
SUPPLEMENTARY PLANNING DOCUMENT

WASTE MINIMISATION

IN DEVELOPMENT PROJECTS

**(incorporating reduction, re-use and
recycling requirements)**



**SUSTAINABILITY
APPRAISAL REPORT
ON THE FORMAL DRAFT
CONSULTATION**

April – June 2006

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Table 1: Environmental Report requirements – Fulfilling the SEA Directive 2001/42/EC	Section of this or other report
(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes.	Context Report / Scoping Report Section 3
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Context Report / Scoping Report
(c) the environmental characteristics of areas likely to be significantly affected.	Context Report / Scoping Report
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Context Report / Scoping Report
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Context Report / Scoping Report
(f) the likely significant effects*on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (These effects should include secondary, cumulative, synergistic, short medium and long-term, permanent and temporary and positive and negative effects).	Context Report / Scoping Report, Section 5 of this report and Appendix 4 & 5 of this report.
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Section 5 of this report.
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 2 of this report.
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10.	Section 7 of this report.
(j) a non-technical summary of the information provided under the above headings.	Section 1 of this report.

² These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

Section 1. Summary and outcomes

1.1 Non – technical summary: background



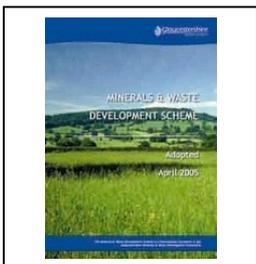
■ New Planning Laws

The planning system has changed. Under new planning laws, Gloucestershire's Waste Local Plan and Minerals Local Plan are being replaced by the Gloucestershire Minerals and Waste Development Framework (MWDF). The MWDF will contain a suite of documents containing policies relating to minerals and waste development in the county. Work on these documents will continue over a 10-year period. The South West Regional Spatial Strategy (RSS) is due to be adopted in 2007 and the MWDF is required to be in general conformity with it.



■ Sustainable Development

The UK Government is committed to Sustainable Development. Its aim is to "enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life without compromising the quality of life of future generations." (Securing the Future – delivering UK sustainable development strategy – 2005).



■ More Sustainable Plans

It is a statutory requirement for the MWDF to undergo a Sustainability Appraisal (SA) whereby potential social, economic and environmental impacts of plans are identified and carefully considered. The SA should inform and influence the development of plans early in the process with the aim of making them more sustainable. SA as a process incorporates the rigorous requirements of European law, (the SEA Directive), which ensures that certain plans and programmes are scrutinised for their potential environmental impact.



■ The Initial Stages of the SA

The initial stages of undertaking an SA involve gathering evidence and building a framework against which relevant plans within the suite of the MWDF can be tested. Gloucestershire County Council has completed these initial stages with the publication of a Context Report and a Scoping Report.

1.2 Non – technical summary of the SPD

■ The content and objectives of the SPD and how it links to other plans.

This report is the Sustainability Appraisal Report for Gloucestershire County Council's Formal Draft Supplementary Planning Document on Waste Minimisation in Development Projects (incorporating reduction, re-use and recycling requirements (SPD). The process of appraisal has been carried out in accordance with ODPM Guidance – Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, November 2005. The SA report is the key output and the most important part of the appraisal process. It is issued with the SPD for formal public consultation presenting information on any significant likely effects.

The aim of the SPD is to "...minimise the production of waste during demolition, construction and occupation of buildings. This is to be achieved through developers preparing and submitting a Waste Minimisation Statement (WMS) as part of their planning application, and then committing to implement it through their permission." The document provides guidance on the implementation of Policy 36 'Waste Minimisation' of the Adopted Gloucestershire Waste Local Plan (2004).

The SPD principles / objectives are:

- To design proposals sustainably;
- To reduce the amount of waste generated from development;
- To conserve natural resources through re-using waste arising as a result of construction;
- To re-use waste materials on-site to reduce transportation;
- To utilise recycled materials where possible; and
- To facilitate a reduction in waste arisings during the operational lifetime of the development.

The SPD covers the following areas:

- Introductory questions such as: the need for an SPD, why minimise waste, who is the SPD for, what types of development it applies to.
- The planning context, including SA/SEA requirements;
- SA/SEA requirements;
- Applicant/developer requirements during design, demolition and construction, and habitation;
- Checklist for preparing a Waste Minimisation Statement.

The relationship of the SPD with other relevant plans and programmes has been extensively dealt with in the Context and Scoping Reports.

▣ Gloucestershire's state of the environment and potential impact of the SPD.

Levels of waste produced and managed in the county have been increasing in recent years and the majority of it is still going to landfill. Without targeted efforts at waste minimisation this situation is unlikely to improve with the result that there could be increasingly negative social, economic and environmental repercussions. The detail on these issues are covered in the SA Context and Scoping Reports.

▣ What areas of Gloucestershire are likely to be affected.

This SPD affects the whole county, as the benefits of waste minimisation that it seeks to implement should have a positive effect countywide. Gloucestershire is an attractive rural county, with the Royal Forest of Dean and Wye Valley AONB to the west, the Cotswold AONB and Cotswold Water Park to the east, and the Stroud valley to the south of the county. Running down the middle is the Severn Vale, containing Gloucester and Cheltenham, which are divided by green belt land as well as the M5 motorway.

▣ Environmental problems in Gloucestershire.

There are a number of existing environmental problems in Gloucestershire including:

- increased traffic congestion;
- the increased potential for flooding;
- rising levels of waste produced;
- the decline in certain bird species; and
- incidents of serious pollution.

The detail on these issues, including their relation to areas of particular environmental importance and sensitivity, is available in the SA Context and Scoping Reports.

▣ Ways in which the environment is already protected.

The County benefits from a range of natural and man-made environmental assets, which are considered of international, national or local importance, and are protected accordingly. The environmental protection measures (at all levels) which are relevant to the SPD are included in detail in the Context and Scoping Reports. For example,

- Nature Conservation Assets: 6 Special Areas of Conservation (2,739 ha) and 2 Ramsar sites (8,450 ha).
- Landscape Assets: 3 Areas of Outstanding Natural Beauty.
- Historic Environment: 400 Scheduled Ancient Monuments.

▣ The likely significant effects on the environment / reducing harmful effects.

The purpose of the SPD is to improve and increase levels of sustainability in Gloucestershire. As a result the likely significant effects will generally be very positive. For example it is likely that in the longer term that if increasing amounts of construction and demolition waste are recycled or reused on building sites then there will be a reduction in the need for primary building materials and consequently less need for mineral extraction. The appraisal of the potential impacts of the SPD are available in Appendix 4 and Appendix 5

There are no apparent harmful effects arising from the implementation of the SPD, rather it has the potential to greatly improve the quality of the environment, especially in the longer term.

■ Choosing and testing alternative options.

The SA process requires consideration of alternative options to the SPD. The primary reason for selecting the alternatives or options examined in this report is that these comprise the issues raised either by the expert group which was convened specifically to advise on the approach to the SPD or through informal consultation on the SA Framework. The strategic options that were tested were as follows:

Option 1: Without the SPD (Business as usual);

Option 2: An SPD based on best practice examples;

Option 3: An SPD based on targets.

A further option to be tested (Option 4) came out of representations during the period of informal consultation (mid September 2005 – to end of December 2005).

Option 4: An SPD based primarily on best practice examples but with a 10% (total value) recycled/reused materials requirement target.

In summary, when tested against the SA objectives, Option 1 is likely to have a neutral/negative effect. The three remaining options tested positively against the SA objectives with Options 2 & 4 emerging as most positive. Option 4 was favoured because it retains the benefits of Option 2 whilst encouraging best practice through consistency with emerging national guidance. (See section 5 and Appendix 3 of the SA Report for detailed comments).

■ Proposal for monitoring?

Monitoring proposals are linked to the Gloucestershire Minerals and Waste Annual Monitoring Report 2004 – 2005. The main indicators will be:

- The number of 'major' (as defined in the SPD) development and redevelopment proposals that include Waste Minimisation Statements.
- The percentage of 'major' development and redevelopment proposals refused, where waste minimisation issues acted as one of the reasons for refusal.

1.3 Statement of the likely significant effects of the SPD

Following tests through the SA process of the principles, options and conformity with the Key Planning Objectives of PPS10 and main proposals / aspects of the SPD, it is likely that implementing the SPD will cause no significant negative impacts on the environment. The likely positive effects are:

- A reduction in the levels of waste going to landfill;
- Increased levels of recycling and reuse;
- A reduction in the need for primary aggregates and other quarried materials – especially in the longer term.
- Reduced levels of lorry traffic due to an increase in the sorting of materials / crushing and screening on sites; and
- Initially there may be increases in cost for developers, in terms of producing the WMS and design elements but there will be probable reductions in costs with reduced skip hire, landfill costs and a reduction in primary materials needed (paragraph 1.5 of the SPD details some of the cost savings developers would benefit from).

1.4 How the SA process has influenced the approach to the SPD

Throughout the process of producing the SPD discussions took place between those producing the plan and those conducting the SA. From the outset the SA process has confirmed the desirability of producing this SPD and the sustainability benefits it will bring to Gloucestershire. The appraisal indicates that no significant adverse effects are likely to arise should it be adopted.

The SA of the SPD took its lead from discussions at the Waste Minimisation Expert Group on 7th September 2005. The initial 3 options were developed as a result of this meeting. An interim SA was conducted of the SPD and this was issued for a 3 month period of informal consultation along with the SPD itself. As a result of this informal consultation a decision was made to test Option 4. (See Section 2.1)

1.5 How to comment on the report

If you wish to comment on the contents of this report please send your responses by Wednesday 7th June to:

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Gloucester
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Section 2. Appraisal methodology

2.1 Developing and appraising options

Following the Waste Minimisation Expert Group on 7th September 2005 options were developed drawing from the discussion and outcomes of the meeting. In the Draft Interim Sustainability Appraisal Report which was produced following the Expert Group, the strategic options that were tested were as follows:

Option 1: Without the SPD (Business as usual);

Option 2: An SPD based on best practice examples;

Option 3: An SPD based on targets.

A further option to be tested (Option 4) came out of representations during the period of informal consultation (mid September 2005 – to end of December 2005).

Option 4: An SPD based primarily on best practice examples but with a 10% (total value) recycled/reused materials requirement target.

2.2 When the SA was carried out

The following table details the timeframe in which the SA was developed.

Stage of the SA	Date
Initial work on the Minerals and Waste Development Framework Context & Scoping Report - Collection of baseline information and initial reviews of other plans and programmes.	April – August 2005
Original Context Report & Scoping Report out to consultation with The Countryside Agency / English Heritage / English Nature / The Environment Agency and other stakeholders.	25 th August – 29 th September 2005
Draft SPD on Waste Minimisation produced following Expert Group. Interim Sustainability Appraisal of the SPD produced and placed on the County Council's website along with the SPD for informal consultation.	Mid September 2005 till end December 2005
Changes and amendments made to Context Report & Scoping Report following consultation and Response Report produced. Letters and Response Reports sent out to consultees.	October 2005
Updated versions of Context Report & Scoping Report as well as Response Report posted on the website.	8 th November
Consultants review of the Context & Scoping Report and Interim SA of the SPD. Appropriate changes made.	18 th – November
SA Report on the Formal Draft SPD produced incorporating changes to the SPD following period of informal consultation.	Mid – December

2.3 Who carried out the SA

The SA was carried out by members of Gloucestershire County Council's Minerals & Waste Planning Policy Team. The process was reviewed by independent consultants Levett-Therivel in November 2005.

2.4 Who was consulted, when and how

Developing the SA Framework

Consultation on the development of the SA framework i.e. the Context Report and the Scoping Report was carried out for 5 weeks (in accordance with ODPM Guidance) from 25th August to the 29th September. Copies of the report was sent to 48 consultees, including internal consultees within the County Council, and 12 responses were received, the majority being reasonably supportive, providing constructive comments and additional baseline data. This list of consultees was produced in line with ODPM SA Guidance and Planning Policy Statement 12 and reflects the commitment made in the Statement of Community Involvement (SCI) which outlines the approach to consultation and engagement for the emerging MWDF. The reports were also made available on the County Council's website, for information purposes, and as a result, two groups

(Forest of Dean Friends of the Earth and Friends of the Forest), who were not on the original consultation list, made representations which were considered. Where appropriate amendments were made to the Context and Scoping Reports reflecting representations made. A Response Report was produced and sent to all those who had made comments. The revised Context and Scoping Reports as well as the Response Report were then placed on the County Council's website.

In November 2005 the Context Report and the Scoping Report, as well as the initial SA report of the SPD were reviewed by independent consultants Levett-Therivel, and changes were made in the light of their recommendations. Updates of the Context and Scoping Reports were published in April 2006 and are available to view at the following address: <http://www.gloucestershire.gov.uk/index.cfm?articleid=11577>

Developing the SPD

Pre-production work on the SPD began in Summer 2005. Following a Waste Minimisation Expert Group meeting on 7th September 2005, changes were made to the initial draft of the SPD and it was subject to an initial or interim SA. The revised SPD and the interim SA were then placed on the County Council's website as a means of informal consultation for a period of roughly 3 months. Comments were invited from anyone relating to the focused questions or on any other aspect of the SPD or the SA.

2.5 Difficulties encountered in compiling information or carrying out the assessment

There were no significant problems in carrying out the appraisal. However it should be noted that baseline data on waste in the county is better in some areas than others. Municipal waste data tends to be fairly comprehensive, whereas data on levels of construction and demolition waste and commercial and industrial waste is less so.

Section 3. Background

3.1 Purpose of the SA and the SA report

According to ODPM Guidance on SA: “Sustainable development is central to the reformed planning system. The purpose of sustainability appraisal (SA) is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of revisions of Regional Spatial Strategies (RSS) and for new or revised Development Plan Documents (DPDs) and Supplementary Planning Documents (SPDs). SA essentially broadens the concept of Strategic Environmental Assessment (SEA) which involves the systematic identification and evaluation of the environmental impacts of a strategic action (e.g. a plan or programme). In 2001, the EU adopted Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the ‘SEA Directive’). The Directive entered into force in the UK on 21 July 2004 and applies to a range of English plans and programmes including Minerals & Waste Development Frameworks.

Under the Planning and Compulsory Purchase Act Planning Authorities must undertake SA for Development Plan Documents and Supplementary Planning Documents included in their Local Development Frameworks including Minerals and Waste Development Frameworks. The Government’s approach is to incorporate the requirements of the SEA Directive into a wider SA process and, to this end, it has published guidance on undertaking combined SEA / SA for development frameworks.

The specific purpose of this SA report is to ensure that the Waste Minimisation SPD is sustainable and based on sound principles of sustainability. Although ‘waste minimisation’ would appear to be a sustainable goal in itself, the methods of achieving it i.e. (the option or options chosen) need to be tested in order to find the most sustainable option and to evaluate possible impacts.

3.2 SPD objectives and outline of contents

The principles / objectives of the SPD are as follows:

- 1. To design proposals sustainably.**
- 2. To reduce the amount of waste generated from development.**
- 3. To conserve natural resources through re – using waste arising as a result of construction.**
- 4. To re-use waste materials on-site to reduce transportation.**
- 5. To utilise recycled materials where possible**
- 6. To facilitate a reduction in waste arisings during the operational lifetime of the development.**

The purpose of the SPD is to guide the implementation of the adopted Gloucestershire Waste Local Plan Policy 36 on Waste Minimisation. The specified aim of the SPD is to “...minimise the production of waste during demolition, construction and occupation of buildings. This is to be achieved through developers preparing and submitting a Waste Minimisation Statement (WMS) as part of their planning application, and then committing to implement it through their permission.”

The SPD covers the following areas:

- Introductory questions such as - the need for an SPD, why minimise waste, who is the SPD for, what types of development it applies to;
- The planning context including SA/SEA requirements;
- Applicant/developer requirements during design, demolition and construction and habitation;
- Checklist for preparing a Waste Minimisation Statement.

The relationship of the Minerals & Waste Development Framework (and the SPD of which it is a component) with other relevant plans and programmes is extensively dealt with in the Context and Scoping Reports which should be read in conjunction with this report.

3.3 Compliance with the SEA Directive / Regulations

This SA Report and the accompanying Context and Scoping Reports are in compliance with the SEA Directive (2001/42/EC) '*on the assessment of the effects of certain plans and programmes on the environment*' and with the Environmental Assessment of Plans and Programmes Regulations 2004 (Statutory Instrument 2004 No.1633). Table 1 on page 1 details where the material required for the purposes of Article 5(1) of the SEA Directive (2001/42/EC) may be found within this document and the supporting Context and Scoping Reports.

Section 4. Sustainability objectives, baseline and context

4.1 Links to other policies, plans and programmes and sustainability objectives and how these have been taken into account

Other relevant policies, plans and programmes and sustainability objectives have been identified and considered in the development of the SA framework. In total over 120 relevant plans and programmes were reviewed, the details of which are contained in the Context Report. The list ranges from those at the International / European level e.g. various EU Directives, to plans at a county & local level. They have been taken into account in that the relevant issues within them have fed into the identification of key issues and problems in the county and consequently into the process of formulating SA Objectives. Key plans and programmes that relate specifically to this SPD include:

- ❑ Planning Policy Statement 10 “Planning for Sustainable Waste”;
- ❑ Waste Strategy 2000;
- ❑ Changes to Waste Strategy 2000;
- ❑ Waste not want not – A strategy for tackling the waste problem in England;
- ❑ Better Buildings, Planning for waste management facilities;
- ❑ Environment Agency – position statement on sustainable construction;
- ❑ Environment Agency – position statement on resource efficiency; and
- ❑ Joint municipal waste strategy for Gloucestershire, Gloucestershire waste partnership joint strategy statement.

4.2 Description of the social, environmental and economic baseline characteristics and the predicted future baseline

A study of the baseline related to key aspects of Gloucestershire has been undertaken as part of the SA process. A brief summary of the baseline is provided here, but further detail and the bulk of this information is supplied in the Context and Scoping Reports, particularly in Section 6 and Appendix 3 of the Scoping Report. It should be noted that the baseline table (Appendix 3) is one that is being regularly updated.

Population

The County has a population of approximately 565,000; the two largest urban areas are Gloucester and Cheltenham. At the last census in 2001 the population of Gloucester was 109,885 and the figure for Cheltenham was 110, 013. The population of the County grew by 29,000 between 1991 and 2001 and work undertaken as part of the emerging Regional Spatial Strategy (RSS) for the South West suggests a possible increase in population of approximately 69,000 in Gloucestershire between 2006 – 2026, most of which will be from net-migration. (Source: ONS Sub-National Population Projections 2003 & Chelmer Net Migration Led Model produced on behalf of the South West Regional Assembly).

Predicted future baseline: Population increase in Gloucestershire of c.69,000 in the next 25 years due primarily to in-migration.

Gloucestershire's environment

Gloucestershire is a substantially rural county with the main urban focus in Gloucester and Cheltenham. The County supports a wealth of international, national and locally important environmental assets. The County is divided between the Royal Forest of Dean in the west, the Cotswolds to the east, and the Stroud valley to the south of the county. Running down the middle is the Severn Vale, containing Gloucester and Cheltenham which are divided land designated as Green Belt as well as the M5 motorway. The Cotswolds Area of Outstanding Natural Beauty (AONB) is one of the UK's largest AONB designations and is a popular draw for tourists from all over the country and abroad.

Predicted future baseline: Continued pressure on the environment from an increasing population with associated housing and employment needs.

Minerals planning in Gloucestershire

Gloucestershire has a diverse geological base with significant deposits of economic value. The County may be conveniently subdivided into the following resources areas:

Resource Area	Mineral Type
Forest of Dean	Limestone (Carboniferous), Sandstone, Clay, Iron Ore, Coal
Cotswolds	Limestone (Jurassic)
Upper Thames Valley	Sand and Gravel, Clay, Cornbrash (Jurassic Limestone)
Vale of Moreton	Sand and Gravel
Severn Vale	Sand and Gravel, Clay

There are 36 operational minerals sites in the County (2003 figures). 18 are within the Cotswolds and the Forest of Dean, extracting limestone both for aggregate and non-aggregate purposes. Ten sites, primarily located in the Upper Thames Valley are extracting sand and gravel. There are a further 8 sites in the County extracting either sandstone or clay. Additionally there are a number of inactive and dormant sites where minerals may potentially be worked in the future.

Waste Planning in Gloucestershire

A large percentage of waste produced in Gloucestershire is still disposed of in landfill or landraising sites. Approximately 1.37 million tonnes of waste is handled in the County each year. In 2002/3 around three quarters was disposed of in landfill and landraising. Every year the amount of waste produced in the County rises, for example Municipal Solid Waste produced in the County has increased by 35% since 1994, an average of 3.2% per annum. In 2003/04 the production of household waste in Gloucestershire was 51kg per head of population higher than the national average. However, there have been increases in recycling / composting in the County in recent years but further progress needs to be made in this area to meet national targets.

The WLP has identified twenty-one preferred sites for future waste management facilities throughout Gloucestershire. These are 'Strategic Sites' and 'Local Sites'. The following table gives an indication of the range and number of waste management facilities within Gloucestershire. It should be noted that there are also a large number (over 400) of 'exempt' waste sites throughout the County.

Waste management operations by facility type as of February 2003 (Source Gloucestershire Waste Local Plan & updated data from County Council DC.)
Materials Recycling / Recovery and Treatment Facilities = 5
Composting Facilities = 4
End-of Life Vehicle Dismantling & Metal Facility =27
Household Recycling Centre = 6
Waste Transfer Stations = 31
Sewage Treatments Works / Operations = 87
Hazardous Waste Treatment Facilities = 1
Thermal treatment / pet cremation = 2
Landfill/Landraise Operations Hazardous = 1, Non-Haz - Bio-degradable = 4, Non-Haz – Inert = 12

Industry and commerce

Gloucestershire has historically been a significant location for commerce primarily due to its location at a crossroads of trade routes between Wales and London and the Midlands and the South West. These locational factors continue to make the county attractive as a business location today. There has been a historic concentration of defence and aerospace contractors in the county and Gloucestershire continues to have a significant manufacturing presence. Particular strengths are in advanced engineering, including companies such as Spirax Sarco, Invista (formerly Dupont), Kohler Mira and Messier-Dowty. The County is also a major centre for banking, insurance and business services and has a number of headquarters functions located here, including Cheltenham & Gloucester plc, Zurich, the Stroud & Swindon Building Society and Endsleigh Insurance. Gloucestershire is also home to a number of government departments including GCHQ, the UK government intelligence centre.

Economic indicators and prospects

Key economic indicators generally portray Gloucestershire in a favourable light with low levels of unemployment and gross value added per head similar to the national average. At a sectoral level the growth in the service sector and the decline in manufacturing over the last 10 years will continue up to 2015. Unemployment in Gloucestershire is low at 1.8% in August 2003, well below the national average at 2.3%.

The average income in the county was £19,857 in 2003, almost £1000 lower than the national average. However average incomes vary considerably between Gloucestershire's districts. While average earnings in the county rose by 18.6% between 1999 and 2003, average property prices rose by 81.5% in the same period.

4.3 Main social, environmental and economic issues and problems identified

The SA Context and Scoping Reports highlight a number of key sustainable issues/problems within Gloucestershire. In keeping with the principles of SA and SEA, social, economic and environmental issues are taken into account. The full list is as follows:

1. High house prices	10. Growing levels of waste in Gloucestershire
2. Low average income	11. Recycling / composting rates
3. Crime levels	12. Minerals site restoration
4. Health	13. Protecting Gloucestershire's environment whilst providing minerals needed by society
5. Traffic impacts and congestion	14. Renewable energy
6. Rural economy	15. The general state of Gloucestershire's biodiversity, the condition of SSSIs, sites protected under the Habitat's Directive and locally designated sites
7. Areas of deprivation and social exclusion	16. Decline in species biodiversity - in particular of certain bird species in Gloucestershire
8. Potential for flooding	17. Increases in serious pollution incidents
9. Waste to landfill	18. Possible damage to the historic environment
	19. Detrimental changes to landscape character

This list was amended slightly following comment resulting from the consultation on the Context and Scoping Report (25th August – 29th September 2005). The full list can be viewed in the Scoping Report.

The following is a summary of the sustainability issues and problems that are particularly related to this SPD. For a full list of baseline see the Scoping Report, particularly Appendix 3 and section 6.

► Issue 9. Waste to landfill

Biodegradable Municipal Waste (BMW)

In recent years there have been increasingly effective efforts to divert BMW from landfill and the trends are fairly encouraging. However as levels of municipal waste continue to rise by about 3% per year, more needs to be done if Gloucestershire is to meet Best Value (BV) targets and Landfill Allowance Trading Scheme (LATS) requirements. In 2005 the tonnage of MSW arising in Gloucestershire was 309,403. The biodegradable component was 210,394 tonnes, that is 68%. In order to meet the 2010 target, 131,763 tonnes of BMW will have to be diverted from landfill including through composting and recycling. More needs to be done in terms of the source segregated collection of biodegradable waste (e.g. garden waste, kitchen waste, paper, textiles and cardboard as well as dry recyclables through kerbside collections, household recycling centres (HRCs) and bring banks.

Municipal Solid Waste (MSW)

In 2004/05 the people of Gloucestershire produced 309,500 tonnes of Municipal Solid Waste (this includes 8,500 tonnes of trade waste collected by local authorities from shops and businesses). This represents a 35% increase since 1994. Roughly 74% of this waste went to landfill, 7% was composted and 19% was recycled.

Commercial and Industrial Waste (C&I)

During 2002/3 around 359,000 tonnes of C&I waste and 240,000 tonnes of Metal waste was managed in Gloucestershire. The amount of C&I waste managed (not including metals) has reduced slightly over the last five years. There has been a big reduction in the amount of the amount of C&I going to landfill, most probably attributable to the introduction of the landfill tax.

Construction and Demolition waste (C&D)

In 2002/03 the split between landfill and recycling for Construction and Demolition waste was 312,000: 95:000 tonnes.

► Issue 10. Growing levels of waste in Gloucestershire

Municipal Solid Waste MSW

Over recent years levels of MSW have increased by around 3% per year, by around 35% since 1994. In 2003/4 Household waste produced per head in Gloucestershire was 490kg. The following figures show the increase since 1998: 1998/99 = 445kg / 1999/00 = 464kg / 2000/01 = 458kg / 2001/02 = 473kg / 2002/03 = 483kg.

In 2003/04 the production of Household waste in the county was 51kg per head of population higher than the national average. (All figures from Gloucestershire County Council Waste Management, 2005).

Construction and Demolition waste (C&D)

Most C&D waste is assumed to be inert materials such as brick, concrete, subsoils etc. The trend for the levels of C&D waste managed in Gloucestershire has shown a steady increase in the past few years, as is demonstrated by the following figures: Total Inert & C&D Managed: 1999/00 = 262,000 tonnes / 2000/01 = 279,000 tonnes / 2001/02 = 353,000 tonnes / 2002/03 = 418,000 tonnes.

Commercial and Industrial waste (C&I)

Like C&D waste trends, the levels of C&I waste managed in the County has fluctuated in recent years as the following figures demonstrate: Total C&I Waste Managed: 1998/99 = 414,000 tonnes / 1999/00 = 457,000 tonnes / 2000/01 = 371,000 tonnes / 2001/02 = 344,000 tonnes / 2002/03 = 359,000 tonnes. Unlike Municipal waste, which is dealt with by local authorities, C&I waste is dealt with by private contractors. The majority of C&I waste is still landfilled, although in tonnage terms the amount going to landfill is decreasing. The situation with regards recycling is better in relation to metals due to the economic value of scrap metals.

► Issue 11. Recycling / composting rates

In 1993/04 Gloucestershire's household recycling rate (not including composting) was 10.2%. In 2004/05 it was 24.2% - (this is a combined figure for composting and recycling). Currently Gloucestershire has a household recycling/composting rate of 26% (The County recycling figure for the purposes of meeting the Best Value Performance Indicator – (BVPI) was 24.3%). The 26% figure includes recycled DIY/hardcore. Initial indications from the Waste Management Unit are that the Best Value recycling target of 30% for 2005/06 will be met. The amount of household waste in the County that has been recycled/composted has increased year on year at an average of 15%.

In terms of the specific figures for recycling at Gloucestershire's six Household Recycling Centres (HRCs) the total capacity tonnage in 2004/05 was 81,000 tonnes whilst the total throughput was 65,000 tonnes. This indicates that much more can be done to improve recycling / composting rates through greater use of the HRCs by the general public.

4.4 Limitations of the information

The baseline situation is reasonable for waste but perhaps not as good as it could be. While data on municipal waste streams is good, the data on other waste streams is less comprehensive. There is a realistic concern regarding the successful implementation of the SPD which will be through District Development Control who already have a high workload.

4.5 The SA framework, including objectives, targets and indicators

The SA Framework consists of sustainability objectives, which are distinct from the objectives of the plan or SPD, but may in some cases overlap with them. They provide a way of checking whether the DPD/SPD objectives are the best possible ones for sustainability and can be seen as a methodological yardstick against which the social, environmental and economic effects of the plan can be tested.

The SA Framework objectives were developed on the basis of:

- The objectives / priorities for action contained in the Government's national sustainability strategies – 1999 and 2005.
- The objectives in "Just Connect" the Integrated Regional Strategy for the South West 2004 –2026.
- Identifying other relevant plans and programmes, resulting key messages and the identification of sustainability issues.
- ODPM Guidance.
- Changes were made to a small number of SA Objectives following the statutory 5 week period of consultation on the Context and Scoping Reports.

1. To promote development that is socially, economically and environmentally sustainable.
2. To give the opportunity to everyone to live in an affordable and sustainably designed and constructed home.
3. To safeguard sites suitable for the location of waste management facilities, or future mineral development from other proposed development.
4. To protect and improve the health and well-being of people living and working in Gloucestershire as well as visitors to the county.
5. To contribute to a sustainable Gloucestershire which provides excellent opportunities for education, economic development, employment and recreation to people from all social and ethnic backgrounds.
6. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development.
7. To conserve minerals resources from inappropriate development whilst providing for the supply of aggregates and other minerals sufficient for the needs of society.
8. To provide employment opportunities in both rural and urban areas of the County, promoting diversification in the economy.
9. To protect, conserve and enhance Gloucestershire's biodiversity, natural environment, landscape and tourist assets including the historic environment.
10. To prevent flooding, in particular preventing inappropriate development in the floodplain and to ensure that development does not compromise sustainable sources of water supply.
11. To protect and enhance Gloucestershire's environment – (the land, the air and water) from pollution and to apply the precautionary principle.
12. To reduce the adverse impacts of lorry traffic on communities, through reducing the need to travel, promoting more sustainable means of transport (including through sensitive routing and the use of sustainable alternative fuels) and to promote the management of waste in one of the nearest appropriate installations.
13. To restore mineral sites to a high standard in order to achieve the maximum environmental and nature conservation benefits.
14. To reduce waste to landfill and in dealing with all waste streams to actively promote the waste hierarchy (i.e. Prevent, Reduce, Reuse, Recycle, Dispose) to achieve the sustainable management of waste.
15. To reduce contributions to and to adapt to Climate Change.

Section 5. SPD issues and options

5.1 Main strategic options considered and how they were identified

The main strategic options for the SPD are as follows:

Option 1: Without the SPD (Business as usual).

Option 2: An SPD based on best practice examples.

Option 3: An SPD based on targets.

Option 4: An SPD primarily based on best practice examples but with a 10% (total value) recycled/reused materials requirement target.*

* From a Government's Sustainable Buildings Task Force recommendation that "At least 10% of the total value of materials used in the construction project must be derived from recycled and re-used content in the products and materials selected."

Options 1 to 3 were identified primarily through the discussions at the Waste Minimisation Expert Group which included a range of stakeholders including representatives from environmental groups as well as waste operators. Option 4 came out of the period of informal consultation.

5.2 Comparison of the social, environmental and economic effects of the options

The detailed assessment of these options is provided in Appendix 3. An overall summary/commentary is provided here.

Option 1: The results of the test against the SA Objectives were essentially neutral / negative – even considering that the 'business as usual' approach includes the requirement of waste minimisation under WLP Policy 36. There would be a neutral or negative effect when considered against a majority of the SA Objectives. Against a number of objectives the effect was uncertain. It should not be inferred from this that Policy 36 of the WLP is unsustainable; the issue is not its sustainability credentials, but whether or not it was achieving results in terms of waste minimisation. It appears that developers and planning authorities need more impetus in this area.

Option 2: In the test against the SA Objectives this option was the most positive and is favoured with Option 4. (See below) The only area where there was a potentially adverse effect was in terms of the long term effects that waste minimisation might have on restoring mineral sites to a high standard. Areas in which the option would be likely to produce a 'major positive' effect were as follows:

- In promoting sustainable development generally in Gloucestershire (SA Objectives 1 & 5).
- In contributing to the building of affordable and sustainable homes (SA Objective 2).
- In safeguarding the amenity of local communities from the adverse impacts of minerals and waste development – basically by reducing the levels of both (SA Objective 6).
- In conserving minerals (SA Objective 7).
- In protecting conserving and enhancing the environment (SA Objectives 9 & 11).
- In protecting conserving and enhancing the historic environment (SA Objective 9).
- In reducing the adverse impacts of lorry traffic on communities (SA Objective 12).
- In reducing waste to landfill and promoting the waste hierarchy (SA Objective 14).
- In reducing contributions to Climate Change (SA Objective 15).

A particularly positive aspect of this option was that it would be potentially effective, workable and user friendly for both developers and District Development Control Officers, who will be implementing the SPD. This was an issue that was raised at the Waste Minimisation Expert Group meeting.

Option 3: This option was also very positive. The test appeared to confirm that while targets can be very useful and effective, there are significant problems with their implementation and enforcement. There is the potential for targets to be set unrealistically high, too low, or too rigidly thus stifling innovation. Targets may also invite 'do-minimum' proposals from developers. Added to this there is potentially considerable difficulty in the comparison of sites, no two sites or development proposals are alike. If a developer is required to reuse or recycle a set percentage of a certain material, or a certain weight or quantity of material then this becomes highly problematic. These were all issues that were raised at the Waste Minimisation Expert Group and on which there was a considerable degree of consensus. However targets do provide the opportunity to monitor the effects of the SPD more effectively provided that the information is available.

Option 4: This options is also considered to be positive offering a best practice approach, which as indicated for Option 2, is particularly positive as it would be potentially effective, workable and user friendly for both developers and District Development Control Officers, who will be implementing the SPD. Additionally the 10% target is considered to be realistic, easily achieved and a useful means of monitoring the effective implementation of this SPD. In general the result were positive against most of the SA Objectives and with the addition of the 10% target is considered to be the most favoured option.

5.3 Other options considered, and why these were rejected

Only feasible options were tested. It may be appropriate to test alternative options if they emerge during the consultation period of the SPD. Three options were considered to have a potentially positive effect with only option 1 indicating a neutral or negative impact.

5.4 Any proposed mitigation measures

The tests on the potential effects of the SPD indicate that they are likely to be beneficial and it is unlikely that there will be any significant adverse effects that will require mitigation.

Section 6. SPD policies

6.1 Significant social, environmental and economic effects of the preferred policies

For the detailed appraisal of the SPD, please refer to Appendix 4, 5 & 6. In summary the SPD scored very favourably against the detailed criteria. In terms of mitigating the effects, as they are all essentially positive, significant mitigation measures are not required. However mitigation measures can take a wide range of forms and there may be scope to refine options or change the plan in some other way, (possibly strengthen certain policy criteria). In terms of maximising the benefits, a clear message from the appraisal is that it needs to be a useable document, both from the developer's and Development Control Officer's point of view.

6.2 Proposed mitigation measures

The effects of the SPD are likely to be beneficial and it is unlikely that there will be any significant adverse effects that will require mitigation.

6.3 Uncertainties and risks

The significant area of uncertainty and risk is that of implementation / enforcement. This SPD has been produced by the County Council but implementation will be the responsibility of the 6 District Councils.

Section 7. Implementation

7.1 Links to other tiers of plans and programmes and the project level (EIA, design guidance etc.)

The SPD has links to the following:

National level

National planning guidance on waste minimisation is primarily contained in Planning Policy Statement 10 'Planning for Sustainable Waste Management' (PPS10) and the amended National Waste Strategy 'Waste Strategy 2000' (DETR).

Regional level

The Regional Waste Strategy (RWS) Policy P10.8 on Waste Minimisation requires new development to be designed to minimise the production of waste (see Appendix A). In determining planning applications the RWS states that developers should be encouraged to provide information on how they will minimise the production of waste and maximise the re-use and recycling of that, which is produced. (This is to be translated into the Regional Spatial Strategy (RSS), due to be adopted in 2007).

Local level

Gloucestershire Waste Local Plan Policy 36 requires waste to be minimised when development is undertaken and when buildings are occupied. The Gloucestershire Waste Local Plan comprises part of the development plan for Gloucestershire. Planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. This SPD sets out how WLP Policy 36 is to operate, and is considered a material consideration in the determination of planning applications.

7.2 Proposals for monitoring

Government guidance highlights the essential linkages between the SA process and a new statutory emphasis on preparing an Annual Monitoring Report (AMR), with one informing the other. AMR Objective 4 of the Gloucestershire Minerals and Waste Annual Monitoring Report 2004 –2005 is as follows:

- 'To encourage the more efficient use of minerals and waste materials during development and re-development'

The main local output indicators for this objective are:

- The number of 'major' development and redevelopment proposals that include Waste Minimisation Statements.
- The percentage of 'major' development and redevelopment proposals refused, where waste minimisation issues acted as one of the reasons for refusal.

The target in relation to AMR Objective 4 is:

- 'To achieve 100% submission of Waste Minimisation Statements for all 'major' development and re-development applications in Gloucestershire by 2008.'

As much as is possible, the SA Baseline will also be kept up to date in terms of more general waste data. Areas which will be a particular focus will be:

- Total levels of waste generated in Gloucestershire.
- Levels of construction and demolition and commercial and industrial waste going to landfill.

Appendix 1. Testing plan principles / objectives against the SA objectives

SPD Principles / Objectives  SA Objectives 	1. To design proposals sustainably	2. To reduce the amount of waste generated from development	3. To conserve natural resources through re – using waste arising as a result of construction	4. To re-use waste materials on-site to reduce transportation	5. To utilise recycled materials where possible	6. To facilitate a reduction in waste arisings during the operational lifetime of the development
Objective 1 To promote development that is socially, economically and environmentally sustainable	+	++	+	+	+	+
Objective 2 To give the opportunity to everyone to live in an affordable and sustainably designed and constructed home	++	+	+	+	+	+
Objective 3 To safeguard sites suitable for the location of waste management facilities, or future mineral development from other proposed development	0	0	0	0	0	0
Objective 4 To protect and improve the health and well-being of people living and working in Gloucestershire as well as visitors to the county	+	+	+	+	+	+
Objective 5 To contribute to a sustainable Gloucestershire which provides excellent opportunities for education, economic development, employment and recreation to people from all social and ethnic backgrounds	++	++	++	++	++	++

Objective 6 To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development	+	+	+	+	+	+
Objective 7 To conserve minerals resources from inappropriate development whilst providing for the supply of aggregates and other minerals sufficient for the needs of society	0	0	0	0	0	0
Objective 8 To provide employment opportunities in both rural and urban areas of the County, promoting diversification in the economy	0	0	0	0	0	0
Objective 9 To protect, conserve and enhance Gloucestershire's biodiversity, natural environment, landscape and tourist assets including the historic environment	+	+	++	+	+	+
Objective 10 To prevent flooding, in particular preventing inappropriate development in the floodplain and to ensure that development does not compromise sustainable sources of water supply	+	0	0	0	0	0
Objective 11 To protect and enhance Gloucestershire's environment – (the land, the air and water) from pollution and to apply the precautionary principle	+	+	+	+	+	+

<p>Objective 12 To reduce the adverse impacts of lorry traffic on communities, through reducing the need to travel, promoting more sustainable means of transport (including through sensitive routing and the use of sustainable alternative fuels) and to promote the management of waste in one of the nearest appropriate installations</p>	+	+	+	++	+	+
<p>Objective 13 To restore mineral sites to a high standard in order to achieve the maximum environmental and nature conservation benefits</p>	0	0	?	0	0	0
<p>Objective 14 To reduce waste to landfill and in dealing with all waste streams to actively promote the waste hierarchy (i.e. Prevent, Reduce, Reuse, Recycle, Dispose) to achieve the sustainable management of waste</p>	++	++	++	++	++	++
<p>Objective 15 To reduce contributions to and to adapt to Climate Change</p>	+	+	+	+	+	+

Key	
++	The SPD Objective / Principle directly promotes the SA Objective
+	The SPD Objective / Principle indirectly promotes the SA Objective
0	The SPD Objective / Principle has no clear link to the SA Objective
-	The SPD Objective / Principle indirectly contradicts the SA Objective
--	The SPD Objective / Principle directly contradicts the SA Objective
?	Uncertain

Appendix 2. Compatibility matrix with the Key Planning Objectives of PPS10

Planning for Sustainable Waste Management – Companion guide to PPS10 (November 2005) highlights that options that make an inadequate contribution to meeting the Key Planning Objectives of PPS10 are unlikely to be acceptable. The Key Planning Objectives of PPS10 are as follows: (PPS10, Pg. 5 - Para.3) and the following table is a test of the SPD options against them.

1. Help deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option, but one which must be adequately catered for.
2. Provide a framework in which communities take more responsibility for their own waste, and enable sufficient and timely provision of waste management facilities to meet the needs of their communities.
3. Help implement the national waste strategy, and supporting targets, are consistent with obligations required under European legislation and support and complement other guidance and legal controls such as those set out in the Waste Management Licensing Regulations 1994.
4. Help secure the recovery or disposal of waste without endangering human health and without harming the environment, and enable waste to be disposed of in one of the nearest appropriate installations.
5. Reflect the concerns and interests of communities, the needs of waste collection authorities, waste disposal authorities and business, and encourage competitiveness.
6. Protect green belts but recognise the particular locational needs of some types of waste management facilities when defining detailed green belt boundaries and, in determining planning applications, that these locational needs, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission.
7. Ensure the design and layout of new development supports sustainable waste management.

Key Planning Objectives of PPS10 →	Key Planning Objective 1	Key Planning Objective 2	Key Planning Objective 3	Key Planning Objective 4	Key Planning Objective 5	Key Planning Objective 6	Key Planning Objective 7
SPD Option ↓							
1. Business as usual.	++	++	++	++	++	0	++
2. An SPD based on best practice examples.	++	++	++	++	++	0	++
3. An SPD based on targets.	++	++	++	++	++	0	++
4. An SPD primarily based on best practice but with a 10% (total value) recycled/reused materials requirement.	++	++	++	++	++		++

Key	
++	The SPD Option directly promotes the Key Planning Objective of PPS10
+	The SPD Option indirectly promotes the Key Planning Objective of PPS10
0	The SPD Option has no clear link to the Key Planning Objective of PPS10
-	The SPD Option indirectly contradicts the Key Planning Objective of PPS10
--	The SPD Option directly contradicts the Key Planning Objective of PPS10
?	Uncertain

Appendix 3. Testing the options

S = Short term effects M = Medium term effects L = Long term effects	Option 1: Without the SPD (Business as usual) n.b. Waste minimisation is still required under WLP Policy 36				Option 2: An SPD based on best practice examples			
	S	M	L	Comments / explanation	S	M	L	Comments / explanation
SA Objective ↓								
1. To promote development that is socially, economically and environmentally sustainable.	0	0	-	Without the implementation of the SPD there is less pressure or onus on developers to operate sustainably, although the requirement to submit a WMS is still present under Waste Local Plan Policy 36.	+	+	+	The SPD's purpose is to promote sustainable development. Best practice examples will encourage developers to design, build and demolish (dismantle) sustainably.
2. To give the opportunity to everyone to live in an affordable and sustainably designed and constructed home.	0	0	0	Without the SPD houses (and buildings in general) are less likely to be sustainably designed. In this sense Option 1 is neutral.	+	+	+	A workable / usable SPD from a developer's and a DC point of view could be very positive in relation to this Objective. Allows an opportunity for innovation in design.
3. To safeguard sites suitable for the location of waste management facilities, or future mineral development from other proposed development.	0	0	0	Neutral or no demonstrable link.	0	0	0	Neutral or no demonstrable link.
4. To protect and improve the health and well-being of people living and working in Gloucestershire as well as visitors to the county.	?	?	-	Unclear, and yet it could be argued that people's health and well-being are improved with better designed dwellings and community facilities. Thus the non-implementation of the SPD is negative, particularly in the longer term.	?	?	+	Somewhat unclear, although it is likely that people's health and well-being are improved with better designed dwellings and community facilities and the opportunities to participate in recycling etc.
5. To contribute to a sustainable Gloucestershire which provides excellent opportunities for education, economic development, employment and recreation to people from all social and ethnic backgrounds.	0	0	0	The SPD encourages and promotes 'a sustainable Gloucestershire' and thus without its implementation the county is potentially less sustainable than it could be.	+	+	+	Positive in relation to all aspects of the Objective.
6. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development.	-	-	-	Wasteful practices and less recycling means increased use of primary materials which can result in negative impacts on communities e.g. on those living near quarries / on lorry routes.	+	+	+	The SPD has the potential in the medium to longer term to reduce the amounts of primary materials being used - thus reducing the impacts of M&W development.

S = Short term effects M = Medium term effects L = Long term effects	Option 1: Without the SPD (Business as usual) n.b. Waste minimisation is still required under WLP Policy 36				Option 2: An SPD based on best practice examples			
	S	M	L	Comments / explanation	S	M	L	Comments / explanation
SA Objective ↓								
7. To conserve minerals resources from inappropriate development whilst providing for the supply of aggregates and other minerals sufficient for the needs of society.	?	-	-	In theory the SPD will conserve mineral resources by minimising mineral waste and encouraging recycling and reuse. Thus no SPD will be neutral or negative in this regard.	+	+	+	The SPD will have a positive effect as in theory mineral resources will be conserved by inert waste substituting for primary aggregates.
8. To provide employment opportunities in both rural and urban areas of the County, promoting diversification in the economy.	?	?	-	Creating less waste and using more e.g. recycled aggregates could potentially reduce employment opportunities in the extractive industries which can be important in some rural areas e.g. the Forest of Dean.	?	?	?	This is somewhat unclear. Potentially there could be a reduction in mineral extraction employment, but there may be positive employment spin-offs in other waste recycling areas.
9. To protect, conserve and enhance Gloucestershire's biodiversity, natural environment, landscape and tourist assets including the historic environment.	-	-	-	The SPD promotes sustainability and will help to protect all the areas mentioned in this Objective. No SPD would thus be neutral or negative. There would continue to be large levels of C&D waste produced.	+	+	+	Very positive in contributing to this Objective.
10. To prevent flooding, in particular preventing inappropriate development in the floodplain and to ensure that development does not compromise sustainable sources of water supply.	?	?	?	Uncertain.	?	?	?	Uncertain.
11. To protect and enhance Gloucestershire's environment – (the land, the air and water) from pollution and to apply the precautionary principle.	0	0	0	The SPD promotes sustainability and ultimately seeks to protect the natural environment. No SPD would thus be neutral or negative.	+	+	+	Very positive in contributing to this Objective.
12. To reduce the adverse impacts of lorry traffic on communities, through reducing the need to travel, promoting more sustainable means of transport (including through sensitive routing and the use of sustainable alternative fuels) and to promote the management of waste in one of the nearest appropriate installations.	0	0	0	The SPD would in theory reduce the impacts of lorry traffic on communities and promote sustainable transport. The no SPD Option would thus be neutral or negative.	+	+	+	The SPD would reduce the impacts of lorry traffic in the longer term with less primary mineral extraction and less waste being produced and transported in the county.

S = Short term effects M = Medium term effects L = Long term effects	Option 1: Without the SPD (Business as usual) n.b. Waste minimisation is still required under WLP Policy 36				Option 2: An SPD based on best practice examples			
	S	M	L	Comments / explanation	S	M	L	Comments / explanation
SA Objective ↓								
13. To restore mineral sites to a high standard in order to achieve the maximum environmental and nature conservation benefits.	?	?	-	The effects are uncertain. Minimisation of inert waste may have a negative impact on the potential to restore mineral sites to a high standard.	?	?	-	The effects are uncertain. Minimisation of inert waste may have a negative impact on the potential to restore mineral sites to a high standard.
14. To reduce waste to landfill and in dealing with all waste streams to actively promote the waste hierarchy (i.e. Prevent, Reduce, Reuse, Recycle, Dispose) to achieve the sustainable management of waste.	-	-	-	The business-as-usual approach (without the SPD) would mean that targets associated with achieving the sustainable management of waste e.g. those in the National Waste Strategy, guided by EU Directives may be harder to meet.	+	+	+	Highly positive in the promotion of this Objective.
15. To reduce contributions to and to adapt to Climate Change.			-	The business-as-usual approach (without the SPD) will not significantly reduce contributions to Climate Change. More impetus is needed. Without the SPD the achievement of this Objective is more remote.	+	+	+	A likely positive effect particularly in the longer term. Minimisation of waste will lead to an eventual reduction in e.g. the energy used to produce building materials. The SPD should further this and this will reduce contributions to Climate Change.

S = Short term effects M = Medium term effects L = Long term effects	Option 3: An SPD based on targets				Option 4: An SPD based primarily on best practice examples but with a 10% (total value) recycled/reused materials requirement target.			
	S	M	L	Comments / explanation	S	M	L	Comments / explanation
SA Objective ↓								
1. To promote development that is socially, economically and environmentally sustainable.	?	?	?	Targets can be useful, but problems arise in setting the level. Each site is different - what is being measured? / Major problems in enforcing targets.	+	+	+	There may be a problem of enforcement, similar to Option 3. A number of developments may already use 10% total value recycled/reused materials or more. However most major development is likely to be already meeting this target and its inclusion will make developers consider the issue more explicitly.
2. To give the opportunity to everyone to live in an affordable and sustainably designed and constructed home.	+	+	+	While taking account of the above, a target based SPD could be very positive. However practical implementation issues may have the opposite effect.	+	+	+	While taking account of the above, this target or even a higher percentage could be positive in the long term.

S = Short term effects M = Medium term effects L = Long term effects	Option 3: An SPD based on targets				Option 4: An SPD based primarily on best practice examples but with a 10% (total value) recycled/reused materials requirement target.			
	S	M	L	Comments / explanation	S	M	L	Comments / explanation
3. To safeguard sites suitable for the location of waste management facilities, or future mineral development from other proposed development.	0	0	0	No demonstrable link / uncertain.	0	0	0	No demonstrable link / uncertain.
4. To protect and improve the health and well-being of people living and working in Gloucestershire as well as visitors to the county.	?	?	+	Somewhat unclear, although it is likely that people's health and well-being are improved with better designed dwellings and community facilities and the opportunities to participate in recycling etc.	?	?	+	Unclear, but possible positive in the long term.
5. To contribute to a sustainable Gloucestershire which provides excellent opportunities for education, economic development, employment and recreation to people from all social and ethnic backgrounds.	+	+	+	Positive in promoting sustainable development in the county.	+	+	+	Positive in promoting sustainable development in the county.
6. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development.	+	+	+	The SPD has the potential in the medium to longer term to reduce the amounts of primary materials being used - thus reducing the impacts of M&W development.	+	+	+	The SPD has the potential in the medium to longer term to reduce the amounts of primary materials being used - thus reducing the impacts of M&W development.
7. To conserve minerals resources from inappropriate development whilst providing for the supply of aggregates and other minerals sufficient for the needs of society.	+	+	+	The SPD will have a positive effect as in theory mineral resources will be conserved by inert waste substituting for primary aggregates.	+	+	+	A generally positive effect as in theory mineral resources will be conserved and by inert waste substituting for primary aggregates. In terms of the specific benefit of the target, its success is very dependent on its enforceability.
8. To provide employment opportunities in both rural and urban areas of the County, promoting diversification in the economy.	?	?	?	Unclear. Potential loss of jobs in extractive industries in the longer term – but this has to be weighed against significant environmental benefits and job creation in the waste recycling field.	?	?	?	Unclear. Losses in some areas – possible spin-off employment in other areas. Possible loss of jobs in the long term in the extractive industries but possibly off set by job creation in the waste recycling field.

S = Short term effects M = Medium term effects L = Long term effects	Option 3: An SPD based on targets				Option 4: An SPD based primarily on best practice examples but with a 10% (total value) recycled/reused materials requirement target.			
	S	M	L	Comments / explanation	S	M	L	Comments / explanation
SA Objective ↓								
9. To protect, conserve and enhance Gloucestershire's biodiversity, natural environment, landscape and tourist assets including the historic environment.	+	+	+	Very positive in contributing to this Objective.	+	+	+	Very positive in contributing to this Objective.
10. To prevent flooding, in particular preventing inappropriate development in the floodplain and to ensure that development does not compromise sustainable sources of water supply.	?	?	?	Uncertain.	?	?	?	Uncertain.
11. To protect and enhance Gloucestershire's environment – (the land, the air and water) from pollution and to apply the precautionary principle.	+	+	+	Very positive in contributing to this Objective.	+	+	+	Generally very positive in contributing to this Objective.
12. To reduce the adverse impacts of lorry traffic on communities, through reducing the need to travel, promoting more sustainable means of transport (including through sensitive routing and the use of sustainable alternative fuels) and to promote the management of waste in one of the nearest appropriate installations.	+	+	+	The SPD would reduce the impacts of lorry traffic in the longer term with less primary mineral extraction and less waste being produced and transported in the county.	+	+	+	Again, the issue of the enforceability of the target is an issue, but generally the SPD would reduce the impacts of lorry traffic in the longer term with less primary mineral extraction and less waste being produced and transported in the county.
13. To restore mineral sites to a high standard in order to achieve the maximum environmental and nature conservation benefits.	?	?	-	The effects are uncertain. Minimisation of inert waste may have a negative impact on the potential to restore mineral sites to a high standard.	?	?	-	Uncertain effects, but minimisation of inert waste may have a negative impact on the potential to restore mineral sites to a high standard.

S = Short term effects M = Medium term effects L = Long term effects	Option 3: An SPD based on targets				Option 4: An SPD based primarily on best practice examples but with a 10% (total value) recycled/reused materials requirement target.			
	S	M	L	Comments / explanation	S	M	L	Comments / explanation
SA Objective ↓								
14. To reduce waste to landfill and in dealing with all waste streams to actively promote the waste hierarchy (i.e. Prevent, Reduce, Reuse, Recycle, Dispose) to achieve the sustainable management of waste.	+	+	+	Highly positive in the promotion of this Objective.	+	+	+	Highly positive in the promotion of this Objective.
15. To reduce contributions to and to adapt to Climate Change.	+	+	+	A likely positive effect particularly in the longer term. Minimisation of waste will lead to an eventual reduction in e.g. the energy used to produce building materials. The SPD should further this and thus reduce contributions to Climate Change.	+	+	+	A likely positive effect particularly in the longer term. Minimisation of waste will lead to an eventual reduction in e.g. the energy used to produce building materials. The SPD should further this and thus reduce contributions to Climate Change.

Key	
++	Major positive effect
+	Positive effect
0	Neutral effect
-	Negative effect
--	Major negative effect
?	Uncertain

Appendix 4. Predicting effects (overall assessment)

SA Objective ↓	Score	Comments and overall general assessment:	Possible changes recommended:
1. To promote development that is socially, economically and environmentally sustainable.	+	The SPD clearly promotes this objective. Its primary aim is for the promotion of sustainable development.	N/A
2. To give the opportunity to everyone to live in an affordable and sustainably designed and constructed home.	+	The SPD does promote sustainable design. However it is not clear that the SPD directly promotes all the aspects of this objective. In the longer term the increased recycling and re-use of materials may lead to a reduction in the costs of house building.	N/A
3. To safeguard sites suitable for the location of waste management facilities, or future mineral development from other proposed development.	0	In an overall assessment the SPD is neutral with regard to this objective. In the longer term it is possible that there will be less need sites for future mineral development, and waste landfill sites, though there maybe an increased demand for facilities to process and handle recycled materials.	N/A
4. To protect and improve the health and well-being of people living and working in Gloucestershire as well as visitors to the county.	+	Although this is somewhat unclear and difficult to quantify, it is likely that people's health and well-being will be improved with better designed dwellings and community facilities. In the longer term it is logical that more waste minimisation will result in less need for primary mineral extraction and waste disposal facilities, which will be beneficial in terms of people's amenity.	N/A
5. To contribute to a sustainable Gloucestershire which provides excellent opportunities for education, economic development, employment and recreation to people from all social and ethnic backgrounds.	+	The SPD directly promotes 'a sustainable Gloucestershire' although the specific benefits in terms of education, economic development, employment and recreation (for all) are not specifically clear.	N/A
6. To safeguard the amenity of local communities from the potential adverse impacts of minerals and waste development.	+	The SPD promotes this objective in that waste minimisation will eventually lead to a reduction in mineral extraction and waste disposal sites and thus an improvement in the amenity of local communities.	N/A
7. To conserve minerals resources from inappropriate development whilst providing for the supply of aggregates and other minerals sufficient for the needs of society.	0	In an overall assessment the SPD is neutral with regard to this objective, but it is possible that the SPD may have positive effects in the long term as in theory mineral resources will be conserved and mineral waste will be minimised through the encouragement of recycling.	N/A

8. To provide employment opportunities in both rural and urban areas of the County, promoting diversification in the economy.	?	It is unclear how the SPD will promote this objective. It is possible that over a longer time period employment in extractive industries will be reduced, which is a concern in some rural areas where this sort of employment is valuable. However there may be positive employment spin-offs in other areas used as waste recycling.	N/A
9. To protect, conserve and enhance Gloucestershire's biodiversity, natural environment, landscape and tourist assets including the historic environment.	++	The SPD is very positive in contributing to this objective. Waste minimisation should lead to a reduction in the need for primary quarried material and a reduction in waste and thus sites to handle and dispose of waste. A complicating factor in the county is the Cotswold Water Park, where biodiversity has increased as a result of sand and gravel extraction. The Cotswold Water Park has also become a major tourist asset.	N/A
10. To prevent flooding, in particular preventing inappropriate development in the floodplain and to ensure that development does not compromise sustainable sources of water supply.	?	It is unclear how the SPD will directly promote this objective, but these are beyond the scope of the SPD.	N/A
11. To protect and enhance Gloucestershire's environment – (the land, the air and water) from pollution and to apply the precautionary principle.	+	The SPD is positive in contributing to this objective.	N/A
12. To reduce the adverse impacts of lorry traffic on communities, through reducing the need to travel, promoting more sustainable means of transport (including through sensitive routing and the use of sustainable alternative fuels) and to promote the management of waste in one of the nearest appropriate installations.	++	The SPD is highly positive in contributing to this objective. It is likely that in the long term the negative impacts of lorry traffic will be reduced, particularly with more waste materials being used on site.	N/A
13. To restore mineral sites to a high standard in order to achieve the maximum environmental and nature conservation benefits.	0	The effects are neutral or uncertain. There may be a case to argue that the minimisation of inert materials may have the long term effect of depriving mineral sites (or indeed landfill sites) with sufficient materials required for restoration.	N/A
14. To reduce waste to landfill and in dealing with all waste streams to actively promote the waste hierarchy (i.e. Prevent, Reduce, Reuse, Recycle, Dispose) to achieve the sustainable management of waste.	++	The SPD is directly relevant to this objective and highly positive in contributing to its achievement.	N/A

15. To reduce contributions to and to adapt to Climate Change.	+	In the longer term the SPD will contribute to reducing contributions to climate change.	N/A
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Key	
++	Major positive effect
+	Positive effect
0	Neutral effect
-	Negative effect
--	Major negative effect
?	Uncertain

Appendix 5. Predicting effects (detailed assessment)

Component of Plan ↓	SA Objectives															Effect Over Time			Cumulative Impact	Geographic Scale	Temporary or Permanent Effect	Significance and Likelihood of Effect
	1. Sustainable development	2. Housing needs	3. Safeguarding sites	4. Health & well-being	5. Education, economic dev	6. Amenity	7. Conserve / provide minerals	8. Employment	9. Biodiversity/landscape/tourism/hist'	10. Flooding	11. Pollution	12. Sustainable transport	13. Mineral site restoration	14. Reduce waste	15. Climate change	Short Term	Medium Term	Long Term				
Applicants required to submit WMS to accompany planning app'.	+	+	+	+	+	+	0	?	+	0	+	+	?	+	+	+	+	+	++	Countywide	Permanent.	Significant if enforced – High.
Use of standard planning conditions.	+	+	+	+	+	+	0	?	+	0	+	+	?	+	+	+	+	+	++	Countywide	Some conditions longer term?	Significant if enforced - High.
Recommendations for 'designing in' recycling facilities.	+	+	+	+	+	+	0	?	+	0	+	+	?	+	+	+	+	+	++	Countywide	Permanent - lifetime of the building.	Significant – Medium.
Substituting hazardous materials for none hazardous ones at the design stage.	+	+	+	+	+	+	0	?	+	0	+	?	?	+	?	+	+	+	++	Countywide	Permanent.	Significant – Medium.
New development to make sufficient provision for appropriate waste management.	+	+	+	+	+	+	0	?	+	0	+	?	?	+	+	+	+	+	++	Countywide	Permanent – but alterations possible.	Significant – Medium.
10% of the total value of materials used in construction to be devired from recycled or reused materials.	+	+	+	+	+	+	0	?	+	0	+	+	?	+	+	+	+	+	+	Countywide	Permanent.	Not enforcable – Medium.
Segregation at source.	+	+	+	+	+	+	0	?	+	0	+	+	?	+	+	+	+	+	++	Countywide	Temporary.	Significant – Medium.
Segregation off site.	?	+	+	+	+	+	0	?	+	0	+	+	?	+	+	+	+	+	+	Countywide	Temporary.	Significant – High.
Disposal.	-	-	0	?	?	-	0	?	-	0	?	?	?	-	-	-	-	-	-	Countywide	Permanent?	Significant – High.
On-site crushing & screening.	+	+	+	?	+	?	0	?	+	0	?	+	?	+	+	+	+	+	++	Countywide	Temporary.	Not for small sites – Medium.

Applicants to provide recycling / composting bins & storage areas.	+	+	+	+	+	+	0	?	+	0	+	+	?	+	+	+	?	?	++	Countywide	Temporary?	Significant – Medium.
Applicant/Waste Collection Authority discussion.	+	+	+	+	+	+	0	?	+	0	+	+	?	+	+	+	+	+	++	Countywide	Na.	Very Significant - Medium
Commercial waste collection.	+	+	+	+	+	+	0	?	+	0	+	+	?	+	+	+	+	+	++	Countywide	Permanent?	Significant – Medium.
Major Development Threshold	+	0	0	+	+	+	0	?	+	0	+	?	?	+	+	+	+	+	++	Countywide	Permanent	Significant - medium

Key	
++	Major positive
+	Minor positive
0	Neutral effect
-	Minor negative
--	Major negative
?	Uncertain effect

Appendix 6. Cumulative impacts & secondary / synergistic effects

Commentary on Cumulative Impacts & Secondary and Synergistic Effects	
Component of plan:	Commentary:
Applicants required to submit WMS to accompany planning applications.	As indicated in Appendix 5 cumulative impacts are likely to be positive rather than negative. In terms of secondary and synergistic effects a major consideration is the increased time taken and resources that may be required by Development Control officers at the District. Failure to produce a WMS may result in applications not being validated or could result in delays in processing applications. Developers may find it difficult to submit a WMS with outline applications as opposed to full applications. The costs (to the applicant) of submitting an application for planning permission may rise with the extra duty of submitting a WMS.
Use of standard planning conditions.	As indicated in Appendix 5 there are likely to be no significantly adverse cumulative impacts.
Recommendations for 'designing in' recycling facilities.	As indicated in Appendix 5 it is likely that there will be no significantly adverse cumulative impacts. A possible secondary impact is that homes and businesses may be designed for a certain type of collection regime and this may change even in the short term. It is possible that homes and other buildings may be designed with facilities or spaces that soon become out of date as new technologies / methods and ideas in waste collection and management come forward.
Substituting non -hazardous materials for hazardous ones at the design stage.	As indicated in Appendix 5 there are likely to be no significantly adverse cumulative impacts. In terms of secondary effects it is possible that if certain hazardous materials (e.g. glues, resins, bonding agents) are substituted for non –hazardous ones then the build quality or finish of buildings may be compromised to some degree.
New development to make sufficient provision for appropriate waste management.	As indicated in Appendix 5 there are likely to be no significantly adverse cumulative impacts but a possible secondary effect could be the non-utilisation or incorrect use of e.g. communal areas set aside for recycling / composting. It is also possible that facilities or spaces may be by-passed by new technologies / methods and ideas in waste collection and management.
10% of the total value of materials used in construction to be derived from recycled or reused materials.	This issue has been considered as an option (Option 4). There are no envisaged cumulative effects of any significance. The major secondary effect would be the difficulty to enforce such a requirement particularly if it applies to all (even small scale) development.
Segregation at source.	As indicated in Appendix 5 there are likely to be no significantly adverse cumulative impacts but there could be problems of there being enough space on certain sites and this could also lead to health and safety issues.
Disposal.	The SPD states that disposal is the last option, but for some waste e.g. contaminated soils it will be the only option. The secondary effects are clear: costs to the developer of landfilling, transportation.

On-site crushing & screening.	Cumulative/secondary effects may include adverse impacts on neighbouring properties - specifically noise and dust. Smaller sites are excluded as crushing and screening are not appropriate on such sites. In the longer term, the development of smaller scale crushing and screening plant would be hugely beneficial.
Applicants to provide recycling / composting bins & storage areas.	There are likely to be no significant adverse cumulative impacts. A secondary impact could be problems for residents in obtaining recycling bins/boxes etc should they need a replacement. Developers may be willing to provide these at the outset, but obtaining replacements (ongoing provision) may be more problematic.
Applicant/Waste Collection Authority discussion.	Positive,.
Commercial waste collection.	Commercial waste makes up a significant proportion of all waste streams and this is an important aspect of the SPD. It is likely that any adverse cumulative or secondary impacts will be limited. However there may be a danger in some developments that facilities or spaces/areas set aside for recycling (indicated in a WMS) may be used for other activities. Areas set aside for large bins / bottle banks may be used for car parking or the storage of residual waste rather than waste for reuse / recycling.
“Major Development” Thresholds	Positive, no adverse cumulative, secondary or synergistic effects. Major development threshold as defined by ODPM is an easily understood threshold which will be simpler for local planning authorities to implement and monitor. However the positive cumulative effects would be improved by extending the SPD to apply to all scales of development in the long-term.

Appendix 7. The need for an Appropriate Assessment under Article 6 (3) and (4) of the Habitats Directive (92/43/EEC)

RAMSAR / Special Protection Area (SPA) / Special Area of Conservation (SAC)	Comments on whether the land-use plan would adversely affect the integrity of the site:
<p>Rodborough Common Designation: (SAC) District: Stroud Grid Reference: SO849036 Area: 104.26ha General Site Character: Heath, Scrub, Maquis and Garrigue. Phygrana (10%) Dry grassland. Steppes (70%) Improved grassland (10%) Broad-leaved deciduous woodland (10%) Source: Joint Nature Conservation Committee</p>	<p>This SPD has been tested against the SA Objectives and the potential effects and impacts have been examined in detail. The tests indicate that the plan is likely to produce significant environmental benefits and it is unlikely that there will be any significant adverse effects that will require mitigation. Following Figure 1: <i>Consideration of development proposals affecting Internationally Designated Nature Conservation Sites</i> in ODPM Circular 06/2005 – <i>Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System</i> the proposal [read plan] is not likely to have a significant effect on the internationally important interest features of the site, alone or in combination with other plans and projects.</p>
<p>Dixton Wood Designation: (SAC) District: Tewkesbury Grid Reference: SO979313 Area: 13.14ha General Site Character: Broad-leaved deciduous woodland (100%) Source: Joint Nature Conservation Committee</p>	<p>The SPD is not likely to have a significant effect on the internationally important interest features of the site, alone or in combination with other plans and projects.</p>
<p>Wye Valley & Forest of Dean Bat Sites Designation: (SAC) District: Forest of Dean / Fynwy / Monmouthshire Grid Reference: SO605044 Area: 142.7ha General Site Character: Broad-leaved deciduous woodland (26.2%) Other land (including towns, villages, roads, waste places, mines, industrial sites) (73.8%) Source: Joint Nature Conservation Committee</p>	<p>The SPD is not likely to have a significant effect on the internationally important interest features of the site, alone or in combination with other plans and projects.</p>
<p>River Wye Sites Designation: (SAC) District: Forest of Dean / Fynwy / Monmouthshire / Herefordshire / Powys Grid Reference: S0109369 Area: 2234.89ha General Site Character: Tidal rivers. Estuaries. Mud flats. Sand flats. Lagoons (including saltwork basins) (9.5%) Salt marshes. Salt pastures. Salt steppes (1.5%) Inland water bodies (standing water, running water) (52.5%) Bogs. Marshes. Water fringed vegetation. Fens (3.1%) Heath. Scrub. Maquis and garrigue. Phygrana (1%) Dry grassland. Steppes (5.3%) Humid grassland. Mesophile grassland (2.4%) Improved grassland (10.4%) Broad-leaved deciduous woodland (12.3%) Inland rocks. Screes. Sands. Permanent snow</p>	<p>The SPD is not likely to have a significant effect on the internationally important interest features of the site, alone or in combination with other plans and projects.</p>

<p>and ice (0.2%) Other land (including towns, villages, roads, waste places, mines, industrial sites) (1.8%) Source: Joint Nature Conservation Committee</p>	
<p><i>Wye Valley Woodlands</i> Designation: (SAC) District: Forest of Dean / Monmouthshire / Herefordshire Grid Reference: SO530957 Area: 916.24 General Site Character: Heath, Scrub, Maquis and Garrigue. Phygrana (10%) Dry grassland. Steppes (0.2%) Broad-leaved deciduous woodland (87%) Coniferous woodland (0.7%) Inland rocks. Screes. Sands. Permanent snow and ice (0.6%) Other land (including towns, villages, roads, waste places, mines, industrial sites) (1.5%) Source: Joint Nature Conservation Committee</p>	<p>The SPD is not likely to have a significant effect on the internationally important interest features of the site, alone or in combination with other plans and projects.</p>
<p><i>North Meadow & Clattinger Farm</i> (Wiltshire Site) Designation: (SAC) District: Wiltshire Grid Reference: SU014934 Area: 104.88ha General Site Character: Inland water bodies (standing water, running water) (2%) Dry grassland. Steppes (15%) Humid grassland. Mesophile grassland (71%) Improved grassland (12%) Source: Joint Nature Conservation Committee</p>	<p>The SPD is not likely to have a significant effect on the internationally important interest features of the site, alone or in combination with other plans and projects.</p>
<p><i>Walmore Common</i> Designation: SPA & Ramsar site District: Forest of Dean Grid Reference: SO745150 Area: 52.85ha General Site Character: Walmore Common occupies a low lying area in the Severn Vale, which is subject to winter flooding. The site is a wetland overlying peat providing a variety of habitats including improved neutral grassland, unimproved marshy grassland and open water ditches. The common is part of a series of sites within the Severn Vale which, in winter, form an important refuge and feeding area for wildfowl. Source: Joint Nature Conservation Committee</p>	<p>The SPD is not likely to have a significant effect on the internationally important interest features of the site, alone or in combination with other plans and projects.</p>
<p><i>Severn Estuary</i> Designation: SPA & Ramsar site District: Stroud / Forest of Dean Grid Reference: 51 13 29N 03 02 57W Area: 24662.98 ha General Site Character: The estuary's classic funnel shape, unique in Britain, is a factor causing the Severn to have the second-largest tidal range in the world (after the Bay of Fundy, Canada). This tidal regime results in plant and animal communities typical of the extreme physical conditions of liquid mud and tide swept sand and rock. The species-poor invertebrate community includes high densities of ragworms, lugworms and other invertebrates forming an important food source for passage and wintering waders. A further consequence of the large tidal range is the extensive intertidal zone, one of the</p>	<p>The SPD is not likely to have a significant effect on the internationally important interest features of the site, alone or in combination with other plans and projects.</p>

<p>largest in the UK, comprising mudflats, sand banks, shingle, and rocky platforms. Glassworts and annual sea-blite colonise the open mud, with beds of all three species of eelgrass occurring on more sheltered mud and sandbanks. Large expanses of common cord-grass also occur on the outer marshes. Heavily grazed saltmarsh fringes the estuary with a range of saltmarsh types present. The middle marsh sward is dominated by common saltmarsh-grass with typical associated species. In the upper marsh, red fescue and saltmarsh rush become more prominent.</p> <p>Source: Joint Nature Conservation Committee</p>	
<p><i>Cotswold Beechwoods</i> Designation: (SAC) District: Cotswold Grid Reference: SO898134 Area: 585.85ha General Site Character: Inland water bodies (standing water, running water) (1%) Dry grassland. Steppes (1.5%) Broad-leaved deciduous woodland (82%) Coniferous woodland (5%) Mixed woodland (10%) Other land (including towns, villages, roads, waste places, mines, industrial sites) (0.5%). Source: Joint Nature Conservation Committee</p>	<p>The SPD is not likely to have a significant effect on the internationally important interest features of the site, alone or in combination with other plans and projects.</p>



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