

ISSUE 3 – WHETHER THE CS IS CONSISTENT WITH NATIONAL POLICY

Question 2: PPS10

1. The WCS is unsound because it does not meet the requirement in para 18 of PPS10 to identify the type or types of waste management facility that would be appropriately located on the allocated sites. Indeed, by taking a 'technology neutral' stance the waste planning authority has deliberately shut down such a debate. Responses to the core sites consultation were effectively ignored if they mentioned concerns regarding types of waste management, being reported as 'don't know' responses, and therefore creating a false impression of support for sites. (See CD4.3).
2. A site might be appropriate for one form of waste management but not another. This is indeed the case with Javelin Park, which is well placed for some forms of waste management, such as a local MBT facility covering Gloucester and Stroud, because of its position on the roads network, but not suitable for other forms. In particular, it is not well placed for processes which generate heat, since it is not possible from this site, without the addition of considerable network infrastructure with its attendant adverse environmental impact, to meet the EU Waste Incineration Directive requirement that 'heat generated during the incineration...process is recovered as far as practicable e.g through combined heat and power, the generating of process steam or district heating' (EU, 2000).
3. Annexe E of PPS10, point c. Visual Intrusion, requires waste planning authorities to protect landscapes of national importance, including Areas of Outstanding Natural Beauty. The AONB Cotswold escarpment, and the national trail of the Cotswold Way, are of national importance largely because of the views they provide of the Severn Vale, yet this has not been considered when proposing sites, particularly the Javelin Park site, as a likely location for mass burn incineration. A large waste facility would have a massive impact on views into the Vale.
4. The WCS is unsound because, by ignoring aspects of PPS10, particularly the need in para 18 to identify types of waste management facility, it allows for the development of inappropriate facilities that would then be in contravention of both national and European guidance.