment at the time was not considered likely to result in significant effects. In addition, as NE point out above, NH₃ is unlikely to affect qualifying habitats due to tidal inundation and uncertainties in sensitivity.</p> <p>The results of both AERMOD and ADMS are included within the report for completeness as it is recognized that both models are widely used for regulatory applications in the UK and therefore both are equally valid. This is explained further in Annex B, Section B3, page 116 of the PDF. In presenting and discussing both it shows the worst case findings and also documents the limitations of the models.</p> <p>The lower value has been used where a range is provided for Critical Loads. Annex B, Table 1.4, page 150 of the PDF states 10-15 for the critical load range but also highlights where ‘PC as a % of the Critical Load’ and ‘PEC as a % of the Critical Load’ are in exceedance in bold. The summary of the results at Table B2.1 and other places in the report including Page 39/40 Tables 6.2/6.3 of the main report reflect the lower values in each case.</p>
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			<p>Pg 42 The favourable condition table (FCT) targets are being used here to identify site sensitivity. This is okay as a starting point, but it should be understood that it is not just the attributes and measures outlined in the FCTs that need to be considered. It is not possible to monitor everything that underpins the integrity of designated sites to report on site condition and the FCTs are not designed to specifically detect AQ impacts. So, lower plants may not be monitored on a site but may still be considered as underpinning the integrity of the site.</p> <p>Conversely, just because there are lower plants present, it does not follow that we would necessarily argue that the lower NH3 CLe should be applied. NE would need to be consulted on a site specific basis on the appropriate CLes that apply, meaning Natural England are reluctant to agree to screening out of any specific proposal at this stage on this basis. Site specific consultation with Natural England is essential at the more detailed planning stages so appropriate CLe/CLs can be agreed for the site likely to be affected.</p> <p>Natural England does not consider the detail regarding whether or not the direct toxic effect of NH3 on woodland/grassland to have been appropriately considered in Table 6.4 (pg 44); The issue is not just N deposition but also the concentration of NH3 in the air i.e. its CLe.</p>	<p>This is too detailed for a higher level HRA, this analysis would be appropriate at the planning application stage. The independent consultant who carried out the work on the WPA behalf (ERM) agree that it is not possible or practical to provide sufficient detail for the LPA to carry out a full appropriate assessment of the development of a particular waste site allocation at this level in the planning process and that is not the intention of this assessment.</p> <p>The WCS does not 'screen in' or 'screen out' any proposal, but it does inform what applications might be acceptable. Details will come at the planning application stage and through an AA if NE deem necessary. ERM agree that the HRA report makes it clear that consideration of further assessment at the planning application stage will be required when precise facility details are known. The HRA report provides guidance as to whether the WCS is achievable in terms of compliance with the 2010 regulations and suggests where further assessment is likely to be required.</p> <p>Table 6.4 provides general indications of likely effects of pollutants on habitats and was not intended to be a comprehensive consideration of air pollution effects. Whilst it would be of benefit to add in a sentence on the effects of NH3, it will not change the findings of the assessment, but should be considered as standard where further assessment into the effects of air pollution from</p>
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			<p>Water Quality (WQ) issues seem to be ruled out on the basis that standard mitigation measures would be employed and that they would need a consent from the EA (abstraction, discharge etc). It does not necessarily follow therefore that there would be no LSE from WQ issues.</p> <p>On point of clarity, Natural England would contest that the application of mitigation measures does not necessarily mean that a conclusion of no LSE can be concluded (pg 74). Survey work may be required to ensure that this is the case. Pg 63 IN Combination – all other known plans and projects would need to be included in the in combination assessment that have not been included in calculations for existing PECs.</p> <p>Annex B The assessment made in Table B1.5 and Table 1.3 (pg13) seem to have screened LSE for acid deposition using one single acid deposition critical load. NE/EA are not signed up to this methodology</p>	<p>EfW facilities is required.</p> <p>It does follow from our preparatory technical work and earlier conversations between the GCC Ecologist and NE (Ali Watson, now Swanson). There are huge distances and dilutions and also waste sites are down stream in some cases means that there must be 'No LSE' – at this level of plan.</p> <p>Again, if it were the case that significant effects were identified at the planning application stage, then this would require detailed assessment. The HRA report refers to dilution effects and the large distance between some waste sites and European sites together with the standard mitigation and control measures and regards that significant effects are unlikely in some cases.</p> <p>With regard to mitigation measures: In our view, this is not appropriate for the assessment of a higher level plan; on policy which only guides development NOT decides it. On the in-combination assessment: It is not appropriate to go to this level of detail, the line has to be drawn somewhere. No significant projects or plans have been omitted that are likely to change the findings. A thorough consideration of all known plans and projects, not just those included in the PECs have been included in the In-combination Assessment.</p> <p>ERM received definitive guidance on the appropriate acid deposition critical loads (CL) to be used, stating single values should be used which had recently been posted on the APIS website at</p>
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			<p>nationally. According to national specialists, EA/NE would expect two critical loads to be used (minCLmaxN and minCLmaxS) for assessing likely significant effect of acid deposition and both Nitrogen & Sulphur sources separately assessed where critical load functions are available on APIS, which is the case in all N2K sites.</p> <p>In Table B1.6 it would appear a CLe of 1 ug/m3 for NH3 has been applied for woodlands, but lower plants underpin site integrity on sites other than woodlands e.g. certain grasslands etc.</p> <p>Table 1.4 (pg 32) When crosschecking the CLs used with those provided on APIS using the site specific N deposition critical loads rather than the generic woodland habitat ones for N Deposition Critical Loads there appear to be some inconsistencies; For example, on Dixon Wood SAC the N deposition CL given on APIS for the most sensitive feature, ground flora is 10-15 Kg N/ha/yr. The assessment has used 15 but the lower end of the site specific CL should be used.</p>	<p>that time. This guidance was issued by the National Critical Loads Focal Centre (NCLFC) and the Centre for Ecology and Hydrology (CEH) and was passed to ERM by Natural England (NE) (from Dr. Zoe Russell, Senior Air Quality Specialist based in Kent).</p> <p>NE confirmed the final list of APIS habitats and values used which included a discussion of the use of lower NH3 values for woodland sites where lower plants are a known important feature. NE did not advise further on the inclusion of other grassland sites (email from NE dated 19th April 2010). As a precaution woodland values have already been applied to some European sites as a precautionary approach. The use of 1 rather than 3 for NH3 would potentially only make a difference for the ADMS modelling of Waste Sites 6 or 8 against Rodborough Common. However waste sites 6 and 8 are not being taken forward in the WCS. In addition, the HRA report recommends that further air quality assessment would be required at the planning application stage.</p> <p>ERM have checked their calculations and the lower value has been used where a range is provided for Critical Loads as stated in the response from NE above. Annex B, Table 1.4, page 150 of the pdf states 10-15 for the critical load range for Dixon Wood and 10 was used – the critical load figures in column 3 fall over two lines so this may be a mis-read.</p>
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			<p>Same for Bredon Hill SAC, the assessment has used 15-25 Kg N/ha/yr for protection of Calcareous Grassland but APIS recommends using a CL of 10-15 Kg N/ha/yr for the protection of temperate and boreal ground flora. Not sure if this is an area/SSSI specific approach that has been adopted or an error. Cotswold Beechwoods 15-25 Kg N/ha/yr calcareous grassland but most sensitive feature beech woodlands is 10-15 Kg N/ha/yr so appropriate CL is 10 Kg/ha/yr so the correct most sensitive CL has been applied here.</p> <p>There are a whole range of additional toxic chemicals emitted from EfW incinerators and other waste facilities that do not appear to have been assessed here (heavy metals etc). The entire range of all potential damaging air pollutants will have to be assessed in detail using the appropriate air dispersion modelling and screening methodology, as well as potential impacts from PM10 particles on birds and mammals, before final decisions are made about LSE/AEOI etc.</p> <p>In conclusion, as is acknowledged in the assessment, "The need for more detailed assessment at the development control stage due to the high level capability of this assessment is therefore included within the findings and recommendations".</p> <p>There are various areas of clarification required,</p>	<p>With regard to Bredon Hill N deposition and the use of 15-25 as a critical load range rather than 10-15. To use 10-15 critical load range would not make any difference to the findings for the relevant waste site 3, Easter Park as the site shows exceedance of the significance criteria for acid deposition at each modelled facility.</p> <p>The WPA would question whether this level of detail is appropriate for a higher level assessment such as that which has been carried out by ERM. What has been undertaken in other parts of the country e.g. West of England Partnership? Is NE providing consistent advice to WPAs in the preparation of waste DPDs? ERM advise that heavy metals should not be included in air dispersion modelling at this level due to the wide range of results that this would provide which would not be useful or meaningful at this stage. The HRA report recommends that further air quality modelling is carried out at the planning application stage.</p> <p>The WPA considers that the HRA Report is appropriate for a higher level / strategic Waste Core Strategy. It is accepted that the clarifications and 'data gaps' will need to be addressed with any application at the planning application stage, should one come forward on any of the proposed WCS allocations.</p>
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			<p>gaps in the assessment and potential flaws in the methodology used for this screening assessment and therefore the ultimate conclusions regarding LSE are also potentially flawed. As a consequence, Natural England is currently unable to agree with the ultimate conclusions within this screening assessment.</p> <p>HRA is an iterative process however, and Natural England would therefore expect any further analysis, whether a revised scoping assessment, or appropriate assessment of lower tier document (such as planning application) to include resolution of the clarifications and data gaps listed above.</p>	<p>Given the waste sites that are being referenced in the WCS, the discrepancies noted in the comments do not make any difference to the evidence base provided by the ERM HRA report.</p> <p>No Change.</p>
Claire Cullen-Jones Cheltenham Borough Council	27	27/1	<p>Recognising that this consultation is primarily aimed at assessing the soundness and legal compliance, Cheltenham Borough Council has no objection to the legal compliance or soundness of the Core Strategy but would like to make the following comments:</p>	<p>Support noted.</p> <p>No Change.</p>
Claire Cullen-Jones Cheltenham Borough Council	27	27/2	<p>Strategic Objective 2. Whilst the council is supportive of this objective, the recycling target will have operational implications for both the County and the districts in terms of levels of vehicles and depots required and the promotion of the reduce/recycle/re-use agenda. Any increase in re-use, recycling and composting will reduce the amount of residual waste and therefore will have implications on the amount, location and type of resource required across the county.</p> <p>Therefore, any proposals should ensure that they are sustainable in the long term, as well as the</p>	<p>Support for Strategic Objective 2 noted. In relation to the issue of recycling/composting targets, it is anticipated that if the target of 60% is achieved, there will still be a remaining 'residual' element of around 150,000 tonnes per year that will need to be managed through waste recovery processes.</p> <p>The strategic site allocations are intended to deliver this requirement on one or more sites. They will also help to manage residual commercial and industrial waste.</p> <p>With regard to the importation of waste, whilst the</p>

			<p>short term, as would not wish to see a position where new plants become unviable due to insufficient waste thus resulting in the need to import significant amounts from elsewhere in the country.</p>	<p>Council can influence the management of municipal waste it has no direct control over commercial and industrial waste, hazardous or construction and demolition waste and this may be imported and exported to and from Gloucestershire through private contractual arrangements.</p> <p>No Change.</p>
<p>Claire Cullen-Jones</p> <p>Cheltenham Borough Council</p>	27	27/3	<p>Core Policy WCS4 Other Recovery (including energy recovery). The Council continues to support the general principle that waste facilities should be located in close proximity to waste arisings and accepts that this will necessitate the majority of strategic waste treatment facilities being located in the "Zone C".</p> <p>Whilst the allocation of disposal sites close to collection areas offers advantages in terms of reducing carbon emissions and provides operational and financial efficiencies, this needs to be balanced against the impact of such sites on the existing, and potential, communities living in close proximity.</p> <p>The Council welcomes the criteria based approach to additional/alternative sites that may come forward in the future for strategic and non-strategic sites. Any new sites, occurring as a result of the criteria based policy, either of strategic or non-strategic nature should consider the journey times and distances from collection point to disposal as significant savings in cost and CO2 emissions can be achieved through reduced vehicle</p>	<p>Support for Zone C noted. The need to take into account the impact of new development on existing and potential communities is fully acknowledged and is reflected in the various core policies as well as the strategic site schedules attached at Appendix 5.</p> <p>The support expressed for the criteria based approach is noted. The policy as drafted refers to speculative proposals having to form 'part of a sustainable waste management system'. This is considered sufficient to address the issue of journey times which in any case would be assessed as part of any proposal that comes forward for example through a Transport Assessment (TA).</p>

			<p>mileage.</p> <p>The Council acknowledges that the WCS is 'technology neutral' and therefore does not include reference to specific technologies, as such, Cheltenham Borough Council has been restricted to commenting on the principle of waste treatment on strategic sites and reserves the right to further comment to specific uses at a later date and at the planning application stage.</p> <p>Cheltenham Borough Council, whilst recognising the benefits that result in terms of economies of scale and carbon savings that result from utilising central sites close to waste arisings, would have very significant concerns if support for a specific site implied the processing of hazardous waste, and/or the production of toxic end products in a location close to centres of population.</p> <p>Cheltenham Borough Council therefore wishes to reiterate concerns over the potential proximity to any possible North West Urban Extension to the hazardous waste plant at Wingmoor Farm and will take account of the most up to date information contained within the Wingmoor Waste Treatment Plant and Landfill Sites Community Health Impact Assessment (HIA).</p>	<p>The strategic site allocations are capable of accommodating a range of different waste recovery technologies. It is noted that the Borough Council will submit further comments at a later date should a detailed proposal come forward.</p> <p>The strategic site allocation that has been identified at Wingmoor Farm (East) does not presuppose the outcome of the current planning application which includes an element of hazardous waste disposal. The publication WCS clearly sets out the position in relation to Wingmoor Farm (East) and the current application. Paragraph 4.129 has however been amended to clarify the implications of planning permission not being granted.</p> <p>See Focused Change 26.</p> <p>The concerns expressed in relation to the proximity of the Wingmoor Farm site to a north west urban extension to Cheltenham are noted. It is important to emphasise however that at the present time there is no certainty that the urban extension will come forward due to the potential abolition of the regional spatial strategy. Conversely there is a current planning application to continue the existing waste operation at Wingmoor Farm and the application will be determined on its merits based on all relevant material considerations.</p>
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		<p>Cheltenham Borough Council does not necessarily support the County's potential approach for Javelin Park to provide a 'one site solution' to residual waste, as consider the significance of journey times and distances from collection point to disposal point as an important factor in reducing carbon emissions and making operational and financial efficiencies. If the decision is taken to have a single site to accommodate residual waste recovery, then this needs to be supported by the provision of appropriate waste transfer facilities elsewhere in the county. Core Policy WCS4 does not make reference to the possibility of a one site solution to residual waste recovery, but it is recommended that the policy or supporting text be expanded to include a requirement to provide waste transfer stations should such an approach be explored.</p> <p><u>Wingmoor Farm East and West</u></p> <p>In principle, the Council continues to support the use of existing waste treatment sites, as opposed to building new sites, however wish to reiterate the following in relation to Wingmoor Farm.</p> <ul style="list-style-type: none"> - The proximity to any possible urban extension at North West Cheltenham needs to be considered and, in practice, may prove unacceptably close. The Council reserves the right to object to specific uses on this site. The specific type of facility promoted on the site will need to take into account the potential impact on existing residential properties and those that may come forward in the future. 	<p>The comments in relation to Javelin Park are noted. Four strategic sites have been allocated and the publication WCS makes it clear that proposals may come forward on one or more of these sites.</p> <p>Javelin Park is well-located in relation to the source of the majority of Gloucestershire's waste arisings i.e. the Central Severn Vale. It was also allocated in the adopted Waste Local Plan, the principle of development in this location therefore having been accepted.</p> <p>The issue of waste transfer has been removed from Core Policy WCS2 and is now addressed through a new core policy and supporting text. This should help to provide additional clarity.</p> <p>See Focused Change 13.</p> <p>The support expressed for the use of existing waste sites noted. This approach is consistent with national policy.</p> <p>As set out above, at the present time there is some doubt as to whether an urban extension to the north west of Cheltenham will come forward due to the potential abolition of the South West Regional Spatial Strategy (SW-RSS).</p> <p>If an urban extension does come forward and is followed by a detailed waste proposal at Wingmoor Farm, clearly consideration will need to</p>
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			<p>- Development of this site may have impacts on the Wingmoor Farm Meadow Gloucestershire Wildlife Trust Reserve and suitable mitigation measures may be required at the application stage.</p> <p>- Development of this site has the potential to increase traffic on the A435, A4019 and A40 in and around Cheltenham. This increase in traffic needs to be considered in conjunction with increases which could result from the proposed urban extension at North West Cheltenham.</p> <p>- Consideration will need to be given to the potential for increased surface water flooding resulting from development of the site. This needs to be considered in conjunction with the proposed urban extension to the south of the site.</p> <p>Foot note (1) The Council would like to make it clear that any references to urban extensions as proposed by the draft Regional Spatial Strategy for the South West (RSS) do not imply that they are</p>	<p>be given to any potential impact. This is however not a reason to exclude the site from further consideration particularly as it forms part of an existing waste operation. Furthermore, major development in close proximity to a waste recovery operation at Wingmoor Farm would present the opportunity to utilise combined heat and power through district heating etc. thereby creating potential sustainability benefits.</p> <p>The presence of the Key Wildlife Site (KWS) is noted and is acknowledged in the site schedule attached at Appendix 5. Any development will therefore be required to take this into account and mitigate any potential impact.</p> <p>The potential traffic impact associated with the Wingmoor Farm sites is also acknowledged in the site schedules. Any development will need to be supported by a Transport Assessment and Travel Plan. This will build on the initial transport assessment carried out in support of the publication WCS which highlighted in broad terms a number of key issues.</p> <p>In relation to surface water flooding, the strategic site schedule specifies that surface water mapping should be undertaken should a detailed proposal come forward. A site-specific Flood Risk Assessment (FRA) will also be required.</p> <p>Comment noted.</p> <p>No Change.</p>
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			supported and the Council remains opposed to significant elements of the RSS. The Council is specifically opposed to the construction of the proposed NW extension, for reasons which include its proximity to existing and proposed waste treatment sites.	
Councillor Barbara Tait Stroud District Council	443	443/1	The Council welcomes the improvement within the document in communicating the intrinsic relationships between land use, waste treatment solutions and collection regimes. In particular we support paragraphs 4.76 and 4.77 that identify specific sites and yet importantly allow flexibility for smaller-scale facilities to come forward. This approach should therefore comply with the Planning and Climate Change Coalition guidance produced in November 2010 which states the need to 'facilitate waste management and meeting targets for renewable capacity' and 'supporting identified opportunities for decentralised energy or connecting to an existing decentralised energy supply system' that contribute to sustainable waste management. With strategic sites close to our Hunt's Grove development, we believe the opportunities for low carbon and decentralised energy should be explored further.	<p>Support noted. The potential opportunity to link waste recovery at Javelin Park with the Hunt's Grove development via combined heat and power (CHP) is fully acknowledged and is reflected in the strategic site schedule attached at Appendix 5 as well as the supporting CHP evidence paper.</p> <p>The County Council previously responded to the planning application at Hunt's Grove suggesting that the potential for utilising renewable energy be explored in more detail.</p> <p>No Change.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Councillor Barbara Tait Stroud District Council	443	443/2	The Council supports the definition of strategic sites given in Paragraph 4.78	Support noted. No change.
Councillor Barbara Tait Stroud District Council	443	443/3	The Council could support in principle the reference to the potential of sustainable transport in paragraphs 4.264 to 4.274 inclusive. However the Council observes that clearer linkages need to be made in relation to each site under WCS4 so that they are "situated so as to maximise the opportunities for sustainable modes of transport such as rail and water." The preferred sites at Javelin Park and Moreton Valence appear to have little or no such linkage at present. We disagree with the line "As described above, several of the sites allocated in Core Policy WCS4 are located in close proximity to the rail network providing some possibility of creating a rail link for the sustainable movement of waste." In fact within Stroud District the locations in policy WCS4 would focus primarily upon HGV movements related to the strategic highway network. The Council comment that they would like to see a truer and more deliverable picture of how sustainable these sites would be in practice in terms of transport aspirations. There is little or no possibility for rail and water transport in "close proximity" in spatial terms or within the current economic context. In this sense Policy WCS14 - Sustainable Transport will offer little added value to securing alternatives to road travel in this District. We acknowledge that Wingmoor Farm could offer rail linkages, but observe that an	Comment noted. The strategic site allocations have been identified having regard to a number of factors including site size, location, availability, flood risk and landscape impact. The potential for sustainable transport is one of a number of considerations and it is acknowledged that the likelihood of such a scheme coming forward varies between the different sites. The Wingmoor Farm sites offer some potential for the movement of waste by rail, whilst Javelin Park and Moreton Valence perhaps offer less potential. The transport impact of any development will be assessed through a Transport Assessment and Travel Plan. It is also important to note that whilst Core Policy WCS14 is applicable to the strategic allocations, it also applies to speculative proposals. No Change.

			indicative map of how this could be achieved either on-site or adjacent to it. Further evidence as to how this could be achieved in rail line capacity terms or be economically deliverable would be useful for the reader. I consider that without such acknowledgements the policy considerations offer little more than an unrealistic transport aspiration. The overriding need to deal with the waste in Gloucestershire would probably have greater weight than these other transport considerations in practice.	
Councillor Barbara Tait Stroud District Council	443/4	443/4	The Council supports the identification of the key drivers set out in section 3 and the Waste Hierarchy at Figure 4. We welcome the reference to Changing Technology. This has been a regular point in our earlier objections on the need to recognise the unique but changing characteristics of different technological solutions. The flexibility provided by the policies outside your strategic sites should enable the Council to seek to maximise energy benefit from a network of decentralised facilities.	Support noted. No Change.
Simon Steele-Perkins Strategic Land Partnerships	601	601/1	Government policy places great emphasis on Waste Planning Authorities (WPA) making adequate provision for waste management facilities to deal with waste arisings within the administrative area of the WPA i.e. to be self-sufficient. This approach has been wholeheartedly adopted by the West of England Partnership in the preparation of their Joint Waste Core Strategy. Gloucestershire County Council should similarly make it clear that the continuation of export of waste from the West of England into	Whilst the County Council as Waste Disposal Authority (WDA) has control over the management of municipal waste, it has no control over the movement of other waste streams including commercial and industrial waste and construction and demolition waste, which may occur across administrative boundaries. Notwithstanding this, the spatial vision has been amended to emphasise the importance of ensuring enough waste management capacity is made

			<p>Gloucestershire should not be catered for in policy terms and therefore we would suggest explicit reference to this within the Core Strategy, in that waste facilities will only be provided within the authority area to meet the waste arising from within the authority area and not to meet the needs of neighbouring authorities in the event that they have failed to make adequate provision. The use of historic input rates to various facilities may give misleading results due to the past trends of importing waste into the county.</p>	<p>available to meet Gloucestershire's needs.</p> <p>See Focused Change 10.</p>
<p>Malcolm Watt</p> <p>Cotswolds Conservation Board</p>	219	219/1	<p>The fourth bullet point on paragraph 4.85 implies that development outside the AONB is unconstrained by the AONB designation. However, national and local policies with respect to the conservation of designated landscapes including the Cotswolds AONB include a requirement to consider the impact of development outside the protected landscape on the special qualities of the area. This consideration is reflected correctly elsewhere in the Waste Core Strategy. Amend the fourth bullet point to read: Zone C avoids those parts of the county where flood risk is most prevalent and also avoids the Cotswolds Area of Outstanding Natural Beauty (AONB). It is thus relatively [delete - "unconstrained"] [insert "less constrained"] in land use planning terms.</p>	<p>Comment noted. It is acknowledged that the wording of the fourth bullet point (paragraph 4.85) could be improved for clarity.</p> <p>See Focused Change 18.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Malcolm Watt Cotswolds Conservation Board	219	219/2	Appendix 2 sets out "Influences on the Waste Core Strategy" The Board considers that this appendix should include reference to the AONB Management Plans. These are statutory plans. The Cotswolds AONB Management Plan 2008-13 has been endorsed by the Council as a material consideration for planning policy formulation. This should be reflected in Appendix 2 as well as in Policy WCS 11. Include reference to the Cotswolds AONB Management Plan 2008-13 in Appendix 2.	Comment noted. It is acknowledged that reference could usefully be made to the AONB management plans within Appendix 2. The appendix has therefore been amended accordingly. See Focused Change 38.
Josephine Marsden	299	299/1	<p>An alternative to landfill is needed but incineration is not the answer. An Incinerator would be costly to buy and to run. It would pollute the atmosphere and cause health problems. Older people may remember the pea-souper fogs of the 40s & 50s caused by burning coal.</p> <p>MBT So far little is known to the public about this.</p> <p>WHAT WE NEED TO DO</p> <p>1. EDUCATE. We need to change the public mind set about the disposal of rubbish. We have become a throw-away society & need to be made aware of the damage to our Planet.</p> <p>2. RE-USE. Provide a storage space for unwanted goods which might be useful to others and let people have access to this.</p> <p>3. COMPOST. All families with gardens should be</p>	<p>The publication WCS describes a number of different waste recovery technologies including autoclaving, mechanical biological treatment (MBT), modern thermal treatment (incineration) and advanced thermal treatment (pyrolysis and gasification).</p> <p>In line with national policy, the WCS adopts a 'technology neutral' approach and the strategic site allocations are capable of accommodating a range of different waste recovery operations including incineration. Paragraph 4.91 has been amended to clarify the fact that the strategic site allocations are capable of accommodating a range of different waste recovery processes.</p> <p>See Focused Change 20.</p> <p>With regard to waste re-use and recycling the WCS is based on the waste hierarchy and already places great emphasis on waste reduction, re-use,</p>

			<p>making compost. They may need instruction and help in buying their first two bins. The resultant soil is super.</p> <p>4. SORT AND COLLECT MORE. At present the only plastics collected are milk and similar bottles.</p> <p>5. CLAMP DOWN ON PACKAGING. Supermarkets are big NSenders.</p> <p>6. INVENT. Engage our scientists in designing recyclable packaging.</p> <p>7. RECYCLE. New goods can be made from waste. I have an excellent bird-feeding tray made from plastic bottles.</p> <p>8. AVOID MAKING RUBBISH. Must we tolerate junk-mail? Firms could be more sparing in their use of paper. Make do and mend.</p> <p>9. LISTEN. Professor Paul Connett is a world expert on waste management issues and well worth listening to.</p>	<p>recycling and composting.</p> <p>It also includes reference to the Courtauld Agreement which aims to reduce household waste by designing out packaging waste.</p>
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Late Representations (i.e. received after 7th February 2011)

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Richard Lacey Stonehouse Town Council	66	66/1	I would advise that this Council voted unanimously at the full Stonehouse Town Council meeting on Monday 7 th February 2011 to endorse the submission made by GlosVAIN to you dated the same day. Stonehouse Town Council feels the GlosVAIN research to be comprehensive and thus should be regarded as highly relevant in the Consultation.	See response to Sue Oppenheimer on behalf of GlosVAIN (respondent number 1850) above.
Meyrick Brentnall Gloucester City Council	1370	1370/1	<p>WCS4. Government policy commits the UK to reducing its CO2 emissions by 26% by 2020 and 80% by 2050. Waste is a significant contributing factor and all means should be deployed to reduce the Greenhouse gas emissions associated with waste management.</p> <p>The site allocations as put forward assume Combined Heat and Power will be a component of any large scale facility. Technical Evidence Paper WCS-Q assumes that because there are identified SHLAA sites within 2km of the proposed sites that CHP is viable.</p> <p>There are a number of concerns regarding this.</p> <ul style="list-style-type: none"> - Many of the SHLAA sites have no prospect of coming forward - Those that do will still be too distant from the facility i.e. on the periphery of the 2km isochrone - Any existing development that is nearer will be 	<p>Comments noted. There are a number of important factors to consider in response.</p> <p>First, the site allocations do not assume that combined heat and power (CHP) will be a component of any large-scale facility.</p> <p>Whilst the strategic site schedules and supporting evidence base identify the CHP potential associated with each site, there is no presumption that CHP will come forward. This will depend on the type of waste recovery facility that comes forward.</p> <p>Second, the County Council would contend that if Strategic Housing Land Availability Assessment (SHLAA) sites have 'no prospect of coming forward' as has been suggested by the respondent then they should not have been included in the SHLAA in the first instance.</p> <p>Thirdly, modern technology means that heat</p>

			<p>impractical to retrofit. This is particularly the case with housing development</p> <ul style="list-style-type: none"> - That by the time any of the housing is built it will be built to such a high code standard that space heating will not be a significant requirement. It is just not economic to provide a heat main for hot water demand. - That for a low carbon option to be followed, utilisation of waste heat is necessary. Sites need to be promoted therefore in conjunction with other commercial and industrial users that have a realistic opportunity of utilising the waste heat generated. <p>By identifying a suite of sites that have little realistic prospect of utilising its waste heat we consider the plan to be unsound.</p>	<p>users/clients no longer need to be located adjacent to the source of heat to benefit rather heat can be transported several kilometres albeit with a greater proportion of heat being lost the further it travels.</p> <p>It is not accepted that the strategic site allocations have 'little prospect' of utilising any waste heat that might be generated. The potential is clearly set out in the strategic site schedules attached at Appendix 5 as well as the separate supporting CHP evidence paper.</p> <p>No Change.</p>
<p>Meyrick Brentnall</p> <p>Gloucester City Council</p>	1370	1370/2	<p>Continuing on a low carbon theme. While the document is seen to be technology neutral, landfill as a process is rightly discriminated against. This is at the bottom of the waste hierarchy and due to its greenhouse gas emissions and expense is not pursued as a technology.</p> <p>As such we suggest that other carbon heavy forms of waste management should also be discriminated against. It is clear that some forms of waste management result in far greater greenhouse gas emissions than others. These, as one would expect, tend to be at the bottom of the waste hierarchy. It is proposed therefore that preference should be given to those technologies that are higher up the hierarchy and, therefore, less carbon heavy.</p>	<p>The publication WCS identifies a range of waste recovery technologies.</p> <p>The strategic site allocations are capable of accommodating a range of different solutions. This approach is considered to be consistent with national policy which states that local authorities in preparing Waste Core Strategies and other development plan documents should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy. Paragraph 4.91 has been amended to clarify the fact that the strategic site allocations are capable of accommodating a range of different waste recovery processes.</p>

			<p>Stressing the technology neutrality of document does not tackle the underlying issue. Government policy requires us to significantly reduce green house gas emissions. PPS12 (para 2.1) is clear in that a strategic spatial planning document should contribute to sustainable development. Delivering a low carbon waste management process is a fundamental component of this.</p> <p>PPS 1 Climate Change supplement para 9 is even more clear in that it states:</p> <p>‘To deliver sustainable development, and in doing so a full and appropriate response on Climate change, regional planning bodies and all planning authorities should prepare, and manage the delivery of, spatial strategies that:</p> <ul style="list-style-type: none"> – make a full contribution to delivering the Government’s Climate Change Programme and energy policies, and in doing so contribute to global sustainability; – in providing for the homes, jobs, services and infrastructure needed by communities, and in renewing and shaping the places where they live and work, secure the highest viable resource and energy efficiency and reduction in emissions;; – respond to the concerns of business and encourage competitiveness and technological innovation in mitigating and adapting to climate change’. <p>It goes on to say in para 10 that</p>	<p>See Focused Change 20.</p> <p>With specific regard to anaerobic digestion (AD) this has been separated out from Core Policy WCS2 and is now addressed through a new core policy and supporting text which clearly explains the Government's position in relation to AD and highlights the potential benefits and limitations such as the need for a source segregated supply of organic waste.</p> <p>See Focused Change 13.</p>
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			<p>'Regional planning bodies and all planning authorities should apply the following principles in making decisions about their spatial strategies:</p> <ul style="list-style-type: none"> – the proposed provision for new development, its spatial distribution, location and design should be planned to limit carbon dioxide emissions; – new development should be planned to make good use of opportunities for decentralised and renewable or low carbon energy; – new development should be planned to minimise future vulnerability in a changing climate; – climate change considerations should be integrated into all spatial planning concerns; <p>Further to this the Coalition Government has stressed its commitment to reducing greenhouse gas emissions and has favoured Anaerobic Digestion as means to achieving this. Indeed, the coalition agreement makes clear that Government will introduce 'measures to promote a huge increase in energy from waste through anaerobic digestion'. To conclude PPS 1 and 12 require that development plans pursue low carbon policies. National policy requires significant reductions in CO2 emissions. The Coalition Government has made clear its preference for AD technology as a means of disposing of waste. The Waste Core Strategy should therefore pursue, with vigour, low carbon options (giving preference to AD) to waste management to be deemed sound. By ignoring the Greenhouse gas emissions of differing technologies we suggest that, in this respect, the plan is not pursuing national policy and therefore it is deemed to be unsound.</p>	
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Councillor Sarah Lunnon Gloucestershire County Council	306	306/1	In the Core Waste Strategy 3.2 lists the Five Strategic Objectives, starting with Reduction – however, the residual Waste Strategy only aims for no growth after 2020 (3.2.1 Outline business case for Residual Waste Procurement 2008). Surely these need to be linked.	Strategic Objective 1 aims to ensure that waste is seen as a potential resource and that the amount of waste is reduced with zero-growth achieved by 2020. This objective stems from the Joint Municipal Waste Management Strategy (JMWMS). It is therefore entirely consistent with the residual waste project. Waste reduction is an established part of the waste hierarchy. No Change.
Councillor Sarah Lunnon Gloucestershire County Council	306	306/2	<p>1.1 Commercial Waste tonnage needed to dispose off is given as an upper and lower limit 143,000-193,000. If waste municipal waste tonnages continue to fall, or stabilise before 2020 surely a lower limit is needed for municipal waste tonnage as well as an upper figure.</p> <p>For example a lower figure could be based on 80% recycling in ten years time and residual waste reduction of 1% per annum for the next 10 years.</p> <p>This would mean that reductions in domestic waste production could be planned for and the potential of diverting material that could be recycled to meet contracted residual waste targets or facing large fines for lack of tonnage would be avoided.</p> <p>The potentially embarrassing scenario of a GCC procured facility hoovering up commercial, waste and artificially deflating recycling rates would be</p>	<p>Waste data shows that there is no obvious trend for commercial and industrial waste which has fluctuated in recent years and has latterly been characterised by a downward trend. It is not possible to determine with any degree of accuracy what will happen in the future given the lack of obvious trend data.</p> <p>For this reason a 0% growth rate has been assumed and the range of 143,000 – 193,000 tonnes/year has been identified for waste recycling/re-use and recovery (including transfer) having regard to the RSS targets.</p> <p>For municipal waste the 150,000 tonnes/year requirement for residual MSW set out in the publication WCS is based on forecast waste data provided by the Waste Disposal Authority (WDA).</p> <p>The strategic site allocations are capable of accommodating a facility of this scale plus</p>

			<p>avoided by planning for upper and lower limits.</p>	<p>potentially an element of commercial and industrial waste also.</p> <p>There is nothing to suggest that the provision of a residual waste recovery facility will impact on recycling rates. The facility would instead manage the 'residual' waste that cannot reasonably be recycled or composted.</p> <p>No Change.</p>
<p>Caroline Power</p> <p>English Heritage</p>	1132	1132/1	<p>4.252 - We are disappointed with the lack of a specific policy relating to the Historic "Environment. We understand the reasoning behind the issue of not repeating Government Guidance and that there are policies in the WLP that will remain in force until the production of the Development Management Waste DPD. However, we believe that this will not be adequate in the light of the current PPS5.</p> <p>PPS5 now encourages the identification of non-statutory locally listed heritage assets that allow for a holistic approach to consideration of the historic environment. As part of the appraisal process all designated historic assets should be considered, including the site and setting of Scheduled Monuments and other nationally important remains, Listed Buildings (Grades I, II*, II), Conservation Areas, World Heritage Sites, Registered Parks and Gardens of Special Historic Interest, and Registered Battlefields. As a result it is also important that the historic environment is broadly defined, and potential impacts on non-designated features of local historic interest and</p>	<p>It is understandable that the statutory body responsible for the historic environment would like to see a core policy on this issue within the WCS.</p> <p>However, it is not possible for the WCS to address every single issue and a decision must be made on what topics may be dealt with through other development plan documents.</p> <p>At preferred options, the responses received indicated that most stakeholders considered national policy on the historic environment to be sufficient.</p> <p>It is also pertinent to note that archaeology is rarely an issue that arises in the consideration of waste planning applications, possibly up to 10% of applications at most. It has never been a reason for refusal. Therefore it has never been and did not appear to be a core issue for the WCS. Having regard to this and the need for brevity, in this instance, it has been decided that whilst Gloucestershire unquestionably has a rich historic environment, there are adequate 'saved' policies</p>

			<p>value are fully considered since these can make an important contribution to creating a sense of place and local identity.</p> <p>We would therefore urge you to reconsider your position in this matter given the strength of advice in the PPS and that an omission of a more rounded interpretation of the historic environment at this stage could result in the Strategy being identified as Unsound. As all local authorities are being encouraged to take a more proactive strategy towards the historic environment through such matters as local listing and indeed, some such as Gloucester and Cheltenham, have already instigated programmes along these lines, there should be some continuity between the LPA and the more strategic county-wide planning documents in this respect.</p> <p>The seeming lack of setting considerations to heritage assets as indicated in our response on Javelin Park may also be directly related to not including a specific policy.</p>	<p>contained in the adopted Waste Local Plan (2004) that can be used until a replacement policy or policies dealing with the historic environment can be developed through a separate development management DPD to be prepared following adoption of the WCS.</p> <p>In relation to the consideration of local heritage assets, the site schedules attached at Appendix 5 have been amended to identify the number of listed buildings and scheduled monuments within 1km of each of the strategic site allocations.</p> <p>See Focused Change 41.</p>
<p>Caroline Power</p> <p>English Heritage</p>	1132	1132/2	<p>Policy WCS13 on Design. This is a laudable policy however we wonder how the idea of high chimney stacks will reflect, respond and are appropriate to the local environment in Gloucestershire. Our concern rests in about how it is proposed to assess the potential impact which waste management facilities might have upon historic assets lying some way from the sites of these proposed developments. We note that in the 4 sites detailed in the document, the potential for the erection of 40-80m emission stacks have been sited.</p>	<p>It is too simplistic to think of waste management facilities as purely functional buildings with little aesthetic or design quality. Innovative design can be brought to bear on waste management proposals as they can on housing, retail or other forms of development.</p> <p>Importantly, at this stage the site allocations have been identified in broad terms as being suitable for accommodating a waste management use. However, it is not yet known what type of process</p>

				<p>and therefore what type or scale of building will come forward. It may be the case for example that there is no high chimney stack.</p> <p>Even if the proposal does include a tall structure, there is no reason why this cannot be built to a good standard of design.</p> <p>In terms of the potential impact of built development on historic assets it is acknowledged that there are some heritage assets within 1km of some of the strategic allocations.</p> <p>To take account of this, the general development criteria attached at Appendix 5 specify that any application should be supported by an assessment of the significance of the heritage assets that may be affected and the contribution of their setting to that significance together with an assessment of the impact of the proposals.</p> <p>Notwithstanding this, it is acknowledged that the site-specific schedules also attached at Appendix 5 could usefully be amended to include reference to the number and type of local heritage assets within 1km of each site boundary.</p> <p>See Focused Change 41.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Caroline Power English Heritage	1132	1132/3	<p>Site No. 3: Whilst we would have general concerns about the impact of such structures on the wider historic landscape of these areas, we cannot bring up specific issues relating to the historic environment apart from in respect to Site No 3, Javelin Park. In the vicinity of this site, to the east, are some significant heritage assets. In particular The Mount Castle a Scheduled Monument, Church of St Peters a Grade 11* Listed Building and Haresfield House. These assets are located on the edge of Haresfield village and are within a relatively flat landscape. The formation of a "landmark" emission stack to the waste facility at Javelin Park could be detrimental to the setting of these assets.</p> <p>The environmental consideration table does not explicitly consider settings to heritage assets and this is therefore an omission that could make this document unsound as it has not addressed the issues as set out in PPS5.</p> <p>We would recommend that this aspect of the all the sites but especially for Javelin Park is re-assessed. Before this area is allocated for waste management facilities, it will be necessary to demonstrate that the scale and massing of such a development on this site would be unlikely to have an adverse effect upon the character or setting of these important remains.</p>	<p>It is acknowledged that there are a number of heritage assets within the area around Javelin Park.</p> <p>The potential impact on these and other heritage assets within the local area would form part of the consideration of any planning application should a detailed proposal come forward.</p> <p>Importantly, the general development criteria attached at Appendix 5 (which apply to all of the strategic sites) require a description of the significance of heritage assets affected and the contribution of their setting to that significance together with an assessment of the impact of the proposals to be provided.</p> <p>Notwithstanding this, it is acknowledged that the site-specific schedules also attached at Appendix 5 could usefully be amended to include reference to the number and type of local heritage assets within 1km of each site boundary.</p> <p>See Focused Change 41.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Caroline Power English Heritage	1132	1132/4	Furthermore, the impact which strategic waste management facilities might have upon historic assets lying at some distance from the site of the proposed waste management facility also needs to be robustly assessed. The information regarding the likely scale of some of the potential waste management developments has increased our concerns that using arbitrary distances from historic assets is unlikely to provide a robust indication of the potential impact which such developments might have upon the setting and views from some of the designated assets in this part of the Region. A significant adverse impact should be scored for any proposed site which would have an adverse impact upon the site or setting of a Listed Building, Scheduled Monument, Conservation Area or Historic Park and Garden and, in the case of the latter, any proposal which would detract from important views out of a Registered Landscape.	At this stage the likely scale of development is unknown and will only be known if a detailed proposal comes forward. As specified in the general development criteria, any potential impact on heritage assets in the local area will be considered as part of the determination of any planning application should a detailed proposal come forward. No Change.
Gary Parsons Sport England (South West)	135	135/1	Thank you for consulting Sport England. We are the Government agency responsible for delivering the Government's sporting objectives. Maximising the investment into sport and recreation through the land use planning system is one of our priorities. You will also be aware that Sport England is a statutory consultee on planning applications affecting playing fields (defined by The Town and Country Planning (Development Management Procedure) (England) Order 2010 (Statutory Instrument 2010 No.2184).	None of the strategic site allocations involve the loss of a playing field. Should a speculative proposal for waste management come forward on land including a playing field, Sport England would be consulted as part of the planning application process. No Change.

			<p>Sport England would consider any future planning application on playing fields in the light of its playing fields policy.</p> <p>The aim of this policy is to ensure that there is an adequate supply of quality pitches to satisfy the current and estimated future demand for pitch sports within the area. The policy seeks to protect all parts of the playing field from development and not just those which, for the time being, are laid out as pitches. Sport England opposes such developments in all but exceptional cases, whether the land is in public, private or educational use. It is our policy to oppose development on playing fields unless at least one of the five exceptions as set out in our policy are met, which have been incorporated into the revised Planning Policy Guidance note 17 'Planning for Open Space, Sport and Recreation' (ODPM, July 2002).</p> <p>The Policy states that:</p> <p>"Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of, all or any part of a playing field, or land last used as a playing field or allocated for use as a playing field in an adopted or draft deposit local plan, unless, in the judgement of Sport England, one of the specific circumstances applies."</p> <p>Reason: Development which would lead to the loss of all or part of a playing field, or which would prejudice its use, should not normally be permitted because it would permanently reduce the opportunities for participation in sporting</p>	
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			<p>activities. Government planning policy and the policies of Sport England have recognised the importance of such activities to the social and economic well-being of the country.</p> <p>Sport England opposes such developments in all but exceptional cases, whether the land is in public, private or educational use. It is our policy to oppose development on playing fields unless at least one of the five exceptions as set out in our policy are met:</p> <p>E1 “A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport.”</p> <p>E2 “The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use.”</p> <p>E3 “The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of, or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other sporting/ancillary facility on the site.”</p>	
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			<p>E4 “The playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of the development.”</p> <p>E5 “The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field or playing fields.” Playing fields have been given greater protection and recognition by the Government through the revised PPG 17 (ODPM, July 2002). Our 5 exception clauses as set out above has been modified and incorporated into the revised PPG 17. Paragraph 15 of the revised PPG 17 states that: ‘In advance of an assessment of need, local authorities should give very careful consideration to any planning applications involving development on playing fields.</p> <p>Where a robust assessment of need in accordance with this guidance has not been undertaken, planning permission for such developments should not be allowed unless:</p> <p>i. the proposed development is ancillary to the use of the site as a playing field (e.g. new changing rooms) and does not adversely affect the quantity and quality of pitches and their use;</p>	
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			<p>ii. the proposed development only affects land which is incapable of forming a playing pitch (or part of one);</p> <p>iii. the playing fields that would be lost as a result of the proposed development would be replaced by a playing field or fields of equivalent or better quantity and quality and in a suitable location; or</p> <p>iv. the proposed development is for an outdoor or indoor sports facility of sufficient benefit to the development of sport to outweigh the loss of the playing field.'</p>	
Dr Shona Arora NHS Gloucestershire	449	449/1	Waste Reduction. We welcome the strong emphasis in the waste strategy on the application of the waste minimisation strategy. Prevention and reduction of waste is the most sustainable option and will be particularly important as global resources reduce.	<p>Support noted.</p> <p>No Change.</p>
Dr Shona Arora NHS Gloucestershire	449	449/2	Re-Use, Recycling and Composting. It is felt that the Commercial and Industrial (C&I) recovery rate should mirror the household recovery rate with a target of 60% diversion from landfill. The target cited in the Waste Core Strategy is to divert 143,000 - 193,000 tonnes of C&I waste through waste recovery facilities this rate includes residual recovery along with composting and recycling. There is 375,000 tonnes of C&I waste produced, thus the tonnes diverted equate to 38 - 51 % of waste produced. DEFRA Survey of Commercial and Industrial (C&I) Waste Arisings 2010 estimates the England recycling rate (including reuse) for 2009 to be 52%. The commercial and industrial figures for Gloucestershire in 2008 show that 83% is sent to landfill.	<p>The recycling/composting target for MSW (at least 60% by 2020) is derived from the Joint Municipal Waste Management Strategy (JMWMS).</p> <p>There is no local requirement for recycling/composting commercial and industrial waste, rather the identified C&I capacity requirement of 143,000 – 193,000 tonnes/year is derived from the targets set out in the South West Regional Spatial Strategy (SW-RSS). Whilst it is the Government's intention to abolish the RSS, at the present time it remains a material consideration and this approach is therefore considered appropriate.</p> <p>There has been no specific consultation on a</p>

			<p>NHS Gloucestershire therefore feels that C&I waste should be an area of focus in the Waste Core Strategy and that the target recycling level should be increased to exceed the 2009 recycling rate for England and come in line with the household recycling rate at a level of 60% diversion from landfill. This is particularly important as more tonnes of C&I waste are produced in the County than household waste. The 2007 Waste Strategy for England (as cited in the Commercial and Industrial Waste in England Statement of aims and actions, 2009) echoes these sentiments as it calls for local authorities to 'consider the commercial and industrial wastes that arise in their areas and whether there are benefits in dealing with them together with similar household wastes' and to 'ensure that there is sufficient recycling collection/bring facilities for SMEs whether that be through providing a direct service or acting in a facilitating role'. NHS Gloucestershire recognises the valuable sign posting services provided by the local authority in relation to C&I (business) waste.</p> <p>We believe there is potential to work at community level to provide support and collection services for businesses through existing networks e.g. Parish Councils, Village Agents and third sector organisations to increase the amount of C&I waste that is recycled. Anecdotally small to medium enterprises have cited a frustration that household recycling collection services travel directly by their premises and yet they are not permitted to utilise those services. Some local authorities in England provide a direct recycling service e.g. the London</p>	<p>recycling/composting target for C&I waste throughout the preparation of the WCS and it would be inappropriate to introduce such a target at this late stage.</p> <p>It should also be noted that the RSS targets are indicative and not maximum limits. Clearly the WPA wishes to divert as much C&I as possible from landfill, and it is likely that the escalating Landfill Tax will continue to be a significant driver. With regard to the joint management of municipal and commercial wastes, the revisions made to the spatial vision clarify that the strategic allocations are intended to deal with both municipal and commercial and industrial waste.</p> <p>See Focused Change 10.</p> <p>Whilst working at the community level is a laudable aspiration it is beyond the scope of the WCS. Furthermore, whilst the Council is responsible for municipal waste and how it is collected, managed and disposed of, it has no control over commercial and industrial waste which is a matter for the private sector. It should be noted that some municipal waste collected by local authorities comes from local businesses, it is not all derived from households.</p> <p>The variation in District recycling and composting rates is acknowledged within the publication WCS. However, increasing the overall level of recycling and composting is a matter for the Gloucestershire Waste Partnership (GWP) and will necessitate close working between the County Council as Waste</p>
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			<p>Borough of Richmond and Chichester District Council. According to the district recycling rates 2009/2010, there is significant variation across the districts in the percentage of household waste sent for reuse, recycling or composting from 26% to 60%. Action plans that complement the delivery of the Waste Core Strategy should consider how to raise the levels of reuse, recycling and composting across the lower performing districts.</p>	<p>Disposal Authority (WDA) and the District Councils as Waste Collection Authorities (WCA) in relation to potential new collection regimes.</p> <p>No Change.</p>
<p>Dr Shona Arora</p> <p>NHS Gloucestershire</p>	449	449/3	<p>Other Recovery (including energy recovery) The strategy notes that the Council is technology neutral. We would however encourage an evidence based assessment of the technologies in order to draw up a waste management technology 'order of preference' which would put the county in a better position to react to commercial propositions as they arise.</p> <p>The DEFRA 2004 Review of Environmental and Health Effects of Waste Management: Municipal Solid Waste and Similar Wastes started to consider the health impacts of a range of waste disposal methods. It did not rank the options in terms of the impacts to health but it did note the significance of environmental impacts, including issues such as noise odour and dust which are potentially harmful to health.</p>	<p>The publication WCS identifies a range of residual waste recovery technologies. The strategic site allocations are capable of accommodating any of these solutions. Paragraph 4.91 has been amended to clarify the fact that the strategic site allocations are capable of accommodating a range of different waste recovery processes.</p> <p>See Focused Change 20.</p> <p>To favour one technology over another and to specify what should come forward on each site would be inflexible and would be contrary to national policy which states that 'local authorities in preparing Waste Core Strategies and other development plan documents should avoid any detailed prescription of waste management technique or technology that would stifle innovation in line with the waste hierarchy'.</p> <p>Any proposal will be considered having regard to the overall spatial strategy and any relevant core policies.</p> <p>Detailed matters such as noise, odour and dust would be taken into consideration at the planning</p>

				<p>application stage should a detailed proposal come forward.</p> <p>No Change.</p>
<p>Dr Shona Arora</p> <p>NHS Gloucestershire</p>	449	449/4	<p>The Waste Core Strategy states that there is sufficient hazardous waste landfill available to cover the period 2012 to 2027.</p> <p>Whilst the strategy notes that this is reliant on the outcome of the current planning application at Wingmoor Farm no alternatives are given should the planning application be unsuccessful.</p> <p>There are significant community fears and concerns concerning the extension of the hazardous waste planning application at Wingmoor Farm and the lack of alternative sites within the strategy has heightened those concerns.</p>	<p>The publication WCS identifies existing capacity for non-hazardous and hazardous landfill within the county.</p> <p>It clearly states that these capacities are subject to the outcome of the current planning application at Wingmoor Farm (East). If planning permission is not granted, there would be less capacity available and further capacity/sites would need to be found either through a review of the WCS or through the preparation of a separate landfill development plan document.</p> <p>It is acknowledged that this scenario could be more clearly explained and the supporting text at paragraph 4.129 has been amended accordingly.</p> <p>See Focused Change 26.</p>
<p>Dr Shona Arora</p> <p>NHS Gloucestershire</p>	449	449/5	<p>NHS Gloucestershire supported the establishment of Zone C the preferred location of strategic waste management facilities since most waste was generated here and this included the central transport corridors of Gloucestershire.</p> <p>However, away from the M5 access to the waste management facilities at Wingmoor Farm involves regular vehicular movements along narrow 'B' roads.</p>	<p>The support expressed for Zone C is noted. In relation to Wingmoor Farm and potential traffic impacts, it is important to note that any proposal for a strategic waste recovery facility would need to be supported by a Transport Assessment (TA) and Travel Plan exploring in detail the highway implications of the proposal. This is clearly specified as a requirement in the general development criteria attached at Appendix 5.</p> <p>In addition, the site specific schedules attached at</p>

			<p>We would therefore encourage a review of the appropriateness of further extending waste management in this area and would encourage the review to consider other areas along Zone C that may not previously have been subject to any waste management facility.</p>	<p>Appendix 5 identify in broad terms the particular highway issues associated with the Wingmoor Farm area including some forecast operational problems at nearby junctions.</p> <p>These issues would need to be further explored at the planning application stage should a detailed proposal come forward with any necessary mitigation secured as appropriate (e.g. junction improvements).</p> <p>With regard to the consideration of other potential sites, the four strategic site allocations have been identified from a long-list of potential sites and an exhaustive search and have proven to be the most suitable having regard to a number of factors.</p> <p>No Change.</p>
<p>Dr Shona Arora</p> <p>NHS Gloucestershire</p>	449	449/6	<p>Gloucestershire County Council will be aware of the longstanding involvement of NHS Gloucestershire (and the predecessor organisation) regarding the landfill sites and waste treatment plant at Wingmoor Farm.</p> <p>A Community Health Impact Assessment was presented taken to the Health Overview and Scrutiny Committee (HOSC) in 2009 and we would refer you to this report and the recommendations (referred to as key areas for action) arising from this report which provide additional information as to the specific areas of fears and concerns from the community with regard to the operations related to the sites.</p>	<p>There are several points to note in response. First the health concerns that exist surround the existing hazardous landfill operation at Wingmoor Farm (East). The proposed site allocation, whilst within the boundary of the Wingmoor Farm (East) operation, is for strategic residual waste recovery (treatment), rather than hazardous landfill. To a large extent the two processes could be independent of one another (although clearly there could be potential benefits associated with co-location).</p> <p>Secondly, many of the health concerns relate to the escape of dust from the Wingmoor site. In this regard, a recent dust assessment has been undertaken. The Environment Agency in addition to</p>

				<p>its ongoing monitoring undertook a monitoring project at the Wingmoor Farm (East) site over a 10-week period (21st September to 30th November). A report was then provided to the Health Protection Agency (HPA) for consideration against relevant air quality standards and guidelines.</p> <p>The HPA has now responded and has concluded that airborne concentrations of dioxins, furans, polychlorinated biphenyls (PCBs) and metals are likely to be lower than recognised guideline values and are 'unlikely to be associated with a significant risk to health', and specifically for chromium in its hexavalent form 'at the likely exposure concentrations the risk of cancer is likely to be very small but efforts to reduce exposure would be prudent'.</p> <p>Thirdly, Planning Policy Statement 10 – Planning for Sustainable Waste Management, states that 'modern, appropriately located, well-run and well-regulated, waste management facilities operated in line with current pollution control techniques and standards should pose little risk to human health'.</p> <p>No Change.</p>
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Dr Shona Arora NHS Gloucestershire	449	449/7	In relation to hazardous waste we would ask for clarity around the amounts of hazardous waste produced in Gloucestershire as opposed to that produced and managed in Gloucestershire. Since the Hazardous Waste Regulations 2005 were introduced the number of sites managing hazardous waste was drastically reduced which has meant that Gloucestershire is dealing with a significant proportion of 'out of county' hazardous waste.	<p>Table 1 and 2 of the publication WCS provide a summary of the total amount of hazardous waste managed in Gloucestershire during 2008.</p> <p>The footnote to Table 1 and the supporting text at paragraph 2.65 have been amended to clarify that the total managed hazardous figure of 90,000 tonnes/year includes both pre-treatment and disposal.</p> <p>See Focused Change 2.</p> <p>The supporting waste data evidence paper available separately, provides further, more detailed information in relation to the amount of hazardous waste imported into and exported out of Gloucestershire.</p>
Dr Shona Arora NHS Gloucestershire	449	449/8	Transport. NHS Gloucestershire supports the core policy on sustainable transport and the need to minimise the impacts of waste management facilities on road networks. In some cases it is the vehicular movements rather than the waste facility itself that can cause concerns amongst the local resident population.	<p>Support noted.</p> <p>No Change.</p>

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Dr Shona Arora NHS Gloucestershire	449	449/9	Sustainability. Sustainable development is a strong theme throughout the Waste Core Strategy and NHS Gloucestershire supports the encouragement of industry to eliminate waste at source through careful design and consideration of whole life cycle costs. Support of local production e.g. food and produce can minimise packaging waste and hence carbon emissions. Local community groups and in particular the Transition movement can assist to drive down waste and we would encourage the County Council and partners to further develop local sustainable communities through approaches such as these.	<p>The elimination of waste at source through product design is outside the scope of the WCS although reference is made within the WCS to the 'Courtauld Agreement', a voluntary national agreement which aims to reduce household waste by designing out packaging waste.</p> <p>Notwithstanding this, Core Policy WCS1 – Waste Reduction has been amended to include reference to partnership working with local communities.</p> <p>See Focused Change 12.</p>
Jane Hennell British Waterways (South)	127	127/1	Please find attached a copy of British Waterways' representations in response to the Gloucestershire Waste Core Strategy Publication Document consultation. Please accept our apologies for the late submission but British Waterways has recently undertaken a review of the commercial performance and future potential of the Sharpness Estate in the context of British Waterways' move to charitable trust status (in April 2012) and engagement with the localism agenda. The review has examined the performance and future potential of our Estate and in order to determine whether firstly, the Sharpness Estate is contributing its full potential to local advantage and secondly, whether current planning policies for the Estate facilitate or constrain its contribution and potential.	<p>Whilst the publication WCS recognises the recycling/composting capacity afforded by the existing IVC operation at Sharpness, any current problems such as odour are outside the scope of the WCS.</p> <p>The comments made in relation to the potential allocation of land at Sharpness are noted. There are clearly considerable doubts with regard to the deliverability of a strategic waste facility in this location.</p> <p>No Change.</p>

			<p>As part of the review process, British Waterways needed to consult our principal tenants and Stroud District Council on the key findings and conclusions, prior to formally submitting our representation. We have now discussed the emerging new vision and strategy for the Sharpness Estate, which seeks to improve its commercial performance and contribution to British Waterways' purposes and the wider community as well as to unlock the potential of the under-utilised canal and other heritage assets. Diversification of employment uses within the Estate will make a greater contribution to the local economy (by increasing employment gains in growth sectors of the local economy) and improve the community well-being for the increasingly isolated, local communities (through provision of additional amenities, addressing local environmental concerns and creating scale economies for service.</p> <p>We have discussed with Stroud DC our desire to work collaboratively with them and the Parish Council to deliver the new vision and strategy in order to ensure that:</p> <ul style="list-style-type: none"> • the docks are working for the full benefit of the District; • the tourism and community value of the canal and other heritage assets are fully optimised so as to create new employment opportunities and to open up access to and recreational use of the canal by the existing communities of Newtown and Sharpness; • the environmental quality and visual 	
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			<p>appearance of the Estate is improved in order to create an attractive place to live, invest and work.</p> <p>British Waterways intends to work closely with Stroud DC, the Environment Agency and the Parish Council to address the unacceptable issue of odour emissions being generated by the in-vessel composting activities undertaken by one of our tenants, which has been severely compromising the quality of life of residents and our other commercial tenants.</p> <p>In April 2009 we advised that we would not support the designation of any land at Sharpness as a new municipal solid waste site. British Waterways welcomed land at Sharpness not being listed as a potential MSW site within the Site Options Consultation (November 2009) and now Publication Document Core Strategy. However, it has come to our attention that one of our tenants is promoting its building for allocation and wishing to expand its operations to become a MSW facility. British Waterways would like to reiterate our representation that land at Sharpness is not a suitable strategic waste site due to the remoteness of its location and the close proximity of the existing residential properties (within 110metres of the premises being promoted). I would therefore like to reiterate the site's inappropriateness for a strategic waste allocation and trust that Council will continue to share our view. We have advised our tenants that we would not be willing to withdraw the representations we made to the Gloucestershire Waste Core Strategy Site Options Consultation in 2009.</p>	
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Jane Hennell British Waterways (South)	127	127/2	<p><i>Core Policy WCS2 – Recycling & Composting / Anaerobic Digesting including Bulking and Transfer</i></p> <p>British Waterways finds this policy unsound, and propose the following changes to the policy's drafting to improve it:</p> <p>1. Either insert the word 'all' before 'the following criteria' or list the criteria and insert 'and' between the penultimate and last criterion.</p> <p><i>Planning permission will be granted will be granted subject to all the following criteria being met:</i></p> <p>Reason: to improve the policy's clarity and robustness.</p> <p>2. Add a statement to criterion 1 that refers to odour and noise.</p> <p><i>1. It can be demonstrated that Proposals for composting/AD generally...must be at least 250m, and for noise and odour emissions significantly more than 250m, from sensitive land uses</i></p> <p>Reason: noise and odour emissions can generate adverse impacts on local wellbeing over much longer distances than 250m</p>	<p>The suggested wording is considered to be superfluous. It is already implicit that all of the criteria will be applied and no further clarification is considered necessary.</p> <p>The 250m buffer is not intended to apply to noise or odour (although clearly these will be considerations for any waste proposal in close proximity to a sensitive receptor) rather it is intended to apply to composting facilities where bio-aerosols are a consideration. Where relevant, noise and odour will be considered separately as part of any planning application.</p> <p>It should be noted that Core Policy WCS2 has been amended and now only relates to recycling and composting.</p> <p>Anaerobic Digestion (AD) and bulking and transfer are dealt with through new core policies and supporting text.</p> <p>See Focused Change 13.</p>

Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Jane Hennell British Waterways (South)	127	127/3	<p>Core Policy CCS4 – Other Recovery (including energy recovery)</p> <p>British Waterways supports this policy, and welcomes bringing the Waste Core Strategy into line with the strategy for waste management set out in PPS10, in particular in relation to strategic sites close to the sources of waste arisings and the aim to move the management of waste up the hierarchy.</p>	<p>Support noted.</p> <p>No Change.</p>
Jane Hennell British Waterways (South)	127	127/4	<p>Core Policy WCS7 – Cumulative Impact</p> <p>British Waterways finds this policy unsound, and suggests the following changes to improve the clarity of the policy and its consistency with PPS10:</p> <p>1. Add reference to ‘wellbeing’ of the local community ...the effects of existing and previous waste disposal facilities on the wellbeing of local communities.</p> <p>Reason:</p> <p>Community wellbeing is a well-understood concept; consistent with the Council’s obligations under the Local Government Act 2000, and the inclusion of the reference to ‘wellbeing’ is consistent with PPS10’s provisions on cumulative impact</p>	<p>Suggestion 1 adds little value to the policy. It is considered sufficient to simply state that the Council will have regard to any potential impact on the local community.</p> <p>Whilst PPS10 includes reference to ‘well-being’ it is not the role of the WCS to repeat national policy.</p> <p>Suggestion 2 is not considered to be necessary. The policy does not suggest that the efficiencies of co-location offset the cumulative effects of existing and previous waste disposal facilities. It simply states that in determining waste-related development, the Council will balance the potential benefits of co-location alongside possible cumulative effects.</p> <p>Suggestion 3 is also not considered necessary. The policy as drafted is already clear that regard will be had to all of the factors listed.</p>

		<p>2. Delete the reference to ‘the potential benefits of co-locating complimentary facilities together’.</p> <p>...the potential benefits of co-locating complimentary facilities together.</p> <p>Reason:</p> <p>It is contrary to PPS10 paragraph 21(i) to suggest that the efficiencies of co-location would be sufficient to offset the cumulative effects of existing and previous waste disposal facilities on the wellbeing of a local community.</p> <p>3. Insert ‘each of’ in the introduction to the list of criteria:</p> <p>In considering the issue of cumulative impact, particular regard will be given to each of the following:</p> <p>Reason:</p> <p>To clarify the intent of the policy, and bring it into line with PPS10, paragraph 21(i).</p> <p>4. Delete ‘traffic’ from the list that includes noise, odour etc, and instead re-draft to reference to the particular attention to be paid to ‘traffic effects:</p> <p><i>Within these broad categories this will include an assessment of the following impacts issues: noise, odour, traffic, dust, health and visual intrusion.</i></p> <p><i>Traffic impacts will also be considered be given</i></p>	<p>Suggestion 4 adds little value to the policy. As worded the policy already makes it clear that traffic impacts will be given particular attention.</p> <p>No Change.</p>
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Jane Hennell British Waterways (South)	127	127/5	<p>Core Policy WCS8 – Safeguarding Sites for Waste Management</p> <p>British Waterways finds this policy unsound, and suggest the following changes to improve the policy.</p> <p>1. Substitute 'could be' for 'likely to be' so that the first statement of the policy reads:</p> <p><i>Existing and allocated sites for waste management use will be safeguarded by local planning authorities who must consult the Waste Planning Authority where there could be is likely to be incompatibility between land uses.</i></p> <p>Reason:</p> <p>To ensure that the merits or otherwise of safeguarding an existing facility are fully considered, and do not rely solely on a 'likely' conflict.</p>	<p>The first suggested amendment to Core Policy WCS8 is considered unnecessary and would not add any value to the policy.</p> <p>Core Policy WCS8 is intended to apply to both existing and allocated waste sites/uses. This approach is consistent with national policy set out in PPS10 (paragraph 33) which states that 'In determining planning applications, all planning authorities should, where relevant, consider the likely impact of proposed, non-waste related, development on existing waste management facilities, and on sites and areas allocated for waste management'.</p> <p>In relation to potential mitigation, the suggested amendment is considered to add little value to the policy.</p> <p>Suggestion 3 would introduce too much subjectivity. It is considered more appropriate to simply state that proposals which would adversely</p>

		<p>2. Amend the drafting of the second statement in the policy, so that it inserts the word ‘allocated’ and reads:</p> <p><i>Proposals that would adversely affect, or be adversely affected by, allocated waste management uses sites will not be permitted, unless it can be satisfactorily demonstrated that there would be no conflict potential for conflict can be satisfactorily mitigated.</i></p> <p>Reasons:</p> <p>The policy applies to existing waste uses and allocated uses sites. Policy that aims to safeguard provision should distinguish between these. Allocated sites and designated uses for these accord with the provisions of PPS10, and have gone through the site selection and option process involved in preparing the Waste Core Strategy. The existing uses and sites have not necessarily gone through this process and policy needs to recognise the possibility that some may not satisfy the PPS10 criteria nor support the delivery of the Waste Core Strategy’s objectives for moving waste up the waste management hierarchy.</p> <p>Protection for these existing uses and sites could have the unintended effect(s) of perpetuating uses that do not move waste up the hierarchy, perpetuating the adverse impacts on community wellbeing of existing uses, and/or of implying that expansion in both cases would be acceptable. The risk of these unintended consequences is exacerbated by the current drafting (unacceptable</p>	<p>affect or be adversely affected by, waste management uses, will not be permitted unless there is no conflict.</p> <p>Suggestion 4 would make the policy too broad and go beyond the scope of what the policy is trying to achieve. The aim of the policy is simply to ensure that development proposals do not impact on or are not impacted upon by an existing or allocated waste site.</p> <p>No Change.</p>
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			<p>to British Waterways) of Core Policy WS7. WS7 suggests that any otherwise unacceptable cumulative adverse effects on wellbeing could be counterbalanced by efficiencies to be gained from co-locating waste management operations.</p> <p>3. Insert a new statement to refer to existing waste uses and sites.</p> <p>Proposals that would adversely affect, or be adversely affected by, existing waste operations will not be permitted where the proposal would undermine the delivery of the Waste Core Strategy through prejudicing movement up the waste hierarchy.</p> <p>Reason:</p> <p>Not all existing waste sites are of equal value to achieving the objectives of the Waste Core Strategy; and local policy should recognise this.</p> <p>4. Amend the final statement in the policy to reflect the proposed amendments above, so that the final statement reads instead:</p> <p>The Waste Planning Authority will oppose proposals for development that would prejudice the delivery of the strategy for waste management set out in the Core Strategy, including for moving waste up the hierarchy, for strategic scale operations located close to the point of arisings, and for the management of waste without adverse effects on community wellbeing.</p>	
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Respondent Name and Organisation	Respondent Number	Representation Number	Summary of Representation	Officer Response
Jane Hennell British Waterways (South)	127	127/6	<p>Core Policy WCS14</p> <p>The ambitions to use the canal for transporting waste treated on sites at Sharpness Docks has not proved economic because the sources of arisings, and the markets for the treated waste, are too dispersed to make this feasible.</p> <p>Moreover, the sites at Sharpness allocated for waste in the Waste Local Plan have not performed well on the criteria set by PPS10 and exercised in the site option process undertaken for the Core Strategy. Thus the likelihood of any very significant expansion of waste management at Sharpness Docks is limited.</p> <p>With regard to the disused rail sidings at Sharpness, while British Waterways is content to support a re-opening of the rail service, subject to the availability of private finance and a commercially viable rail freight operation to the docks, BW points out that neither condition has been met to date. Moreover, none of the Sharpness sites allocated by the saved policies of the Stroud Local Plan that are distant from the docks themselves have performed well on the criteria for allocating employment land to meet Stroud's general B1, B2 or B8 needs over the period to 2026.</p>	<p>The comments in relation to Sharpness are noted. It is however considered appropriate to include a policy which seeks to encourage the movement of waste by sustainable means.</p> <p>The performance of sustainable transport (water and rail) is a matter for waste operators and landowners and ultimately will come down to economics and viability. The WPA can only encourage the use of these alternative forms of transport and can do little about delivery if such proposals fail to come forward.</p> <p>The potential support for re-opening of the rail service subject to finance is noted.</p> <p>No strategic site allocations have been identified at Sharpness. However, should a speculative proposal come forward this will be considered on its merits having regard to relevant policies of the WCS and any other material considerations.</p> <p>No Change.</p>